How do CMS surveyors evaluate life safety compliance?

THE DIRECT ANSWER

CMS surveyors evaluate life safety compliance against the 2012 editions of NFPA 101 (Life Safety Code) and NFPA 99 (Health Care Facilities Code) , which CMS adopted in 2016. State-agency surveyors trained as Life Safety Code specialists walk the building with the K-tag checklist — hundreds of specific requirements covering construction, compartmentation, egress, fire protection, and building services — and every deficiency gets a K-tag citation tied to the exact Code section.

THE K-TAG SYSTEM

- Life safety deficiencies are cited as K-tags (e.g., K-712 for fire drills, K-tags in the 100s–700s for the full range). Each tag maps to a specific NFPA 101-2012 section. The surveyor documents what was observed, where, and which Code section it violates.

WHAT THE WALKTHROUGH COVERS

- Building construction and compartmentation — smoke barriers, fire barriers, penetrations, door ratings and latching
- Means of egress — corridors, stairwells, exit access, emergency lighting, exit signage
- Fire protection systems — sprinklers, standpipes, fire alarm and detection, extinguishers — with testing and inspection records
- Building services — medical gas, emergency power, HVAC, elevators
- Interior finish and furnishings — flame-spread ratings, cubicle curtains, decorations
- Special features — cooking facilities, hyperbaric, laboratories

FIELD QUESTION

Which edition of the Life Safety Code does CMS enforce?

The 2012 editions of NFPA 101 and NFPA 99, adopted by CMS in 2016. Newer NFPA editions don't apply for CMS purposes until CMS adopts them.

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Caution: codes, editions, and targets vary by facility and authority having jurisdiction (AHJ). Figures marked as common practice are facility targets, not code requirements. Confirm against your AHJ and the current code text before acting.