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FACILITIES OPERATIONS PROCEDURES

Category: Safety

Title: **Code Deficiencies and Maintenance Activities
ILSM Procedures**

Applicability: Thomas Jefferson University Hospitals, Inc.

Contributing Departments: Facilities Operations, Environmental Health & Safety

PURPOSE

Interim Life Safety Measures (ILSM's) are administrative actions that as appropriate are implemented to temporarily compensate for hazards posed by significant Life Safety Code deficiencies which cannot immediately be corrected or for activities or failures which may compromise any of the Life Safety features of the hospital's facilities.

This procedure is established to ensure that Life Safety Code (LSC) deficiencies and impairments which may compromise Life Safety systems are managed in compliance with Thomas Jefferson University Hospitals Interim Life Safety Policy (118.06) and to provide a procedure for the execution of the policy.

SCOPE

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

GENERAL

Whenever fire alarm and notification systems, or fire suppression systems, or other life safety features of the hospital's facilities are either expected or found to be compromised, an assessment will be conducted to determine the level of impact. When the assessment indicates the need, the hospital will institute and document interim life safety measures (ILSM's) to temporarily compensate for the hazard posed by existing life safety deficiencies and/or to ensure the level of life safety is not diminished during the period of activity (during renovations, significant impairments or extended repair periods).

This procedure is intended to ensure that appropriate ILSM's are assessed, implemented, and documented for instances where Life Safety Systems are compromised during maintenance activities, repairs, or modifications to Life Safety systems, and/or as Life Safety code deficiencies are discovered.

For certain routine, repetitive maintenance activities, a general pre-completed ILSM assessment covering such activity may be used to determine if ILSM assessments are required, and if so what measures are required to be implemented. Any such documentation covering a general type of maintenance activity will be kept on file by Facilities Operations (CC) or Facilities Management (MHD). Interim Life Safety Measure (ILSM) pre-assessments and assessments are not required for non-life safety items or for deficiencies that are immediately (within 24 hours) repaired (except for fire alarm system impairments >4 hours and/or sprinkler system impairments >10 hours which must always be assessed as indicated on ILSM Assessment Form).

TJUH uses consistent ILSM criteria for evaluating when and to what extent the listed administrative actions will be necessary to compensate for increased life safety risk for discovered LSC deficiencies, and during impairments or maintenance activities. When determined to be appropriate during the risk assessment, the hospital will implement Interim Life Safety Measures to compensate for the reduction of life safety caused by any activities or identified life safety deficiencies. 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 Operations (CC), Facilities Management (MHD), and any contractor representative applicable to the specific work involved.

PROCEDURE

Overview

Life Safety Code (LSC) deficiencies and impairments can arise or be discovered by various means, including maintenance, testing, inspection, or survey activities. If the impairment or deficiency causes or is determined to be a LSC deficiency, the process outlined below will be followed to pre-assess and then (if required) assess whether significant deficiencies or impairments exist and whether ILSM's are required to be implemented to mitigate life safety deficiencies.

Those responsible for the maintenance, testing, inspection, or survey activities that cause or identify LSC deficiencies will initiate an ILSM pre-assessment by use of an ILSM Assessment Form for all LSC deficiencies not immediately (within 24 hours) corrected (except for fire alarm system impairments >4 hours and/or sprinkler system impairments >10 hours which must always be assessed as indicated on ILSM Assessment Form). If LSC deficiencies are caused or discovered by maintenance mechanics, the maintenance mechanic will notify their Maintenance Supervisor and describe the deficiency and timing of repair. In such cases, the Maintenance Supervisor will use an ILSM Assessment Form to document the issue and pre-assess whether conditions of a deficiency or impairment exist. In all other cases, the employee causing, discovering, or made aware of deficiencies will use an ILSM Assessment Form to document the issue and pre-assess whether conditions of a deficiency or impairment exist.

If the pre-assessment indicates that there are conditions which may represent an LSC deficiency or impairment, the employee completing the pre-assessment will transmit the ILSM Assessment Form with the completed pre-assessment to the Fire Marshal (CC) or Safety Officer (MHD). The Fire Marshal or Safety Officer will then complete the ILSM Assessment Form to determine whether ILSM's are required, and, if so, what measures

are required. Documentation will be kept via notes on Work Orders and ILSM Assessment Forms will be maintained by the Fire Marshal or Safety Officer and the employee initiating the assessment.

