



Policy No: **118.06**
 Original Issue Date:
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HOSPITAL POLICIES & PROCEDURES

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| Category: | Safety |
| Title: | INTERIM LIFE SAFETY MEASURES |
| Applicability: | Thomas Jefferson University Hospitals, Inc. |
| Contributors/Contributing Departments: | Facilities Design and Construction, Facilities Operations (CC), Facilities Management (MHD), Environmental Health & Safety, Accreditation |

PURPOSE

Interim Life Safety Measures (ILSM's) are administrative actions that are implemented to compensate for the hazards posed by significant Life Safety Code deficiencies that cannot immediately be corrected, or by construction or maintenance activities which cause any of the Life Safety features of the hospital's facilities to be compromised.

SCOPE

The policy applies to all Thomas Jefferson University Hospital operated facilities and personnel including third parties and contractors operating on TJUH premises.

POLICY

It is the policy of Thomas Jefferson University Hospital to ensure the safety of all building occupants during periods when significant Life Safety Code deficiencies compromise the level of life safety protection provided by the building.

When determined to be required through risk assessment, the Hospital will initiate ILSM's to compensate for the reduction of life safety caused by identified life safety deficiencies which cannot be immediately corrected or by construction or maintenance activities. All parties involved in these activities are responsible for operating according to all applicable regulatory and safety guidelines regardless of their employment status. Compliance with these policies shall be managed by the TJUH Safety Officer or his/her designee in cooperation with Facilities Design & Construction, Facilities Operations (CC) / Facilities Management (MHD), Environmental Health & Safety and any contractor representative applicable to the specific work involved.

PROCEDURE

The ILSM policy will provide guidance when Life Safety Code deficiencies cannot be immediately corrected or during periods of construction or maintenance activities. Life Safety Code deficiencies, whether identified on the Statement of Conditions or through any other means, will be assessed to determine which, if any, ILSM's are to be implemented.

ILSM's are comprised of administrative actions which may be required to provide temporary compensation for hazards posed by Life Safety Code deficiencies or by construction or maintenance activities. When TJUH, Inc. identifies Life Safety Code deficiencies that cannot be immediately corrected or, during periods of construction, TJUH, Inc. will assess the need for, and, if determined to be required by procedures, implement the following actions:

1. Notify Philadelphia Fire Department and initiate a fire watch when the fire alarm or sprinkler system is out of service more than 4 hours in a 24-hour period. Documentation will be maintained.
2. Post signage for alternate exits and inspect exits.
3. Provide temporary fire alarm and detection systems when fire system is impaired.
4. Provide additional firefighting equipment as appropriate.
5. Employ temporary construction partitions that are smoke tight or made of noncombustible material that will not contribute to the spread of fire as appropriate.
6. Increase surveillance of buildings, grounds, and equipment giving special attention to construction areas and storage, excavation, and field offices as appropriate.
7. Enforce storage, housekeeping and debris-removal practices that reduce the building's flammable and combustible fire load to the lowest feasible level as appropriate.
8. Provide additional training to those who work in the organization on the use of firefighting equipment as appropriate.
9. Conduct one additional fire drill per shift per quarter as appropriate.
10. Inspect and test temporary systems monthly and document test completion dates as appropriate.
11. Conduct education to promote awareness of building deficiencies, construction hazards, and temporary measures implemented to maintain fire safety as appropriate.
12. Train those who work in TJUH, Inc. facilities to compensate for impaired structural or compartmental fire Safety features.
13. Smoking in the construction site and adjacent areas is prohibited and the hospital smoking policy is being followed.

For identified Code Deficiencies and for Maintenance activities compromising Life Safety features of the facilities, ILSM assessment, selection, implementation, monitoring and documentation will be accomplished in accordance with Facilities Operations (CC) / Facilities Management (MHD) Department Procedure 204.36 – Code Deficiencies and Maintenance Activities ILSM Procedures. These procedures include criteria for evaluating deficiencies & hazards to determine when and to what extent ILSM measures apply.

For Construction and Renovation projects, ILSM assessment, selection, implementation, and monitoring will be accomplished in accordance with Facilities Design and Construction Department Procedure 118 – Construction and Renovation ICRA – PCRA – ILSM Procedures. These procedures include criteria for evaluating deficiencies & hazards to determine when and to what extent ILSM measures apply.

