Which NFPA 101 Edition Does CMS Enforce?

THE DIRECT ANSWER

CMS currently enforces the 2012 editions of NFPA 101 (Life Safety Code) and NFPA 99 (Health Care Facilities Code) , adopted in the 2016 final rule (81 FR 63860). A proposed rule floated in 2026 would update fire safety provisions — more homelike environments, corridor equipment allowances, revised furnishing rules — but it remains a proposal, not a final rule. Until CMS finalizes an update, 2012 is the enforceable edition for Medicare/Medicaid-participating facilities.

THE CURRENT STATE

- Enforced now: NFPA 101-2012 and NFPA 99-2012, with CMS-specific modifications (e.g., stricter corridor projection limits, roller latch prohibitions, 4-hour sprinkler-impairment fire watch vs. 10 hours in the base code).
- Proposed (2026): updates encouraging homelike environments — corridor storage of lifts, fixed corridor furniture as resting points, open cooking facilities for small service areas, flame-retardant-treated combustible décor, and locking arrangements for wandering-risk units. Still based on the 2012 codes with modifications.
- Not yet final: proposals don't change survey expectations. Build and maintain to 2012 until a final rule says otherwise.

WHAT THIS MEANS FOR YOUR FACILITY

- Design new construction and renovations to NFPA 101-2012 as modified by CMS , and watch the proposed rule — if finalized, it will ease several long-standing pain points (corridor use, furnishings, décor).

FIELD QUESTION

Which NFPA 101 edition does CMS enforce?

The 2012 edition (with NFPA 99-2012), adopted in the 2016 final rule.

From Healthcare Facility Hub - free, like everything on the site. The full article is at the link below.

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.