

Managing the Interim Life Safety Measures (ILSM) Process

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A Program for

Minnesota Healthcare Engineers Association

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Seminar Objectives



- Overview of the Interim Life Safety Measures (ILSM) standards as required by The Joint Commission® (LS.01.02.01)
- When and where ILSM evaluations are required
- Tips on evaluating your existing ILSM process
- Ensuring appropriate measures are taken for specific projects and deficiencies

Managing the ILSM Process

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- ILSM was in the EC chapter as a part of Fire Safety
- ILSM is now located in the separate Life Safety chapter
- The 11 interim life safety measures are in existence just embedded in the EP's 4-14

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- LS.01.02.01: **A**  **R**
 - *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)*

Fire Watch

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- **Fire Watch Definition:**
 - A Fire Watch is required when:
 - “hot work” is being conducted, such as cutting, torching, or welding, or
 - the fire alarm or sprinkler service is out of service, for any four hours in a 24-hour period.
- **Fire Watch Purpose:**
 - The purpose of the Fire Watch is to supplement the existing fire detection and response systems and to provide additional compensatory activity to assure the safety of patients, visitors, and staff.

Development

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- Develop a policy for Fire Watch
- Separate “hot work” and ILSM fire watch
- Notifications to fire department (or other emergency response group)
 - Who contacts department?
 - How is it documented?

Fire Watch

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- Determine time frame system inoperative
- If greater than 4/24, institute fire watch
- Develop watch schedule
- Identify issues
- Monitor and document inspections of area

Fire Watch Personnel

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- Who is authorized or trained to perform?
 - AHJ may have further requirements such as NY

Fire Watch Instruction Sheet

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FIRE WATCH / FIRE GUARD INSTRUCTION SHEET FOR ILSM

For each fire watch round, the following items will be reviewed each hour and documented on the Fire Watch Log. Record any deficiencies on the Fire Watch Log and notify person responsible.

Item	Conditions To Check For
1	There is no fire, smoke, or a smell of smoke, or other evidence of a fire or incipient fire.
2	Fire alarm pull stations, smoke detectors, or heat detectors are not blocked, obstructed, or rendered inaccessible.
3	Fire alarm pull stations, smoke or heat detectors, bells or other fire alarm elements are not damaged or broken.
4	Fire extinguishers are not blocked, or obstructed, or rendered unavailable for immediate use.
5	Fire extinguishers are not damaged, missing, or have been inspected for the month.
6	Fire or smoke doors are not blocked or obstructed by materials, equipment, or wedging.
7	Fire or smoke doors are not damaged, broken. They are able to close fully and they do latch appropriately.
8	Exit lights or illumination in the corridor are not burned out and are operating properly.

FIRE WATCH / FIRE GUARD LOG FOR ILSM

Building Name:	Date:
Patrolled Area:	
Certificate of Fitness (COF) Print Holder's Name:	COF Holder's Signature:
COF #:	COF Expiration Date:
Document notification to the Fire Department after the initial 4 hours within 24 hours of fire alarm or sprinkler systems are out of service. Print time, Department, and Person's Name and ID number:	
Indicate the Time the Fire Alarm System or Sprinkler System was deactivated, if not a 24 hour fire watch:	Indicate the Time the Fire Alarm System or Sprinkler System was reactivated, if not a 24 hour fire watch::

Instructions:

1. As the designated Fire Guard, you are required to make hourly inspections, and to record the deficiencies of your inspections on this log.
2. Check for all items on Fire Watch checklist on the rounds.
3. Provide a description of any deficient items in the comments section and bring them to the attention of the designated responsible person immediately.
4. Print your name and Fire Guard certification number on this log for each round.

FG #	Print Name	Time	Verified Area is Fire Safe: Circle Yes or No	Problems/Comments Noted and Name of Person Reported To:
			YES OR NO	

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- 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)*

Exit Closure Signage

ILSM Notification

STAIRWELL CLOSURE

Effective <<Date and Area>> has been closed to complete the Renovation Project. The exit will be closed for approximately <<DATE>>. During this time period the area will be under Interim Life Safety Measures (ILSM).

In event that evacuation of the building becomes necessary please be aware of the alternate exits: <<Exits>>.

