Department of Health & Human Services
Centers for Medicare & Medicaid Services
26 Federal Plaza, Room 37-130
New York, NY 10278
Northeast Survey & Enforcement Division



LSC WAIVERS

GREEN = Waived RED=DENIED BLUE = No Waiver request

STANDARD - EPs	Document / Requirement	Frequency	Deferment Recommendation	СоР	K-Tag
EC.02.03.05	Fire Protection and Suppression Testing and Inspection		*SOE = State of Emergency		
EP 1	Supervisory Signals-including: Control valves; pressure supervisory; pressure tank, pressure supervisory for a dry pipe (both high and low conditions), steam pressure; water level supervisory signal initiating device; water temperature supervisory; and room temperature supervisory.	Quarterly	If tested in the previous 30 days prior to SOE, next test required within 60 days of lifting SOE.	482.41(d)(2)	K-345
-	Water flow devices	Semi-Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	K-353
EP 2	Tamper switches	Semi-Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	K-345
EP 3	Duct, heat, smoke detectors, and manual fire alarm boxes	Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	K-345
EP 4	Notification devices (audible & visual), and door- releasing devices	Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	K-345
EP 5	Emergency services notification transmission equipment	Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	K-345
EP 6	Electric motor-driven fire pumps tested under no-flow conditions	Monthly	No deferment because the risk level\testing requirement is critical to patient safety	482.41(d)(2) 482.15(b)(1)(ii)(c)	K-353
Li o	Diesel-engine-driven fire pumps tested under no-flow conditions	Weekly	No deferment because the risk level\testing requirement is critical to patient safety	482.41(d)(2) 482.15(b)(1)(ii)(c)	K-345
EP 7	Water storage tank high and low level alarms	Semi-Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2) 482.15(b)(1)(ii)(c)	K-353
EP 8	Water storage tank low water temp alarms (cold weather only)	Monthly	No defer if done with inhouse staff, if outsourced, defer 60 days after lifting SOE	482.41(d)(2) 482.15(b)(1)(ii)(c)	K-353
EP 9	Sprinkler systems main drain tests on all risers	Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2) 482.15(b)(1)(ii)(c)	K-353
EP 10	Fire department connections inspected (Fire hose connections N/A)	Quarterly	If tested in the previous 30 days prior to SOE, next test required within 60 days of lifting SOE	482.41(d)(2) 482.15(b)(1)(ii)(c)	K-353

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EC.02.03.05	C.02.03.05 Fire Protection and Suppression Testing and Inspection		*SOE = State of Emergency		
EP 11	Fire pump(s) tested – under flow**Waived as long as the facility is meeting the weekly/monthly test requirements, which is critical.	Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2) 482.15(b)(1)(ii)(c)	K-353
EP 12	Standpipe flow test every 5 years	5 year	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	N/A
EP 13	Kitchen suppression semi-annual testing	Semi-Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	N/A
EP 14	Gaseous extinguishing systems inspected (no discharge req.)	Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	N/A
EP 15	Portable fire extinguishers inspected monthly	Monthly	No defer if done with inhouse staff, if outsourced, defer 60 days after lifting SOE	482.41(d)(2)	K-355
EP 16	Portable fire extinguishers maintained annually	Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	K-355
EP 17	Fire hoses hydro tested 5 years after install; every 3 years thereafter	5/3 Year	If test was due during SOE, add 60-day grace period after lifting SOE	482.41(d)(2)	N/A K-353
EP 19	Smoke and fire dampers tested to verify full closure	1/6 Year		482.41(d)(2)	
EP 19	Smoke detection shutdown devices for HVAC tested	Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	N/A K-345
EP 20	All horizontal and vertical roller and slider doors tested	Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	N/A K-224
EP 25	Inspection and testing of door assemblies by qualified person. Does not include nonrated doors, including corridor doors to patient care rooms and smoke barrier doors.	Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2)	K-761
<u>EP 27</u>	Elevators with firefighters' emergency operations	Monthly	No defer if done with inhouse staff, if outsourced, defer 60 days after lifting SOE	482.41(d)(2)	K-531

STANDARD – Eps	Document / Requirement	Frequency	Deferment Recommendation *SOE = State of Emergency	СоР	K-Tag
EC.02.05.07	Emergency Power Systems are Maintained and Tested				
<u>EP 1</u>	At least monthly performs functional test of emergency lighting systems and exit signs required for egress and task lighting for a minimum duration of 30 seconds, along with a visual inspection of other exit signs	Monthly	Defer because of minimal criticality\risk, next test required within 60 days of lifting SOE	482.15(e)(2)	K-918
<u>EP 2</u>	Every 12 months performs functional test of battery powered lights on the inventory required for egress and exit signs for a duration of 1 ½ hours For new construction, renovation, or modernization battery-powered lighting in locations where deep	Annual	If test was due during SOE, add 60-day grace period after lifting SOE	482.15(e)(2)	K-918

