

What to Consider Before Implementing Life Safety System ITM Reporting Services

Fire codes require fire protection and life safety systems to be inspected, tested and maintained (ITM) on a regular basis. NFPA 25, the *Standard for Inspection, Testing and Maintenance of Water Based Fire Suppression Systems*, and NFPA 72, the *National Fire Alarm and Signaling Code*, the *Gaseous Agent Extinguishing Systems* (NFPA 12, 12A, and 2001), the *Dry and Wet Chemical Fire Extinguishing Systems Standards* (NFPA 17 and 17A) requires that certain records be generated during the ITM process. These standards mandate that the records are maintained by the property owner, and that they be made available to the Authority Having Jurisdiction (AHJ) upon request.

Because of its impact on the fire protection and life safety industry, the Board of Directors of the National Fire Sprinkler Association (NFSA) and Automatic Fire Alarm Association (AFAA), and the National Association of Fire Equipment Distributors (NAFED) formed committees to study the current practices of ITM Reporting Services that have been implemented in several jurisdictions in the US.

In 2018, the NFSA initiated a summit on the topic of ITM Reporting Systems in Chicago IL, and with the issues raised at that summit, conducted another summit in Fort Lauderdale FL with the collaboration of the AFAA. Both summits were well attended by all the stakeholders in this process and resulted in much better understanding of the impact that the inclusion of ITM Reporting Services has on the Life Safety industry overall.

When such reporting services are utilized, the ITM process has the following four stakeholders:

- **Property Owner**, who owns and has the responsibility to inspect, test and maintain their life safety system(s) in accordance with the applicable standards, and who contracts with the ITM Service Provider to perform those services.
- **ITM Service Provider**, a fire protection and life safety system contractor (fire sprinkler, fire alarm, etc.) who provides the required inspection, testing and maintenance service at the Owner's property, provides the Owner and the AHJ with the report indicating either a full compliance or with deficiencies that might have been established, and tags the system(s) accordingly.
- **Authority Having Jurisdiction (AHJ)**, who accepts and reviews the ITM reports and receives confirmation from the Owner or the ITM Service Provider that any deficiencies identified during the ITM process are corrected within the timelines allotted by the State Legislature. Typical AHJs who enforce ITM codes and standards reports such as NFPA 12, NFPA 12A, NFPA 17, NFPA 17A, NFPA 2001, NFPA 25 and NFPA 72 are fire departments.
- **ITM Reporting Service**, a software provider sometimes referred to as "third-party reporting", who facilitates electronic delivery of ITM reports to the AHJ, and inspections management service employed typically by the AHJ. Every ITM reporting service has other service lines and products.

The ITM reporting service typically contracts directly with an AHJ who requires that the ITM service providers (contractors) submit their reports via the ITM reporting platform. Other services are sometimes provided by the ITM reporting service such as notifying the owner of deficiencies or when ITM is due. Each ITM reporting service company has its own business model and operates differently.

The purpose of this document is to provide all the stakeholders in this process with information that was gathered by the NFSA and AFAA committees throughout 2018, specifically related to the six key areas for improvements that were identified and discussed during the summits.

#1 - SECURITY/REGULATORY / LIABILITY:

While most users of ITM reporting services are comfortable with data security, careful consideration should be given to how the data is stored and who has access to it.

- Security of data from both a physical (ensuring the data is adequately backed up) and privacy (accessible only by those who entered it) standpoint should be considered.
- Inspectors (AHJ and ITM Service Provider) with portable devices, such as tablets and cell phones with access to the ITM reporting service software, should be equipped with a secure screen lock.
- Information that is entered by the service provider (contractor) who performed the ITM service or deficiency repair should remain confidential and not be shared or intentionally disclosed with any other contractors or potential competitors.
- Some ITM reporting services store ITM records on multiple servers which are not owned by the municipality. This leads to questions and concerns about who ultimately owns the data and who has the authority to share it and with whom.
- The responsibility and liability lines between the ITM service providers and the AHJ become unclear by inserting the ITM reporting services between them, whose role in the process is neither defined nor regulated at the local, state or national levels.

#2 - DATA:

ITM codes and standards establishes very specific minimum requirements for what information ITM reports must contain. Many ITM reporting services and AHJs expand on those minimums.

