

**VANDERBILT  UNIVERSITY**  
**MEDICAL CENTER**

**Policy:** Interim Life Safety Implementation

Category	Safety
Policy Number	SA 40-10.05
Approval Date	February 2018
Effective Date	February 2018
Supersedes	July 2015

Applicable to	
<input checked="" type="checkbox"/> Adult Enterprise	<input checked="" type="checkbox"/> Pediatric Enterprise
<input checked="" type="checkbox"/> Behavioral Health Enterprise	
Team Members Performing	
<input checked="" type="checkbox"/> All faculty & staff	<input type="checkbox"/> Faculty & staff providing direct patient care or contact
<input type="checkbox"/> MD	<input checked="" type="checkbox"/> House Staff
<input type="checkbox"/> Other:	<input type="checkbox"/> APRN/PA <input type="checkbox"/> RN <input type="checkbox"/> LPN
Responsible Committee	
<input type="checkbox"/> Clinical Operations Committee	<input type="checkbox"/> Pharmacy, Therapeutics, and Diagnostics Committee
<input type="checkbox"/> Clinical Practice Committee	<input type="checkbox"/> Health Record Executive Committee
<input type="checkbox"/> Quality Steering Committee	<input type="checkbox"/> Information Privacy and Security Executive Committee
<input type="checkbox"/> Infection Prevention Executive Committee	<input checked="" type="checkbox"/> Medical Center Safety Committee
Content Experts	
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**I. Purpose:**

To establish guidelines for implementation of Interim Life Safety Measures (ILSM).

**II. Policy:**

Life Safety systems (e.g., sprinklers, smoke detectors) are required to protect the lives of Vanderbilt patients, visitors, and workforce members and to protect Vanderbilt property from damage. The effectiveness of these life safety systems may be compromised during building maintenance, renovation and construction. Vanderbilt University Medical Center (VUMC) maintains a program of ILSM to minimize the possibility of injury or damage due to fire, smoke and other dangerous conditions when life safety systems are compromised.

Abatement, construction, renovation, or repair projects (referred to as “activities” hereafter) in VUMC are evaluated prior to beginning of work and reviewed

during the work to promote patient, visitor and workforce member life safety. Activities are designed and conducted to minimize the disruption of life safety systems.

Activities resulting in the impairment of any VUMC life safety system requires adherence to the interim measures outlined in this policy. Failure to follow these guidelines results in immediate cessation of work and could result in disciplinary action.

### **III. Specific Education:**

Staff who make Interim Life Safety Implementation assessments are trained to recognize life safety systems and when these systems might be impaired.

### **IV. Specific Information:**

- A. ILSM are a series of actions taken to compensate temporarily for the hazards posed by new or existing activities or life safety deficiencies arising out of aforementioned types of conditions.
- B. The implementation of ILSM is required in or adjacent to activity areas and throughout buildings where activities have impaired any life safety system. Life safety systems include, but are not limited to, building alarms, smoke detectors, sprinkler systems, and emergency egress.
- C. The ILSM assessment is intended to determine what temporary measures are required to protect occupants and the building. Interim life safety is a complex and ongoing process that can affect many different people. Adequate time is allowed to develop plans and communicate these plans to the involved parties. If at any time a department/unit representative affected by the interim life safety measure has a concern with the life safety measure put into place, they have the responsibility to elevate the concern to the Activity representative and/or Vanderbilt Environmental Health and Safety (VEHS).
  1. Contact VEHS as required by the ILSM assessment.
  2. Notify Facilities Management and/or Planning Design Construction if the ILSM measure affects their activity.

The Activity representative and/or VEHS have the authority to stop the process until the concerns are addressed.

- D. Interim life safety is an ongoing process. If life safety impairments/deficiencies are not identified by the initial assessment, subsequent assessments may be necessary per this policy.

