

Statement of Conditions Instructions

EQUIVALENCY INSTRUCTIONS

The Time-Limited Waiver / Equivalency is a submittal page for organizations seeking additional time to complete a physical environment (EC or LS) Requirement for Improvement (RFI) outside of the 60 days provided within the evidence of standards compliance (ESC) allotted time or for Equivalency of an RFI Life Safety Code® deficiency that cannot be corrected without major construction.

A. Introduction:

Occasionally building owners discover building features or deficiencies that are not compliant with the National Fire Protection Association (NFPA) Life Safety Code® (LSC), known as NFPA 1012012. 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.

B. Two Equivalency Types:

The accredited organization may submit either Traditional Equivalency or an FSES-based Equivalency

1. Traditional Equivalency A Traditional Equivalency is based on field verification by 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).
2. Fire Safety Evaluation System (FSES) Equivalency 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 - 2013, Guide on Alternative Approaches to Life Safety and the building(s) being evaluated.

C. Instructions for Submitting an Equivalency Request:



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- iv. ILSM/ Mitigation Actions Implementation as per Policy that includes any ILSMs or other mitigation actions that are currently being implemented for the SPFI. ~~Maximum 250 Characters~~

- v. Request Summary must include ~~Maximum 250 Characters~~

- a. Summary of the deficiency.
- b. Summary of request of equivalency

- vi. Proposed Corrective Action must include ~~Maximum 250 Characters~~

- a. Summary timeline of proposed corrective action if applicable
- b. Any other information that may be relevant to the decision making process if applicable
- c. If the above

- d. Select ~~Save~~ at the bottom of the page.

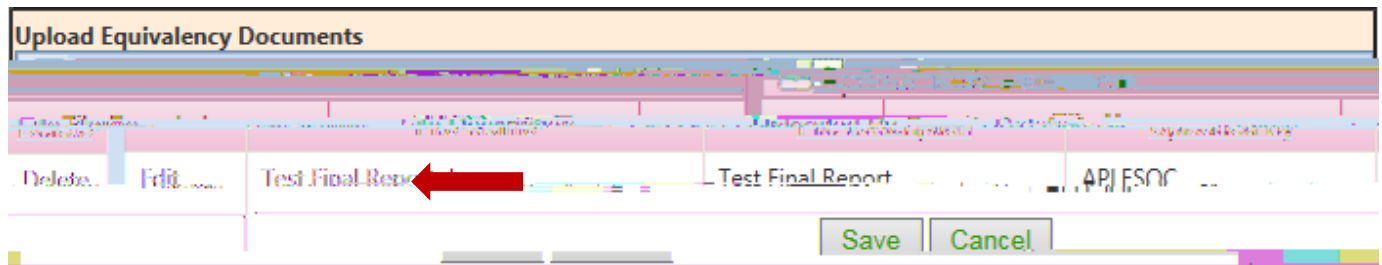
- 2. Upload Documents Based on Equivalency Type. Please refer to Annex B for required documentation for Traditional Equivalency ~~Annex C~~ or FSES Equivalency.

- a. How to Upload Documentation:

- i. Select ~~Upload a New Document~~
- ii. Enter a File Description for the document you are about to upload
- iii. Select ~~Browse~~ and locate the file

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- iv. Once you have selected the document to upload select **Save** or select **Cancel** to cancel the request.
- v. Verify in the **Upload New Document** field that all documents were successfully uploaded.



- vi. Select **Save**
 - a. If you have completed uploading all required documentation select **Submit**
 - b. If you have additional documentation continue to upload, but select **Save** after each document is uploaded so no work is lost.
 - c. The organization may edit the equivalency request up until its submission.
- vii. After you have submitted your request, select **View All** from the Menu on the left side of the page to verify the submission of your Equivalency. The **Status** will list **Submitted to TJC** A notification has been submitted to the Department of Engineering at the Joint Commission for processing.

