

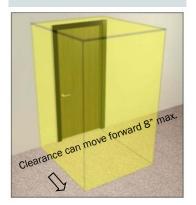
Taken to Access

FPS
Physical Access
Compliance Program

Volume 3, Issue 12 * December 1, 2014

Question of the month:

- Q. Can certain small elements such as clip board holders, card readers, grab bars or guardrails be located adjacent to doors and encroach into door maneuvering clearances?
- R. They can be located adjacent to the door within an 8 inch maximum alcovetype area. However, they cannot encroach into the door maneuvering clearance. This means that the entire maneuvering clearance must move forward by the same depth of the element up to 8 inches from face of door.



FIRE EXTINGUISHER REQUIREMENTS

Back when most of our facilities were first being surveyed several fire extinguisher barriers were identified. In fact, we counted just over 800 of them across the system. With a remediation average estimate of \$3K, the cost to remediate those barriers was estimated at \$240,000!

As affiliates continue to remove barriers many have question the legitimacy of the barrier in the first place. A common argument, is that a fire extinguisher is provided as part of the life safety system of the facility and that only trained service or maintenance staff shall be required to operate them... therefore compliance with operable parts requirements is not applicable. While it's true that staff are required to be trained regularly on life safety procedures, in case of an emergency anyone and everyone can attempt to activate the fire extinguisher and not wait for trained personnel to arrive. Hence the argument that fire extinguishers are not for patient or public use but rather for staff use only is not accepted. Additionally, the range of fire extinguisher barriers extended beyond requirements for operable parts. The range may include:

- 1. Lack of required 30" x 48" floor clearance
- 2. Cabinet control height exceeding 48" AFF for forward approach
- 3. Hardware requiring pinching and twisting of the wrist to operate
- 4. Cabinet depth protruding more than 4" from wall between 27" and 80"
- 5. Extinguisher control height exceeding 48" AFF for forward approach

While the majority of these types of barriers were designated as B severity barriers, meaning that they block access to significant number of people, depending on where they're located we may be able to re-adjust the established priority for removal. We may also implement alternate solutions when original solutions are too technically difficult to implement. For specific scoping solutions assistance, be sure to contact a PAC representative.