E. ILSM Assessment Process:

1. For every project, interim life safety is assessed by the Activity representative using the ILSM Assessment Tool.
  - a. For Facilities Management projects, the Assessment Tool is incorporated into the electronic work management system in the form of a sub-procedure.
  - b. For non-Facilities Management projects, a printable copy of the Assessment Tool is available online: [ILSM Assessment Tool](#).
2. The ILSM Assessment Tool identifies interim life safety measures for a particular project phase. Additional ILSM assessments may be required throughout the course of the Activity.
3. The ILSM Assessment Tool is the minimum standard for interim life safety. Depending on the particular impairment, additional interim life safety measures may be warranted at the discretion of the Construction Safety subcommittee.
4. Completing the ILSM Assessment Tool:
  - a. For every type of work covered by this policy, complete the first three questions of the Assessment Tool to determine if interim life safety measures are required. (See Appendix A – ILSM Flowchart.)
  - b. When ILSM is not required, if using the paper assessment form, record the response to the first three questions, complete the project information, and sign and date the Assessment Tool form. If using the Facilities Management electronic work management system, the pertinent information is recorded as a part of the electronic ticket and no signature is required.
  - c. Record of the assessment and related ILSM documentation is kept for 3 years in the project file; within the Facilities Management work management system or the construction system database.
  - d. When interim life safety measures are required, use the criteria in the printable Assessment Tool to determine the minimum acceptable interim life safety measures for the activity.
  - e. Mark the check box for all life safety deficiencies that apply to the activity.
  - f. Implement the interim life safety measures designated by an “X”. The ILSM are defined under interim life safety implementations.

- g. Once the ILSM criterion has been determined, sign and date the Assessment Tool.
- F. ILSM assessments requiring ILSM #7 (see Appendix B: ILSM Assessment Tool) are approved by at least two different discipline members of the Construction Safety Subcommittee. ILSM deficiencies and issues not addressed by the ILSM Assessment Tool are evaluated and approved by multidisciplinary representatives of the Construction Safety Subcommittee on a case-by-case basis with regard to the appropriate ILSM response. The Construction Safety Subcommittee representatives sign the Assessment Tool after review of the interim life safety measures to be implemented.
- G. ILSM Communication and Education:
- 1. For activities that are less than one shift in duration and affect public spaces:
    - a. Supervise work at all times. If work cannot be supervised at all times, follow the requirements of Section G.2 regarding ILSM notice posting.
    - b. Communicate the ILSM deficiency face-to-face with the area supervisor/representative.
  - 2. For activities that are greater than one shift, but less than 30 days in duration and affect public spaces:
    - a. Communicate the ILSM deficiency face-to-face with the area supervisor/representative.
    - b. Post an “ILSM NOTICE” in a visible location as close to the impaired device/feature as feasible.
    - c. “ILSM NOTICE” postings are only posted for activities by responsible staff.
    - d. Provide staff training as required by the ILSM assessment form.
  - 3. For activities that are greater than 30 days in duration or major construction, regardless of duration:
    - a. Post “ILSM NOTICE” as directed in Section G.2.
    - b. Communicate the ILSM deficiency to the following groups:
      - i. VUMC Construction Safety Subcommittee;
      - ii. VEHS;
      - iii. Facilities Management Shop Manager; and
      - iv. Unit/area supervisor/representative.

- c. Provide staff training as required by the ILSM assessment form.
  - 4. ILSM Training:
    - a. ILSM training is developed by VEHS and distributed to the applicable manager for dissemination.
    - b. ILSM training includes:
      - i. Description of life safety impairments;
      - ii. Workforce Member roles in the interim life safety process with specific attention given to the following:
        - a) ILSM #5: Increased surveillance of buildings, grounds and equipment, giving special attention to construction areas and storage, excavation, and field offices.
        - b) ISLM #6: Enforce storage, housekeeping and debris-removal practices that reduce the building's flammable and combustible fire load to the lowest feasible level.
        - c) ISLM #7: Provide additional training to those who work in the hospital on the use of firefighting equipment, about impaired structural or fire safety features, temporary measure implemented, construction hazards, and building deficiencies. Requires VEHS notification.
      - iii. Workforce Member document by signature indicating completed training.
    - c. Manager or designee is responsible for:
      - i. Posting the training in a common work area (e.g., break room) for the duration of the Activity.
      - ii. Verifying completion of training by regular and temporary workforce members assigned to the area.
      - iii. Returning completed training documentation to VEHS within the time frame designated on the training communication.
- H. Projects requiring interim life safety measures are communicated to the VUMC Safety Committee at the regularly scheduled meeting.
- I. ILSM Review and Documentation:
  - 1. Activities are physically surveyed at least twice monthly. Survey participants include VEHS and/or Infection Control and Prevention, Facilities Management, Space and Facilities Planning,

