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Life Safety Code Survey Deficiencies and Compliance Strategies

Apryl McElheny, MBA, MSN, RN, CASC, CIC

Dale Lyman, CFPS

Learning Objectives

- Identify common Life Safety Code (LSC) deficiencies and their impact on compliance.
- Apply risk assessment methods to mitigate potential hazards.
- Evaluate the role of inspection, testing, and maintenance (ITM) in sustaining safety and compliance.
- Develop proactive strategies to reduce risk and enhance regulatory readiness.

"Why do ASCs have the follow the Life Safety Code (LSC)?"

Medicare Requirement

All CMS-certified ASCs must comply with NFPA 101 (2012) and NFPA 99 (2012) under CMS Conditions for Coverage (42 CFR §416.44(b) Appendix L).

CMS formally adopted the 2012 editions in 2016; surveyors cite directly from these codes.

State Variations

Some states have adopted newer editions of the LSC; ASCs must meet both CMS and state rules, whichever is stricter.

FGI Guidelines

Many states also enforce the FGI Guidelines for Design & Construction. FGI cites NFPA 101 for fire safety and integrates it into facility design and licensure requirements.

Did you know?

The NFPA Life Safety Code (NFPA 101) is the only **building code written with the sole purpose of protecting human life** rather than property.

While most codes focus on saving structures, **the LSC is all about getting patients, staff, and visitors out safely during a fire or emergency.** That's why it's so detailed about exits, fire doors, alarms, sprinklers, and even the lighting in hallways.

Common LSC Deficiencies

"From your expert perspective, what would you identify as the TOP 10 areas of LSC deficiency most commonly seen in ASCs?"

Top 10 LSC Deficiency Areas

1	Egress / Exits
2	Emergency Lighting / Exit Signs
3	Fire Protection Systems
4	Electrical Safety / Power Systems
5	Fire Barriers / Smoke Compartmentation
6	Storage / Sprinkler Clearance
7	Life Safety Documentation / Testing
8	Compressed Gas / Mechanical Rooms
9	Fire Doors / Smoke Doors
10	Fire Drills / Staff Training

"That's quite a list! Can you help us break it down?"

Egress / Exits

Corridors kept clear, minimum width maintained	*NFPA 101: 7.1.10.1, 7.1.10.2*
Exit doors swing direction, signage, accessibility	*7.2.1.4, 7.10.1.2*
Posted exit route maps (when required)	*7.10.8.1*

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Top 10 LSC Deficiency Areas

Emergency Lighting / Exit Signs

Emergency lighting test for 90 minutes Monthly 30-sec test of task lighting	*7.9.2.1, 7.9.2.3* *6.3.2.2.11*
Exit signs illuminated & reliable	*7.10.5.1, 7.10.6.3*
Illumination levels (1 foot-candle at floor)	*7.8.1.3, 7.9.2.1*

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Top 10 LSC Deficiency Areas

Fire Protection Systems

Maintain fire protection features	*NFPA 101 (2012), 4.6.12.1*
Sprinkler inspection/testing/maintenance	*NFPA 25; NFPA 101: 9.7.5*
Spare sprinkler head storage ≤100°F	*NFPA 25 (2011), 5.4.1.5.5*
Fire alarm systems functional and tested Approved fire watch policy	*9.6.1.3, 9.6.1.6* *9.6.1.6*
Pull stations accessible, unobstructed	*9.6.1.5*
Fire Department Connection (FDC) Quarterly Inspections: requires inspection/testing of water-based fire protection systems to ensure it is visible, accessible, and in good condition.	*9.7.5*
Waterflow alarm devices Must be tested semiannually (every 6 months) to ensure they activate within 90 seconds of flow.	*9.7.5*

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Top 10 LSC Deficiency Areas

Electrical Safety / Power Systems

No extension cords or daisy-chaining	*NFPA 70 (NEC) 400.8; NFPA 101: 9.1.2*
Generator testing and records Weekly visual inspections Weekly generator log voltage reading Monthly Load Tests: requires monthly testing under load for at least 30 minutes, with documentation Annual fuel quality testing	*NFPA 110, Ch. 8; NFPA 101: 9.1.3* *8.4.1* *NFPA 110 (2010), 8.3.7* *8.4.2* *8.3.8*
Electrical panel clearance	*NFPA 25 (2011), 5.4.1.5.5*
Electrical panel labeling	*9.6.1.3, 9.6.1.6* *9.6.1.6*

