Healthcare Facility Hub

NFPA 101 Healthcare Survey Quick Card — 2012 CMS Edition
Reference

Current version — Oct 31, 2026
Update history: healthcarefacilityhub.org/nfpa-101-life-safety-code-healthcare-guide/

CMS Federal Adoption Baseline: 2012 NFPA 101 (with TIAs 12-1 through 12-4) and 2012 NFPA 99 (Health Care Facilities Code) adopted per 81 FR 26872 (May 4, 2016; effective July 5, 2016; surveyed since Nov 1, 2016 per S&C 17-15-LSC). Governing regulations: **42 CFR § 482.41** (Hospitals), **§ 483.90** (SNFs), **§ 416.44** (ASCs), **§ 485.623** (CAHs), **§ 418.110(d)** (Hospice). As of October 2026, CMS has not finalized or formally proposed a newer edition. *State/Local Rule:* Stricter requirement governs where state fire code adopts newer editions (2015–2027).

CORE OPERATING STRATEGY: DEFEND-IN-PLACE

Healthcare facilities do not rely on rapid total evacuation. Operations center on **defend-in-place**: (1) Limit fire to room of origin, (2) Keep smoke out of corridors, (3) Split floor into distinct smoke compartments, and (4) Relocate patients horizontally to a safe smoke compartment on the same floor before vertical evacuation is considered.

KEY EGRESS & COMPARTMENT THRESHOLDS SURVEYORS CHECK (CMS-2786R)

Means of Egress & Corridors K211–K251

- **Egress Obstructions (K211):** Means of egress must be continuously maintained free of all obstructions to full emergency use.
- **Corridor Width (K232):**
  • New hospitals & nursing homes: **8 ft clear**.
  • New limited care & psychiatric: **6 ft clear**.
  • Existing corridors: **4 ft clear** (stretcher transport).
- **Door Clear Width (K233):** Existing exit-access doors ≥ **32 inches** clear. New patient movement doors ≥ **41.5 inches** clear.
- **Egress Locks (K222):** No key or tool permitted on egress side unless approved clinical-needs, security-threat, or delayed-egress locking arrangements are certified.
- **Exits & Travel (K241/K251):** Min **2 remote exits** per story. Min 2 distinct paths per smoke compartment. Dead ends limited to **30 ft**. New common path max **100 ft**.
- **Emergency Lighting (K291):** At least **1.5-hour duration**. CoP 482.41(a)(1) mandates emergency power/lighting in OR, recovery, ICU, ED, and stairwells.

Smoke Compartments & Barriers K371–K374

- **Compartment Triggers (K371):**
  • Existing: ≥ **2 smoke compartments** on every sleeping floor with 30+ patient beds.
  • New: Required on every floor used by inpatients for sleeping/treatment, and any floor with occupant load ≥ 50.
- **Area & Travel Limits (K371):** Max compartment area **22,500 sq ft**. Max travel distance to smoke door **200 ft**.
- **Barrier Rating (K372): 1-hour** fire resistance in new; **1/2-hour** in existing. Continuous slab-to-slab with penetrations firestopped.
- **Smoke Barrier Doors (K374):** 20-min rated or 1¾-in solid-bonded core wood. Self-closing; new cross-corridor pairs swing opposite with astragals/rabbets. Positive latching NOT required.
- **Vertical Openings & Hazardous Areas:** Stairs/shafts enclosed 1-hr (K311). Hazardous storage/linen rooms: 1-hr barrier or auto-extinguishing (K321).

CORRIDORS, DOORS & OPEN SPACE PROTECTIONS

Corridor Walls & Doors K362–K363

- **Corridor Walls (K362):** 1/2-hour fire resistance in existing; smoke-resistant only in fully sprinklered smoke compartments.
- **Corridor Doors (K363):** Must resist smoke passage. Positive latching required. **Roller latches strictly prohibited** per 42 CFR § 482.41(b)(1)(ii). Gap at bottom max **1 inch**. Nothing may impede closing.
- **Open Spaces (K361):** Waiting areas, nurses' stations, and gift shops may open to corridors only under strict 18/19.3.6.1 criteria.

Sprinklers, Alarms & Impairments K345–K354

- **Sprinklers (K351/K521):** NFPA 13 throughout new construction. Existing high-rises fully sprinklered by **July 2028** (12 yrs from rule).
- **Sprinkler Impairment (K354):** Out of service > **10 hours** in 24 hrs → evacuate or initiate fire watch (42 CFR § 482.41(b)(8)).
- **Fire Alarm Impairment (K346):** Out of service > **4 hours** in 24 hrs → notify AHJ and evacuate or initiate fire watch.
- **Smoke Detection (K347):** Required in spaces open to corridor.

