Equivalency Request Information

To accurately respond to your Statement of Conditions™ (SOC) request, the Standard Interpretation Group (SIG) Engineers require you to follow the submittal process exactly. Any deviation will result in our denying your request and requiring your re-submittal. All references to the Life Safety Code (LSC) are to the NFPA 101-2000 edition.

Introduction
Occasionally building owners discover building features or deficiencies that are not compliant with the National Fire Protection Association (NFPA) Life Safety Code® (LSC), also known as NFPA 101-2000. The preferred course of action is to immediately correct the deficiency. However, in some instances, the corrective action may pose a hardship to the organization and not directly impact patient, staff, or visitor safety. Under these conditions, the organization may submit a request for an equivalency to The Joint Commission for review.

Two Equivalency Types
The accredited organization may submit either a Traditional Equivalency or an FSES-based Equivalency. A Traditional Equivalency is based on field verification by a either the local fire marshal responsible for fire safety of the building; a registered architect or Professional Engineer (PE); or a Certified Fire Protection Specialist (CFPS).

The FSES Equivalency process was developed by NFPA. It objectively applies specific values to building features and allows deficiencies to be deducted from the building features numerical value. Once the calculations are completed, if the building score is zero or better, the building as evaluated would be considered compliant based on the FSES process and the identified deficiencies would not be considered a threat to occupants of the building. The NFPA 101A document does not specify qualifications of the submitter; however, The Joint Commission requires a thorough understanding of the Life Safety Code, NFPA 101A, Guide on Alternative Approaches to Life Safety, and the building(s) being evaluated (See Attachment B).

Attachments A & B include instructions for requesting an eEquivalency. This information is extracted from the Statement of Conditions™ section titled Extension and Equivalency Requests, found under the PFI Menu.

For organizations that use Joint Commission for deemed status purposes: After receiving a request for an equivalency, The Joint Commission will conduct the required analysis, and if it is found acceptable, The Joint Commission will forward the request to the relevant regional office (RO) of CMS for their approval or denial. During this period of RO review, the organization is still required to resolve any pending issues associated with the equivalency request, including appropriate Interim Life Safety Measures (ILSM).
Attachment A
Instructions for an Organization Requesting a Traditional Equivalency

A. Submit the Online Standards Submission form. Supply all required information (identified with a red * ) and use the following information as described:
   1. For the Subject select “Life Safety-Traditional Equivalency”
   2. In the text box marked “Please enter your question here (limited to 4000 characters)”
      a. Enter your Organization’s Name, address and HCO# (located in the title section of the SOC)
      b. Name, title and contact (phone and email) information of the individual requesting the change
      c. Indicate which of the following submittal options will be used
         i. “A Hard copy will be mailed directly to the Department of Engineering” or
         ii. “An Electronic submission will be sent”
      d. Indicate your request for a Traditional Equivalency

Your Hard copy or Email should include:
1. The ticket number located on the confirmation email you will receive after submitting the Online Standards Submission form. Enter the ticket number on the cover letter of the hard copy or the subject line of the email
2. Identify each deficiency.
   b. State the intent of the LSC.
3. Propose an alternate solution.
   a. Explain proposal in writing.
   b. Provide detailed drawings showing existing conditions and proposed solution (maximum size of unfolded drawings - 11 in x 17 in).
   c. Indicate the total cost and describe the source, availability, and commitment of funds for the proposed alternate solution.
   d. Provide a timetable of events from present through completion.

4. Implement Interim Life Safety Measures (ILSM) as appropriate as per organization policy
5. Have one of the following certify, in writing, that to the best of their knowledge, your proposed alternate solution meets either the intent of the LSC identified in 1A above or will provide an equivalent level of life safety:
   a. Certified Fire Protection Specialist (CFPS)
   b. Registered architect or Professional Engineer (PE)
   c. Local authority having jurisdiction (over enforcement of fire safety)
6. Submit request via Email or Hard copy:
   Email: Engineer@jointcommission.org
   Mail: The Joint Commission
   Department of Engineering
   One Renaissance Boulevard
   Oakbrook Terrace, Illinois 60181
Attachment B
Instructions for an Organization Requesting a FSES Equivalency

