Good morning,

The above attachment is a detailed look at CMS LSC Compliance Methods.

We are sending this to you all in hopes that everybody will understand the process and steps of coming into compliance with the OSFM after a LSC survey. This handout highlights the different options that are available to your facilities after the LSC survey has occurred.

To begin, the handout talks about the four different compliance methods that a facility could use. It will detail how each method can be used and how to implement them for your facility. Please take a look at these methods and feel free to reach out to our office if you have any further questions.

Have a great day!

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Four Compliance Methods
Meet all prescriptive requirements
Meet most prescriptive requirements with approved waiver(s)
FSES - fire safety equivalency system
Performance based design

Process
Prescriptive survey annually with all non-compliant tags cited, including those with waivers, FSES, PBD
Waivers, FSES and performance based design options must also be completed annually
Facility will always have a deficiency, until the deficient practice is corrected

Waivers
After completion of a prescriptive survey and cite the deficiency
Types – temporary to allow time to correct and continuing
Ask for a waiver if:
   Nearly impossible to correct
   High cost
   Additional time needed
Drawback – additional safety measures are required

Additional Safety Measures for Waivers (some examples)
Add smoke detection
Add fire extinguishers
Conduct safety rounds
Infrared inspections of motors and electrical panels
Additional maintenance and inspections
Fire department inspections/review of emergency plans
HVAC shutdown with FA activation
Install a horizontal exit
Hands on training/competency evaluation
Fire watch

FSES - Fire Safety Equivalency System
Complete a prescriptive survey and cite a deficiency
Use the 2013 Edition of NFPA 101A
Mathematical evaluation process
Used for deficiencies that are nearly impossible to correct
Must be performed onsite and submitted with the Plan of Correction
Evaluator is to conduct an independent review of all LSC features of the facility
Drawback - Expensive to perform
Drawback - Must utilize qualified professionals

Performance-Based Option (Computerized Fire Modeling)
Complete a prescriptive survey and cite the deficiency
Completed Annually
Used for deficiencies that are nearly impossible to correct
Must be performed onsite and submitted with the Plan of Correction
Evaluator is to conduct an independent review of all LSC features of the facility
Drawback - Expensive to perform
Drawback - Must utilize qualified professionals (such as a Fire Protection Engineer)