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NFPA 101 Healthcare Survey Quick Card — ITM & Practical Action Protocols

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CRITICAL ITM FREQUENCIES & TESTING STANDARDS (TABLE 5)

System	Governing Standard	Required Inspection, Testing & Maintenance Protocol	Survey Citation
Sprinklers & Standpipes	NFPA 25	Records of design, inspection, testing, and maintenance kept in secure location and readily available.	Tag K353
Fire Pumps	NFPA 25	Joint Commission: electric pumps tested monthly, diesel pumps weekly, under no-flow churn conditions.	Tag K353 (EC News)
Fire Alarm Systems	NFPA 72 / NFPA 70	Approved testing and maintenance program; initial acceptance and ongoing annual device test records available.	Tag K345
Fire Door Assemblies	NFPA 80	Fire-rated door assemblies inspected and tested annually. Corridor and smoke barrier doors checked under routine maintenance.	Tag K761
Emergency Generators	NFPA 99 / NFPA 110	Inspected weekly; exercised under load 30 min monthly (12x/yr at 20–40 day intervals); 4-hr continuous load test every 36 months; power transfer within 10 sec.	Tag K918
Emergency Lighting	NFPA 101 § 7.9	1½-hour annual battery discharge test (K291); Joint Commission requires monthly 30-second functional bump test per fixture.	Tag K291 (EC News)
Fire Drills	NFPA 101 § 18/19.7	Held at least quarterly on each shift, at expected and unexpected times. Coded announcement permitted 9:00 PM to 6:00 AM.	Tag K712
Portable Extinguishers	NFPA 10	Selected, installed, inspected monthly, and maintained/tested annually per NFPA 10.	Tag K355

TOP 5 COMMON DEFICIENCIES & DROP-CEILING RISKS (JOINT COMMISSION PE.03.01.01 EP 3)

Top 5 Life Safety Opportunities for Improvement

1. **Dedicated Sprinkler Piping:** Cables, zip-ties, or conduits improperly supported by sprinkler pipe (formerly LS.02.01.35 EP 4).
2. **Automatic Extinguishing Requirements:** Clearance < 18 in below sprinklers (36 in for dense storage) (LS.02.01.35 EP 14).
3. **Fire Barrier Penetration Seals:** Missing, unrated, or mismatched firestopping around pipes/cables (LS.02.01.10 EP 14).
4. **Sprinkler Maintenance:** Loaded, painted, corroded heads or missing escutcheons (LS.02.01.35 EP 5).
5. **Fire-Rated Door Requirements:** Latches failing, missing labels, frame gaps > 1/8 in, wedges/hold-opens (LS.02.01.10 EP 11).

Frequent "Walk-By" Survey Citations

- **Corridor Clutter (K211):** Unattended crash carts, linen hampers, or diagnostic machines parked in 8-ft/4-ft corridors.
- **Non-Latching Corridor Doors (K363):** Hardware failing positive latch test or disabled by kickdown stops.
- **Electrical Misuse (K920):** Daisy-chained power strips, household cords in patient-care vicinities.
- **Above-Ceiling Hazards:** Open junction boxes, abandoned wiring resting on tiles, broken fire dampers.
- **Construction Overlap (K791):** Failure to perform daily egress inspections during renovations per NFPA 241.

THE 8-STEP PRACTICAL SURVEY-READINESS ACTION CARD

1. Confirm Codes per Building: Document occupancy chapter (18/19, 20/21, 38/39), construction type, sprinkler status, and local AHJ edition.
2. Current Life Safety Drawings: Map smoke compartments, fire/smoke barriers, hazardous rooms, suites, and approved equivalencies.
3. Prepare the 3 Core Plans: Maintain Fire Response Plan (PE.03.01.01), Water Management Plan, and Emergency Operations Plan (482.15) ready within 5 minutes.
4. Organize ITM Logs by K-Tag: Bind last 12 months of test results, technician signatures, and completed corrective action records by tag.
5. Elect Categorical Waivers in Advance: Document waiver election in writing and present at entrance conference before being cited (Tag K000).
6. Enforce Above-Ceiling Permits: Require formal permit for all ceiling work; inspect firestopping before ceiling tiles are reinstalled.
7. Integrate Construction Controls: Approve ICRA and ILSM simultaneously; inspect egress daily and maintain fire watch logs (K791 / NFPA 241).
8. Conduct Annual Mock Survey: Walk the entire physical plant using Form CMS-2786R tag by tag at least annually and following major projects.