

KSFM 2024-014 - KSFM Prevention Information Release

To: Healthcare Occupancies

Date: 11/22/2024

Subject: Emergency Lockdowns in Healthcare Settings

On September 8, 2016 CMS published in the Federal Register the *Emergency Preparedness Requirements for Medicare and Medicaid Participating Providers and Suppliers Final Rule*. The regulation became effective November 16, 2016. Health care providers and suppliers affected by this rule were to be compliant and implement all regulations one year after the effective date, on November 15, 2017.

As a part of this requirement, each facility is required to conduct a hazard and vulnerability assessment. While this assessment focuses mainly on natural hazards, facilities must also take into consideration and plan for human hazards such as an active shooter or hostage type situation which would involve a facility lockdown to ensure staff and resident safety.

The Kansas State Fire Marshal's Office encourages facilities to collaborate with their county emergency management and/or local law enforcement agencies to develop their plan. These agencies have specialized training and can help develop a plan that will help to ensure safety within the facility and be compatible with law enforcement response procedures.

NFPA 101 Life Safety Code restricts the use of locking devices and requires that visitors, staff, and cognitively aware residents be able to freely exit the building. However, during an emergency lockdown situation, staff and resident safety is the primary consideration. In these situations, the requirements would be suspended until the facility has received notification that the threat has ended.

CMS also provides guidance for developing plans for an active shooter or armed assailant situation. This can be found at <https://files.asprtracie.hhs.gov/documents/on-campus-hospital-armed-assailant-planning-considerations.pdf>.

For questions and to assist you in complying with the requirements, the KSFM has a section on its website devoted to Healthcare Facilities.

Please visit <https://www.firemarshal.ks.gov/>. In the "Resources" section, select Healthcare.