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2026 Joint Commission Physical Environment Update

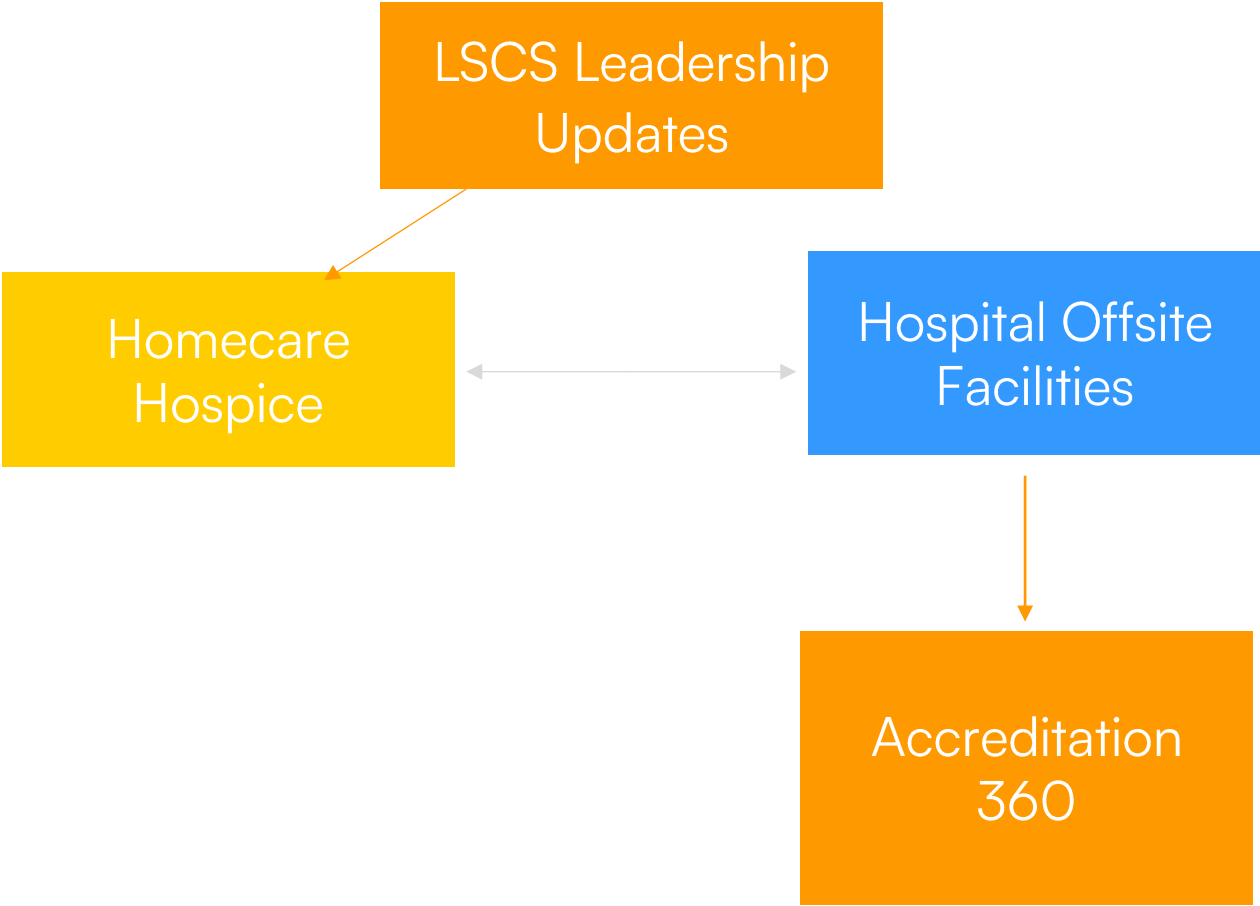
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Associate Field Director

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Joint Commission

Topics/Learning Objectives



Joint Commission LSCS Leaders



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Surveying Outpatient Facilities and Hospice: The Why

- Providing accredited organizations with a consistent of survey process
- Ensuring the survey process is comparable with CMS State Operations Manual
- All accrediting organizations are expected to follow the guidance outlined in the CMS State Operations Manual

Hospice

- March 2025
- Home Care Program
- Deemed Only
- Different Program, Different CoP's (418.110)
- Inpatient
- Both Hospital Based and/or Free-Standing
- LSCS complement
 - Hospital Based — Built into hospital complement
 - Free-Standing — 1 LSCS day for each inpatient location

Outpatient Facilities

- Separate survey process apart from A360
- Started July 2025
- HAP to start (HAP Psych, CAH in the future)
- Deemed (Not VHA or DHA)
- Staffing complement matches the clinical ambulatory days minus ASC\FSED because those are already included.
- Scoring will be based on occupancy type using the new PE/NPG standards

Outpatient Facilities

- Clinical surveyor assigned to off-site locations identifies locations to be visited and shares plan with LSC surveyor prior to survey.
- LSC surveyor is not required to visit additional locations at same time as clinical surveyor, but needs to prioritize visits to sites:
 - Hospital (2004)
 - ASC (2020)
 - FSED (2020)
 - Outpatient (2025)

Outpatient Facilities

- All moderate or deep sedation and anesthetizing locations
- All Complex out-patient care locations
 - Intensive Chemotherapy
 - Complex Wound Care
 - Advanced Cardiac Rehab
 - Intensive Medication Management
- Sample a mix of large, medium, small clinics
- Application & SOC/BBI Accuracy

Business/Ambulatory Occupancy Building Tour Guidance

Topic	Notes	Ambulatory Scoring Location	Business Scoring Location
Means of Egress			
Locked exits	Look for exit doors that are locked or delayed that would impact exiting the building. If there is delayed egress, test the delayed egress hardware to ensure it releases in time frame posted on the door (no more than 30 seconds max).	PE.03.01.01 EP 3	The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).
Illumination	- Continuous when occupied - Is the path of egress well lit, including outside the building at the point of discharge and to the public way?	PE.03.01.01 EP 3	The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).
Battery back-up	If battery back-up lights exist, are they functional and being tested on monthly/ annual basis?	PE.04.01.01 EP 1	The hospital meets the applicable provisions and proceeds in accordance with the Health Care Facilities Code (NFPA 99-2012 and Tentative Interim Amendments [TIA] 12-2, 12-3, 12-4, 12-5 and 12-6).
Corridors			
Corridor widths	Minimum 44 inches wide in Ambulatory, In Business 44" min only if 50+ occupants, 36 inches if fewer than 50 occupants	PE.03.01.01 EP 3	The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).
Visible exit signs	Look to see there are exit signs that are visible to direct occupants out of the building.	PE.03.01.01 EP 3	The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).
Junction Boxes			
	Look for any open electrical junction boxes that have the cover removed.	PE.04.01.01 EP 2	The hospital maintains essential equipment in safe operating condition.
Electrical Outlets			
	GFI if within 6 ft of sinks	PE.04.01.01 EP 2	The hospital maintains essential equipment in safe operating condition.

Electrical Panel	Locking - If policy requires locking due to public access	PE.04.01.01 EP 1 The hospital meets the applicable provisions and proceeds in accordance with the Health Care Facilities Code (NFPA 99-2012 and Tentative Interim Amendments [TIA] 12-2, 12-3, 12-4, 12-5 and 12-6).
	Accurate panel legends, circuit breakers in panels need to be identified on the panel legend	PE.04.01.01 EP 1 The hospital meets the applicable provisions and proceeds in accordance with the Health Care Facilities Code (NFPA 99-2012 and Tentative Interim Amendments [TIA] 12-2, 12-3, 12-4, 12-5 and 12-6).
Safety Data Sheets (SDS)	Does the organization have an inventory of the chemicals? Do staff have access to SDS for any chemicals used in the environment? If the organization uses electronic SDS, is there a way for employees to access SDS during computer downtime?	PE.02.01.01 EPs 1, 2 EP 1 The hospital maintains a written, current inventory of hazardous materials and waste that it uses, stores, or generates. The only materials that need to be included on the inventory are those whose handling, use, and storage are addressed by law and regulation. EP 2 For managing hazardous materials and waste, the hospital has the permits, licenses, manifests, and safety data sheets required by law and regulation.
Security/ Access	Look at how the org controls access to facility. Can the public enter parts of the facility without authorization? Backdoors unsecured etc.?	NPG.11.01.01 EP 1 The hospital controls access to and from areas it identifies as security sensitive.

Fire Extinguishers		
Inspection	Fire extinguishers inspected monthly and maintained annually. This is documented on the tag or electronically.	PE.04.01.01 EP 2 The hospital maintains essential equipment in safe operating condition.
Mounting and Visibility	- Proper mounting height between 4" and 60" off the floor - Extinguishers are conspicuously visible. Need to be able to see them or a sign of where they are.	PE.04.01.01, EP 1 The hospital meets the applicable provisions and proceeds in accordance with the Health Care Facilities Code (NFPA 99-2012 and Tentative Interim Amendments [TIA] 12-2, 12-3, 12-4, 12-5 and 12-6).
MRI	- MRI-safe fire extinguisher	PE.04.01.01, EP 1 The hospital meets the applicable provisions and proceeds in accordance with the Health Care Facilities Code (NFPA 99-2012 and Tentative Interim Amendments [TIA] 12-2, 12-3, 12-4, 12-5 and 12-6).

