

Managing the Interim Life Safety Measures (ILSM) Process

1

A Program for

The Texas Association of Healthcare Facility Management

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2

Element of Performance LS.02.01.01 EP 3 Requires:

“The hospital has a written Interim Life Safety Measure policy that covers situations when Life Safety Code deficiencies cannot be immediately corrected or during periods of construction. The policy includes criteria for evaluating when and to what extent the hospital follows special measures to compensate for increased life safety risk. (see also LS. 01.01.01 ep3)”

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3

- This EP causes a situational decision rule to be invoked:
 - It results in Automatic Conditional Accreditation
 - It can lead to Non-Accreditation
 - It is one of only two (2) of the 442 EP's that can cause this

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4

- “...when Life Safety Code deficiencies cannot be corrected immediately.”
 - According to the Standards Interpretation Group (SIG): “Immediately” means if not corrected on the shift it was discovered

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5

- *“When and to what extent the hospital follows special measures to compensate for increased Life Safety risk”*
 - This means the organization chooses
 - If they need to do any ILSM measures
 - If so, which measures?
 - How & how often they perform them

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6

- ILSM Measures LS.01.02.01
 - *EP1 – The hospital notifies the fire department (or other emergency response group) and initiates a fire watch when a fire alarm or sprinkler system is out of service more than 4 hours in a 24-hour period in an occupied building. Notification and fire watch times are documented. (For full text and any exceptions, refer to NFPA 101-2000: 9.6.1.8 & 9.7.6.1) (See also LS.01.01.01. EP 3)*

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7

- ILSM Measures LS.01.02.01 (cont.)
 - *EP2 – The hospital posts signage identifying the location of alternative exists to everyone affected. (See also LS.01.01.01, EP 3)*

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8

- ILSM Measures LS.01.02.01 (cont.)
 - *EP3 – The hospital has a written interim life safety measure (ILSM) policy that covers situations when Life Safety Code deficiencies cannot be immediately corrected or during periods of construction. The policy includes criteria for evaluating when and to what extent the hospital follows special measures to compensate for increased life safety risk. (See also LS.01.01.01, EP 3)*

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- ILSM Measures LS.01.02.01 (cont.)

When the hospital identifies Life Safety Code deficiencies that cannot be immediately corrected or during periods of construction, the hospital does the following:

- *EP4 – Inspects exits in affected areas on a daily basis. The need for these inspections is based on criteria in the hospital’s interim life safety measure (ILSM) policy. (See also LS.01.01.01, EP 3)*

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10

- ILSM Measures LS.01.02.01 (cont.)
 - *EP5 – Provides temporary but equivalent fire alarm and detection systems for use when a fire system is impaired. The need for equivalent systems is based on criteria in the hospital's interim life safety measure (ILSM) policy. (See also LS.01.01.01, EP 3)*

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11

- ILSM Measures LS.01.02.01 (cont.)
 - *EP6 – Provides additional firefighting equipment. The need for this equipment is based on criteria in the hospital's interim life safety measure (ILSM) policy. (See also LS.01.01.01, EP 3)*

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12

- ILSM Measures LS.01.02.01 (cont.)
 - *EP7 – Use temporary construction partitions that are smoke-tight, or made of noncombustible or limited-combustible material that will not contribute to the development or spread of fire. The need for these partitions is based on criteria in the hospital’s interim life safety measure (ILSM) policy. (See also LS.01.01.01, EP 3)*

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13

- ILSM Measures LS.01.02.01 (cont.)
 - *EP8 – Increases surveillance of buildings, grounds, and equipment, giving special attention to construction areas and storage, excavation, and field offices. The need for increased surveillance is based on criteria in the hospital's interim life safety measure (ILSM) policy. (See also LS.01.01.01, EP 3)*

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14

- ILSM Measures LS.01.02.01 (cont.)
 - *EP9 – Enforces storage, housekeeping, and debris-removal practices that reduce the building’s flammable and combustible fire load to the lowest feasible level. The need for these practices is based on criteria in the in the hospital’s interim life safety measure (ILSM) policy. (See also LS.01.01.01, EP 3)*

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15

- ILSM Measures LS.01.02.01 (cont.)
 - *EP10 – Provides additional training to those who work in the hospital on the use of firefighting equipment. The need for additional training is based on criteria in the in the hospital's interim life safety measure (ILSM) policy. (See also LS.01.01.01, EP 3)*

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16

- ILSM Measures LS.01.02.01 (cont.)
 - *EP11 – Conducts one additional fire drill per shift per quarter. The need for additional drills is based on criteria in the hospital's interim life safety measure (ILSM) policy. (See also LS.01.01.01, EP 3)*

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17

- ILSM Measures LS.01.02.01 (cont.)
 - *EP12 – Inspects and tests temporary systems monthly. The completion date of the tests is documented. The need for these inspections and test is based on criteria in the hospital’s interim life safety measure (ILSM) policy. (See also LS.01.01.01, EP 3)*