The ILSM Assessment Form indicates criteria for evaluating when and to what extent measures are typically required to compensate for increased life safety risk due to code deficiencies or maintenance activities. Recognizing that it is impossible to identify all unique conditions in which a deficiency or impairment may occur, mitigating conditions may allow the professional discretion of the Fire Marshal or Safety Director to reasonably and safely not select or implement some typical measures which may be deemed unnecessary on a case by case basis. Mitigating conditions may include, but are not limited to: Trained staff in the area; Small size of the deficiency; Area with lower impact to patient population; Short duration of the deficiency; and other means of fire suppression, or fire alarm, or exit in the area. The original form is maintained as part of the Committee file.

All LSC deficiency repair work must also be documented through completion. Upon discovery of an LSC deficiency, the employee completing the pre-assessment will describe the deficiency and expected timing of its correction and transmit a copy repair Work Order or Purchase Order and the ILSM Assessment Form to the Facilities Compliance Director. The Facilities Compliance Director will add the issue to the ongoing 60-day completion list. All corrective repairs on the '60-day list' will be tracked and documented through completion, including Work Order # (if any), corrective action, and date of completion. ILSM assessments and actions will be documented along with documentation of corrective actions.

The following process flow shall be implemented to properly assess, implement, and document LSC deficiency ILSM assessments.

Process Flow

- A. Possible LSC deficiencies will be pre-assessed and assessed as required for conditions discovered or work initiated via:
 - Maintenance requests
 - Preventive maintenance activities
 - Testing / inspection activities
 - Life Safety building assessments (SOC surveys)
- B. If the deficiency is corrected immediately (within 24 hours) and does not involve a system impairment or utility failure (whole system or zone), ILSM's are not required.
- C. In accordance with Philadelphia Fire Department (PFD) requirements, any impairment of any fire protection system (detection, alarm, suppression) effecting any area greater than 30,000 square feet of any one floor or one full floor, or multiple floors, must be reported to the PFD as a fire system impairment regardless of the duration of the impairment. ILSM's will be required for such impairments. This applies to maintenance and testing activities as well as impairments discovered by any means.
- D. For utility failures, other Facilities Services response procedures appropriate for the specific utility failure shall also be adhered to as covered in the Emergency Operations Plan and Annexes. For system impairments, the Life Safety / System Impairments Procedure shall be adhered to.

- E. If a deficiency cannot or is not anticipated to be completed within 24 hours, for deficiencies identified by maintenance, maintenance mechanics will notify Maintenance Supervisors of potential LSC deficiencies.
- F. Within 24 hours of identifying a potential LSC deficiency, the Maintenance Supervisor for maintenance items, or other responsible personnel such as Facilities Compliance staff, will use the pre-assessment portion of the ILSM Assessment Form to identify whether LSC deficiency or impairment conditions exist.
- G. For multiple deficiencies reported as a result of a building survey process, due to the number of items being assessed at one time, and the need to evaluate the reported deficiencies, it is recognized that a longer processing period is required than the 24 hours for review of routinely discovered deficiencies. Facilities Compliance personnel will complete the pre-assessment portion of the ILSM Assessment Form for each LSC deficiency or type of deficiency bundled on a per floor basis and transmit completed forms to the Fire Marshal or Safety Officer as soon as reasonably possible and within the 60-day time frame to ensure completion of ILSM assessments in a timely manner. A pre-assessment will be completed and an assessment as necessary will be completed for each 60-day list Work Order.
- H. If a potential deficiency or impairment is pre-assessed as not presenting conditions of life safety deficiency or impairment, the item need not be further assessed and the assessment process is considered complete. The employee completing the pre-assessment will maintain a copy of the ILSM Assessment Form and transmit a copy to the Facilities Compliance Director for documentation of work not requiring ILSM's.
- I. If the potential deficiency or impairment is pre-assessed as presenting any condition of life safety deficiency or impairment, the employee completing the pre-assessment will transmit the ILSM Assessment Form to the Fire Marshal (CC) or Safety Director (MHD) for completion of the ILSM Assessment.
- J. Upon receipt of the ILSM Assessment Form with completed pre-assessment, the Fire Marshal or Safety Officer will complete the ILSM assessment. Identified conditions of deficiencies and impairments will be assessed as to whether they are significant. If, in the professional opinion of the Fire Marshal or Safety Officer, any identified deficiencies or impairments are deemed to be significant, ILSM's will be identified by checking the appropriate cell(s) on the grid in the assessment portion of the ILSM Assessment Form. The ILSM Assessment Form indicates when and to what extent measures are typically required. However, mitigating conditions may allow the professional discretion of the Fire Marshal or Safety Officer to reasonably and safely not select or implement some typical measures which may be deemed unnecessary on a case by case basis. Mitigating conditions may include, but are not limited to: Trained staff in the area; Small size of the deficiency; Area with lower impact to patient population; Short duration of the deficiency; and other means of fire suppression, or fire alarm, or exit in the area.
- K. Upon completion of the ILSM Assessment Form, the Fire Marshal or Safety Officer will transmit a completed and signed copy of the form to the requestor.