<p>Biohazardous and Pharmaceutical Waste</p>	<p>-Is biohazard waste stored in proper containers with proper labeling</p> <p>-Are sharps containers locked and not overfilled</p> <p>Is Biohazard and pharm waste stored so public cannot access while awaiting pickup?</p>	<p>PE.02.01.01, EP 4 The hospital develops and implements policies and procedures to protect patients and staff from exposure to hazardous materials. The policies and procedures address the following:</p> <ul style="list-style-type: none"> - Minimizing risk when selecting, handling, storing, transporting, using, and disposing of radioactive materials, hazardous chemicals, and hazardous gases and vapors - Disposal of hazardous medications - Minimizing risk when selecting and using hazardous energy sources, including the use of proper shielding - Periodic inspection of radiology equipment and prompt correction of hazards found during inspection - Precautions to follow and personally protective equipment to wear in response to hazardous material and waste spills or exposure <p>Note 1: Hazardous energy is produced by both ionizing equipment (for example, radiation and x-ray equipment) and nonionizing equipment (for example, lasers and MRIs).</p> <p>Note 2: Hazardous gases and vapors include but are not limited to ethylene oxide and nitrous oxide gases; vapors generated by glutaraldehyde; cauterizing equipment, such as lasers; waste anesthetic gas disposal (WAGD); and laboratory rooftop exhaust. (For full text, refer to NFPA 99-2012: 9.3.8; 9.3.9).</p> <p>PE.02.01.01, EP 6 The hospital has procedures for the proper routine storage and prompt disposal of trash and regulated medical waste.</p>	<p>Alcohol-based hand rub (ABHR) Dispensers</p> <ul style="list-style-type: none"> - Not directly over outlets - Corridor clear width of 44 inches is not compromised by dispenser (Business) - Only allowed in corridors over 6' wide (Ambulatory) - ABHR does not exceed 95% alcohol - Maximum individual dispenser capacity is 0.32 gallon of fluid (0.53 gallon in suites or rooms separated from corridors) or 18 ounces of NFPA Level 1-classified aerosols - Dispensers have a minimum of four feet of horizontal spacing between them - Dispensers are not installed within one inch of an ignition source - Operation must comply with the manufacturer's instructions for use. - ABHR is protected against inappropriate access - Not more than an aggregate of 10 gallons of fluid or 135 ounces of aerosol are used on a single story or in a single fire compartment outside a storage cabinet, excluding one individual dispenser per room - Storing more than five gallons of fluid on a single story or in a single fire compartment complies with NFPA 30 	<p>PE.03.01.01, EP 7 When the hospital installs alcohol-based hand rub dispensers, it installs the dispensers in a manner that protects against inappropriate access.</p>
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Eye Wash Stations	<p>-Are there chemicals being used that require eye wash per SDS?</p> <p>-Is there a mixing valve on the eye wash station if need to maintain tepid temperature 60 – 100 degrees?</p> <p>-Can the eye wash be reached within 10 secs (approximately 55 feet) without going through a doorway?</p> <p>-Is there eye wash testing documentation?</p>	<p>PE.02.01.01, EP 4 The hospital develops and implements policies and procedures to protect patients and staff from exposure to hazardous materials The policies and procedures address the following:</p> <ul style="list-style-type: none"> - Minimizing risk when selecting, handling, storing, transporting, using, and disposing of radioactive materials, hazardous chemicals, and hazardous gases and vapors - Disposal of hazardous medications - Minimizing risk when selecting and using hazardous energy sources, including the use of proper shielding - Periodic inspection of radiology equipment and prompt correction of hazards found during inspection - Precautions to follow and personally protective equipment to wear in response to hazardous material and waste spills or exposure 	Medical Equipment	<p>-Is the medical equipment in the medical equipment inventory?</p> <p>-Has the org identified the equipment as high risk or non-high risk?</p> <p>-Can the org tell you what type of maintenance they are doing, OEM or AEM</p> <p>-Is the equipment up to date on PM's?</p>	<p>PE.04.01.01, EP 2 The hospital maintains essential equipment in safe operating condition.</p>
			Compounding	See MST template library	
			Cylinder Storage	<p>-Are there cylinders that are not secured?</p> <p>-Are they storing more than 12 E cylinders outside of a secure storage room of non-or limited- combustible construction (do not count cylinder in use)</p>	<p>PE.04.01.01, EP 1 The hospital meets the applicable provisions and proceeds in accordance with the Health Care Facilities Code (NFPA 99-2012 and Tentative Interim Amendments [TIA] 12-2, 12-3, 12-4, 12-5 and 12-6).</p>
Storage Rooms	<p>Existing construction - If greater than 50 ft, they must have a one-hour fire barrier or automatic sprinkler.</p> <p>New construction storage areas – they must either have a one-hour fire barrier, or be sprinkled with a self-closing door and smoke resistive construction</p> <p>Hazardous Area. Hazardous areas include areas for the storage or use of combustibles or flammables; toxic, noxious, or corrosive materials; or heat-producing appliances.</p>	<p>PE.03.01.01, EP 3 The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).</p>	Sprinkler Heads/System	<p>Clearances, Cubicle Curtain Mesh</p> <p>Sprinkler heads are not obstructed (18" rule)</p> <p>Sprinkler heads are not damaged/dirty, escutcheon plates installed</p>	<p>PE.03.01.01, EP 3 The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).</p> <p>PE.03.01.01, EP 3 The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).</p> <p>PE.03.01.01, EP 3 The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).</p> <p>PE.03.01.01, EP 3 The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).</p>
			Fire Drills	<p>Documentation of quarterly (Ambulatory) or annual (Business) fire drill</p>	


Outpatient Facilities

- Inspection/Testing/Maintenance (ITM) Document Review
- LSCS Drawings
- Above Ceiling
- SOC\BBI

Accreditation 360: The New Standard

Simplified Accreditation Process

Intent & Purpose Of Updated Manual

- Streamlined approach that more directly identifies the CoPs
- Differentiate what Joint Commission requirements rise above the regulatory requirements
- Overall EP reduction
 - 46% of EPs were eliminated for critical access hospitals
 - 48% of EPs were eliminated for hospitals
- Manuals will display regulation number in new section below each EP text that is associated with a CoP
-  Burden reduction by providing clear, concise language, the origin, and intent which will lead to operational efficiencies

Manual Redesign

Accreditation Participation Requirements (APR)

Emergency Management (EM)

Human Resources (HR)

Infection Prevention and Control (IC)

Information Management (IM)

Leadership (LD)

Medication Management (MM)

Medical Staff (MS)

National Performance Goals (NPG)

Nursing (NR)

Provision of Care, Treatment, and Services (PC)

Physical Environment (PE)

Performance Improvement (PI)

Record of Care, Treatment, and Services (RC)

Rights and Responsibilities of the Individual (RI)

Transplant Safety (TS)

Moving from Complexity to Clarity



1,551



774

Historical....



Present....

CFR Number \$482.24(c)(2)	Medicare Requirements	Joint Commission Equivalent Number	Joint Commission Standards and Elements of Performance
\$482.24(c)(2)	TAG: A-0454 (2) All orders, including verbal orders, must be dated, timed, and authenticated promptly by the ordering practitioner or by another practitioner who is responsible for the care of the patient only if such a practitioner is acting in accordance with State law, including scope-of-practice laws, hospital policies, and medical staff bylaws, rules, and regulations.	PC.02.01.03	The hospital provides care, treatment, and services as ordered or prescribed, and in accordance with law and regulation.
		EP 1	For hospitals that use Joint Commission accreditation for deemed status purposes: Prior to providing care, treatment, and services, the hospital obtains or renews orders (verbal or written) from a physician or other licensed practitioner in accordance with professional standards of practice; law and regulation; hospital policies; and medical staff bylaws, rules, and regulations. Note 1: Outpatient services may be ordered by a physician or other licensed practitioner not appointed to the medical staff as long as the practitioner meets the following: - Responsible for the care of the patient - Licensed to practice in the state where the practitioner provides care to the patient or in accordance with Veterans Administration and Department of Defense licensure requirements - Acting within the practitioner's scope of practice under state law - Authorized in accordance with state law and policies adopted by the medical staff and approved by the governing body to order the applicable outpatient services Note 2: For hospitals that use Joint Commission accreditation for deemed status purposes: Patient diets, including therapeutic diets, are ordered by the physician or other licensed practitioner responsible for the patient's care, or by a qualified dietitian or qualified nutrition professional who is authorized by the medical staff and acting in accordance with state law governing dietitians and nutrition professionals.
		RC.01.01.01	The hospital maintains complete and accurate medical records for each individual patient.
		EP 7	All entries in the medical record are dated.
		EP 13	For hospitals that use Joint Commission accreditation for deemed status purposes: All entries in the medical record, including all orders, are timed.
		RC.01.02.01	Entries in the medical record are authenticated.
		EP 2	The hospital defines the types of entries in the medical record made by licensed practitioners that require countersigning, in accordance with law and regulation.
		EP 3	The author of each medical record entry is identified in the medical record.
		EP 4	Entries in the medical record are authenticated by the author. Information introduced into the medical record through transcription or dictation is authenticated by the author. Note 1: Authentication can be verified through electronic signatures, written signatures or initials, rubber-stamp signatures, or computer key. Note 2: For paper-based records, signatures entered for purposes of authentication after transcription or for verbal orders are dated when required by law or regulation or hospital policy. For electronic records, electronic signatures will be date-stamped. Note 3: For hospitals that use Joint Commission accreditation for deemed status purposes: All orders, including verbal orders, are dated and authenticated by the ordering physician or other licensed practitioner who is responsible for the care of the patient, and who, in accordance with hospital policy, law and regulation, and medical staff bylaws, rules, and regulations, is authorized to write orders.
		EP 5	The individual identified by the signature stamp or method of electronic authentication is the only individual who uses it.
		RC.02.03.07	Qualified staff receive and record verbal orders.
		EP 3	Documentation of verbal orders includes the date and the names of individuals who gave, received, recorded, and implemented the orders.
		EP 4	Verbal orders are authenticated within the time frame specified by law and regulation.
		EP 6	For hospitals that use Joint Commission accreditation for deemed status purposes: Documentation of verbal orders includes the time the verbal order was received.