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Top 10 LSC Deficiency Areas

Fire Barriers / Smoke Compartmentation

Fire barriers maintained (no unsealed penetrations)	*8.3.5.1, 8.5.6.5*
Smoke partitions intact, continuous	*8.5.2, 8.5.6*
Doors in smoke barriers self-closing/latching	*8.5.4.2, 8.5.4.3*

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Top 10 LSC Deficiency Areas

Storage / Sprinkler Clearance

Clearance below sprinklers (≥18 inches)	*NFPA 13: 8.5.6.1*
No storage in mechanical/electrical rooms	*NFPA 101: 7.1.10.1 (egress/utility)*
Flammable storage per NFPA 30; alcohol-based hand rubs	*NFPA 101: 18/19.3.2.6*

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Top 10 LSC Deficiency Areas

Life Safety Documentation / Testing

Fire drills conducted & documented per shift	*NFPA 101: 21.7.1, 21.7.2*
Fire extinguisher monthly checks	*NFPA 10: 7.2.1.2*
Sprinkler, alarm, generator test records	*NFPA 25, NFPA 72, NFPA 110*
Annual line isolation monitor test	*NFPA 99 (2012), 6.3.2.6.3.4*
ILSM risk assessment required	*NFPA 101 (2012), 4.6.10.1*

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Top 10 LSC Deficiency Areas

Compressed Gas / Mechanical Rooms

Cylinders secured upright	*NFPA 99: 11.6.2.3*
Oxygen storage room signage ("No Smoking/Oxygen in Use")	*NFPA 99: 11.3.4.1*
No storage in mechanical/electrical rooms	*NFPA 101: 7.1.10.1*
Medical gas system inspection/testing	*NFPA 99 (2012), 5.1.14.2.2.2(b)*

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Top 10 LSC Deficiency Areas

Fire Doors / Smoke Doors

Fire doors must self-close, latch, not propped	*NFPA 80: 5.2.13; NFPA 101: 8.3.3.3*
Labels intact, not painted over	*NFPA 80: 4.2.2*
Door undercut/gap ≤¾ inch	*NFPA 80: 6.3.1.7*

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Top 10 LSC Deficiency Areas

Fire Drills / Staff Training

Fire drills per shift/quarter	*NFPA 101: 21.7.1, 21.7.2*
Staff training & participation required	*NFPA 101: 4.7.1, 4.7.2*
Documentation of drills retained	*NFPA 101: 4.7.5*

"Before moving on, let's clear this up: what do surveyors expect to see in fire drill documentation?"

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Top 10 LSC Deficiency Areas

Quarterly Fire Drill Documentation

Date and Time of the Drill	
Shift/occupancy during which the drill occurred	*must vary each quarter*
Notification method, how staff were alerted	*alarm, overhead, coded announcement*
Alarm actuation	*documentation that the fire alarm signal was transmitted*
Staff participation	*who was involved, roles performed, and staff response observed*
Simulation of emergency conditions	*fire location, blocked exit, patient in OR*
Evacuation routes used	*which exits or corridors were tested/discussed*
Use of fire response plan, RACE	*how staff applied the procedure*
Issues identified	*delays, confusion, equipment not working, blocked exits*
Corrective actions taken or planned	
Evaluator signature/title	*who conducted and reviewed the drill*

Risk Assessments

"ASCs perform a lot of risk assessments, but the LSC outlines particular ones we must do. Can you walk us through those?"

Facility Building & Category Risk Assessment

1 Identify Systems

Building, electrical, gas/vacuum, plumbing, HVAC, IT/communications, equipment.

2 Assess Risk

Determine impact if each fails (major injury/death, minor injury, discomfort, no impact).

3 Assign Category (1–4)

1	Failure could cause major injury/death *General anesthesia, deep sedation*	Requires Type 1 EES *3 branches, dual power*
2	Failure could cause minor injury *Moderate sedation, local only*	May use Type 2 EES *1 branch, dual power*
3 / 4	No EES required	

4 Documentation

- Record system, category, and rationale, keep in LS/Environment of Care files.
- Documented risk assessment, policies reflecting assigned categories.

5 Timing

Governing Body approves

- Annually
- when systems/services change.

Wet Procedure Risk Assessment

1 Identify Wet Locations / NPFA 99: 6.3.2.2.8

ALL procedure rooms are considered wet locations unless a risk assessment proves otherwise.