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EC.02.05.07	Emergency Power Systems are Maintained and Tested				
	sedation and general anesthesia are administered is tested annually for 30 minutes with test results and completion dates documented				
	Functional test of Level 1 SEPSS, monthly; Level 2 SEPSS, quarterly, for 5 minutes or as specified for its class Annual test at full load for 60% of full duration of its class	Monthly Quarterly Annual	M- Defer because of minimal criticality\risk, next test required within 60 days of lifting SOE Q- Defer because of minimal criticality\risk, next test required within 60 days of lifting SOE A- Defer because of minimal criticality\risk, next test required within 60 days of lifting SOE	482.41(d)(2) 482.15(e)(2) 482.15(b)(1)(ii)(c)	K-918
EP 3	Note 1: Non-SEPSS tested per manufacturer's specifications Note 2: Level 1 SEPSS defined for critical areas and				
	equipment Note 3: Class defines minimum time which SEPSS is designed to operate at rated load without recharging				
EP 4	Emergency power supply system (EPSS) inspected weekly, including all associated components and batteries	Weekly	Defer because of minimal criticality\risk, next test required within 60 days of lifting SOE	482.41(d)(2) 482.15(e)(2)	K-918
EP 5	Emergency generators tested monthly for 30 continuous minutes under load (plus cool-down)	Monthly	No deferment	482.41(d)(2) 482.15(e)(2)	K-918
	Monthly load test for diesel-powered emergency generators conducted with dynamic load at least 30% of nameplate rating or meets mfr. Recommended prime movers' exhaust gas temperature; OR	Monthly	No deferment	482.41(d)(2) 482.15(e)(2)	K-918
EP 6	Emergency generators tested once every 12 months using supplemental loads of 50% of nameplate rating for 30 minutes, followed by 75% of nameplate rating for 60 minutes for total of 1 ½ continuous hours	Annual	If test was due during SOE, add 60-day grace period after lifting SOE.	482.41(d)(2) 482.15(e)(2)	K-918
EP 7	All <u>automatic and manual</u> transfer switches monthly/12 times per year with results and completion dates documented	Monthly	No deferment	482.41(d)(2) 482.15(e)(2)	K-918
EP 8	Fuel quality test to ASTM standards	Annual	If test was due during SOE, add 60-day grace period after lifting SOE	482.15(e)(2)	
EP 9	Generator load test once every 36 months for 4 hours	3 Year	If test was due during SOE, add 60-day grace period after lifting SOE	482.41(d)(2) 482.15(e)(2)	K-918
EP 10	Generator 4 hour test performed at, at least 30% nameplate	3 Year	If test was due during SOE, add 60-day grace period after lifting SOE	482.41(d)(2) 482.15(e)(2)	K-918

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EC.02.05.09	Medical Gas and Vacuum Systems are Inspected and Tested				
<u>EP 7</u>	Test, inspect and maintain critical components of piped medical gas and vacuum systems, waste anesthetic gas disposal (WAGD), and support gas systems on the inventory. Inventory of critical components includes at least all source subsystems, control valves, alarms, manufactured assemblies containing patient gases, and inlets and outlets with activities, dates and results documented No prescribed frequency; recommend risk assessment if < annual	Per Organizational Policy	Dependent on HCO policy- If test was due during SOE, add 60-day grace period after lifting SOE	482.41(d)(2)	K-907

STANDARD – Eps	Document / Requirement	Frequency	Deferment Recommendation *SOE = State of Emergency	СоР	K-Tag
EC.02.03.03	Fire Drills				
EP 1	Fire drills once per shift per quarter in health care occupancies; Quarterly in each building defined as ambulatory health care occupancy (If available, please provide five quarters of fire drill data)	Monthly\ Quarterly	Defer due to additional stress placed upon facility personnel	482.41(b)(1)(i)	K-712
EP 2	Fire drills every 12 months from date of last drill: Business Occupancies	Annual	Defer due to placing people in close proximity to others	482.41(b)(5)	K-712

STANDARD - EPs	Document / Requirement	Frequency	Deferment Recommendation *SOE = State of Emergency	СоР	K-Tag
EC.02.04.03	Medical equipment inspection, testing and maintenance				
EP 2	All high-risk equipment. Note 1: High-risk equipment includes medical equipment for which there is a risk of serious injury or even death to a patient or staff member should it fail, which includes life-support equipment. Note 2: Required activities and associated frequencies for maintaining, inspecting, and testing of medical equipment completed in accordance with manufacturers' recommendations must have a 100% completion rate.	Per OEM or AEM procedures	No deferment – NOT A WAIVER	482.41(d)(2)	K-921

