

POLICY **INTERIM LIFE SAFETY MEASURES**

DATED: **February 2009, rev DEC2014, rev FEB2021**

TOPIC: **LIFE SAFETY MANAGEMENT**

SUBJECT: **INTERIM LIFE SAFETY**

REFERENCE: LS.01.02.01: The hospital protects occupants during periods when the Life Safety Code is not met or periods of construction.

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 implements LS.01.02.01, EP's 2-15 to compensate for increased fire safety risk. The criteria include the assessment process to determine when interim life safety measures are implemented.

POLICY:

Interim Life Safety Measures

When requirements for fire protection or environment and grounds safety are affected by construction, the hospital institutes and documents interim life safety measures to temporarily compensate for the hazard posed by existing life safety deficiencies based on the criteria specified in the interim life safety policy.

Interim Life Safety Measures are selected based upon professional judgment from the following list and are instituted during major construction, renovation or improvement projects; parties responsible for compliance are identified parenthetically:

1. A fire watch is initiated and emergency forces are notified when a fire system is out of service for more than 4 hours out of 24 hours, or a sprinkler system is out of service for more than 10 hours out of 24 hour period in an occupied building. Notification and fire watch times are documented. *(Construction Manager/Fire Protection Inspector)*
2. Free and unobstructed exits are ensured. When alternative exits must be designated, affected personnel receive notification. Escape routes for construction workers are maintained at all times; these routes are inspected daily. *(Construction Manager/Fire Protection Inspector)*
3. Free and unobstructed access to emergency services and for fire, police, and other emergency forces are ensured. *(Construction Manager/Fire Protection Inspector)*
4. Fire alarm, detection, and suppression systems are maintained in good working order, and a temporary but equivalent system is provided when any fire system is impaired. Temporary systems are inspected and tested monthly. *(Construction Manager/Fire Protection Inspector)*
5. Additional fire-fighting equipment is provided and construction and other affected personnel are trained in its use. *(Construction Manager/Fire Protection Inspector)*
6. Temporary construction partitions are smoke tight and built of noncombustible or limited combustible materials that will not contribute to the development or spread of fire. *(Construction Manager/Fire Protection Inspector)*
7. Increased hazard surveillance of buildings, grounds, and equipment with special attention to excavations, construction areas/storage and field offices. *(Construction Manager/Fire Protection Inspector)*
8. Storage, housekeeping and debris removal practices are developed and enforced to reduce the building's flammable and combustible fire load to the lowest feasible level. *(Construction Manager/Fire Protection Inspector)*

9. An additional fire drill per shift per quarter is conducted, for a total of two drills per shift per quarter for areas under and adjacent to construction. Drills are reported to the Safety Manager. (*Construction Manager/Fire Protection Inspector*)
10. Organization-wide safety education programs are conducted to promote awareness of Life Safety Code deficiencies, construction hazards, and ILSM. (*Safety Manager and Fire Protection Inspector*)
11. Affected personnel are trained to compensate for impaired structural or compartmentalization features of fire safety. (*Construction Manager/Fire Protection Inspector*)
12. Provide documentation for other ILSM's not specifically addressed in EP 2-14 (*Construction Manager/Fire Protection Inspector*)

The decision to implement any or all of these measures depends on the scope of the project, the life safety systems that are disrupted, and the length of time the systems are disrupted. The Life Safety Code provides the basis for the decision. Additionally, a matrix has been designed to provide the criteria for implementing Interim Life Safety Measures and document any deficiencies along with the associated measures taken to address them. The following criteria are to be used to implement Interim Life Safety Measures and complete the ILSM Matrix:

1. Exit paths impaired or blocked – Implement ILSM Matrix Column #2 & #3.
2. Emergency forces access is impaired – Implement ILSM Matrix Column #2 and #3.
3. Fire detection and/or suppression systems impaired – Implement ILSM Matrix Column #2 and/or #6.
4. The occupied area is not separated from the construction area by a smoke barrier – Implement ILSM Matrix Column #7.
5. Additional fire hazards are present due to construction – Implement ILSM Matrix Column #6, #8 and/or #9 as needed.
6. Smoke compartments are impaired and/or horizontal exits are changed for areas adjacent to construction – Implement ILSM Matrix Column #11 and #14 as needed.
7. Staff, patients and visitors have a close proximity to the construction area – Implement ILSM Matrix Column #8.
8. Fire safety features, including compartmentalization, structural and alarms are impaired - Implement ILSM Matrix Column #11, #13 and/or #14 as needed.

The Director of Health System Physical Plant is responsible for managing the Interim Life Safety Program for both Health System Physical Plant (HSPP) and Facilities Planning & Construction (FP&C) managed projects. The Director of HSPP maintains a current list of all areas where ILSM are in effect.