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18

- ILSM Measures LS.01.02.01 (cont.)
 - *EP13 – The hospital conducts education to promote awareness of building deficiencies, construction hazards, and temporary measures implemented to maintain fire safety. The need for education is based on criteria in the hospital’s interim life safety measure (ILSM) policy. (See also LS.01.01.01, EP 3)*

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19

- ILSM Measures LS.01.02.01 (cont.)
 - *EP14 – The hospital trains those who work in the hospital to compensate for impaired structural or compartmental fire safety features. The need for training is based on criteria in the hospital’s interim life safety measure (ILSM) policy. (See also LS.01.01.01, EP 3)*

Note: Compartmentalization is the concept of using various building components (for example, fire-rated walls and doors, smoke barriers, fire-rated floor slabs) to prevent the spread of fire and the products of combustion so as to provide a safe means of egress to an approved exit. The presence of these features varies, depending on the building occupancy classification.

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20

Sample ILSM Policy

POLICY

It is the policy of <<Facility Name>> to assure the safety of all building occupants during periods of construction or when deficiencies compromise the level of life safety protection provided by the building by implementing the appropriate Interim Life Safety Measures (ILSM).

PURPOSE

Interim Life Safety Measures (ILSM) are administrative actions taken to temporarily compensate for the hazards posed by construction activities or any time the fire protection features of the facility are compromised. ILSM's are intended to provide a level of fire safety comparable to that described in the 2000 edition of NFPA 101[®] Life Safety Code[®].

The Interim Life Safety Measures (ILSM) will be implemented when Life Safety Code[®] deficiencies cannot be immediately corrected or during periods of construction.

Life Safety Code deficiency, whether identified during a Statement of Conditions assessment, through environmental tours or any other source, will be evaluated to determine if any ILSM should be implemented.

The potential project, whether construction, renovation, and/or remodeling, will be assessed at least <<one week>> before the project begins. The ILSM <<Project Assessment Tool (Attachment I)>> is used.

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Sample ILSM Policy (cont.)

ASSESSMENT CRITERIA

Conditions which may lead to the implementation of Interim Life Safety Measures may include but are not necessarily limited to the following evaluation criteria:

- Emergency exits are obstructed.
- Fire detection or alarm systems are inoperable or impaired.
- Current fire-fighting equipment is insufficient.
- Temporary construction partitions are not smoke tight or made of non-combustible or limited combustible materials.
- Increased risks of fire is present in buildings, on grounds, and with equipment, giving special attention to construction and storage areas, excavation activities, and field offices requiring increased surveillance.
- Increase in the building's flammability and combustible fire load.
- Situation requires additional fire safety training for individuals on the use of fire-fighting equipment.
- Situation requires an additional fire drill for each shift in each quarter.
- Activities require inspection and testing of temporary systems monthly.
- Building deficiencies, construction hazards, and temporary measures implemented require additional education to promote awareness of fire and life safety activities.
- Impaired structural or compartmental fire features require additional training of hospital staff.

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Sample ILSM Policy (cont.)

PROCEDURES

1. If any one of the above conditions applies, the appropriate measure(s) selected from those listed below will be implemented.
 - a. Inspects exits in affected areas on a daily basis.
 - b. Provides temporary but equivalent fire alarm and detection systems for use when a fire system is impaired.
 - c. Provides additional fire-fighting equipment.
 - d. Uses temporary construction partitions that are smoke-tight, or made of noncombustible material, or made of limited combustible material that will not contribute to the development or spread of fire.
 - e. Increases surveillance of buildings, grounds, and equipment, giving special attention to construction areas and storage, excavation, and field offices.
 - f. Enforces storage, housekeeping, and debris removal practices that reduce the building's flammable and combustible fire load to the lowest feasible level.
 - g. Provides additional training to those who work in the hospital on the use of fire-fighting equipment.
 - h. Conducts one additional fire drill per shift per quarter.
 - i. Inspects and tests temporary systems monthly. The completion date of the tests is documented.
 - j. Conducts education to promote awareness of building deficiencies, construction hazards, and temporary measures implemented to maintain fire safety.
 - k. The hospital trains those who work in the hospital to compensate for impaired structural or compartmental fire safety features.

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23

Sample ILSM Policy (cont.)

PROCEDURES (cont.)

2. When a project is under ILSM, the criteria identified will also have the responsibilities identified.
3. The ILSM will be established, implemented, documented, and monitored during construction by the Contractor and <<Director Facilities or Construction Manager>> for feedback to the Environment of Care® (EC) Committee.

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Sample ILSM Policy (cont.)