2 Purpose

Determines if isolated power or GFCI protection is required.

3 Assessment Factors

Type of procedures
Equipment used
Likelihood of fluid exposure
Patient vulnerability

4 Documentation

Keep the assessment on file for surveyors as part of the LS/Environment of Care program

5 Timing

- Conducted initially (new facility, renovation).
- Repeat only if the facility's scope of service or equipment changes.
- Must be reviewed and approved by the Governing Body.

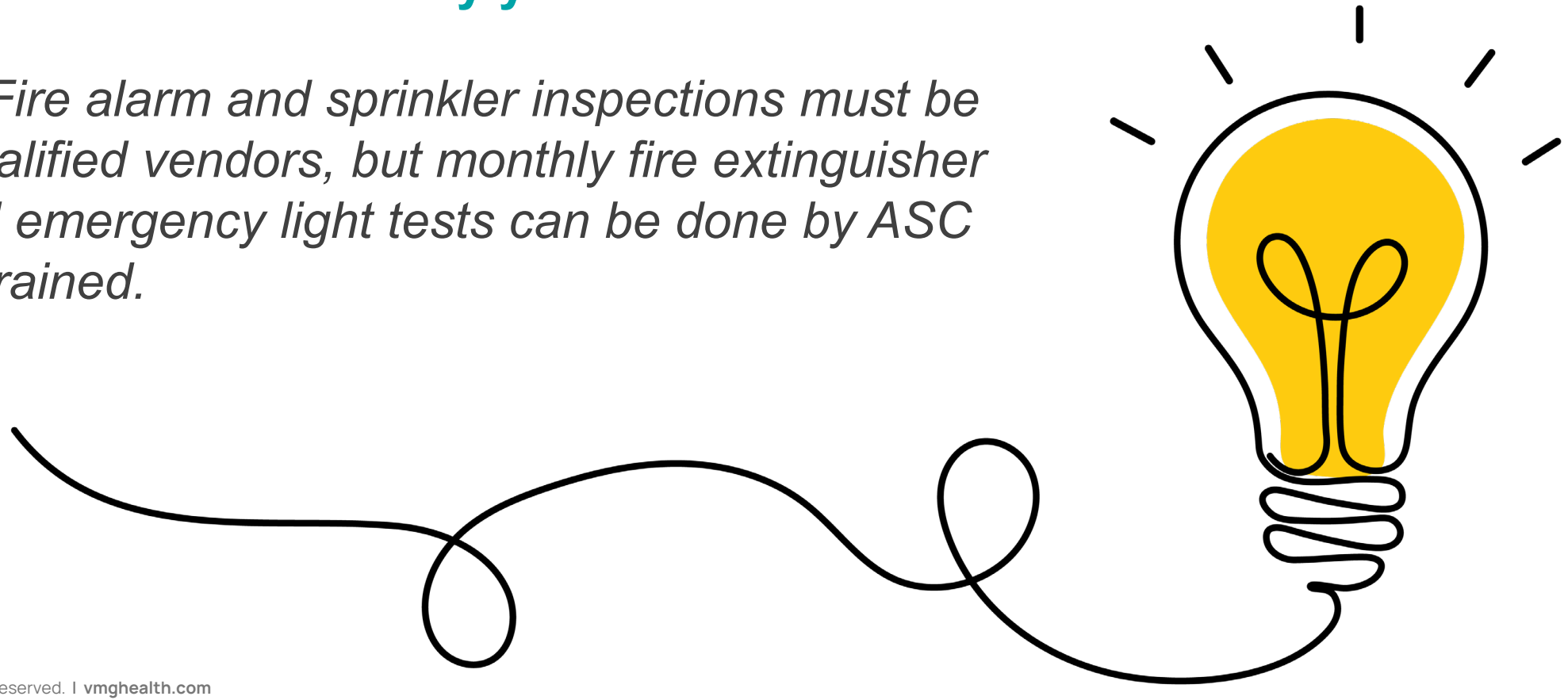
Inspection, Testing, & Maintenance (ITM)

"Once we've assigned each system a risk category, how do we decide what inspection, testing, and maintenance schedule applies, the Life Safety Code, or the manufacturer's instructions?"

Did you know?