STANDARD - EPs	Document / Requirement	Frequency	Deferment Recommendation *SOE = State of Emergency	СоР	K-Tag
EC.02.04.03	Medical equipment inspection, testing and maintenance				
	Note 3: Scheduled maintenance activities for high-risk medical equipment in an alternative equipment maintenance (AEM) program inventory must have a 100% completion rate. AEM frequency is determined by the hospital's AEM program.				
<u>EP 3</u>	Non-high-risk equipment identified on the medical equipment inventory Note: Scheduled maintenance activities for non-high-risk medical equipment in an alternative equipment maintenance (AEM) program inventory must have a 100% completion rate. AEM frequency is determined by the hospital's AEM program.	Per OEM or AEM procedures	If testing/inspection/maintenance was due during SOE, add 60-day grace period after lifting SOE	482.26(b)(1) 482.26(b)(2) 482.41(d)(2)	K-921
<u>EP 4</u>	Conducts performance testing of and maintains all sterilizers	Per OEM or AEM procedures	No deferment – NOT A WAIVER	482.41(d)(2)	
EP 10	All occupancies containing hyperbaric facilities comply with construction, equipment, administration, and maintenance requirements of NFPA 99-2012: Chapter 14.	Per OEM or AEM procedures	If testing/inspection/maintenance was due during SOE, add 60-day grace period after lifting SOE	482.41(d)(2)	K-931
<u>EP16</u>	Qualified hospital staff inspect, test, and calibrate nuclear medicine equipment annually. The results and completion dates are documented.	Per OEM or AEM procedures	If testing/inspection/maintenance was due during SOE, add 60-day grace period after lifting SOE	482.53(c)(2)	K-921
EP 20, 21, 22, 23,24,25,34	Non-high-risk equipment identified on the medical equipment inventory Note: Scheduled maintenance activities for non-high-risk medical equipment in an alternative equipment maintenance (AEM) program inventory must have a 100% completion rate. AEM frequency is determined by the hospital's AEM program.	Per OEM or AEM procedures	If testing/inspection/maintenance was due during SOE, add 60-day grace period after lifting SOE	N/A	K-921

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EC.02.05.01	Manages risks associated with utility systems				
<u>EP 14</u>	Minimizes pathogenic biological agents in cooling towers, domestic hot- and cold-water systems, and other aerosolizing water systems Deemed status requirement: Review the following policies, procedures and reports:	Per Organizational Policy	If tested in the previous 30 days prior to SOE, next test required within 60 days of lifting SOE	482.42	

STANDARD - EPs	Document / Requirement	Frequency	Deferment Recommendation *SOE = State of Emergency	СоР	K-Tag
EC.02.05.01	Manages risks associated with utility systems				
	 Facility risk assessment to identify where Legionella and other opportunistic waterborne pathogens could grow and spread in the facility water system Water management program that considers the ASHRAE industry standard and the CDC toolkit Testing protocols and acceptable ranges for control measures Documented results of testing Corrective actions taken when control limits				
<u>EP 15</u>	In critical care areas designed to control airborne contaminants (such as biological agents, gases, fumes, dust), the ventilation system provides appropriate pressure relationships, air-exchange rates, filtration efficiencies, temperature and humidity. (form of and frequency of assessment per hospital policy) Note: For more information about areas designed for control of airborne contaminants, the basis for design compliance is the Guidelines for Design and Construction of Health Care Facilities, based on the edition used at the time of design (if available).	Per Organizational Policy	No deferment – NOT A WAIVER	482.42	

STANDARD - EPs	Document / Requirement	Frequency	Deferment Recommendation *SOE = State of Emergency	СоР	K-Tag
EC.02.05.05	Utility system Inspection, testing and maintenance				
<u>EP 4</u>	High-risk utility system components on the inventory with completion date and results of activities documented Note 1: A high-risk utility system includes components for which there is a risk of serious injury or even death to a patient or staff member should it fail, which includes life-support equipment. Note 2: Required activities and associated frequencies for maintaining, inspecting, and testing of utility systems components completed in accordance with manufacturers' recommendations must have a 100% completion rate. Note 3: Scheduled maintenance activities for high-risk utility systems components in an alternative equipment maintenance (AEM) program inventory must have a 100% completion rate.	Per OEM or AEM procedures	No deferment — NOT A WAIVER	482.41(d)(2)	K-915 K-921
<u>EP 5</u>	Infection control utility system components on the inventory with completion date and results of activities documented Note 1: Required activities and associated frequencies for maintaining, inspecting, and testing of utility systems components completed in accordance with manufacturers' recommendations must have a 100% completion rate. Note 2: Scheduled maintenance activities for infection control utility systems components in an alternative equipment maintenance (AEM) program inventory must have a 100% completion rate.	Per OEM or AEM procedures	No deferment	482.41(d)(2) 482.41	K-921
<u>EP 6</u>	Non-high-risk utility system components on the inventory with completion date and results of activities documented Note: Scheduled maintenance activities for non-high-risk utility systems components in an alternative	Per OEM or AEM procedures	If testing/inspection/maintenance was due during SOE, add 60-day grace period after lifting SOE	482.41(d)(2)	

