



Center for Clinical Standards and Quality/ Quality, Safety & Oversight Group

Admin Info: 24-04-LSC

DATE: October 31, 2023
TO: State Survey Agency Directors
FROM: Director, Quality, Safety & Oversight Group (QSOG)
SUBJECT: Life Safety Code (LSC) Training

Memorandum Summary

- **Training Requirement for New LSC Surveyors:** Effective October 31, 2023, all new LSC surveyor candidates will not be required to have a National Fire Protection Association (NFPA) Certified Fire Inspector I (CFI-1) prior to attending the CMS Basic Life Safety Code (BLSC) Training.
- **Attestation Form:** Effective October 31, 2023, a CMS Surveyor Field Experience Attestation Form will be submitted prior to new LSC surveyor candidates surveying independently.
- **Advanced LSC Courses:** Effective October 31, 2023, CMS surveyors will be required to complete the Advanced LSC courses (Fire Alarm Systems, Sprinkler Systems, and Building Construction Systems) after surveying independently for one year.

Background:

CMS has required new LSC surveyor candidates to obtain CFI-1 from the NFPA before attending the CMS BLSC course to ensure candidates had sufficient basic knowledge of fire protection, NFPA codes, and surveying to effectively participate in training. New LSC surveyor candidates are now able to receive fundamental knowledge by completing the Quality, Safety, and Education Portal (QSEP) prerequisite courses. Specifically, the Orientation to Life Safety Code Training and Basic Life Safety Code: The Survey Process Training, which provides a basic knowledge of fire protection, NFPA codes, and surveying. Additionally, CMS will require all surveyors to complete the Advanced LSC courses; Fire Alarm Systems, Sprinkler Systems, and Building Construction Systems, one year after surveying independently. Lastly, CMS is including an attestation component to the State Agency (SA) Surveyor Field Experience to be completed at the conclusion of the QSEP LSC mandatory training to ensure surveyors are prepared to survey independently.

Discussion:

NFPA previously recognized CFI-1 certificates from accredited courses, which included courses offered by state agencies and other training entities. NFPA now recognizes only CFI-1 certificates issued by NFPA. In addition, NFPA CFI-1 training includes instruction on

occupancies that CMS does not survey. The additional time required to obtain a NFPA CFI-1 has delayed new surveyor candidates from being able to begin conducting LSC surveys. Therefore, CMS is no longer requiring new LSC surveyor candidates to obtain an NFPA CFI-1 since the existing QSEP training is sufficient. LSC candidates currently in the process of obtaining the CFI-1 certification will not need to obtain the NFPA CFI-1 certification. However, new LSC surveyor candidates must complete the mandatory prerequisite training and associated tests before attending the BLSC training, as defined in the [QSEP LSC Training Plan](#). The mandatory prerequisite training is intended to assure new LSC surveyor candidates have sufficient fundamental knowledge to participate effectively in the revised and more intensive BLSC.

In addition, the CMS LSC Training Plan requires new LSC surveyor candidates who have completed all required training to perform three surveys with a preceptor, two as a survey team member and one as a survey team lead, to verify their ability to apply the LSC training during facility surveys. The CMS Surveyor Field Experience Attestation Form shall be submitted through QSEP before the new LSC surveyors are able to conduct surveys independently, this will be enforced by the Regional Training Administrator (RTA) and State Training Coordinator (STC). Mandatory LSC training shall not be complete until an approved attestation form is uploaded and approved in QSEP.

Contact:

For questions or concerns relating to this memorandum, please contact QSOG_LifeSafetyCode@cms.hhs.gov.

Effective Date:

Immediately. Please communicate to all appropriate staff within 30 days.

	/s/	
Karen L. Tritz		David R. Wright
Director, Survey & Operations Group		Director, Quality, Safety & Oversight Group

Resources to Improve Quality of Care:

Check out CMS's new Quality in Focus interactive video series. The series of 10–15 minute videos are tailored to provider types and aim to reduce the deficiencies most commonly cited during the CMS survey process, like infection control and accident prevention. Reducing these common deficiencies increases the quality of care for people with Medicare and Medicaid.

Learn to:

- *Understand surveyor evaluation criteria*
- *Recognize deficiencies*
- *Incorporate solutions into your facility's standards of care*

See the [Quality, Safety, & Education Portal Training Catalog](#), and select Quality in Focus