The Life Safety Code requires **certain inspections and tests to be performed by certified professionals**, while **others can be handled by your own trained staff.**

Example: *Fire alarm and sprinkler inspections must be done by qualified vendors, but monthly fire extinguisher checks and emergency light tests can be done by ASC staff once trained.*



Core Components of ITM

Fire Protection Systems

Fire & Smoke Barriers / Doors

Means of Egress / Emergency Lighting

Electrical Systems

Medical Gas & Vacuum Systems

Environmental Controls

Life Safety Documentation

Sprinklers	Inspection: **Quarterly & annual** Obstruction Tests: **5-year**	*NFPA 25*
Fire Alarms	Testing: **Semiannual and annual**	*NFPA 72*
Fire Extinguishers	Vision checks: **Monthly** Maintenance: **Annual**	*NFPA 10*

Core Components of ITM

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Means of Egress / Emergency Lighting

Electrical Systems

Medical Gas & Vacuum Systems

Environmental Controls

Life Safety Documentation

Fire Doors	Inspection and functional testing: **Annual** *Doors must latch, self-close, and labels remain visible*	*NFPA 80*
Smoke Barriers	Integrity checked **during facility rounds**	*NFPA 101 Ch. 8*

Core Components of ITM

Fire Protection Systems

Fire & Smoke Barriers / Doors

Means of Egress / Emergency Lighting

Electrical Systems

Medical Gas & Vacuum Systems

Environmental Controls

Life Safety Documentation

Exit Signs & Emergency Lights	30-second functional tests: **Monthly** 90-minute test with documentation: **Annual**	NFPA 101: 7.9.3
Egress Paths	Inspection to ensure corridors, exits, and stairways remain clear: **Routine**	

Core Components of ITM

Fire Protection Systems

Fire & Smoke Barriers / Doors

Means of Egress / Emergency Lighting

Electrical Systems

Medical Gas & Vacuum Systems

Environmental Controls

Life Safety Documentation

Essential Electrical System (EES):	Generator runs (30 min at ≥ 30% load): **Monthly** 4-hour test: **Annual** Visual checks: **Weekly**	NFPA 110
Wet Room Assessment	GFCI or isolated power panels tested: **Regularly**	NFPA 99, Ch. 6

Core Components of ITM

Fire Protection Systems

Fire & Smoke Barriers / Doors

Means of Egress / Emergency Lighting

Electrical Systems

Medical Gas & Vacuum Systems

Environmental Controls

Life Safety Documentation

Cylinders	Secure storage, signage, and **weekly** checks.	
Systems (if piped)	Inspection and maintenance: **Annual**	NFPA 99

Core Components of ITM

Fire Protection Systems

Fire & Smoke Barriers / Doors

Means of Egress / Emergency Lighting

Electrical Systems

Medical Gas & Vacuum Systems

Environmental Controls

Life Safety Documentation

OR Humidity/ Temperature/ Air Pressure	Monitored **Daily** Risk assessment if outside 20–60%
ABHR Placement	Reviewed for compliance with fire safety **Annually**

Core Components of ITM

Fire Protection Systems

Fire & Smoke Barriers / Doors

Means of Egress / Emergency Lighting

Electrical Systems

Medical Gas & Vacuum Systems

Environmental Controls

Life Safety Documentation

Logs must include date, task, result, signature/initials of the inspector/tester
Retain for minimum 3 years *longer if required by state or accreditor*
Missing logs = “not done” in surveyor eyes ***a top-cited deficiency***

ITM-Related Deficiencies

- Missing monthly/annual logs for emergency lighting and exit sign tests.
- Fire doors not inspected annually or propped open.
- Sprinkler heads obstructed or no 5-year internal inspection documentation.
- Generator load tests not performed to NFPA 110 standard.
- No documented fire drills on all shifts.
- Medical gas cylinders not secured or stored with empties/full mixed.
- Missing humidity/temperature monitoring logs for ORs and sterile supply areas.