If you have any questions or concerns that pertain to these measures please, do not hesitate to contact: <<Name and number>>

In the event of an emergency, please have Code Red paged through the operator (###).

Signage

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- ILSM Notification

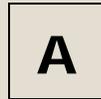
ILSM Notification

This construction project is under Interim Life Safety Measures (ILSM). If you have any questions or comments that pertain to these measures please do not hesitate to call <<Name and number>>. In the event of an emergency, please have Code Red paged through the operator (#####).

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LS.02.01.01 EP 3:



“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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- 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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- *“...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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- *“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

ILSM Code Deficiency

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- eSOC
- Life Safety Assessment
- Repair, Above Ceiling, Survey
- Disaster or Catastrophe

ILSM Code Deficiency

LIFE SAFETY DEFICIENCY ASSESSMENT

Name of Deficiency:	Date of Assessment:
Deficiency is identified on (circle one): Work Order eSOC/PFI	

ILSM Measure		Yes or No:	Comments, Measures or Controls
1	Exits are inspected on a daily basis and are free and unobstructed.		
2	Provide temporary, but equivalent fire alarm and detection system when fire system is impaired. A fire watch is implemented when fire systems are compromised for more than 4 hours in a 24-hour period.		
3	Provide additional fire-fighting equipment (fire extinguishers).		
4	Ensure that temporary construction partitions are smoke-tight and built of non-combustible or limited combustible materials that will not contribute to the development or spread of fire		
5	Increase surveillance of buildings, grounds, and equipment, with special attention excavations, construction areas, construction storage, and field offices		
6	Develop and enforce storage, housekeeping and debris-removal practices that reduce the building's flammable and combustible fire load to the lowest feasible level		

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									
5									
6									
7									
8									
9									
10									
11									
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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	
8										
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- 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

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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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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.

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- 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)*

ILSM Construction

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- Demolition, Renovation, Excavation or Major Repairs

ILSM Assessment

Interim Life Safety Measures Assessment Tool

Project Name:	Location:
Project Date:	
Preparer:	Date:

Risk#	Risk Elements	Yes	No	Controls <Write Control # here>
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.			

Interim Life Safety Measures Implemented

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Control#	Controls
LS-A	Ensure construction materials, equipment, or debris blocks the free use of all exits adjacent so the construction site or impacted by the project. These are inspected daily. Temporary exit signs.
LS-B	Provide temporary but equivalent fire alarm and detection system when fire system is impaired. A fire-watch is implemented when fire systems are compromised for more than 4 hours in a 24 hour period.
LS-C	Provide additional fire-fighting equipment such as fire extinguishers
LS-D	Construction partitions are smoke tight, fire resistant, non-combustible, slab to slab, and wall to wall.
LS-E	Increase surveillance of buildings, grounds, and equipment, with special attention excavations, construction areas, construction storage, and field offices.

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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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- 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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- 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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- 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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- 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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- 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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- 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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- 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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- 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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- 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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- 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.

Monitoring

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- Determine frequency of monitoring for ILSM
- Control measures selected, monitor the progress
- Determine deficiencies
- Correct deficiencies and document

Interim Life Safety Measure Monitoring Form

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

Control #	Controls	Required		Compliance		Comment, Non-compliance identified here
		Yes	No	Yes	No	
LS-A	Exits are not affected and are clear of obstructions.					
LS-B	The temporary fire alarm and detection systems are operational. Fire watch is in effect.					
LS-C	The additional fire-fighting equipment is present, visible, and in compliance.					
LS-D	The temporary construction partitions are smoke-tight, or made of noncombustible material, or made of limited combustible material.					
LS-E	Observed the buildings, grounds, and equipment and construction areas and storage, excavation, and field offices.					
LS-F	The storage, housekeeping, and debris removal practices are being followed.					
LS-F	Additional training has been performed for those that work in the hospital on the use of fire-fighting					
LS-G	The one additional fire drill per shift per quarter has been completed.					
LS-H	Temporary systems have been inspected and tested monthly. The completion date of the tests is					
LS-I	Education has been conducted on the awareness of building deficiencies, construction hazards, and temporary measures implemented to maintain fire					
LS-J	Education has been conducted for the compensation for impaired structural or compartmental fire safety features.					

Questions & Answers

Contact

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