Network Computing Services, and Clinical Engineering (as applicable to the project).

2. During the periodic survey, a representative of the Construction Safety Subcommittee and an Activity representative review the ILSM for the specified work. Deficiencies are communicated to the Activity representatives for correction. The person having continual responsibility for the Activity, who performed the ISLM assessment, sends corrective action documentation via email to the Medical Center Safety Officer or designee to verify deficiency corrections.
3. The Activity representative is responsible for completing the ILSM Daily Egress Inspection Log for projects lasting longer than 24-hours
4. ILSM Training Recordkeeping: Upon completion of the activity, ILSM training documentation is maintained on file for at least 3 years by VEHS.

**V. Endorsement:**

Medical Center Safety Committee	December 2017
Medical Center Medical Board	February 2018

**VI. Approval:**

Marilyn Dubree, MSN, RN, NE-BC Executive Chief Nursing Officer	2/21/18
C. Wright Pinson, MBA, MD Deputy Chief Executive Officer, VUMC Chief Executive Officer, Vanderbilt Health System Chairman, Vanderbilt Health Affiliated Network	2/21/18

**VII. Appendices**

- A. ILSM Flow Chart.
- B. ILSM Assessment Tool.

### VIII. References:

The Joint Commission, Comprehensive Accreditation and Certification Manual. (2018). Retrieved via Eskind Digital Library <http://library.vanderbilt.edu/biomedical/search.php?letter=j#tab-search-databases>, then search Joint Commission. *Management of the Life Safety Standard* LS 01.02.01