- For consistency and to help ensure that the expectations of the AHJ fall within the scope of ITM codes and standards, the classification of deficiencies and/or impairments should match the definitions and recommendations of those standards.
- Software should be enabled to run analytics on the deficiencies. This is to facilitate in-house training of ITM inspectors, technicians, AHJs or building owners.
- The deficiency trends should be produced by the software so that they can be analyzed and used to improve ITM codes and standards.

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#3 - COST

Costs for these services can vary extensively. A best-case scenario would be one where all costs incurred are either neutral or will result in actual cost-savings.

- Special attention should be paid to how fees are based, i.e. per system vs. per building and the frequency in which fees are paid, i.e. per year vs. per inspection.
- Extra information gathered on forms, not required by ITM codes and standards, should result in rebate or cost-neutral submission fees.
- The data should not be used to solicit building owners or be used beyond the intentions of ensuring a properly working fire protection and life safety system.
- Where multiple communities in an area utilize ITM reporting services, filing fees, if any, should be consistent.
- Property owners and ITM service provider contractors should have reduced filing fees for high-volume, batched reports.

#4 - ENFORCEMENT

The sole focus of what data is collected and how that data is used should be on improving fire safety and enhancing the ability of the AHJ to enforce ITM codes and standards. The ability of the AHJ to act on the deficiencies identified during the ITM is one of the cornerstones of the entire ITM process. The main intent of the ITM reporting services approach is to provide the AHJ with more information.

- State-wide tagging systems, such as those in Texas and Florida, increase the number of buildings in compliance. Any ITM reporting service should result in the same level of improvements.
- Fire protection and fire alarm systems that are not in the AHJ's database need to be identified, included in the ITM reporting system and brought into compliance, with due care not to punish those following the rules.
- The effect of the influx of new information on overall code enforcement efforts should be evaluated, as should the impact of using an ITM reporting service on any accreditation the AHJ may have received.

#5 - PROCESS

Implementation of the ITM reporting service systems inevitably impacts the current stakeholders in the process. To assure that no interruption in the ITM compliance occurs during the implementation period and afterwards, the service interface should be user-friendly and accessible from all types of technology and contractor platforms.

- The ITM reporting service software often lack any of the follow-up features for critical and non-critical deficiencies. Follow-up reports, such as filing an "all clear" or "deficiency cleared" report should be covered by the original fee.
- An Application Programming Interface (API, a software intermediary that allows two applications to talk to each other) should be available to access and upload ITM reports to all ITM reporting service software.

- Grouped jurisdictions (such as in a metropolitan area) contracting with multiple ITM reporting services can make data entry confusing and result in unnecessary delays. Consideration should be given to a regional approach in this case.
- ITM reporting forms, inputs and formats should be uniform and follow ITM codes and standards.

#6 - COLLABORATION

Every stakeholder benefits in the ITM reporting program when it works as intended. Every stakeholder in the process has a common goal: better fire protection to save lives, property and investment. Getting fire protection and life safety systems to 100% compliance benefits all involved, most importantly, the public.

- Having several different ITM reporting services in their operating area requires the ITM service providers to train employees in different software platforms that are being implemented within their operating area, a cost which is, in turn, passed on to the owner.
- ITM Reporting Service providers shall provide early and frequent training to the AHJs and ITM service providers on how to use their platform. Follow-up "town-hall" style meetings, where all stakeholders can work through any issues that might have been encountered, will further improve the ITM system and the overall compliance.
- AHJs and the ITM Reporting service providers should work with the ITM service providers on defining and improving the reporting forms and input interface.
- ITM reporting services should be open to contractor input and integrating processes.
- AHJs should involve local NFSA and AFAA chapters for input and support during and after ITM reporting services implementation in their area.
 - There are over 19 NFSA Chapters in the U.S.
 - The AFAA has over 14 state associations in the U.S.

The ITM reporting service is one of the fastest growing methods of improving the overall life safety systems compliance. The NFSA, AFAA and NAFED recognize the potential benefits associated with the inclusion of the ITM Reporting Service Systems into the current ITM process and are suggesting that the decision on utilizing an ITM reporting service is delegated to the local stakeholders, under the conditions of meeting current laws, and not adding any costs or complexity without a clear and quantifiable benefit to all stakeholders. The named fire protection industry associations remain in an open dialogue with all stakeholders and are encouraged and determined to improve compliance while addressing any concerns with this growing technology that might be identified by their members.



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