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Medicare Hospital Requirements to 2024 Joint Commission
Hospital Standards & EPs

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CFR Number \$482.24(c)(2)	Medicare Requirements	Joint Commission Equivalent Number	Joint Commission Standards and Elements of Performance
\$482.24(c)(2)	TAG: A-0454 (2) All orders, including verbal orders, must be dated, timed, and authenticated promptly by the ordering practitioner or by another practitioner who is responsible for the care of the patient only if such a practitioner is acting in accordance with State law, including scope-of-practice laws, hospital policies, and medical staff bylaws, rules, and regulations.	RC.11.02.01	Entries in the medical record are authenticated.
		EP 1	All orders, including verbal orders, are dated, timed, and authenticated by the ordering physician or other licensed practitioner who is responsible for the patient's care and who is authorized to write orders, in accordance with hospital policy, law and regulation, and medical staff bylaws, rules, and regulations.

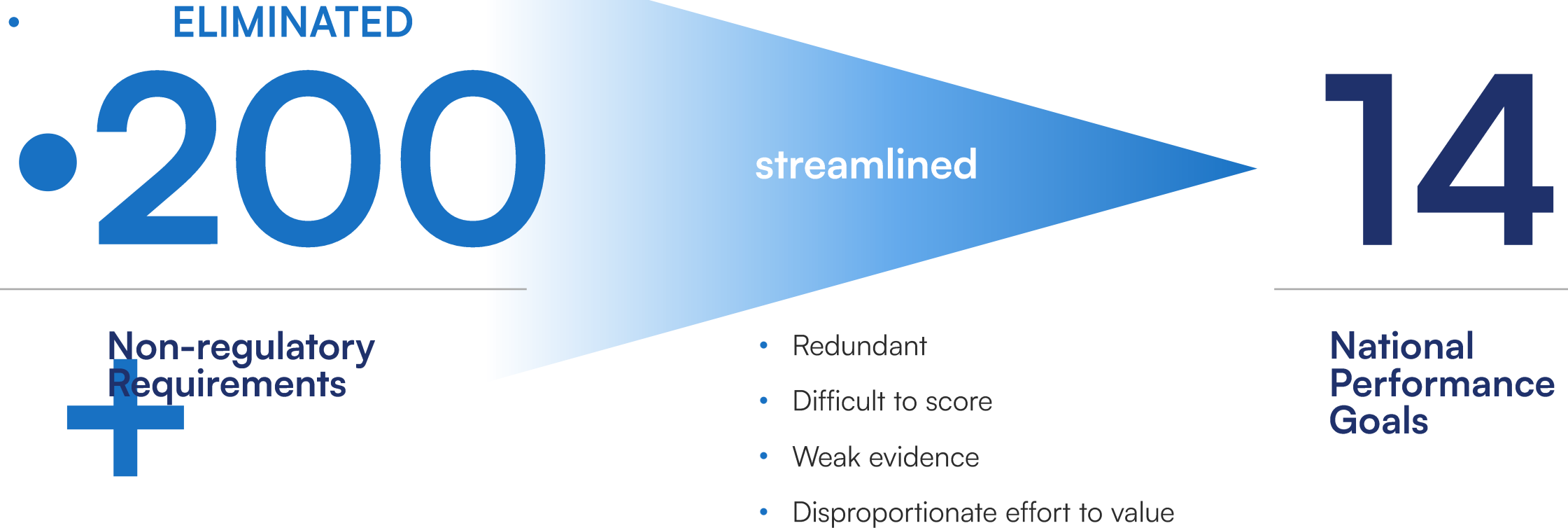
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Medicare Hospital Requirements to 2025 Joint Commission
Hospital Standards & EPs

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Burden Reduction Initiative for Hospitals

Scrutinized our quality & safety requirements that go beyond the CMS Conditions of Participation (CoPs)



National Performance Goal Topics

1. Right Patient, Right Care

- Critical results
- Two patient identifiers
- Flow of patients through the hospital
- Handoff communication
- Clinical alarm safety
- Recognizing and responding to changes in pt condition
- Preprocedural verification

2. Emergency Management

3. Pain Management

- Safe opioid prescribing

4. Excellent Health Outcomes for All (EHO4All)

5. Culture of Safety

- Conflict of interest & ethics
- Designing work processes that focus on safety/quality
- Workplace Violence Prevention

6. Infection Prevention & Control

- Identifying risks based on geographic location, community, and population served
- High consequence infectious diseases or special pathogens
- Hand hygiene

National Performance Goal Topics, cont.

7. Patient Rights

- Effective communication
- Right to give/withhold informed consent
- Identification of possible victims of abuse, neglect, and exploitation
- Treatment in dignified, respectful manner

8. Suicide Risk Reduction (based on CoPs)

9. Safe Transplant Practices

- Bidirectional tracing of tissue

10. Waived Testing (point of care)

- Following manufacturers' IFUs
- Evaluating staff competency

11. Workplace and Patient Safety

- Managing security risks
- Fall risk reduction

12. Staffing

- Competency & training
- Evaluating staffing when undesirable patterns or trends are identified

National Performance Goal Topics, cont.

13. Imaging Safety

- Staff qualifications
- Policies and procedures based on safe imaging practices
- Managing imaging safety risks
- Monitors quality related to imaging safety (dosing)

14. Medication Management

- Override review
- Labeling in procedures
- Anticoagulation safety
- Medication reconciliation
- Antibiotic stewardship



Survey Process Guide

Survey Process Guide (SPG) — Overview

- Replaces Survey Activity Guide (SAG)
- Better reflects State Operations Manual (SOM) related to survey process for the CoPs
- Same version shared between surveyors and accredited organizations
- SPG updated 01/01/2026



Hospital Accreditation

Survey Process Guide

Survey Process Guide (SPG) — Overview

- Organized into sections based on the CMS CoP structure
- Contains separate section for evaluating NPG Chapter
- Includes updated Compliance Evaluation Tools



Hospital Accreditation

Survey Process Guide

Survey Process Remains the Same

Surveyors will continue to conduct the following activities:

- Document Review
- Life Safety Code Building Assessment



Hospital Accreditation

Survey Process Guide

Survey Process Guidance - Modules

Hospital Physical Environment Evaluation Module (482.41)		
Joint Commission Standards / EPs	Hospital CoP	Hospital Survey Process
<p>PE.01.01.01, EP 1: The hospital's building is constructed, arranged, and maintained to allow safe access and to protect the safety and well-being of patients.</p> <p>Note 1: Diagnostic and therapeutic facilities are located in areas appropriate for the services provided.</p> <p>Note 2: When planning for new, altered, or renovated space, the hospital uses state rules and regulations, or the current Guidelines for Design and Construction of Hospitals published by the Facility Guidelines Institute. If the state rules and regulations or the Guidelines do not address the design needs of the hospital, then it uses other reputable standards and guidelines that provide equivalent design criteria.</p>	<p>§482.41 Condition of Participation: Physical Environment</p> <p>The hospital must be constructed, arranged, and maintained to ensure the safety of the patient, and to provide facilities for diagnosis and treatment and for special hospital services appropriate to the needs of the community.</p>	<p>Observation:</p> <ul style="list-style-type: none"> □ Verify that all locations of the hospital, including all campuses, satellites, provider-based activities, and inpatient and outpatient locations meet this CoP.