VUMC Policy Manual. (2018). Retrieved from <https://vanderbilt.policytech.com>

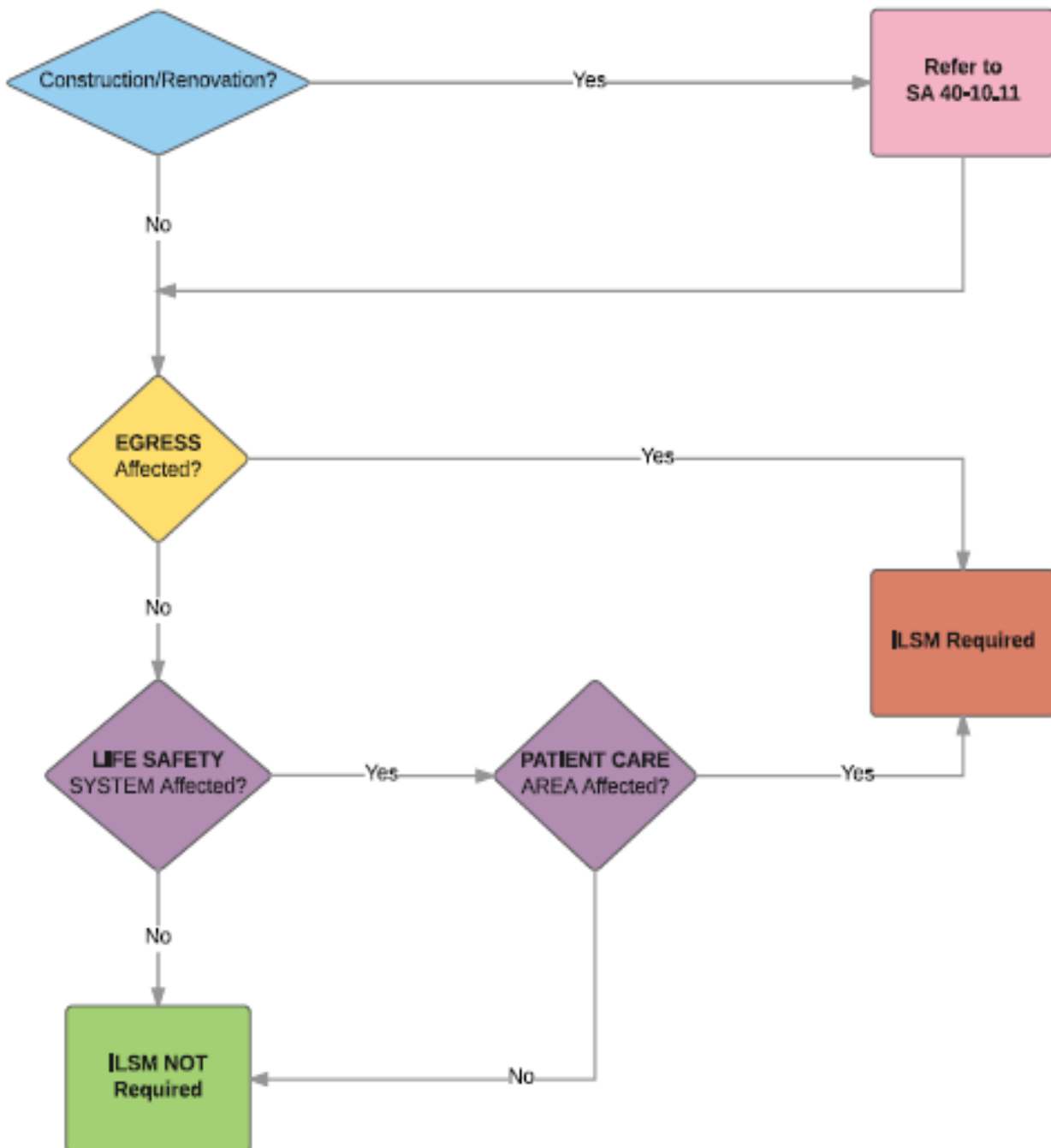
Safety Category:

[Fire Watch Procedure for Fire Alarm or Fire Suppression System Impairment Activities](#)  
[Construction Safety Program at VUMC](#)

VEHS Website. (2018). Construction and Renovation Safety in VUMC Healthcare Facilities. Retrieved from <http://www.safety.vanderbilt.edu/clinical/vumc-construction-safety.php>

