



RISK NOTE

Subject: **FIRE PROTECTION IMPAIRMENT NOTICE¹**

The Health Care Protection Program (HCPP) has a number of means to assist clients in minimizing risks to their assets. One of these is Fire Protection Impairment Notice. Like most commercial insurers, HCPP asks that any and all impairments be reported before they occur, (i.e. in the case of planned impairments), or when they are discovered, (i.e. for concealed and emergency impairments). It is a responsibility of a Health Care Agency (HCA) as a covered entity under the HCPP Property Agreement to report within 48 hours to HCPP of any known interruption to, flaw, or defect in any (a) sprinkler or other fire extinguishing system; or (b) fire detection system or intrusion system. This article will provide an overview of the process.

First, it is important to understand what constitutes a fire protection system and what is meant by impairment. A fire protection system could include an automatic sprinkler system, an extinguishing system, a detection system or the alarm system associated with either one. It is impaired when any part of that system is removed from service either partially or completely. Ultimately these systems reduce the severity of a fire or explosion when one occurs. If that system is not operating, or its ability to operate is limited, the risk a facility will suffer a severe loss increases the longer the system is impaired. One frightening statistic from the National Fire Protection Association report, U.S. Experience with Sprinklers (January 2009) is that "when sprinklers fail to operate, the reason most often given (63%) was shutoff of the system before fire began, as may occur in the course of routine inspection maintenance."

The aim of the Fire Protection Impairment Notice is to help ensure that all appropriate measures are in place to decrease the likelihood a severe fire will occur when a fire protection system is impaired. By requiring written notice of impairment, those responsible for the impairments are reminded to take the necessary steps to mitigate against losses while the system is impaired and ensure it is re-activated in a timely manner and operating properly upon reactivation.

¹ Adapted from the Health Care Protection Program newsletter *Handle With Care*, Volume 6, Issue 1 Spring/Summer 2009

The Fire Protection Impairment Notice Form (found on the HCPP website - www.hcpp.org - under forms) used for reporting an impairment is set up to help the facility ensure they have considered all the risks and put in place appropriate mitigations.

Once it has been completed it should be faxed or emailed to HCPP (when clicking the submit button of the bottom of the fillable PDF form it will prompt the appropriate email address). Upon completion of the work or interruption that caused the impairment, HCPP should be informed the system has been re-activated. This can be done using the same form, completing the restoration information.

There are a large number of things to consider when shutting down a fire protection system. Many of these are listed on the impairment notification form but there are others as well. Consider including any or all of these items in a checklist for conducting maintenance on a protection system:

- 1) Notify HCPP by faxing or emailing the Fire Protection Impairment Notice. Complete all sections carefully, with particular care taken in the section describing which system is being impaired, and the area affected. Be sure to make as accurate an estimate as possible when indicating the approximate date and time for equipment shutdown and restoration, and ensure all applicable precautions taken are checked off. This information enables HCPP, if necessary, to advise on the best measures to minimize the hazard.
- 2) Notify the local fire department (and alarm monitoring company, when applicable) so they will know what protection equipment and water supplies are available and how best to fight a fire.
- 3) If possible schedule any work, which involves shutting off sprinklers for weekends or idle periods, when there are fewer ignition hazards present.
- 4) Make arrangements in advance to have all personnel, materials, and tools ready when sprinklers are shut off, so the job can be moved quickly to completion.
- 5) Use emergency measures to keep as many sprinklers in service as practical. These would include use of temporary connections to hydrants or adjoining sprinkler systems. In some cases the shutoff can be avoided entirely by use of pipe tapping machines that permit connection to underground mains without shutting off the water.

- 6) Lay out charged hose lines from the nearest hydrant or standpipes, and provide wooden plugs or caps so the large open ends of pipes may be closed quickly and water turned on fighting a fire.
- 7) Attach a tag or some visual cue to the valve when closed indicating that it is out of service, and establish a follow-up procedure to assure reopening when work is completed. Never lock a valve in the closed position.
- 8) Use overtime if necessary to expedite completion of work. If possible, do not leave sprinkler systems shut off overnight.
- 9) Have a reliable person patrol the shutoff areas continuously.
- 10) When a sprinkler valve is closed for replacement of sprinklers following a fire, station someone at the valve and have it opened immediately if fire breaks out again. When a sprinkler valve is closed due to an impairment of the sprinkler system, station someone at the valve if the valve can be opened to restore much of the protection in the event of fire.
- 11) Restore all valves to their fully open position as soon as repairs are completed. Then make a full-flow drain test on the downstream side of each valve that was closed. If drain tests are satisfactory, re-lock or reseal the valves. Then notify the HCPP by fax or email of the Fire Protection Impairment Notice (with the completion time now filled out) that protection has been restored. The local fire department and alarm monitoring should also be advised that protection has been restored.

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It should be clearly understood that this document and the information contained within is not legal advice and is provided for guidance from a risk management perspective only. It is not intended as a comprehensive or exhaustive review of the law and readers are advised to seek independent legal advice where appropriate. If you have any questions about the content of this Risk Note please contact your organization's risk manager or chief risk officer to discuss.