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EC.02.05.05	Utility system Inspection, testing and maintenance				
	equipment maintenance (AEM) program inventory must have a 100% completion rate. AEM frequency is determined by the hospital AEM program.				

Below is ASHE'S Request

STANDAD - EPs	Document / Requirement	Frequency	Deferment Recommendation	CoP	K-Tag
	Additional Testing/Inspection/Maintenance Items				
EC.02.05.0 1 EP 27 LS.02.01.70 EP 7 LS.03.01.70 EP 7	Engineer Smoke Control Systems 2012 EXISTING When installed, engineered smoke control systems are tested in accordance with established engineering principles. Test documentation is maintained on the premises.	No testing frequency in TJC EP	If testing/inspection/maintenance was due during SOE, add 60-day grace period after lifting SOE		K-771
EC.02.05.0 1 EP 22	Electrical Systems – Maintenance and Testing Hospital-grade receptacles at patient bed locations and where deep sedation or general anesthesia is administered, are tested after initial installation, replacement or servicing. Additional testing is performed at intervals defined by documented performance data. Receptacles not listed as hospital- grade at these locations are tested at intervals not exceeding 12 months.		If testing/inspection/maintenance was due during SOE, add 90-day grace period after lifting SOE		K-914
EC.02.05.0 5 EP 7	Line isolation monitors (LIM), if installed, are tested at intervals of ≤ 1 month by actuating the LIM test switch per 6.3.2.6.3.6, which activates both visual and audible alarm. For, LIM circuits with automated self-testing, this manual test is performed at intervals ≤ 12 months. LIM circuits are tested per 6.3.3.3.2 after any repair or renovation to the electric distribution system.		If testing/inspection/maintenance was due during SOE, add 60-day grace period after lifting SOE		K-914
LS.01.02.01 EP 4	Construction, Repair, and Improvement Operations Construction, repair, and improvement operations shall comply with 4.6.10. Any means of egress in any area undergoing construction, repair, or improvements shall be inspected daily to ensure its ability to be used instantly in case of emergency and compliance with NFPA 241.		No deferment		K-791

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	Additional Testing/Inspection/Maintenance Items				
EC.02.03.0 1 EP 4 LS.02.01.20 EP 14	Means of Egress – General Aisles, passageways, corridors, exit discharges, exit locations, and accesses are in accordance with Chapter 7, and the means of egress is continuously maintained free of all obstructions to full instant use in case of emergency, unless modified by 18/19.2.2 through 18/19.2.11.		If testing/inspection/maintenance was due during SOE, add no grace period after lifting SOE		K-211
LS.02.01.20 EP 14	Discharge from Exits Exit discharge is arranged in accordance with 7.7, provides a level walking surface meeting the provisions of 7.1.7 with respect to changes in elevation and shall be maintained free of obstructions.		If testing/inspection/maintenance was due during SOE, add no grace period after lifting SOE		K-271
LS.02.01.30 EP 6	The hospital provides and maintains building features to protect individuals from the hazards of fire and smoke. Alcohol-based hand rubs (ABHR) are stored and handled in accordance with NFPA 101-2012: 8.7.3.1, unless all of the following conditions are met: - Corridor is at least six feet wide - ABHR does not exceed 95% alcohol - Maximum individual dispenser capacity is 0.32 gallon of fluid (0.53 gallon in suites) or 18 ounces of NFPA Level 1–classified aerosols - Dispensers have a minimum of four feet of horizontal spacing between them - Dispensers are not installed within one inch of an ignition source - If floor is carpeted, the building is fully sprinkler protected - Operation of the dispenser complies with NFPA 101-2012: 18/19.3.2.6(11) - ABHR is protected against inappropriate access - Not more than an aggregate of 10 gallons of fluid or 135 ounces of aerosol are used in a single smoke compartment outside a storage cabinet, excluding one individual dispenser per room - Storing more than five gallons of fluid in a single smoke compartment complies with NFPA 30		If testing/inspection/maintenance was due during SOE, add 30-day grace period after lifting SOE		K-325