



ISSUE BRIEF

CMS lowers OR humidity requirement

Key Points

- CMS is lowering the humidity requirement for operating rooms from at least 35 percent to at least 20 percent.
- The agency has made the change by issuing a categorical waiver.
- To take advantage of this waiver, hospitals do not have to apply in advance or wait until they are cited.
- Hospitals that want to use the waiver must document their decision to do so. At the beginning of any survey assessing *Life Safety Code* compliance, the facility must notify the survey team of its prior decision to use the waiver.
- Facilities must still monitor relative humidity levels in anesthetizing locations and must take action when needed to ensure that humidity levels remain at or above 20 percent.

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The Centers for Medicare & Medicaid Services (CMS) is lowering the operating room relative humidity requirement from a minimum of 35 percent to at least 20 percent. ASHE has been working with CMS on this issue and applauds the agency for making the change, which will save valuable health care resources without jeopardizing patients.

CMS wrote in a [survey and certification memo](#) April 19 that it has issued a categorical waiver lowering the humidity requirement for operating rooms and other anesthetizing locations from at least 35 percent to at least 20 percent.

CMS currently requires hospitals to comply with the 2000 edition of NFPA 101: *Life Safety Code*®. That edition references the 1999 edition of NFPA 99: *Health Care Facilities Code*, which requires operating room humidity to be at least 35 percent. The categorical *Life Safety Code* waiver issued by CMS allows hospitals to keep operating room relative humidity at a minimum 20 percent instead of 35 percent.

The requirement for at least 35 percent relative humidity was originally intended to reduce static discharge, an important precaution in the days of flammable anesthetics. Recently, several codes and standards (including the latest edition of NFPA 99) have shifted to a minimum requirement of 20 percent humidity after an extensive review found that the change would not adversely affect system performance, patient safety, or clinical outcomes. CMS said it issued the waiver in light of these updates, as well as industry input that the 35 percent level was too burdensome.

It's important to note that the waiver does not apply if more stringent humidity levels are required under state or local laws or regulations, or if the reduction of the relative humidity would negatively affect ventilation system performance.

Facilities are still required to monitor relative humidity levels in anesthetizing locations, and must take action when needed to ensure levels remain at or above 20 percent.

Facilities that elect to use this categorical waiver do not have to apply in advance or wait until they are cited. However, they must document their decision to use the waiver. At the entrance conference for any survey assessing *Life Safety Code* compliance, the facility must notify the survey team of this fact. If a facility fails to show documentation of its prior decision to use the waiver, it could result in a citation. More details are available in the [CMS memo](#).