New Standard/EP

CoP

Survey Process Guidance
(Interview, Document Review, Observation)

Survey Process Guidance - Modules

Hospital Radiologic Services Evaluation Module (482.26)

<p>PE.02.01.01, EP 4: The hospital develops and implements policies and procedures to protect patients and staff from exposure to hazardous materials. The policies and procedures address the following:</p>	<p>§482.26(b) Standard: Safety for Patients and Personnel The radiologic services, particularly ionizing radiology procedures, must be free from hazards for patients and personnel.</p>	<p>Interview</p> <ul style="list-style-type: none"> <input type="checkbox"/> Radiologic services staff to determine: <ul style="list-style-type: none"> <input type="checkbox"/> Familiarity with policies and procedures related to safety in general and to specific clinical protocols. <input type="checkbox"/> Training at appropriate intervals to on
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Hospital Nuclear Medicine Services Evaluation Module (482.53)

<p>LD.13.03.01, EP 9: For hospitals that use the Joint Commission for deemed status purposes: If the hospital provides nuclear medicine services, and nuclear medicine staff perform laboratory tests, the services meet the applicable requirements for laboratory services specified in 42 CFR 482.27.</p>	<p>§482.53(b) Standard: Delivery of Service Radioactive materials must be prepared, labeled, used, transported, stored, and disposed of in accordance with acceptable standards of practice.</p>	<p>Interview</p> <ul style="list-style-type: none"> <input type="checkbox"/> Ask the hospital to demonstrate how it limits access to radioactive materials at all times. <input type="checkbox"/> Determine if staff use their dosimeters according to manufacturer's instructions, particularly in the appropriate placement of the dosimeter on the body, as indicated on the dosimeter. <input type="checkbox"/> Ask responsible staff to demonstrate how they ensure the safe transport of radioactive materials in the hospital. <input type="checkbox"/> Ask responsible staff to determine whether the appropriate container for protection devices (for example, lead for gamma emitters) are being used for storage and administration of radioactive materials. <input type="checkbox"/> Ask staff to show the policy for disposal methods for radioactive waste or unused material and to explain how they ensure that these procedures are followed. <input type="checkbox"/> If radiopharmaceuticals are prepared in-house, determine that the preparation is performed by, or supervised by, a registered pharmacist or MD/DO. <input type="checkbox"/> Ask the supervising pharmacist or MD/DO how technicians
<p>MM.15.01.01, EP 7: For hospitals that use Joint Commission accreditation for deemed status purposes: An appropriately trained registered pharmacist or doctor of medicine or osteopathy performs or supervises in-house preparation of radiopharmaceuticals.</p>	<p>§482.53(b)(1) In-house preparation of radiopharmaceuticals is by, or under the supervision of, an appropriately trained registered pharmacist or a doctor of medicine or osteopathy.</p>	
<p>PE.02.01.01, EP 4: The hospital develops and implements policies and procedures to protect patients and staff from exposure to</p>	<p>§482.53(b)(2) There is proper storage and disposal of radioactive material.</p>	

Survey Process Guide (SPG) PE Examples

STANDARD - EPs	See Legend				Document / Requirement	Frequency	Q1 Semi	Q2	Q3 Semi	Q4 Annual																				
	C	NC	NA	IOU																										
PE.04.01.01					Fire Protection and Suppression Testing and Inspection		<p>Health Care Occupancy LSC and HCFC Evaluation Tool</p> <p>The Health Care Occupancy LSC and HCFC Evaluation Tool reflects the Centers for Medicare & Medicaid Services (CMS) K-tags which represent the detailed NFPA 101 Life Safety Code and NFPA 99 Health Care Facilities Code requirements that are evaluated for compliance to determine if hospitals and critical access hospitals meet the Conditions of Participation. Hospitals and critical access hospitals and surveyors must refer to the tool for the content of Code requirements as these details no longer appear in individual elements of performance under the new, streamlined Joint Commission Physical Environment (PE) standards.</p> <p>The tool will assist both organizations and surveyors in identifying the hospital and critical access hospital Conditions of Participation (CoPs) and the Physical Environment requirements that relate to the K-tags. Refer to the hospital and critical access hospital crosswalks for more detailed information related to the Physical Environment CoP requirements and Joint Commission Physical Environment standards relationships.</p> <table border="1"> <thead> <tr> <th>K-tag</th> <th>Code Requirement</th> <th>CoP</th> <th>TJC EP</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td colspan="5">SECTION 1 – GENERAL REQUIREMENTS</td> </tr> <tr> <td>K100</td> <td> General Requirements – Other Any LSC Section 18.1 and 19.1 General Requirements that are not addressed by the provided K-tags but are deficient. This information, along with the applicable Life Safety Code citation, should be included in the finding. </td> <td>HAP 482.41(b)(1)(i) CAH 485.623(c)(1)(i)</td> <td>PE.03.01.01 The hospital/CAH addresses life safety from fire. EP 3 The hospital/CAH meets the applicable provisions of the Life Safety Code (NFPA 101: 2012 and Tentative Interim Amendments TIA 12-1, TIA 12-2, TIA 12-3, and TIA 12-4).</td> <td></td> </tr> <tr> <td>K111</td> <td> Building Rehabilitation <i>Repair, Renovation, Modification, or Reconstruction</i> Any building undergoing repair, renovation, modification, or reconstruction complies with both of the following: Requirements of Chapter 18 and 19. Requirements of the applicable Sections 43.3, 43.4, 43.5, and 43.6. 18.1.1.4.3, 19.1.1.4.3, 43.1.2.1 Change of Use or Change of Occupancy Any building undergoing change of use or change of occupancy classification complies with the requirements of Section 43.7, unless permitted by 18.1.1.4.2 or 19.1.1.4.2. 18.1.1.4.2 (4.6.7 and 4.6.11), 19.1.1.4.2 (4.6.7 and 4.6.11), 43.1.2.2 (43.7) Additions Any building undergoing an addition shall comply with the requirements of Section 43.8. 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EP 2				NFPA 72-2010: Table 14.4.5 NFPA 25-2011: Table 5.1.1.2 Tamper switches NFPA 72-2010: Table 14.4.5	Semiannual																									
EP 2				Duct, heat, smoke detectors, and manual fire alarm boxes NFPA 72-2010: Table 14.4.5; 17.14	Annually																									
EP 2				Notification devices (audible & visual), and door-releasing devices NFPA 72-2010: Table 14.4.5	Annually																									
EP 2				Emergency services notification transmission equipment NFPA 72-2010: Table 14.4.5	Annually																									
EP 2				Electric motor-driven fire pumps tested under no-flow conditions NFPA 25-2011: 8.3.1; 8.3.2	Monthly																									
				Diesel-engine-driven fire pumps tested under no-flow conditions NFPA 25-2011: 8.3.1; 8.3.2	Weekly																									

Chapter Updates — Physical Environment (PE)

Concepts in the PE Chapter

**Safe, Adequate
Environment**
PE.01.01.01

**Hazardous
Materials &
Waste**
PE.02.01.01

**Comply with
Life Safety Code**
PE.03.01.01

**Interim Life
Safety Measures**
PE.03.02.01

**Building Safety
& Facility
Management**
PE.04.01.01

Utility Systems
PE.04.01.03

**Water
Management**
PE.04.01.05

Imaging Safety
PE.05.01.01

Numbering and Location Changes

Current Standard Numbering
EC.01.01.01
EC.02.01.01
EC.02.01.03
EC.02.02.01
EC.02.03.01
EC.02.03.03
EC.02.03.05
EC.02.04.01
EC.02.04.03
EC.02.05.01
EC.02.05.02

Current Standard Numbering
EC.02.05.03
EC.02.05.05
EC.02.05.07
EC.02.05.09
EC.02.06.01
EC.02.06.05
EC.03.01.01
EC.04.01.01
EC.04.01.03
EC.04.01.05



Future Standard Numbering
PE.01.01.01
PE.02.01.01
PE.04.01.01
PE.04.01.03
PE.04.01.05
PE.05.01.01
Future Standard Numbering
NPG.02.04.01
NPG.11.01.01
NPG.11.03.01
NPG.13.03.01

Numbering and Location Changes

Current Standard Numbering	Current Standard Numbering
LS.01.01.01	LS.03.01.30
LS.01.02.01	LS.03.01.34
LS.02.01.10	LS.03.01.35
LS.02.01.20	LS.03.01.40
LS.02.01.30	LS.03.01.50
LS.02.01.34	LS.03.01.70
LS.02.01.35	LS.05.01.10
LS.02.01.40	LS.05.01.20
LS.02.01.50	LS.05.01.30
LS.02.01.70	LS.05.01.34
LS.03.01.10	LS.05.01.35
LS.03.01.20	



Future Standard Numbering
PE.03.01.01
PE.03.02.01
PE.04.01.01

PE Concepts in the NPG Chapter

**Workplace
Violence Worksite
Analysis**
NPG.02.04.01

Security Risks
NPG.11.01.01

Utility Systems
NPG.11.03.01

Imaging Safety
NPG.13.03.01

Surveyor Impact

- Reduced number of EPs to choose from, improving consistency and ease of scoring
- Easier selection of CoP due to direct connections of CoP language with EPs
- Potential improvement of CMS validation survey results

Top Physical Environment Opportunities

Interior Spaces Safe-Suitable (EC.02.06.01 EP 1)

Utility System Control Labels (EC.02.05.01 EP 9)

Clean Environment-No Odors (EC.02.06.01 EP 20)

Non-High Risk Utility System Test (EC.02.05.05 EP 6)

NFPA Auto Extinguishment (LS.02.01.35 EP 14)

Furnish-Equip Safe-Maintained (EC.02.06.01 EP 26)

Hazardous Chemical Handling-Storage (EC.02.02.01 EP 5)

Dedicated Sprinkler Piping (LS.02.01.35 EP 4)

Fire Barrier Penetration Seal (LS.02.01.10 EP 14)

Non-Critical Pressure Relationship (EC.02.05.01 EP 16)

Fire Rated Door Requirements (LS.02.01.10 EP 11)

Sprinkler Maintenance (LS.02.01.35 EP 5)

Ceiling Membrane Integrity (LS.02.01.34 EP 9)

Critical Pressure Relationship (EC.02.05.01 EP 15)

Cylinder Handling Policy (EC.02.05.09 EP 12)

EC.02.06.01 EP 1 — PE.01.01.01 EP 1

Interior Spaces Safe-Suitable

- **Ceiling and Wall Damage:**
- **Emergency Pull Cord Accessibility**
- **Unsecured Sharps and Equipment:**

Hospital Physical Environment Evaluation Module (482.41)

Note: [K-tag/CoP/EP review tool](#) is required to evaluate compliance with the Life Safety Code.