Inspections

The FP&C Construction Manager will be responsible for the interim life safety compliance for all of the applicable FP&C managed projects. Similarly, the Health System Physical Plant Renovations Superintendent will be responsible for all Health System Physical Plant managed projects. The Construction Manager or the Renovations Superintendent will fill out the interim life safety compliance matrix before the project commences and will ensure that the Fire Protection Inspector (FPI) certifies the interim life safety measures before construction starts.

The Construction Manager/Renovations Superintendent will be responsible for the day-to-day interim life safety measures and will annotate the interim life safety compliance matrix whenever the ILSM are changed. The FPI will certify the compliance monthly in conjunction with the Construction Manager/Renovations Superintendent. Records will be maintained with the dates of all the inspections, issues identified, actions taken, and follow-up plans as necessary.

Construction identification signs must be placed so they are visible on the construction site and must include the project title and the project manager's name and telephone number.

Exception Reporting

Violation notices are submitted by the FPI to the Construction Manager for any life safety code violation identified during inspections or through other means; the construction manager then issues a notice of non-compliance to the contractor. A follow-up inspection is performed within the stated period, and resolution is documented. If the violation is not corrected within the specified period of time, project continuation will be reconsidered. As a tool for monitoring program compliance and assuring quality improvement, exception reports will be submitted for all instances of non-compliance identified.

This documentation will be submitted to Health System Physical Plant and quarterly summaries of problems identified and actions taken will be reported to the Life Safety Work Group.

ILSM Matrix																	
Date:		Interim Life Safety Measures (LS 01.02.01, EP 2-15)															
Project: Location (BLD#/Rm#): Project No/WO#: UVA PM: UVA CM: GC: GC Supervisor: User Contact: Submitted By: Approved By:		Check if Applicable or N/A EP 2 - Notify emergency forces/initiate fire watch for impaired fire alarm/detection/suppression systems EP 3-Ensure egress: Post signage to identify locations of alternative exits EP 4-Ensure egress: Inspect exits daily EP 5-Ensure operational life-safety systems: provide temporary but equivalent fire alarm & detection system EP 6-Provide additional firefighting equipment EP 7-Provide temporary construction barriers, smoke-tight, made of non (limited) combustible materials EP 8-Increased hazard surveillance of buildings, grounds and equipment EP 9-Control flammable/combustible loading, e.g. storage, housekeeping and debris-removal practices EP 10-Provide additional training of personnel on the use of firefighting equipment EP 11-Conduct one additional fire drill per shift per quarter EP 12-Inspect and test temporary systems monthly EP 13-Conduct organizational training on life/fire safety building deficiencies, construction hazards, and ILSNs EP 14-Train personnel to compensate for impaired structural or compartmental fire safety features EP 15- Other ILSM not addressed in EP 2-14; provide documentation															
Existing Code Deficiencies																	
1) Patient/fire/smoke door latching problem																	
2) Lacking a code complying smoke barrier																	
3) Fire exit stairs discharge improperly																	
4) Excessive travel distance to an approved exit																	
5) Lack of two remote exits																	
6) Nonconforming bldg. construction type																	
7) Improperly protected vertical openings																	
8) Penetrations in fire or smoke barriers																	
9) Corridor walls do not extend to the structure																	
10) Hazardous areas not properly protected																	
Construction Related Issues																	
11) Blocking off an approved exit																	
12) Rerouting of traffic to emergency room																	
13) Renovation of an occupied area																	
14) Replacing fire alarm system (out-of-service)																	
15) Installing sprinkler system (out-of-service)																	
16) Modifying smoke/fire barrier walls																	
17) Adding an addition to an existing structure																	
18) Evaluate risk of accidental sprinkler activations: shut down system during construction																	
Maintenance and Testing																	
19) Taking a fire alarm system out-of-service >4 hrs																	
20) Taking a sprinkler system out-of-service >10 hrs																	
21) Disconnection of alarm devices																	
**NOTES:																	

Construction Risk Assessment						
Date:						
Submitted by: Approved by:		Check if Applicable or N/A No Risk-Not Applicable to this project Low Risk -Low-Limited Risk of impact to this system Medium Risk-Potential impacts likely; counter measures to be considered to lower risk and mitigate possible impact High Risk-Assumes impact to affected system and carries significant risks as a result. Develop counter measures and formal plan with responsible parties to mitigate risk.				
Facilities Impact Risk Assessment						
a) Air Quality						
b) Infection Control						
c) Utilities						
e) Noise						
f) Emergency Procedures						

PM= Project Manager, CM= Const. Mgr. FI= HSPP Fire Prot. Inspector, GC= General Contractor, Risk: H = High, M = Medium, L = Low, NA = Not Applicable

Revised Date: 7/14/2017, 5/28/2021, 6/7/2022, 7/26/2023