ILSM Assessment Tool Instructions

1. Evaluate the project or deficiency for impact on exiting, compartmentation, fire detection and response systems, ignition sources, storage, debris, and other potential concerns identified the criteria.
2. Determine if the impact is significant. In general, projects that are less than a week in length, which do not reduce the level of life safety below Life Safety Code® minimum requirements, are not significant. An activity which takes place in a room with an intact door and which does not penetrate walls, generally does not require an ILSM. Activity that affects doors or walls for less than one shift generally does not require an ILSM. Activities that block or compromise exit stairs, required exit corridors, or exit discharge areas for more than one shift generally require an ILSM.
3. If it is determined that an ILSM is warranted, monitor and document that the ILSM is in-place and functioning as required. If the ILSM is not functioning as required, adjust the ILSM or re-assess the situation.
4. Document and submit findings to the EC Committee or designated sub-committee.
5. Document enforcement of each required ILSM when appropriate.

<<Facility Name>>

Interim Life Safety Measures Assessment Tool

Project Name: _____ **Location:** _____

Project Date: _____

Preparer: _____ **Date:** _____

Risk #	Risk Elements	Yes	No	Suggest Controls
LS-1	Will existing exits be impaired?			
	a. alternative exits be necessary?			
	b. existing corridor width be reduced?			
	c. construction area escape routes be needed?			
LS-2	Will existing fire safety systems be impaired?			
	a. existing fire alarm system be impaired?			
	b. existing fire detection system be impaired?			
	c. existing sprinkler system be impaired?			
	d. temporary or equivalent systems be needed?			
LS-3	Will additional fire fighting equipment be needed?			
LS-4	Will temporary, smoke-tight construction partitions that are non-combustible or limited-combustible be needed?			
LS-5	Will increased hazard surveillance of patient buildings be needed?			
	a. hazard surveillance of buildings, grounds or equipment			
	b. special attention to excavations, construction storage or work areas.			
LS-6	Will reduction in the flammable or combustible fire load be needed?			
	a. temporary construction storage be needed			
	b. housekeeping or debris removal be needed?			
LS-7	Will additional fire response training be needed?			
LS-8	Will additional fire drills be needed?			
LS-10	Will it be needed to inspect and test temporary systems monthly and document inspection information			
LS-10	Will organizational training in LSC deficiencies, construction hazards be needed?			
LS-11	Will training to compensate for structural or compartmentation deficiencies be needed?			

<<Facility Name>>

Interim Life Safety Measure Inspection Form

Project Name:	Location:
Inspection Date:	
Conducted by:	Date:

Control #	Controls	Required		Status	Comment
		Yes	No		
LS-1	Inspect exits in affected areas on a daily basis to ensure clear exits. Identify new exits if necessary.				
LS-2	Provide temporary but equivalent fire alarm and detection systems for use when a fire system is impaired.				
LS-3	Provide additional fire-fighting equipment.				
LS-4	Use temporary construction partitions that are smoke-tight, or made of noncombustible material, or made of limited combustible material that will not contribute to the development or spread of fire.				
LS-5	Increase surveillance of buildings, grounds, and equipment, giving special attention to construction areas and storage, excavation, and field offices.				
LS-6	Enforce storage, housekeeping, and debris removal practices that reduce the building's flammable and combustible fire load to the lowest feasible level.				
LS-7	Provide additional training to those who work in the hospital on the use of fire-fighting equipment.				
LS-8	Conduct one additional fire drill per shift per quarter.				
LS-9	Inspect and tests temporary systems monthly. The completion date of the tests is documented.				
LS-10	Conduct education to promote awareness of building deficiencies, construction hazards, and temporary measures implemented to maintain fire safety.				
LS-11	Train those who work in the hospital to compensate for impaired structural or compartmental fire safety features.				

ILSM QuickCheck™

Deficiency Number	Deficiency Description	Fire Alarm Impaired	Fire Suppression Impaired	Exit Route Closed	Travel Distance Increased	Occupancy Separation Compromised	ILSM Required		Comments
							Y	N	
1									
2									
3									
4									
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ILSM QuickCheck™

Item #	Deficiency Description						ILSM Required		Comments	
							Fire Alarm Impaired	Fire Suppression Impaired		Exit Route Compromised
1	Smoke door closer broken outside E326	N	N	N	N	N			X	
2	Room wall penetration by W248	N	N	N	N	N			X	
3	Room door latch broken W567	N	N	N	N	N			X	
4	Exit stair 3E inaccessible	N	N	Y	N	N	X			
5	ICU entry doors gap >1/8"	N	N	N	N	N			X	
6	Fire extinguisher missing 2W hallway	N	N	N	N	N			X	
7	Exit light b W742 burned out	N	N	N	N	N			X	
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29

- Include Life Safety Code items identified during:
 - Life Safety/SOC Surveys
 - The Joint Commission Surveys
 - CMS Surveys
 - State & Local Inspections
 - Environmental Tours
 - 45 Day List
 - Insurance Inspections