



THE JOINT COMMISSION UPDATE

IMPORTANT CHANGES THAT EFFECT YOUR LIFE SAFETY MANAGEMENT PROGRAMS

The Joint Commission has recently announced a number of significant updates and changes that will be effective as of July 1, 2014. The announcements should not change how you utilize the Statement of Conditions™ (SOC) to proactively identify Life Safety Code® deficiencies. However, it may affect how you manage the SOC, interpret survey reports, and address future equivalency requests.

There are essentially four (4) specific changes that your organization should be keenly aware of:

- 1. Past Due Plans for Improvement (PFIs):** The Joint Commission will now proactively monitor an organization's Plans for Improvement focusing on any PFIs that are more than six (6) months past the projected completion due date. When such a situation exists, a representative from The Joint Commission's Department of Engineering will contact the organization to discuss the particular PFI(s) and review overall PFI completion dates.
- 2. Opportunities for Improvement (OFIs):** Post survey decision reports will now include a new section identifying Opportunities for Improvement (OFIs). The new OFI section will list single observations of noncompliance with Category C Elements of Performance.
- 3. Expanded Decision Reports:** All open PFIs will be listed in a new section of the Decision Report.
- 4. Equivalency Requests:** The Joint Commission will continue to review all equivalency requests (traditional and FSES). However, once determined as acceptable by The Joint Commission, the request will be forwarded to the appropriate CMS Regional Office for final action.

These updates and changes are intended to better align The Joint Commission process with the requirements of the Centers for Medicare & Medicaid Services (CMS).

PAST DUE PLANS FOR IMPROVEMENT (PFIs)

The Joint Commission will now proactively monitor PFIs that have been accepted. Any accepted PFI that exceeds the projected completion date by more than six (6) months will be flagged. In such situations, a representative from The Joint Commission's Department of Engineering will generate a "coaching phone call" to the organization to review the item and provide counsel as necessary. Future flagging of PFIs beyond the six (6) month grace period will result in additional communication with the organization and could lead to an on-site survey. It will also likely result in an adverse decision rule (AFS10).

Prior to July 1, 2014 The Joint Commission will be contacting organizations through multiple "reminder emails" making them aware of accepted PFIs that are six months overdue. Emails will go to the organization's primary accreditation contacts including the Facilities Manager, Quality Assurance Representative and the CEO.

Actions:

- Ensure the organization has a process in place to actively manage the Statement of Conditions™ (SOC).
- Proactively request extensions for PFIs that are approaching the end of the six (6) month grace period.
- Ensure senior leadership is aware of any overdue PFIs. Attempt to address overdue PFIs before the July 1st deadline.

OPPORTUNITIES FOR IMPROVEMENT (OFIs)

Under the existing Joint Commission survey and scoring process, the identification of a single Category C Element of Performance deficiency does not result in a requirement for improvement (RFI). It also does not appear in the decision report. The new Opportunities for Improvement (OFI) section of the decision report will now list all single observations of noncompliance with Category C EPs. These single observations will not require Evidence of Standards (ESC) follow-up. However, the organization will not be able to submit clarifying evidence to remove the item from the OFI section of the decision report. If a Category C EP is scored twice, it will continue to generate an RFI and require evidence of standards compliance (ESC) follow-up.

Actions:

- Continue to employ effective Building Maintenance and Preventive Maintenance programs to minimize these single item observations.
- Educate your organization's leadership that this process and documentation change will likely lead to expanded decision reports.

EXPANDED DECISION REPORTS

In the post survey preliminary exit report, a summary page of open & accepted PFIs will be provided. A new section will be added to the final decision report that will include a listing of all the organization's open PFIs. Evidence of Standards Compliance (ESC) is not required for the listed open & accepted PFIs and will not be scored against the organization.

Actions:

- Continue to use the Statement of Conditions™ process to proactively identify and remediate known Life Safety Code® deficiencies.
- Educate your organization's leadership that this process and documentation change will likely lead to expanded decision reports.

EQUIVALENCY REQUESTS

The Joint Commission will continue to review all equivalency requests (traditional and FSES). However, for organizations that use Joint Commission Accreditation for deemed status, once the request is determined acceptable by The Joint Commission Department of Engineering, the request will be forwarded to the CMS Regional Office for final action. The Joint Commission expects CMS Regional Offices to approve equivalencies that are reviewed and accepted by The Joint Commission. However, the exact process, expected timelines and expectations of each CMS Regional Office will have to be monitored as this process unfolds. The new process will likely add additional time to the review process. Categorical Waivers do not need to be submitted to The Joint Commission or CMS.

Actions:

- Continue to use The Joint Commission's existing equivalency submission process for proactively requesting equivalencies to address Life Safety Code® compliance issues when appropriate.

LEARN MORE

You can access Joint Commission notices outlining this information using the following links:

- [May 28, 2014 Joint Commission Online regarding overdue PFIs](#)
- [June 4, 2014 Joint Commission Article regarding revised decision reports](#)

Please contact Russell Phillips & Associates at info@phillipsllc.com or 585-223-1130 for any questions on these changes or any Life Safety / Code Consulting questions. On-site consulting support and staff education is available as well.

Visit our website at www.phillipsllc.com for more information.