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## **Who is Inspecting Your Fire Doors?**

When the 2012 Edition of the Life Safety Code® was adopted by CMS in 2016, it included new provisions requiring healthcare occupancies to conduct an annual inspection of fire doors. After some initial confusion, CMS made the following clarifications in their July 28, 2017 Survey and Certification Memo (S&C 17-38-LSC):

- Fire door assemblies require annual inspection and testing in compliance with the 2010 Edition of NFPA 80 (Standard for Fire Doors and Other Opening Protectives).
- Smoke barrier door assemblies are not subject to the annual testing requirement.
- Non-rated doors are not required to be inspected or tested annually. However, they should be included in a facility maintenance program.
- Full compliance with the fire door inspection requirement was expected by January 1, 2018.

Hopefully by now, your organization has a program in place that includes fire door inventory, inspection and testing. However, recently some state survey agencies have been looking closely at who is conducting the healthcare facility fire door inspections. In fact, a few providers have been cited under K-761. So who can inspect and test your fire doors?

The Life Safety Code® (Section 7.2.1.15.5) indicates that testing of fire door assemblies *“shall be performed by individuals who can demonstrate knowledge and understanding of the operating components of the type of door being subject to the testing.”* The code language very specifically does not include the term “certified”. A person is not required to be certified or licensed to conduct fire door testing and inspection. Rather, a healthcare organization should be prepared to demonstrate how the individual conducting their fire door inspection and testing is knowledgeable and experienced in the process. Documentation is often the best mechanism to accomplish this. Some best practices for establishing knowledge and competency include:

- Maintain on-site a copy of the fire door inspection and testing checklist found in NFPA 80.
- Document any training or education an individual has received specific to fire door inspection, testing, installation and/or repair.
- Outline the length of time an individual has been working with fire door assemblies.

You can purchase a copy of NFPA 80 online at [www.nfpa.org](http://www.nfpa.org). The website also outlines NFPA courses on fire door inspection and testing. Groups such as The Door and Hardware Institute, Jensen Hughes and others also provide training courses.