

## Long-Term Care Survey Alert

### Stay Current On All Life Safety Survey Issues

**Take note of a second life safety memo released recently by the feds.**

On August 30, 2013, the **Centers for Medicare & Medicaid Services** (CMS) issued S&C memo S&C-13-58-LSC. This missive, addressed to state survey agency directors, reveals that CMS has "identified several areas of the 2000 edition of the Life Safety Code and 1999 edition of NFPA 99 that may result in unreasonable hardship on a large number of certified providers/suppliers and for which there are alternative approaches that provide an equal level of protection."

**Translated:** The agency is allowing optional paths to compliance for a number of life-safety requirements.

Although the sprinkler requirement is not covered, the memo outlines five life-safety categories for which waivers are permitted. In addition to some aspects of "extinguishing requirements," the memo covers waivers for openings in exit enclosures, emergency generators and standby power systems, doors, and suites.

In addition, the memo describes how providers can make use of other life safety waivers described in an earlier life-safety memo, S&C-12-21.

**Essential.** If any of the waivers apply to you, don't let the survey team "pass go" before letting them know about your waiver request and plans for compliance. Specifically, you must provide information that you are pursuing a waiver during the survey entrance conference.

For details, see the memo, available at

[www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/Survey-and-Cert-Letter-13-58.pdf](http://www.cms.gov/Medicare/Provider-Enrollment-and-Certification/SurveyCertificationGenInfo/Downloads/Survey-and-Cert-Letter-13-58.pdf).