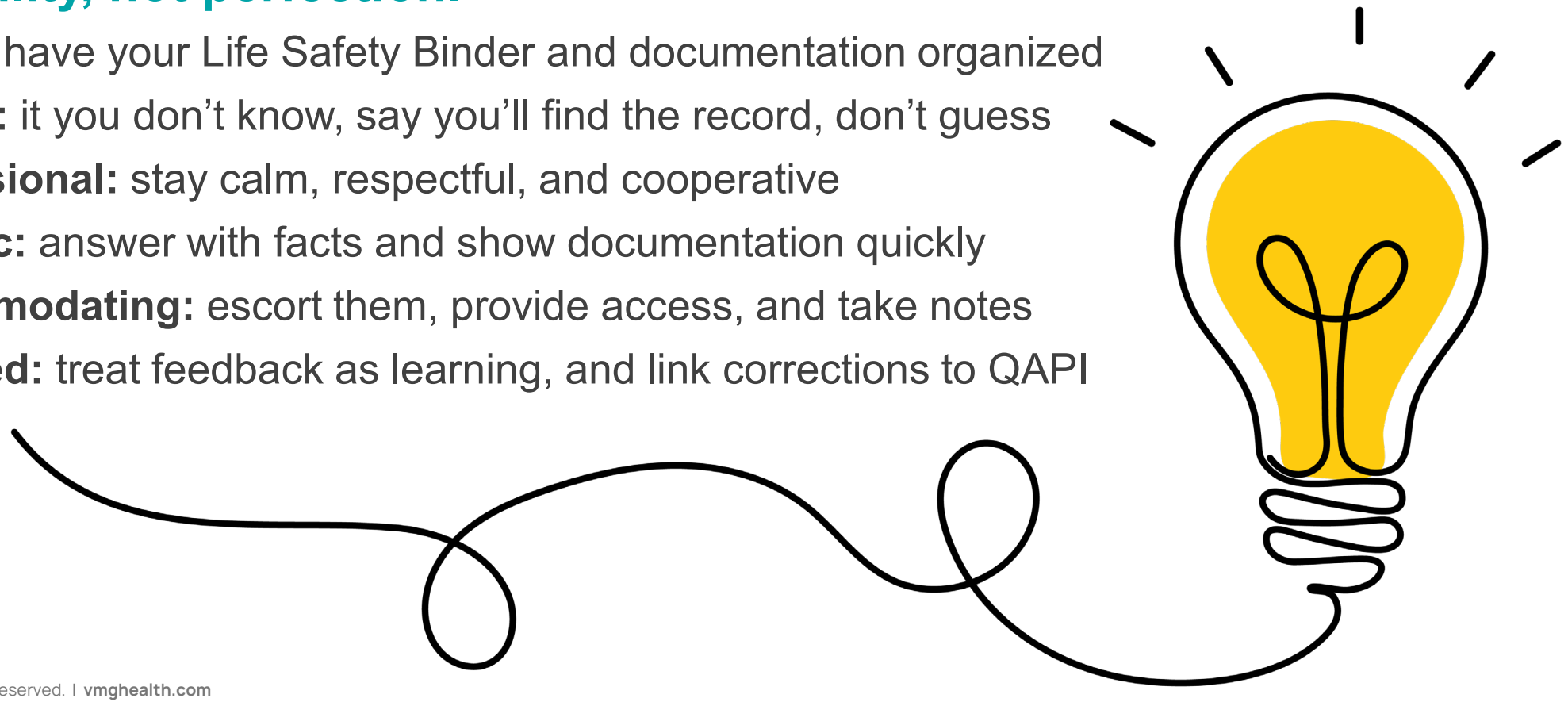
Proactive Strategies

"Wearing your surveyor hat, what do you expect to see from a facility that's truly proactive with LSC compliance?"

Did you know?

LSC surveys are easier when you're organized and collaborative. **Surveyors expect a culture of safety and accountability, not perfection.**

- **Be Ready:** have your Life Safety Binder and documentation organized
- **Be Honest:** it you don't know, say you'll find the record, don't guess
- **Be Professional:** stay calm, respectful, and cooperative
- **Be Specific:** answer with facts and show documentation quickly
- **Be Accommodating:** escort them, provide access, and take notes
- **Be Engaged:** treat feedback as learning, and link corrections to QAPI



Risk Reduction

Egress / Exits

Emergency Lighting / Exit Signs

Fire Protection Systems

Electrical Safety / Power Systems

Fire Barriers / Smoke Compartmentation

Storage / Sprinkle Clearance

Life Safety Documentation / Testing

Compressed Gas / Mechanical Rooms

Fire Doors / Smoke Doors

Fire Drills / Staff Training

- Remove all items stored in hallways and in front of exits; repair/replace doors that don’t latch or swing properly.
- Post signage for “No Storage in Corridors,” conduct monthly walkthroughs to confirm clear exit paths.