A. Submit the Online Standards Submission form. Supply all required information (identified with a red *), and use the following information as described:
   1. For the Subject select “Life Safety- FSES Equivalency”
   2. In the text box marked “Please enter your question here (limited to 4000 characters)”
      a. Enter your Organization’s Name, address and HCO# (located in the title section of the SOC)
      b. Name, title and contact (phone and email) information of the individual requesting the change
      c. Indicate your request for a FSES Equivalency

A. Your Hard copy should include:
   1. The ticket number located on the confirmation email you will receive after submitting the Online Standards Submission form. Enter the ticket number on the cover letter of the hard copy.
   3. Complete all FSES Worksheets for every zone in the healthcare facility. Evaluate each zone as it presently exists. Drawings, SOC, and LSC deficiencies must support point values selected. (See NFPA 101A-2001, 4.3.2)
   4. List all LSC deficiencies (include LSC reference numbers) identified within the zone during building assessment.
   5. Provide a floor plan. Unfolded attachments must not be larger than 11 in x 17 in. Indicate zone boundaries. Identify or illustrate (provide a legend) each of the following features of life safety that exists and where credit is taken on FSES Worksheet 4.7.6: direct exits, exit stairs, horizontal exits, 2-hr fire rated separations, or smoke barriers/partitions.
   6. Complete FSES Worksheet 4.7.10 for each building containing zones being evaluated. Determine if an equivalent condition exists:
      a. Review FSES Worksheet 4.7.9 for each zone being evaluated. Any FSES Worksheet 4.7.9 containing no response indicates that an equivalent level condition does not exist in that zone.
      b. Review FSES Worksheet 4.7.10 for each building containing zones being evaluated. Any FSES Worksheet 4.7.10 containing a Not Met response indicates that an equivalent condition does not exist in any zone within that building.
      c. The person reviewing and completing the worksheets must have a thorough understanding of the Life Safety Code; NFPA 101A, Guide on Alternative Approaches to Life Safety, 1998 edition; and the building(s) being evaluated.
   7. Those zones having all Yes responses to FSES Worksheet 4.7.9 and either Met or Not App. responses to FSES Worksheet 4.7.10 indicate that an equivalent condition presently exists.
   8. Provide authorization for SIG Engineers to review the SOC, Plan for Improvement (PFI) for each zone where an equivalent condition does not presently exist.
   9. Provide list of related PFIs
   10. FSES Worksheet 4.7.7A (see below). The column labeled “Condition After PFI” must validate the numeric values that will result when the PFI is completed. Any numeric increase in “Condition After PFI” from “Condition Before PFI” must be supported by the proposed actions.
   11. All above steps must be accomplished using the most current information available. Do not submit an FSES equivalency request where survey or evaluation information is more than one year old. Drawings and BBI must be current and accurate but are not subject to the one year restriction.
# Worksheet 4.7.7A  Equivalency PFI Validation

<table>
<thead>
<tr>
<th>Safety Parameters</th>
<th>Condition <strong>Before</strong> PFI</th>
<th>Condition <strong>After</strong> PFI</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Containment ($S_1$)</td>
<td>Extinguishment ($S_2$)</td>
</tr>
<tr>
<td>1. Construction</td>
<td></td>
<td></td>
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<tr>
<td>2. Interior Finish (Corridors and Exits)</td>
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<td></td>
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<tr>
<td>3. Interior Finish (Rooms)</td>
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<td>4. Corridor Partitions/Walls</td>
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<td>5. Doors to Corridor</td>
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<tr>
<td>6. Zone Dimensions</td>
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<tr>
<td>7. Vertical Openings</td>
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<tr>
<td>8. Hazardous Areas</td>
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<tr>
<td>9. Smoke Control</td>
<td></td>
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<td>10. Emergency Movement Routes</td>
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<td>11. Manual Fire Alarm</td>
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<td>12. Smoke Detection and Alarm</td>
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<td>13. Automatic Sprinklers</td>
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<tr>
<td>A. Total Value (Add 1-13)</td>
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<td>B. Mandatory Values (Table 3-6)</td>
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<tr>
<td>C. Subtract B from A</td>
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<tr>
<td>D. Check Box if C is ~ 0</td>
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