

## Practical Tips for Asserting and Obtaining Categorical Waiver for Use of Power Strips in Patient Care Areas

CMS has determined that the 2000 edition of the National Fire Protection Association (NFPA) 101<sup>®</sup> Life Safety Code (LSC) contains provisions on the use of power strips in health care facilities that may result in unreasonable hardship for providers or suppliers. CMS released S&C Memo 14-46-LSC on September 26, 2014 outlining a categorical waiver that allows use of power strips in patient care areas.

Effective immediately, CMS created a categorical waiver to allow for the use of power strips in existing and new health care facility patient care areas if the provider/supplier is in compliance with all applicable 2012 LSC power strip requirements and with all other 2000 LSC electrical system and equipment provisions. This document provides a list of “practical tips” on how to assert and obtain the categorical waiver.

- **What patient care rooms/areas must meet the waiver requirements?**

- The requirements do not apply to resident rooms in long-term care or other residential care facilities that do not use line-operated electrical appliances for diagnostic, therapeutic, or monitoring purposes.
- The requirements do apply to resident rooms using line-operated patient-care-related electrical equipment in the patient care vicinity.<sup>1</sup>

- **How do facilities meet the waiver requirements?**

- Patient bed locations in new health care facilities or in existing facilities that undergo renovations or a change in occupancy must be provided with the minimum number of receptacles as required by NFPA 99 Section 6.3.2.2.6.2.
- For existing patient bed locations, power strips may be used in a patient care vicinity to power rack-, table-, pedestal-, or cart-mounted patient care-related electrical equipment assemblies, provided all of the following conditions are met:
  1. The receptacles are attached permanently to the equipment assembly.
  2. The sum of the ampacity of all appliances connected to the receptacles do not exceed 75% of the ampacity of the flexible cord supplying the receptacles.
  3. The ampacity of the flexible cord meets the requirements of the current edition of NFPA 70, National Electric Code.
  4. The electrical and mechanical integrity of the assembly is regularly verified and documented through an ongoing maintenance program.
  5. Steps are taken to ensure that additional devices or nonmedical equipment (e.g., phone chargers) cannot be connected to the multiple outlet extension cord after leakage currents have been verified as safe.

<sup>1</sup>“Patient care vicinity” is defined as a space within a location intended for the examination and treatment of patients (*i.e.*, “patient care room”) extending 6 ft. beyond the normal location of the bed, chair, table, treadmill, or other device that supports the patient during examination and treatment and extends vertically 7 ft. 6 in. above the floor

- Power strips may not be used in a patient care vicinity to power non-patient care-related electrical equipment (e.g., personal electronics).
- Power strips may be used outside the patient care vicinity for both patient care-related electrical equipment and non-patient care-related electrical equipment.
- Power strips providing power to patient care-related electrical equipment must be Special Purpose Relocatable Power Taps (SPRPT).
- Power strips providing power to non-patient-care-related electrical equipment must be Relocatable Power Taps (RPT).
- **How do facilities assert the waiver?**
  - There is no need to apply for the waiver. Facilities may take advantage of the waiver by complying with the above requirements, however:
    - ◆ Facilities must have documentation on hand showing they have elected to use the waiver and have met all of the required waiver provisions.
    - ◆ Facilities must notify any survey team prior to the survey during the entrance conference that the facility has elected to use the categorical waiver and must provide the proper documentation of compliance.

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