Risk Reduction

Egress / Exits

Emergency Lighting / Exit Signs

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Fire Doors / Smoke Doors

Fire Drills / Staff Training

- Replace burned-out bulbs and repair non-functioning battery packs immediately.
- Test exit signs and emergency lights monthly (30 sec) and annually (90 min), documenting results.

Risk Reduction

Egress / Exits

Emergency Lighting / Exit Signs

Fire Protection Systems

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Fire Doors / Smoke Doors

Fire Drills / Staff Training

- Correct sprinkler obstructions, ensure detectors and pull stations are accessible, repair damaged heads.
- Maintain service contracts for quarterly sprinkler inspections and annual alarm testing. Keep all records.

Risk Reduction

Egress / Exits

Emergency Lighting / Exit Signs

Fire Protection Systems

Electrical Safety / Power Systems

Fire Barriers / Smoke Compartmentation

Storage / Sprinkler Clearance

Life Safety Documentation / Testing

Compressed Gas / Mechanical Rooms

Fire Doors / Smoke Doors

Fire Drills / Staff Training

- Eliminate extension cords, cover open junction boxes, ensure generator load tests meet NFPA 110.
- Train staff on safe power use, include electrical checks in monthly safety rounds.

Risk Reduction

Egress / Exits

Emergency Lighting / Exit Signs

Fire Protection Systems

Electrical Safety / Power Systems

Fire Barriers / Smoke Compartmentation

Storage / Sprinkler Clearance

Life Safety Documentation / Testing

Compressed Gas / Mechanical Rooms

Fire Doors / Smoke Doors

Fire Drills / Staff Training

- Seal penetrations with approved fire-stopping material, repair or replace damaged smoke doors.
- Inspect above-ceiling spaces quarterly, include door checks in monthly facility rounds.

Risk Reduction

Egress / Exits

Emergency Lighting / Exit Signs

Fire Protection Systems

Electrical Safety / Power Systems

Fire Barriers / Smoke Compartmentation

Storage / Sprinkler Clearance

Life Safety Documentation / Testing

Compressed Gas / Mechanical Rooms

Fire Doors / Smoke Doors

Fire Drills / Staff Training

- Relocate items stored within 18 inches of sprinkler heads; remove supplies from mechanical/electrical rooms.
- Post signage (“No Storage”), assign a staff member to audit storage areas monthly.

Risk Reduction

Egress / Exits

Emergency Lighting / Exit Signs

Fire Protection Systems

Electrical Safety / Power Systems

Fire Barriers / Smoke Compartmentation

Storage / Sprinkler Clearance

Life Safety Documentation / Testing

Compressed Gas / Mechanical Rooms

Fire Doors / Smoke Doors

Fire Drills / Staff Training

- Catch up on missing fire drills, extinguisher inspections, or generator/sprinkler tests. Keep all logs updated.
- Create a compliance calendar with reminders and assign responsibility to specific staff.

Risk Reduction

Egress / Exits

Emergency Lighting / Exit Signs

Fire Protection Systems

Electrical Safety / Power Systems

Fire Barriers / Smoke Compartmentation

Storage / Sprinkler Clearance

Life Safety Documentation / Testing

Compressed Gas / Mechanical Rooms

Fire Doors / Smoke Doors

Fire Drills / Staff Training

- Secure all cylinders upright, add required signage, remove clutter from mechanical rooms.
- Train staff annually on NFPA 99 storage rules, designate a gas cylinder “safety officer” for weekly checks.

Risk Reduction

Egress / Exits

Emergency Lighting / Exit Signs

Fire Protection Systems

Electrical Safety / Power Systems

Fire Barriers / Smoke Compartmentation

Storage / Sprinkler Clearance

Life Safety Documentation / Testing

Compressed Gas / Mechanical Rooms

Fire Doors / Smoke Doors

Fire Drills / Staff Training

- Remove door wedges, repair closing/latching hardware, uncover painted-over labels.
- Add “Do Not Prop” signage, test all fire doors quarterly, train staff to report door issues immediately.

Risk Reduction

Egress / Exits

Emergency Lighting / Exit Signs

Fire Protection Systems

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Compressed Gas / Mechanical Rooms

Fire Doors / Smoke Doors

Fire Drills / Staff Training

- Conduct make-up drills on any missed shifts, retrain staff unfamiliar with evacuation roles.
- Schedule quarterly drills in advance, vary scenarios, keep complete drill documentation.