Joint Commission Standards / EPs	Hospital CoP	Hospital Survey Process
<p>PE.01.01.01, EP 1: The hospital's building is constructed, arranged, and maintained to allow safe access and to protect the safety and well-being of patients.</p> <p>Note 1: Diagnostic and therapeutic facilities are located in areas appropriate for the services provided.</p> <p>Note 2: When planning for new, altered, or renovated space, the hospital uses state rules and regulations, or the current Guidelines for Design and Construction of Hospitals published by the Facility Guidelines Institute. If the state rules and regulations or the Guidelines do not address the design needs of the hospital, then it uses other reputable standards and guidelines that provide equivalent design criteria.</p>	<p>§482.41 Condition of Participation: Physical Environment</p> <p>The hospital must be constructed, arranged, and maintained to ensure the safety of the patient, and to provide facilities for diagnosis and treatment and for special hospital services appropriate to the needs of the community.</p>	<p>Observation:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Verify that all locations of the hospital, including all campuses, satellites, provider-based activities, and inpatient and outpatient locations meet this CoP.

EC.02.05.01 EP 9 — PE.04.01.01 EP 1

Utility System Control Labels

- Spare/Energized Breakers Labeled Incorrectly:
- Missing or Inaccurate Panel Schedules/Labels:
- Unlabeled Utility Shutoff Valves:

<p>PE.04.01.01, EP 1: The hospital meets the applicable provisions and proceeds in accordance with the Health Care Facilities Code (NFPA 99-2012 and Tentative Interim Amendments [TIA] 12-2, 12-3, 12-4, 12-5 and 12-6).</p> <p>Note 1: Chapters 7, 8, 12, and 13 of the Health Care Facilities Code do not apply.</p> <p>Note 2: If application of the Health Care Facilities Code would result in unreasonable hardship for the hospital, the Centers for Medicare & Medicaid Services may waive specific provisions of the Health Care Facilities Code, but only if the waiver does not adversely affect the health and safety of patients.</p> <p>Note 3: All inspecting activities are documented with the name of the activity; date of the activity; inventory of devices, equipment, or other items; required frequency; name and contact information of person who performed the activity; NFPA standard(s) referenced for the activity; and results of the activity.</p>	<p>§482.41(c) Standard: Building Safety Except as otherwise provided in this section, the hospital must meet the applicable provisions and must proceed in accordance with the Health Care Facilities Code (NFPA 99 and Tentative Interim Amendments TIA 12-2, TIA 12-3, TIA 12-4, TIA 12-5 and TIA 12-6). (1) Chapters 7, 8, 12, and 13 of the adopted Health Care Facilities Code do not apply to a hospital. (2) If application of the Health Care Facilities Code required under paragraph (c) of this section would result in unreasonable hardship for the hospital, CMS may waive specific provisions of the Health Care Facilities Code, but only if the waiver does not adversely <u>affect</u> the health and safety of patients.</p>	<p>Document Review:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Review plans, policies and procedures, and documentation to determine compliance with Health Care Facilities Code requirements. <p>Observation:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Use the K-tag/CoP/EP Review tool to evaluate compliance with the Health Care Facilities Code.
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EC.02.06.01 EP 20 – PE.01.01.01 EP 3

Clean Environment - Cleanliness, No Odors or unsanitary conditions

- **Dust and Debris Accumulation:**
- **Soiling and Residue on Equipment and Surfaces:**
- **Infection Control and Sanitation Concerns:**

PE.01.01.01, EP 2: The hospital has adequate space and facilities for the services provided, including facilities for the diagnosis and treatment of patients and for any special services offered to meet the needs of the community served.

Note: The extent and complexity of facilities is determined by the services offered.

PE.01.01.01, EP 3: The hospital's premises are clean and orderly.

Note: Clean and orderly means an uncluttered physical environment where patients and staff can function. This includes but is not limited to storing equipment and supplies in their proper spaces, attending to spills, and keeping areas neat.

interior locations

Document Review:

- Review the hospital's routine and preventive maintenance schedules to determine that ongoing maintenance inspections are performed and that necessary repairs are completed.
- Review a copy of the most recent environmental risk assessment to determine if the hospital has identified any accessibility, age-related, security, suicide and/or weather-related risks or concerns. If environmental safety concerns have been identified in this assessment, what plans have been implemented by the hospital to ensure patient/staff safety?

Communication with Team

- Refer any potential power strip use deficiencies to Life Safety Code surveyors.

EC.02.05.05 EP 6 – PE.04.01.01 EP 2

Non-High Risk Utility System Testing

- **Blocked or Obstructed Electrical Panels and Equipment:**
- **Open or Uncovered Electrical Junction Boxes:**
- **Unlocked or Accessible Electrical Panels: .**

PE.04.01.01, EP 2: The hospital maintains essential equipment in safe operating condition.

PE.04.01.01, EP 5: The hospital maintains supplies to ensure an acceptable level of safety and quality.

Note: Supplies are stored in a manner to ensure the safety of the stored supplies and to not violate fire codes or otherwise endanger patients.

PE.04.01.05, EP 1: The water management program has an individual or a team responsible for the oversight and implementation of the program, including

§482.41(d)(2) - Facilities, supplies, and equipment must be maintained to ensure an acceptable level of safety and quality.

Interview:

Interview personnel in charge of equipment maintenance to determine:

- If the hospital has identified equipment that is essential for both regular operations and in an emergency situation.
- If the hospital has made adequate provisions to ensure the availability of those and equipment when needed.

Interview equipment users on units/departments to determine:

- If equipment failures are occurring and causing problems for patient health or safety.

Document Review:

Review equipment inventory to verify the following:

LS.02.01.35 EP 14 – PE.03.01.01 EP 3

NFPA Auto Extinguishment

- **Obstructed or Blocked Fire Extinguishers and Sprinkler Heads:**
- **Ceiling Membrane Gaps and Unsealed Penetrations:**
- **Improper Installation or Maintenance of Fire Suppression Equipment:**

<p>PE.04.01.01, EP 1: The hospital meets the applicable provisions and proceeds in accordance with the Health Care Facilities Code (NFPA 99-2012 and Tentative Interim Amendments [TIA] 12-2, 12-3, 12-4, 12-5, and 12-6).</p> <p>Note 1: Chapters 7, 8, 12, and 13 of the Health Care Facilities Code do not apply.</p> <p>Note 2: If application of the Health Care Facilities Code would result in unreasonable hardship for the hospital, the Centers for Medicare & Medicaid Services may waive specific provisions of the Health Care Facilities Code, but only if the waiver does not adversely affect the health and safety of patients.</p> <p>Note 3: All inspecting activities are documented with the name of the activity;</p>	<p>§482.41(e) through (e)(1)(xi)</p> <p>The standards incorporated by reference in this section are approved for incorporation by reference by the Director of the Office of the Federal Register in accordance with 5 U.S.C. 552(a) and 1 CFR part 51. You may inspect a copy at the CMS Information Resource Center, 7500 Security Boulevard, Baltimore, MD or at the National Archives and Records Administration (NARA). For information on the availability of this material at NARA, call 202-741-6030, or go to: http://www.archives.gov/federal_register/code_of_federalregulations/ibr_locations.html. If any changes in this edition of the Code are incorporated by reference, CMS will publish a document in the Federal Register to announce the changes.</p>	<p>PE.04.01.01, EP 5 (482.41(e)(1)(vii) through (e)(1)(xi))</p> <p>PE.05.01.01, EP 1 (482.41(e)(1)(i) through (e)(1)(vi))</p>
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Joint Commission Standards / EPs	Hospital CoP	Hospital Survey Process
<p>date of the activity; inventory of devices, equipment, or other items; required frequency; name and contact information of person who performed the activity; NFPA standard(s) referenced for the activity; and results of the activity.</p> <p>PE.03.01.01, EP 3: The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).</p> <p>Note 1: Outpatient surgical departments meet the provisions applicable to ambulatory health care occupancies, regardless of the number of patients served.</p> <p>Note 2: For hospitals that use Joint</p>	<p>(1) National Fire Protection Association, 1 Batterymarch Park, Quincy, MA 02169, www.nfpa.org, 1.617.770.3000.</p> <p>(i) NFPA 99, Standards for Health Care Facilities Code of the National Fire Protection Association 99, 2012 edition, issued August 11, 2011.</p> <p>(ii) TIA 12-2 to NFPA 99, issued August 11, 2011.</p> <p>(iii) TIA 12-3 to NFPA 99, issued August 9, 2012.</p> <p>(iv) TIA 12-4 to NFPA 99, issued March 7, 2013.</p> <p>(v) TIA 12-5 to NFPA 99, issued August 1, 2013.</p> <p>(vi) TIA 12-6 to NFPA 99, issued March 3, 2014.</p> <p>(vii) NFPA 101, Life Safety Code, 2012 edition, issued August 11, <u>2011</u>.</p> <p>(viii) TIA 12-1 to NFPA 101, issued August 11, 2011.</p> <p>(ix) TIA 12-2 to NFPA 101, issued October 30,</p>	