As developed further in the *Code Deficiencies and Maintenance Activities ILSM Procedures* and the *Construction and Renovation ICRA – PCRA – ILSM Procedures*, the Environmental Health and Safety department in conjunction with Facilities Operations (CC), Facilities Management (MHD), and Facilities Design and Construction is responsible for the following:

1. Developing criteria to evaluate various Life Safety Code deficiencies, maintenance activities, and construction hazards in order to determine when and to what extent one or more of the ILSM's are applicable.
2. Assessing hazards to determine if ILSM's should be implemented.
3. Implementing appropriate ILSM's in conjunction with Project Managers, Maintenance Staff, and/or Contractors.
4. Notifying personnel in areas affected by ILSM's.
5. Conducting inspections as appropriate to confirm compliance.
6. Creating temporary evacuation route maps and assuring installation of maps and signage if alternate exits are required.
7. Providing appropriate training to hospital staff in areas affected by ILSM's.
8. Documenting ILSM-related activities and monitoring ILSM compliance.

When Life Safety Code deficiencies are identified, an assessment will be performed by the Safety Officer or his/her designee in conjunction with Facilities Operations (CC), Facilities Management (MHD), or Facilities Design and Construction to determine what actions may be required to temporarily compensate for the hazard that exists. The Interim Life Safety Measures (ILSM) Assessment Form is used to evaluate each project hazard and Life Safety Code deficiency and/or impairment to determine if the condition warrants ILSM's and what specific measures are required to minimize the effects of the deficiency. ILSM's are documented via the Interim Life Safety Measures (ILSM) Assessment Form, are implemented, and are monitored via the Interim Life Safety Measures (ILSM) / Fire Watch TJUH Inspection Form.

All exits shall remain clear and unobstructed. If alternate exits have been designated, staff and construction employees will receive training from the Safety Department prior to the start of construction. Free and unobstructed access to emergency services and access for other emergency forces such as the Fire Department or Police Department will be maintained.

All fire detection, fire alarm, and fire suppression systems shall be kept clean and maintained in working order. If a smoke detector is covered, it must be uncovered at the end of each workday. If a temporary system is required, the temporary system must comply with all current codes and be inspected and tested at least monthly. If a sprinkler system or fire alarm system is impaired, the Fire Watch Decision Grid will be

used to determine if a fire watch is required. If so, in addition to the fire watch, the Fire Marshal will notify the Philadelphia Fire Department and current insurance carrier.

Temporary construction partitions shall be built of non-combustible or limited combustible materials and be smoke-tight. The Environmental Health and Safety department and/or Facilities Design and Construction or Facilities Services / Management will monitor activities and assess work areas for hazards. If hazards are identified, they will be assessed and implemented as required by other provisions of this policy. Construction sites shall be provided with fire extinguishers. Alternate exit routes will be posted if construction activities block or otherwise interfere with fire exits. Smoking is prohibited in all hospital facilities.

All contractors who perform work for Thomas Jefferson University Hospitals shall be informed of this policy and shall:

- a) Fully implement and maintain identified ILSM's.
- b) Document safety compliance via completion of Construction Daily Checklist.
- c) Inform their personnel of these policies and procedures
- d) Secure all required and applicable permits (both TJUH & external). EH&S requires 3 days' notice when obtaining a Jefferson hot work permit.
- e) Notify the following departments of existing conditions that are LSC deficiencies or have the potential to cause a fire or smoke condition:
 - a. Center City – Jefferson Operations Control Room (215-955-1418). The Operations Control Room personnel will notify Environmental Health and Safety
 - b. Methodist – Facilities Management (215-952-1333). Facilities Management will notify Environmental Health and Safety
- f) Adhere to all NFPA and Philadelphia Fire Codes for fire safety during construction, renovation and repair work impacting life safety/fire safety components or systems.

RELATED PROCEDURES AND ASSOCIATED FORMS

- Facilities Operations / Facilities Management Department Procedure 204.36 – *Code Deficiencies and Maintenance Activities ILSM Procedures*
 - Interim Life Safety Measures (ILSM) Assessment Form
 - Interim Life Safety Measures (ILSM) / Fire Watch TJUH Inspection Form
 - Fire Watch Decision Grid
- Facilities Design and Construction Department Procedure 118 – *Construction and Renovation ICRA – PCRA – ILSM Procedures*
 - Interim Life Safety Measures (ILSM) Assessment Form
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 - Construction Daily Checklist

Attachments: Interim Life Safety Measures (ILSM) Assessment Form, Interim Life Safety Measures (ILSM) / Fire Watch TJUH Inspection Form, Fire Watch Decision Grid

Original Issue Date:

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Responsibility for maintenance of policy: 1. Environment Of Care Safety Committee

Approved by:
David McQuaid
President, Thomas Jefferson University
Hospitals, Inc.