“We’ve covered a lot today… What are your key takeaways?”

Key Learnings and Takeaways

Document Everything	If it’s not logged, it’s not done
Inspect Daily	Build safety checks into routine operations
Test On Schedule	Follow LSC frequencies for fire, electrical, and gas systems
Maintain Proactively	Fix issues before surveyors find them
Engage Staff	Everyone plays a role in spotting and reporting risks
Review Annually	Risk assessments, ITM results, and QAPI must be updated and approved by the Governing Body

Life Safety compliance is an ongoing, constant process!

eSupport > Compliance Calendar

ASC Compliance Calendar: Life Safety Code

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SEARCH

ASC COMPLIANCE CALENDAR

These compliance calendars were created as an at-a-glance assistance tool for complying with regulatory requirements daily, weekly, monthly, quarterly, annually, etc. There is one specific to clients who have PSS's policy and procedure program, which lists where you can find the policies and forms specific to the requirement.

CLICK LINKS BELOW TO DOWNLOAD

ASC FACILITY COMPLIANCE CALENDAR

- ASC Compliance Calendar (Clinical & Life Safety Code) (PDF)
- ASC Compliance Calendar - Clinical & Life Safety Code (Excel)
- ASC Clinical Compliance Calendar - Clinical & Life Safety Code - with V
  Policy References (PDF)
- ASC Clinical Compliance Calendar - Clinical & Life Safety Code - with
  Policy References (Excel)
- ASC Compliance Calendar TRACKING TOOL (Excel)

OBSC-QUAD A FACILITY COMPLIANCE CALENDAR

Updated June 2025: to reflect updated QUAD A standards regarding staff training and drill requirements.

- OBSC-QUAD A Compliance Calendar (PDF)

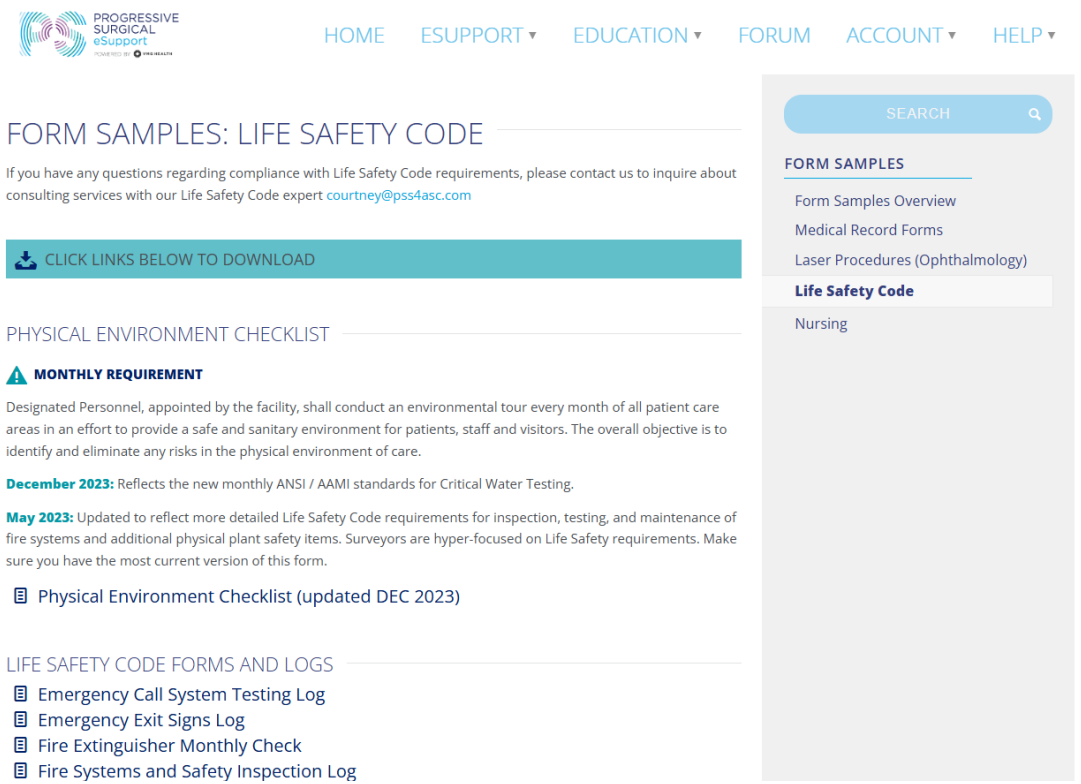
eSupport > Form Samples > Life Safety Code

