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Life Safety Healthcare Consultants, LLC

OPERATING & PROCEDURE ROOMS
WET OR DRY LOCATION
A GUIDE TO RISK ASSESSMENTS

Adopted by the Centers for Medicare and Medicaid Services (CMS) in 2016, the 2012 edition of the Health Care Facilities Code more commonly known as NFPA 99 now views all operating and procedure rooms to be classified as “wet procedure locations." Section 3.3.184 of NFPA 99 defines wet procedure locations as "The area in a patient care room where a procedure is performed that is normally subject to wet conditions while patients are present, including standing fluids on the floor or drenching of the work area, either of which condition is intimate to the patient or staff excluding routine housekeeping procedures and incidental spillage of liquids."

Section 6.3.2.2.8.4 states "that Operating Rooms shall be considered to be a wet procedure location, unless a risk assessment conducted by the health care governing body determines otherwise." In addition, NFPA 99: 6.3.2.2.8.7, requires that operating rooms classified as wet procedure locations "be protected by either isolated power or ground fault circuit interrupters.

For many surgery centers who do not provide or perform these types of surgical services or limit the procedures and operating factors in these rooms to reduce the likelihood of liquids being released, the costs to upgrade current electrical systems that do not contain isolated power or ground fault circuit interrupters (GFCI) would be enormous and possibly cause an interruption of services potentially resulting in a loss of income for the facility. Considering such, this may not warrant the room to be classified as a wet procedure location. At a minimum, the risk assessment performed by the health care governing body should include consultation with all relevant parties of the clinical, facility and biomedical staff. Should the risk assessment indicate the risk level of electric shock is high, the operating or procedure room should be classified as a wet procedure location. If the risk assessment concludes otherwise, the room(s) may not be deemed as a wet procedure location, thus not requiring isolated power or GFCI components.

Bear in mind that the safety of the patients and staff are of extreme importance and an isolated power systems provides the highest degree of protection (the highest standard of care) from electrical shock hazards to staff and patient within invasive procedure rooms. Isolated power systems are prudent in the spaces listed above for this reason alone, but an unbiased risk assessment task force should consider these risks and their liability in its discussions regarding wet procedure locations and the use of isolated power systems.