Appendix A

**ILSM Flowchart**





APPENDIX B

VANDERBILT UNIVERSITY MEDICAL CENTER  
ILSM ASSESSMENT TOOL

NOTE: REFER TO VUMC POLICY SA-40.10.11 FOR ALL CONSTRUCTION AND RENOVATION ACTIVITIES																									
STEP #1 (ILSM ASSESSMENT)																									
FOR THE FOLLOWING QUESTIONS, TAKE THE ACTION IN THE ASSOCIATED 'NO' OR 'YES' COLUMNS TO DETERMINE IF ILSM IS REQUIRED																									
		NO				YES																			
A.	Will this work restrict EGRESS from the affected space?	PROCEED TO STEP B.				ILSM REQUIRED																			
B.	Is the equipment, component, etc., part of a building LIFE SAFETY system?	ILSM NOT REQUIRED				PROCEED TO STEP C.																			
C.	Is the activity in a PATIENT CARE AREA or will it affect a PATIENT CARE AREA?	ILSM NOT REQUIRED				ILSM REQUIRED																			
STEP #2 (GENERAL PROJECT / TASK INFORMATION)																									
Today's Date:		Building:		Project Loc.:																					
Start Date:		Comp. Date:		Project Mgr.:																					
Project/WO Number:				Project Name:																					
Specific Deficiency and Location																									
STEP #3 (LIFE SAFETY IMPAIRMENT TYPE - IF APPLICABLE)																									
USE THE CRITERIA BELOW TO DETERMINE THE APPROPRIATE INTERIM LIFE SAFETY (ILSM) FOR CONSTRUCTION, MAINTENANCE, REPAIR, OR INSPECTION ACTIVITIES																									
Unless otherwise noted below, these requirements apply to impairments of a duration extending beyond the current shift (greater than 8 hours)											ILSM1	ILSM2	ILSM3	ILSM4	ILSM5	ILSM6	ILSM7**	ILSM8	ILSM9	ILSM10	ILSM11	ILSM12	ILSM13	ILSM14	
Check all that apply.																									
Any impairment of a required egress <i>less than 4 hours</i>																X					X			X	
Any impairment of a required egress <i>greater than 4 hours</i>											X		X		X	X	X	X	X	X	X	X	X	X	
Fire detection ALARM system impairment <i>greater than 4 hours</i> ***											X	X			X	X	X	X	X	X	X		X		
Fire SUPPRESSION system impairment <i>greater than 10 hours</i>											X				X	X	X	X	X	X	X		X		
Problem with a single fire or smoke door hardware																X					X				
Fire or smoke barriers with unprotected penetrations																X					X				
Missing or incomplete fire or smoke barriers													X			X	X		X	X					
Missing or impaired NFPA 101 required fire or smoke dampers													X			X	X		X	X					
Hazardous use areas not properly separated from corridors													X			X	X		X	X					
Accumulation of combustibles and/or materials											X		X	X		X					X				
Temporary construction doors not latching or missing hardware													X			X					X				
Activity involving ignition sources (welding, torching)											X		X			X	X				X		X		
Major utility failure or outage affecting a life safety system <i>greater than 4 hours</i>											X	X	X		X	X	X		X	X	X	X	X	X	
Multiple LS impairments within the same fire or smoke zone											X		X		X	X	X	X	X	X	X	X	X	X	
**Requires review by Construction Safety Subcommittee Members prior to ILSM commencement.																									
*** The following functions shall be considered as part of a complete fire alarm system: Release of hold-open devices for doors or other opening protectives, Stairwell or elevator shaft pressurization, Smoke management or smoke control systems, Emergency lighting control, and Unlocking of doors																									
STEP #4 (INTERIM LIFE SAFETY MEASURES to IMPLEMENT- Determined by above matrix)																									
ILSM1	Inspect exits in affected areas on a daily basis and resolve problems immediately.																								
ILSM2	Provide temporary but equivalent fire alarm and detection systems for use when a fire system is impaired.																								
ILSM3	Provide additional firefighting equipment as needed.																								
ILSM4	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.																								
ILSM5	Increase surveillance of buildings, grounds, and equipment, giving special attention to construction areas and storage, excavation, and field offices.																								
ILSM6	Enforce storage, housekeeping, and debris-removal practices that reduce the building's flammable and combustible fire load to the lowest feasible level.																								
ILSM7	Provide additional training on use of firefighting equipment, impaired structural or fire safety features, temporary measures implemented, construction hazards, and building deficiencies. (NOTE: ILSM7 requires VEHS notification. Additional staff training is required for project duration exceeding 8 hours.)																								
ILSM8	Conducts one additional fire drill per shift per quarter as called for by policy, best practice, or at the discretion of the VUMC Safety Officer.																								
ILSM9	Inspect and test temporary (ILSM) systems monthly or once per project if the duration is less than one month.																								
ILSM10	Notify the local fire department and internal responders of the ILSM steps in place using the Interim Life Safety Measures form as required.																								
ILSM11	Notify the occupants in the area of the deficiency and the ILSM steps in place using the Interim Life Safety Measures form as required.																								
ILSM12	Post signage identifying the location of alternate exits to everyone affected.																								
ILSM13	Refer to policy SA 10-10.08 "Fire Watch Policy" (The Fire Watch Policy may require a time limit less than 8 hours.)																								
ILSM14	Blocked egress paths are never left unattended.																								
Name of Person(s) Completing this Assessment				Date the assessment was completed																					
Name of Person(s) Reviewing this Assessment				Date the review was completed																					