Physical Environment Checklist

Life Safety Code Forms and Logs

Testing Requirement References

Systems ITM Checklist



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CONTACT US:

(800)-832-0609

Dale.Lyman@vmghealth.com

Apryl.McElheny@vmghealth.com

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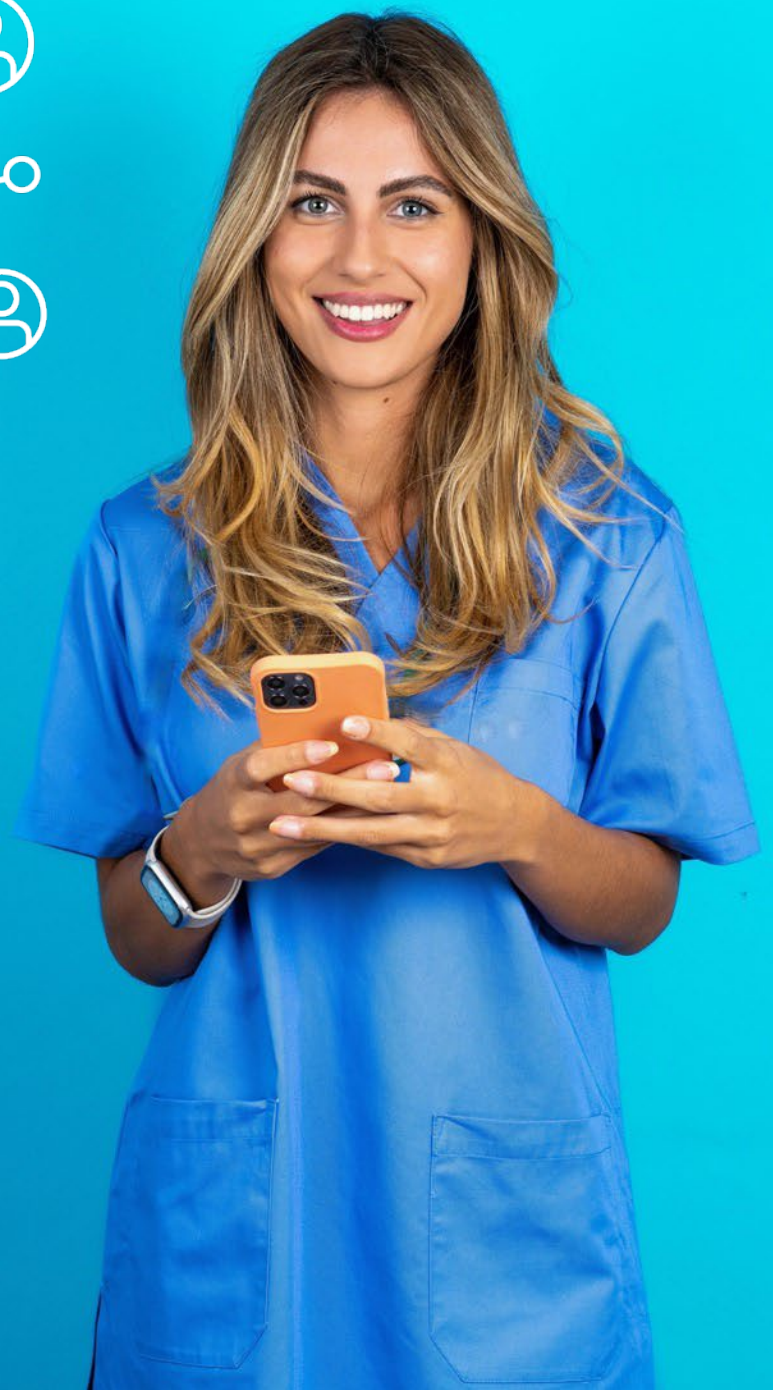

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FEB 27	60	RN, CASC	**Blueprint for ASC Staff Education**	**Apryl McElheny** MBA, MSN, RN, CASC, CIC *VMG Health*
MAR 30	20		**Staff Utilization: How to take Data and Improve Benchmarks**	**Vanessa Sindell** MSN, BSN, RN, CAIP *VMG Health*