

## Comparison of RPT/SPRPT Guidance

The Centers for Medicare & Medicaid Services (CMS) is offering categorical waivers for health care facilities using relocatable power taps (RPTs) and special purpose relocatable power taps (SPRPTs). The table below compares the CMS waiver requirements with previous guidance from the National Fire Protection Association Health Care Interpretations Task Force (HITF). There are no conflicts between the two. The third column in this chart is ASHE guidance expanding on the CMS waiver requirements.

ASHE will continue to provide resources, guidance, and updates to members about this issue. Visit [www.ashe.org/rpt](http://www.ashe.org/rpt) for resources.

Questions/interpretations 6/10/14 HITF meeting	CMS categorical waiver requirements	ASHE guidance and suggestions
	To use the waivers, hospitals must have the minimum number of outlets required by the 2012 edition of NFPA 99: <i>Health Care Facilities Code</i> .	<ul style="list-style-type: none"> <li>• RPTs are not a substitute for use of permanent wiring in hospital environments.</li> <li>• Ensure your facility has the minimum number of outlets required for when the facility was built. As an example, under NFPA 99-2012 patient bed locations in general care areas must have at least 8 receptacles, while patient bed locations in critical care areas must have at least 14. Operating rooms must have 36. Receptacles are not required in bathrooms or special rooms where medical requirements mandate against receptacles (certain psychiatric, pediatric, or hydrotherapy rooms).</li> <li>• Receptacles in pediatric rooms other than nurseries must be tamper-resistant.</li> </ul>
Are RPTs allowed in the patient care vicinity? Yes, if the NFPA 99 requirements in Section 10.2.3.6 (SPRPTs) are met.	RPTs for rack/table/pedestal/cart-mounted patient care-related equipment are allowed in the patient care vicinity if requirements in NFPA 99 10.2.3.6 (SPRPTs) are met.	<ul style="list-style-type: none"> <li>• If receptacles are part of a cart or other equipment assembly they must be permanently attached.</li> <li>• The sum of the ampacity of all appliances connected to the receptacles must not exceed 75 percent of the ampacity of the flexible cord supplying the receptacles.</li> </ul> <p style="text-align: right;"><i>continued</i></p>

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		<ul style="list-style-type: none"> <li>• The ampacity of the flexible cord must be suitable in accordance with the current edition of the NFPA 70: <i>National Electric Code</i>.</li> <li>• The electrical and mechanical integrity of the assembly should be regularly verified and documented through an ongoing maintenance program.</li> <li>• Means must be taken to ensure that additional devices or nonmedical equipment cannot be connected to the multiple outlet extension cord after leakage currents have been verified as safe.</li> </ul>
	<p>RPTs in the patient care vicinity are not allowed to power non-patient care-related equipment.</p>	<ul style="list-style-type: none"> <li>• Develop a policy regarding this requirement and educate hospital staff and visitors about the policy.</li> <li>• Consider having nursing staff designate one outlet in the patient care vicinity as a patient outlet to prevent patient personal devices from being plugged into RPTs.</li> </ul>
<p>Are RPTs outside the patient care vicinity required to meet NFPA 99 – 10.2.3.6? No.</p>	<p>RPTs are allowed outside of the patient care vicinity for both patient and non-patient care-related equipment.</p>	<ul style="list-style-type: none"> <li>• Educate your staff about the differences between requirements in the patient care vicinity and requirements outside of that area.</li> </ul>
	<p>RPTs for rack/table/pedestal/cart-mounted patient care-related equipment do not have to be an integral component of manufactured equipment. RPTs may be permanently attached by qualified personnel.</p>	<ul style="list-style-type: none"> <li>• Establish a policy for the attachment of SPRPTs to provide oversight on who may install them and where they may be installed.</li> </ul>

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	Resident rooms in long-term care facilities that do not use line-operated patient care-related equipment are not subject to NFPA requirements.	
	Resident rooms in long-term care facilities that do use line-operated patient care-related equipment are subject to NFPA requirements and can use the categorical waiver.	
	If RPTs are used in any manner, they are subject to precautions of the <i>Life Safety Code</i> and reference documents.	<ul style="list-style-type: none"> <li>• Inspect the use of RPTs in your facility during environmental rounds to ensure they are being used properly.</li> <li>• Multiple taps should not be plugged into each other or into extension cords.</li> <li>• RPTs should have a grounding plug and should be directly plugged into a grounded outlet.</li> </ul>
RPTs and SPRPTs are listed devices permitted to power multiple pieces of equipment.	Power strips used for patient care-related equipment must be listed SPRPTs.	<ul style="list-style-type: none"> <li>• Only well-designed, high-quality power strips that meet the requirements of UL 1363A (SPRPTs) should be used in the patient care vicinity.</li> </ul>
	Power strips for non-patient care-related equipment must be listed RPTs.	<ul style="list-style-type: none"> <li>• Check all power strips to make sure they are UL-listed.</li> <li>• RPTs without a UL listing should be removed from the facility to prevent them from being used elsewhere.</li> </ul>