- L. The Fire Marshal or Safety Officer is responsible for implementing the following ILSM's as deemed required:
- Notifying the Philadelphia Fire Department (and Insurance Company)
 - Implementing a fire watch for fire detection, fire alarm, and fire suppression system impairments (Hot Work fire watches are the responsibility of maintenance and contractors)
 - Providing additional training to staff on the use of firefighting equipment
 - Conducting additional fire drills
 - Conducting education to promote awareness of building deficiencies, construction hazards, and temporary measures implemented to maintain fire safety
 - Training staff to compensate for impaired structural or compartmental fire safety features
- M. The requestor / responsible employee executing the work is responsible for implementing the following measures as deemed required:
- Posting signs identifying the location of alternative exits
 - Inspecting exits in affected areas on a daily basis
 - Installing temporary fire alarm and detection systems
 - Providing additional firefighting equipment
 - Installing temporary construction partitions that are smoke-tight, or made of noncombustible material or limited-combustible material
 - Providing increased surveillance of buildings, grounds, and equipment, giving special attention to construction areas and storage, excavation, and field offices
 - Enforcing storage, housekeeping and debris-removal practices that reduce the building's flammable and combustible fire load to the lowest feasible level
 - Inspecting and testing temporary systems monthly and documenting dates
- N. Implementation of ILSM's will be monitored by the Fire Marshal or Safety Officer.
- O. Repair of all LSC deficiencies will be tracked and documented to completion. If the LSC deficiency is expected to be repaired within 60 days, the Facilities Compliance Director will include the deficiency on the 60-day list. The 60-day list will identify the deficiency, the date identified, the Work Order number (if any), the ILSM assessment date, and (when complete) the completion date. If the deficiency is discovered during survey and expected to require more than 60 days for completion, the Facilities Compliance Director will submit through the Joint Commission for a time limited waiver. Documentation of corrective actions, completion, and ILSM assessment will be maintained by the Facilities Compliance Director.
- P. If repairs are completed under a Work Order, when the Work Order is completed, the date of repair will be noted on the Work Order. A copy of the completed Work Order or notice of repair by a vendor will be transmitted to the Facilities Compliance Director for documentation of the repair.
- Q. Documentation of the deficiency, order for correction or repair, evidence of correction or repair, and ILSM assessment will be maintained by the appropriate responsible employee. Copies of each will also be transmitted to the Facilities Compliance Director. Generally, the responsible employee is as follows:

- For maintenance requests – The requestor of the repair activity
- For preventive maintenance activities – The Maintenance Supervisor
- Testing / inspection activities – The Maintenance Supervisor, Director, or Facilities Compliance Director or Specialist directing the activity
- Life Safety building assessments (SOC surveys) – The Facilities Compliance Director

(End of process flow)

Contractor Responsibilities

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

- A. Abide by all terms and policies.
- B. Inform their personnel of these policies
- C. Regularly survey all buildings, grounds and equipment within construction/renovation project areas for hazards.
- D. Secure all required and applicable permits (both TJUH & external).
- E. Notify the following departments of existing conditions having the potential to cause a fire or smoke condition (Open Flame/Burning):
 - a. Center City – Jefferson Operations Control Room (215-955-1418). The Operations Control Room personnel will contact Environmental Health and Safety
 - b. Methodist – Environmental Health & Safety, Security, Fire Safety & Utilities
- 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.

Attachments: ILSM Assessment Form

Related Policies: 118.06 Interim Life Safety Measures
FDC118 Construction and Renovation ICRA – PCRA – ILSM Procedures
PDC 118.21 Planning Design and Construction Safety Risk Assessments Policy
PDC 118.21 Planning Design and Construction Safety Risk Assessments Process

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Responsibility for Maintenance of Policy: AVP, Facilities

Approved by: _____
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