EC.02.06.01 EP 26 — PE.04.01.01 EPs 1 & 2

Furnishings - Equipment are Safe - Maintained

Damaged or Degraded Patient Care Equipment and Furniture:

Environmental and Facility Maintenance Issues:

Improper Repairs or Temporary Fixes:

<p>PE.01.01.01, EP 1: The hospital's building is constructed, arranged, and maintained to allow safe access and to protect the safety and well-being of patients.</p>	<p>§482.41(d) Standard: Facilities The hospital must maintain adequate facilities for its services.</p>	<p>Document Review:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Review the facility's water supply and distribution system to ensure that the water quality is
Joint Commission Standards / EPs	Hospital CoP	Hospital Survey Process
<p>Note 1: Diagnostic and therapeutic facilities are located in areas appropriate for the services provided.</p> <p>Note 2: When planning for new, altered, or renovated space, the hospital uses state rules and regulations, or the current Guidelines for Design and Construction of Hospitals published by the Facility Guidelines Institute. If the state rules and regulations or the Guidelines do not address the design needs of the hospital, then it uses other reputable standards and guidelines that provide equivalent design criteria.</p> <p>PE.01.01.01, EP 2: The hospital has adequate space and facilities for the services it provides, including facilities for the diagnosis and treatment of patients and for any special services offered to meet the needs of the community served.</p> <p>Note: The extent and complexity of facilities is determined by the services offered.</p>		<p>acceptable for its intended use (drinking water, irrigation water, lab water, etc.). Review the facility water quality monitoring and, as appropriate, treatment system.</p> <p>Observation:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Observe the facility layout and determine if the patient's needs are met. Toilets, sinks, specialized equipment, etc. should be accessible.

EC.02.02.01 EP 5 – PE.02.01.01 EP 4

Hazardous Chemical Handling-Storage

- **Eyewash Station Accessibility and Functionality Issues:).**
- **Non-compliance with Inspection and Maintenance Protocols:**
- **Inadequate Hazard Controls and Personal Protective Equipment (PPE):**

PE.02.01.01, EP 4: The hospital develops and implements policies and procedures to protect patients and staff from exposure to hazardous materials. The policies and procedures address the following:

- Minimizing risk when selecting, handling, storing, transporting, using, and disposing of radioactive materials, hazardous chemicals, and hazardous gases and vapors
- Disposal of hazardous medications
- Minimizing risk when selecting and using hazardous energy sources, including the use of proper shielding
- Periodic inspection of radiology equipment

§482.53(b)(2) There is proper storage and disposal of radioactive material.

§482.53(b)(3) If laboratory tests are performed in the nuclear medicine service, the 40 CFR Ch. IV (10-1-23 Edition) §482.54 service must meet the applicable requirement for laboratory services specified in §482.27.

- Verify that the preparation is performed by, or supervised by, a registered pharmacist or MD/DO.
- Ask the supervising pharmacist or MD/DO how technicians who prepare radiopharmaceuticals are supervised. Are supervision policies based on the recommendations of the Society of Nuclear Medicine and Molecular Imaging? If not, what is the basis for the supervision policies?
- Ask what policies and procedures the hospital uses to ensure proper preparation.
- Ask what guidelines the hospital relies on for radio pharmaceutical preparation.

**Document Review
General**

- Verify that radioactive materials are prepared, labeled, used, transported, stored, and disposed of in accordance

Joint Commission Standards / EPs	Hospital CoP	Hospital Survey Process
<p>and prompt correction of hazards found during inspection</p> <ul style="list-style-type: none"> - Precautions to follow and personally protective equipment to wear in response to hazardous material and waste spills or exposure <p>Note 1: Hazardous energy is produced by both ionizing equipment (for example,</p>		<p>with hospital policies that are based on acceptable standards of practice.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Verify that the hospital maintains accurate records of the receipt, distribution, and disposal of radioactive materials, including radiopharmaceuticals. <input type="checkbox"/> If radiopharmaceuticals are obtained from an outside source, verify that the receipt and storage are appropriately tracked. <input type="checkbox"/> Verify that the hospital has policies regarding the

LS.02.01.35 EP 4 – PE.03.01.01 EP 3

Dedicated Sprinkler Piping

- Sprinkler piping used to support other items:
- Immediate onsite correction and compliance documentation:

PE.03.01.01, EP 3: The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim	§482.41(b) (1) Except as otherwise provided in this section—	Observation: <input type="checkbox"/> Use the K-tag/CoP/EP Review tool to evaluate compliance with the Life Safety Code.
Joint Commission Standards / EPs	Hospital CoP	Hospital Survey Process
<p>Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).</p> <p>Note 1: Outpatient surgical departments meet the provisions applicable to ambulatory health care occupancies, regardless of the number of patients served.</p> <p>Note 2: For hospitals that use Joint Commission accreditation for deemed status purposes: The provisions of the Life Safety Code do not apply in a state where the Centers for Medicare & Medicaid Services (CMS) finds that a fire and safety code imposed by state law adequately protects patients in hospitals.</p> <p>Note 3: For hospitals that use Joint Commission accreditation for deemed status purposes: In consideration of a recommendation by the state survey agency or accrediting organization or at the discretion of the Secretary for the US Department of Health & Human Services, CMS may waive, for periods deemed appropriate, specific provisions of the Life</p>	<p>(i) The hospital must meet the applicable provisions and must proceed in accordance with the Life Safety Code (NFPA 101 and Tentative Interim Amendments TIA 12-1, TIA 12-2, TIA 12-3, and TIA 12-4.) Outpatient surgical departments must meet the provisions applicable to Ambulatory Health Care Occupancies, regardless of the number of patients served.</p>	

LS.02.01.10 EP 14 – PE.03.01.01 EP 3

Fire Barrier Penetrations

- **Unsealed or Improperly Sealed Penetrations:**
- **Use of Non-Compliant Materials:**

PE.03.01.01, EP 3: The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim	§482.41(b) (1) Except as otherwise provided in this section—	Observation: <input type="checkbox"/> Use the K-tag/CoP/EP Review tool to evaluate compliance with the Life Safety Code.
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LS.02.01.10 EP 11 – PE.03.01.01 EP 3

Fire Rated Door Requirements

- **Failure of Fire Doors to Latch or Close Properly:**
- **Improper Door Conditions Affecting Fire Rating:**
- **Doors Propped or Wedged Open:**

PE.03.01.01, EP 3: The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim	§482.41(b) (1) Except as otherwise provided in this section—	Observation: <input type="checkbox"/> Use the K-tag/CoP/EP Review tool to evaluate compliance with the Life Safety Code.
Joint Commission Standards / EPs	Hospital CoP	Hospital Survey Process
<p>Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).</p> <p>Note 1: Outpatient surgical departments meet the provisions applicable to ambulatory health care occupancies, regardless of the number of patients served.</p> <p>Note 2: For hospitals that use Joint Commission accreditation for deemed status purposes: The provisions of the Life Safety Code do not apply in a state where the Centers for Medicare & Medicaid Services (CMS) finds that a fire and safety code imposed by state law adequately protects patients in hospitals.</p> <p>Note 3: For hospitals that use Joint Commission accreditation for deemed status purposes: In consideration of a recommendation by the state survey agency or accrediting organization or at the discretion of the Secretary for the US Department of Health & Human Services, CMS may waive, for periods deemed appropriate, specific provisions of the Life</p>	<p>(i) The hospital must meet the applicable provisions and must proceed in accordance with the Life Safety Code (NFPA 101 and Tentative Interim Amendments TIA 12-1, TIA 12-2, TIA 12-3, and TIA 12-4.) Outpatient surgical departments must meet the provisions applicable to Ambulatory Health Care Occupancies, regardless of the number of patients served.</p>	

LS.02.01.35 EP 5

Sprinkler Maintenance

- **Missing or Improperly Installed Escutcheon Plates:** Numerous observations report sprinkler heads missing escutcheon plates or having plates that are not properly installed, resulting in gaps or exposure. These issues are noted in a variety of locations, including patient rooms, kitchens, corridors, and specialized areas such as the OR, pharmacy, and mechanical rooms.
- **Accumulation of Dust, Dirt, or Debris on Sprinkler Heads:** Many findings highlight sprinkler heads covered with dust, lint, dirt, or debris. This theme is observed in areas such as kitchens, patient rooms, storage rooms, and utility areas, with several reports confirming that such conditions could impede sprinkler functionality.
- **Corrosion, Paint, or Ice on Sprinkler Heads:** Several observations mention sprinkler heads affected by corrosion, paint, or ice accumulation. These issues are found in locations like laundry rooms, kitchens, and walk-in freezers, and are often confirmed by facilities or engineering staff as not meeting NFPA standards.