View ID	ID	REU/DEF	Document	Submit Date	Status	Doc. Description	IS
9874	sam test	5/11/2016	Submitted to TJC	Y	View		9

- viii. Once received by the Joint Commission Department of Engineering, and email of receipt with a case number will be sent to the submitter email address listed in the Equivalency request form.
- ix. A summary of Time-Limited Waivers and Equivalencies submitted on or after August 1, 2016 may be viewed in the **View All** screen.

TIP An Equivalency is **NOT** guaranteed!

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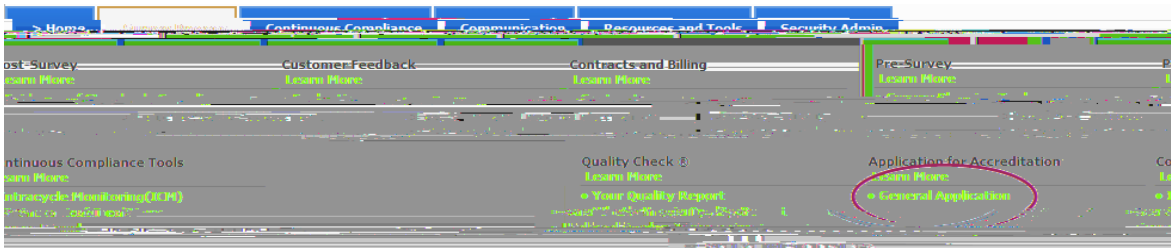
D. Equivalency Review Process:

1. Once an equivalency submission is received by the Joint Commission, an email of receipt with a case number will be sent to the submitter of the equivalency request.
2. If any of the above documentation is not provided, the organization will be notified once to make the necessary corrections and to resubmit the equivalency request. If the required documentation is not received within two weeks, or no communication related to the required missing documentation has been received by the Joint Commission within two weeks from the notification, then the equivalency request will be rejected.
3. Once an equivalency submission is received by the Joint Commission, an email of receipt with a case number will be sent to the submitter of the equivalency request.
4. Approval/Rejection Process After receiving a request for an equivalency, The Joint Commission will conduct the required analysis.
 - a. Deemed Status
 - i. Joint Commission Action:
 - a. If found to be acceptable by the Joint Commission, the review will be documented in the SOC by modifying the status of the equivalency request to Submitted to CMS and noting the status in the History/Audit Trail.
 - b. An email of the Joint Commission approval and notification of submission of the equivalency request to the relevant regional

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Annex A: Accessing CCN

1. Log into your organization's secure Joint Commission Connect page.
2. Select the Survey Process tab and select General Application



3. This will display the dashboard.
4. Select the green button Update Application
5. Select Tab 6 Survey Details
6. From the Menu on the left side of the page, select CCN Information
7. The CCN will be located in the table header, column Hospital CCN

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Annex B: Traditional Equivalency Required Documentation

The following documentation is required:

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Annex C: FSES Equivalency Required Documentation

The following documentation is required:

1. Final Survey Report
2. An Executive Summary on organization/company letterhead must:
 - a. Include details of the deficiencies/conditions being equivalized and validation of onsite survey results
 - b. Include any corrective actions necessary to achieve a passing score, if applicable
 - c. Include justification explaining why this is an unreasonable hardship*
 - d. Include detailed justification to show that the equivalency will not adversely affect occupant health and safety (Occupant Safety Assessment)
 - e. Submit on organization/company letterhead.
3. Supporting Evidence that must be included with the Equivalency Request:
 - i. FSES Worksheets for each building zone for the entire building.
 - ii. Provide detailed drawings showing existing conditions and proposed solutions.
 - iii. Indicate the total cost and describe the source, availability, and commitment of funds for any necessary corrective actions required (if work is required to achieve passing scores). Provide a timetable of events from present through completion.

* Unreasonable Hardship exists when an implementing agency finds that compliance with the building standards would make the specific work of the project affected by the building standard unattainable based on an overall evaluation of the following factors: cost of providing access, the cost of all construction considered, the financial impact of proposed improvements of the project, the nature and accessibility which would be gained or lost, and the nature of the use of the facility under construction and its accessibility to persons with disabilities.