



**American Hospital
Association**

Liberty Place, Suite 700
325 Seventh Street, NW
Washington, DC 20004-2802
(202) 638-1100 Phone
www.aha.org

December 19, 2006

Leslie Norwalk
Acting Administrator
Centers for Medicare & Medicaid Services
Hubert H. Humphrey Building
200 Independence Avenue, S.W., Room 445-G
Washington, DC 20201

RE: Medicare and Medicaid Programs; Fire Safety Requirements for Long Term Care Facilities, Automatic Sprinkler Systems [CMS—3191—P]

Dear Ms. Norwalk:

On behalf of our nearly 5,000 member hospitals, health systems, and other health care organizations, and our 37,000 individual members, the American Hospital Association (AHA) appreciates the opportunity to comment on the proposed rule that would require all long-term care facilities to be equipped with sprinkler systems.

We strongly support the safety goals of this proposal, and we have found that most of our member hospitals operating skilled nursing facilities and/or nursing homes already have installed automatic sprinkler systems throughout their facilities, including the long-term care section. We agree with the provision that would require new sprinkler systems to, at a minimum, comply with the 1999 standards set forth in the National Fire Protection Association's (NFPA) Life Safety Code. We also concur that all sprinkler systems in long-term care facilities need to be tested and maintained in accordance with NFPA standards.

Due to the significant costs associated with installing sprinkler systems and the burden it may place on some rural facilities, we urge CMS to utilize a five-year phase-in schedule for this regulation, as discussed in the proposed rule.

If you have any questions, please feel free to contact Rochelle Archuleta, AHA senior associate director, at 202-626-2320 or rarchuleta@aha.org.

Sincerely,

Rick Pollack
Executive Vice-President

