



## ISSUE BRIEF

# CMS to propose adoption of 2012 *Life Safety Code*

### Key Points

- CMS has indicated it will propose a rule later this year to adopt the 2012 edition of NFPA 101: *Life Safety Code*®.
- The rule would amend fire safety standards for hospitals, ambulatory surgery centers, and other health care facilities.
- ASHE urges CMS to adopt the 2012 edition of the *Life Safety Code*, and applauds the agency for moving toward updated codes.
- The 2012 edition of the *Life Safety Code* reduces code conflicts.
- Adopting the 2012 edition of NFPA 101 will also allow hospitals to comply with newer versions of other codes and standards, including NFPA 99: *Health Care Facilities Code*.
- ASHE will continue to keep members posted about developments in the rulemaking process.

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The Centers for Medicare & Medicaid Services (CMS) has moved a step closer to adopting the 2012 edition of NFPA 101: *Life Safety Code*®.

CMS has filed a federal agenda item that indicates the agency will submit a notice of proposed rulemaking on the issue later this year. The proposed rule would amend the fire safety standards for hospitals, ambulatory surgery centers, long-term care facilities, and other health care facilities. The proposed rule would also adopt the 2012 edition of the *Life Safety Code* and eliminate references in CMS regulations to all earlier editions, according to the [agenda item](#). The proposed rule would have to go through the typical federal rulemaking process, including opportunities for public input.

In 2011, CMS collected public comments about whether the agency should consider adopting the 2012 *Life Safety Code*. ASHE urges CMS to adopt the 2012 edition, and applauds CMS for taking this step toward current codes.

The 2012 edition of the *Life Safety Code* includes several advantages compared to the out-of-date 2000 edition, which is currently required by CMS. The 2012 edition reduces conflicts with other codes, including the *International Building Code*, meaning hospitals will waste fewer resources trying to comply with conflicting codes.

Adopting the 2012 edition of the *Life Safety Code* will also allow hospitals to use newer editions of other standards. The 2000 edition references more than 50 other technical standards, some of which date back to 1995. Under the 2012 edition of the *Life Safety Code*, hospitals can use the latest versions of other codes, including NFPA 99: *Health Care Facilities Code*. This will save facilities significant resources through updates to medical gas, smoke control, power, and other systems.

The 2012 edition of NFPA 101 also allows hospitals to keep critical equipment in corridors outside patient rooms so it can quickly be accessed for patient care, diagnostics, and patient movement. Older versions of the *Life Safety Code* don't allow that, and the issue is reported among the top causes for Joint Commission citations. For more information on the differences between the two editions, see this [position statement from ASHE](#).

ASHE will continue to keep members posted about the latest developments concerning this rule. ASHE will also continue to work with CMS to urge the adoption of updated codes.