LS.02.01.35 EP 5 – PE.03.01.01 EP 3

Sprinkler Maintenance

- **Missing or Improperly Installed Escutcheon Plates:**
- **Accumulation of Dust, Dirt, or Debris on Sprinkler Heads:**
- **Corrosion, Paint, or Ice on Sprinkler Heads:**

PE.03.01.01, EP 3: The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim	§482.41(b) (1) Except as otherwise provided in this section—	Observation: <input type="checkbox"/> Use the K-tag/CoP/EP Review tool to evaluate compliance with the Life Safety Code.
Joint Commission Standards / EPs	Hospital CoP	Hospital Survey Process
<p>Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).</p> <p>Note 1: Outpatient surgical departments meet the provisions applicable to ambulatory health care occupancies, regardless of the number of patients served.</p> <p>Note 2: For hospitals that use Joint Commission accreditation for deemed status purposes: The provisions of the Life Safety Code do not apply in a state where the Centers for Medicare & Medicaid Services (CMS) finds that a fire and safety code imposed by state law adequately protects patients in hospitals.</p> <p>Note 3: For hospitals that use Joint Commission accreditation for deemed status purposes: In consideration of a recommendation by the state survey agency or accrediting organization or at the discretion of the Secretary for the US Department of Health & Human Services, CMS may waive, for periods deemed appropriate, specific provisions of the Life</p>	<p>(i) The hospital must meet the applicable provisions and must proceed in accordance with the Life Safety Code (NFPA 101 and Tentative Interim Amendments TIA 12-1, TIA 12-2, TIA 12-3, and TIA 12-4.) Outpatient surgical departments must meet the provisions applicable to Ambulatory Health Care Occupancies, regardless of the number of patients served.</p>	

LS.02.01.34 EP 9

Ceiling Membrane Integrity

- **Ceiling membrane penetrations and gaps:** Many observations report unsealed penetrations, gaps greater than 1/8 inch, or missing ceiling tiles in various rooms such as equipment rooms, IT closets, and laboratories. These deficiencies are frequently noted around conduits, pipes, or sprinkler escutcheons, and are consistently cited as compromising the integrity of the fire and smoke barrier.
- **Impact on fire suppression and smoke detection:** A recurring theme is the risk that these ceiling deficiencies pose to the timely activation of smoke detectors and fire suppression systems. Observations often specify that such gaps or penetrations could delay or prevent proper smoke detection, potentially compromising safety in areas protected by both sprinklers and smoke detectors.
- **Immediate corrective actions and compliance requirements:** Most findings indicate that the deficiencies were corrected onsite prior to the surveyor's departure. However, organizations are repeatedly reminded that corrective actions must be documented and included in their Evidence of Standards Compliance submissions, emphasizing the importance of ongoing compliance and documentation.

LS.02.01.34 EP 9 – PE.03.01.01 EP 3

Ceiling Membrane Integrity

- Ceiling membrane penetrations and gaps:
- Impact on fire suppression and smoke detection:
- Immediate corrective actions and compliance requirements:

PE.03.01.01, EP 3: The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim	§482.41(b) (1) Except as otherwise provided in this section—	Observation: <input type="checkbox"/> Use the K-tag/CoP/EP Review tool to evaluate compliance with the Life Safety Code.
Joint Commission Standards / EPs	Hospital CoP	Hospital Survey Process
<p>Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).</p> <p>Note 1: Outpatient surgical departments meet the provisions applicable to ambulatory health care occupancies, regardless of the number of patients served.</p> <p>Note 2: For hospitals that use Joint Commission accreditation for deemed status purposes: The provisions of the Life Safety Code do not apply in a state where the Centers for Medicare & Medicaid Services (CMS) finds that a fire and safety code imposed by state law adequately protects patients in hospitals.</p> <p>Note 3: For hospitals that use Joint Commission accreditation for deemed status purposes: In consideration of a recommendation by the state survey agency or accrediting organization or at the discretion of the Secretary for the US Department of Health & Human Services, CMS may waive, for periods deemed appropriate, specific provisions of the Life</p>	<p>(i) The hospital must meet the applicable provisions and must proceed in accordance with the Life Safety Code (NFPA 101 and Tentative Interim Amendments TIA 12-1, TIA 12-2, TIA 12-3, and TIA 12-4.) Outpatient surgical departments must meet the provisions applicable to Ambulatory Health Care Occupancies, regardless of the number of patients served.</p>	

EC.02.05.01 EP 15

Critical Ventilation Pressure Relationship

- **Improper Pressure Relationships in Critical Areas:** Numerous observations highlight that operating rooms, sterile storage, and clean utility areas frequently had negative or neutral pressure relative to adjacent corridors or sterile cores, when positive pressure is required. This was confirmed by facilities or plant operations staff in multiple instances.
- **Temperature and Humidity Non-Compliance:** Many entries document temperatures in operating rooms falling below required standards (often below 68°F), and humidity levels either exceeding or dropping below policy thresholds (e.g., below 30% or above 60%), with a lack of corrective actions or case-based justifications. These issues were often confirmed during document reviews or by facility leadership.
- **Lack of Documentation and Corrective Action:** Several observations note missing documentation for required annual air exchange testing, temperature/humidity monitoring, or corrective actions when environmental parameters were out of range. In some cases, policies were not followed or forms were outdated, and leadership confirmed the absence of required records or mitigation steps.

EC.02.05.01 EP 15 – PE.04.01.01 EP 3

Critical Ventilation Pressure Relationship

- **Improper Pressure Relationships in Critical Areas:**
- **Temperature and Humidity Non-Compliance:**
- **Lack of Documentation and Corrective Action:**

PE.03.01.01, EP 3: The hospital meets the applicable provisions of the Life Safety Code (NFPA 101-2012 and Tentative Interim	§482.41(b) (1) Except as otherwise provided in this section—	Observation: <input type="checkbox"/> Use the K-tag/CoP/EP Review tool to evaluate compliance with the Life Safety Code.
Joint Commission Standards / EPs	Hospital CoP	Hospital Survey Process
<p>Amendments [TIA] 12-1, 12-2, 12-3, and 12-4).</p> <p>Note 1: Outpatient surgical departments meet the provisions applicable to ambulatory health care occupancies, regardless of the number of patients served.</p> <p>Note 2: For hospitals that use Joint Commission accreditation for deemed status purposes: The provisions of the Life Safety Code do not apply in a state where the Centers for Medicare & Medicaid Services (CMS) finds that a fire and safety code imposed by state law adequately protects patients in hospitals.</p> <p>Note 3: For hospitals that use Joint Commission accreditation for deemed status purposes: In consideration of a recommendation by the state survey agency or accrediting organization or at the discretion of the Secretary for the US Department of Health & Human Services, CMS may waive, for periods deemed appropriate, specific provisions of the Life</p>	<p>(i) The hospital must meet the applicable provisions and must proceed in accordance with the Life Safety Code (NFPA 101 and Tentative Interim Amendments TIA 12-1, TIA 12-2, TIA 12-3, and TIA 12-4.) Outpatient surgical departments must meet the provisions applicable to Ambulatory Health Care Occupancies, regardless of the number of patients served.</p>	

EC.02.05.01 EP 16 – PE.04.01.01 EP 3

Non-Critical Ventilation Pressure Relationship

<p>PE.04.01.01, EP 3: The hospital has proper ventilation, lighting, and temperature control in all pharmaceutical, patient care, and food preparation areas.</p>	<p>§482.41(d)(4) - There must be proper ventilation, light, and temperature controls in pharmaceutical, food preparation, and other appropriate areas.</p>	<p>Observation:</p> <ul style="list-style-type: none"><input type="checkbox"/> Verify that food and medication preparation areas are well lit<input type="checkbox"/> Verify the hospital <u>is in compliance with ventilation requirements</u><input type="checkbox"/> Verify that food products are stored under appropriate conditions based on nationally accepted sources<input type="checkbox"/> Verify pharmaceuticals are stored in accordance with manufacturer’s recommendations <p>Document Review:</p> <ul style="list-style-type: none"><input type="checkbox"/> Review monitoring records for temperature to make certain that appropriate levels are maintained
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EC.02.05.09 EP 12

Cylinder Handling Policy

- **Unsecured or Improperly Secured Gas Cylinders:** Numerous observations report gas cylinders (oxygen, nitrogen, carbon dioxide, helium, etc.) found unsecured, freestanding, or not properly chained in various hospital locations such as storage rooms, patient care areas, kitchens, and loading docks. This includes instances where chains or securing devices were present but not used correctly or were too loose to prevent cylinders from falling.
- **Improper Labeling and Segregation of Cylinders:** Several observations highlight deficiencies in labeling and segregating full, partial, and empty cylinders. Examples include cylinders stored in racks labeled incorrectly, comingling of full and empty cylinders, and missing signage or unclear definitions of what constitutes a full or empty tank. These issues were noted in both policy documents and physical storage areas.
- **Non-Compliance with Storage Environment Requirements:** Some observations point to environmental non-compliance, such as cylinders stored outdoors without protection from weather or ground contact, and cylinders placed directly on floors or shelves without mats or grates to prevent rusting. These findings also include policy gaps regarding environmental protection and adherence to NFPA 99-2012 standards.

EC.02.05.09 EP 12 – PE.04.01.01 EP 1

Cylinder Handling Policy

- **Unsecured or Improperly Secured Gas Cylinders:**
- **Improper Labeling and Segregation of Cylinders:**
- **Non-Compliance with Storage Environment Requirements:**

PE.04.01.01, EP 1: The hospital meets the applicable provisions and proceeds in accordance with the Health Care Facilities Code (NFPA 99-2012 and Tentative Interim Amendments [TIA] 12-2, 12-3, 12-4, 12-5 and 12-6).
 Note 1: Chapters 7, 8, 12, and 13 of the Health Care Facilities Code do not apply.
 Note 2: If application of the Health Care Facilities Code would result in unreasonable hardship for the hospital, the Centers for Medicare & Medicaid Services may waive specific provisions of the Health Care Facilities Code, but only if the waiver does not adversely affect the health and safety of patients.
 Note 3: All inspecting activities are documented with the name of the activity; date of the activity; inventory of devices, equipment, or other items; required frequency; name and contact information of person who performed the activity; NFPA standard(s) referenced for the activity; and results of the activity.

§482.41(c) Standard: Building Safety
 Except as otherwise provided in this section, the hospital must meet the applicable provisions and must proceed in accordance with the Health Care Facilities Code (NFPA 99 and Tentative Interim Amendments TIA 12-2, TIA 12-3, TIA 12-4, TIA 12-5 and TIA 12-6). (1) Chapters 7, 8, 12, and 13 of the adopted Health Care Facilities Code do not apply to a hospital.
 (2) If application of the Health Care Facilities Code required under paragraph (c) of this section would result in unreasonable hardship for the hospital, CMS may waive specific provisions of the Health Care Facilities Code, but only if the waiver does not adversely affect the health and safety of patients.

- Document Review:**
- Review plans, policies and procedures, and documentation to determine compliance with Health Care Facilities Code requirements.
- Observation:**
- Use the K-tag/CoP/EP Review tool to evaluate compliance with the Health Care Facilities Code.

Top 10 Medical Equipment Non-Compliances Scored in 2025 with the 2026 Standard Conversion

Number 10

EC 02.04.03 EP 18 — The Quality of Diagnostic Images

- Missing QC Checks of Imaging Equipment

New Standard: Removed

Number 9

EC 02.04.01 EP 4 — Equipment Maintenance Testing Schedule

- No listed preventive maintenance testing schedule for medical equipment (patient scales and lifts)

New Standard: PE 04.01.01 EP 2

Number 8

EC 02.04.01 EP 10 — Quality Control of CT/PET/NM

- Missing daily, weekly, monthly QC checks

New Standard: Removed

Number 7

EC 02.04.03 EP 1 — Medical Equipment initial testing (incoming inspection) and post repair inspections

- Equipment found during survey in use without documented incoming inspection (Biofeedback unit, CPAP machine)

New Standard: PE 04.01.01 EP 2

Number 6

EC 02.04.01 EP 2 — Medical Equipment Inventories

- All Equipment was not listed in the inventory if the organization is deemed. (sphygmomanometers, patient scales, etc.)

New Standard: PE 04.01.01 EP 2

Number 5

EC 02.04.03 EP 4 — Maintenance of Sterilizers

- Vendors not meeting the testing intervals.
- Improper user maintenance (drain screen cleaning)

New Standard: PE 04.01.01 EP 2

Number 4

EC 02.04.03 EP 2 — High-risk Medical Equipment Maintenance

- Reported PM Completion Rates less than 100%
- Improper user maintenance
- PM Intervals “out of date” (expired stickers)

New Standard: PE 04.01.01 EP 2

Number 3

EC 02.05.01 EP 24 — Using Extension Cords instead of Fixed Wiring

- Mounting Power Strips on the wall
- RPTs that are part of an assembly, but other items were also connected (OR table)

New Standard: PE 04.01.01 EP 1

Number 2

EC 02.04.03 EP 3 — Maintenance of Low-Risk Medical Equipment

- PM Intervals “out of date” (expired stickers)
- Improper user maintenance (hydrocollators)

New Standard: PE 04.01.01 EP 2

Number 1

EC 02.05.01 EP 23 — RPT Usage

- RPTs that are not part of an assembly
- RPTs that are part of an assembly but are not permanently mounted
- Improper items plugged into RPTs (heating devices)

New Standard: PE 04.01.01 EP 1

Deleted EC and LS Requirements

Discontinued Requirements

- **EC.01.01.01 EP 4**

- The hospital has a written plan for managing the following: The environmental safety of patients and everyone else who enters the hospital's facilities

- **EC.01.01.01 EP 5**

- The hospital has a written plan for managing the following: The security of everyone who enters the hospital's facilities

- **EC.01.01.01 EP 6**

- The hospital has a written plan for managing the following: Hazardous materials and waste

- **EC.01.01.01 EP 7**

- The hospital has a written plan for managing the following: Fire safety

- **EC.01.01.01 EP 8**

- The hospital has a written plan for managing the following: Medical equipment

- **EC.01.01.01 EP 9**

- The hospital has a written plan for managing the following: Utility systems

Discontinued Requirements

- **EC.02.03.03. EP 5**

- The hospital critiques fire drills to evaluate fire safety equipment, fire safety building

- **EC.04.01.01 EP 15**

- Every 12 months, the hospital evaluates each environment of care (EOC) management plans, including goals, objectives, scope, and performance

- **LS.01.01.01 EP 1**

- The hospital assigns an individual(s) to assess compliance with Life Safety Code when addressing survey-related deficiencies

- **LS.01.01.01 EP 2**

- In time frames defined by the hospital, the hospital performs a building assessment for compliance with Life Safety chapter

- **LS.01.01.01 EP 4**

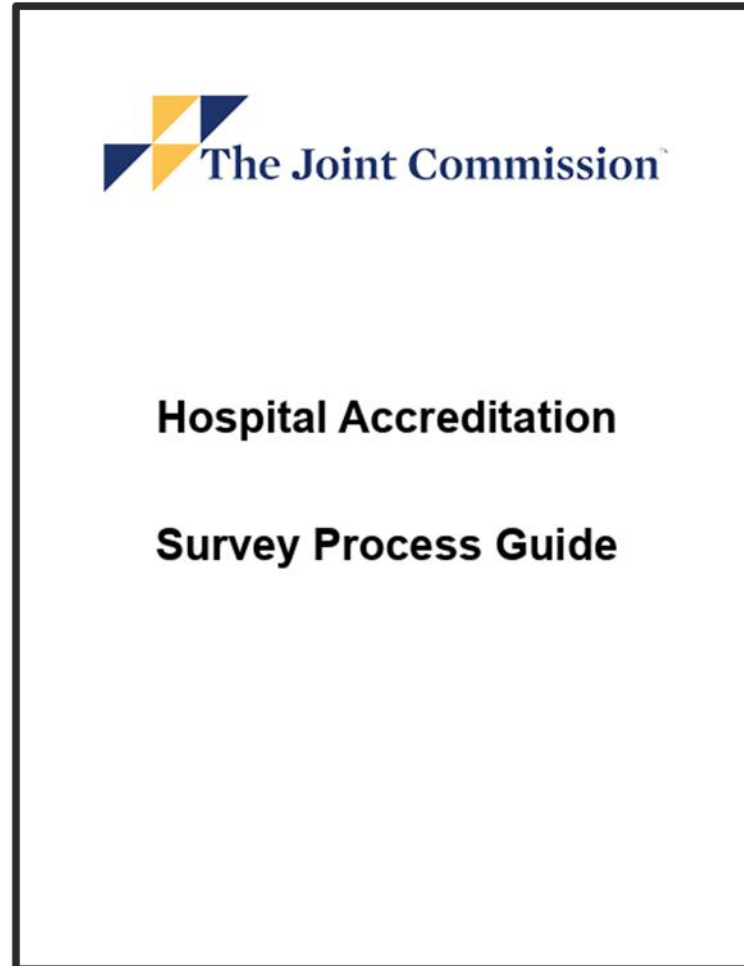
- When the hospital plans to resolve a deficiency through a Survey-Related Plan for Improvement (SPFI), the hospital meets the 60-day time frame

Resources

Survey Process Guide

<https://www.jointcommission.org/en-us/standards/prepublication-standards/critical-access-hospital-and-hospital-requirements-streamlined-to-reduce-burden>

- One Stop Source for new A360
- Survey Tools, checklists, tracers





Questions?