

## Facilities Compliance Policies & Procedures

---

<b>Category:</b>	<b>Safety</b>
<b>Title:</b>	<b>ABOVE CEILING WORK PERMITS</b>
<b>Applicability:</b>	<b>Thomas Jefferson University &amp; Jefferson Health</b>
<b>Contributing Departments:</b>	<b>Planning Design and Construction, Facilities Services (CC), Facilities Management (MHD), Environmental Health &amp; Safety</b>

---

### PURPOSE

The purpose of this policy is to maintain a safe environment for patients, staff, and visitors by ensuring proper installation and code compliance conditions in the concealed space above ceilings in all Jefferson buildings. These conditions include the installation or modification of Mechanical, Electrical, and Life Safety Systems, and the integrity of fire protection systems and compartmentation.

### SCOPE

The policy applies to all Jefferson operated facilities and personnel including third parties and contractors operating on Jefferson's premises. The policy and procedures apply to Center City (CC) and Methodist Hospital Division (MHD) facilities.

### POLICY

It is the policy of Jefferson to ensure the safety of all building occupants by ensuring the proper installation of work installed above ceilings. Because work installed above ceilings is not readily observable for deficiencies after installation of ceilings, all work installed above ceilings shall be installed and approved through the Above Ceiling Work Permit process described herein. Such above ceiling work shall include the repair, installation, or modification of: Mechanical Systems, Electrical Systems, Life Safety Systems, low-voltage wiring, and all Utility Systems.

Above Ceiling Work Permit forms shall be used to control the process and are attached to this policy. The Procedure associated with this policy is as described below.

The Above Ceiling Work Permit process will require the Jefferson responsible manager of such work above ceilings to request and obtain a permit before starting the work and to have the work reviewed and approved as compliant before the work is considered complete.

Emergency work as determined by Facilities Operations or Facilities Management shall not require the permit to be requested and obtained prior to the start of the work. However, as soon as reasonably possible after the direction to start such emergency work, a permit shall be requested and, as the work progresses and as the work is completed, the installed work shall be reviewed for approval in accordance with the Procedure described herein.

For construction activities best described as inspection and non-invasive activities or small scale, short duration activities which create minimal dust (Types A & B Construction Activities) and undertaken in areas with low or medium patient risk, the required Infection Control Precautions would be Class I or Class II. As such, a formal ICRA permit is not required, but the risk assessment and any precautions will be approved via the permit process as described in the Procedure below and as identified in the Above Ceiling Work Permit form. All work of a larger construction scale, or undertaken in higher risk patient areas, shall be brought for approval to the ICRA Committee in accordance with Planning Design and Construction Department Procedure 118 – *Construction and Renovation ICRA – PCRA – ILSM Procedures*.

This policy applies to third party contractors and vendors as well as all Jefferson employees.

Inspection activities requiring the removal of only one ceiling tile within a 50 square foot area at a time, routine maintenance work, or accessing of utility valves above ceilings does not require an Above Ceiling Work Permit.

Compliance with these policies shall be managed by Facilities Compliance.

## **PROCEDURE**

### **Permit Request and Approval**

The responsible manager (Jefferson Requestor) of the required above ceiling work (or the contractor or vendor under the responsible manager's direction) shall complete an Above Ceiling Permit form with all required information. The responsible manager of the work is the Jefferson individual responsible for the requested work (i.e., Maintenance Supervisors, Planning Design and Construction Project Managers, IS Manager or Voice Communication Consultants) and shall submit completed permit forms for approval.

Required information on the form shall include the location where the work is to be performed, a description of the work to be performed, and the expected start and completion dates of the work. Where a

written description of work is not sufficient to convey the scope of the work, drawing(s) indicating the scope of work shall be submitted with the permit application.

The completed permit form shall be submitted by the Jefferson Requestor to the appropriate individuals as noted on the forms depending on the campus and the type of work. The Facilities Compliance Manager (CC) or the Chief Engineer (MHD) shall review the permit for required information and shall review the scope and location of the work relative to potential penetrations of rated smoke or fire barriers in order to confirm impacted barriers and enforce the use of proper sealants or assemblies for penetrations (per notes under "Execution of Work" below). If the information is complete and the work is acceptable to proceed, the approver shall transmit a copy of the permit form with their approval to other approvers per the form via e-mail. The Requestor shall be copied throughout the approval process to address deficiencies or concerns raised in the permit approval process and to track the approval process. The Requestor shall be notified of final approval.

Above ceiling work (other than emergency work) shall not be started without a completed permit form.

### **Execution of Work**

Vendors and contractors (including Jefferson personnel) shall keep a copy of the approved permit on their carts or otherwise immediately available on site as the work is being executed.

Upon initiation of the above ceiling work, the Vendor / Contractor (including maintenance personnel), working in consultation with the responsible manager of the work, shall identify and report any pre-existing code deficiencies in the area in which the work is being performed. Such deficiencies shall be reported promptly to the Jefferson responsible manager of the work, who will then notify the Facilities Compliance Department in writing of any deficiencies. If pre-existing deficiencies are noted, the Facilities Compliance Department will review the findings and manage the correction of the work including initiating a Life Safety risk assessment, and issuing Work Orders (CC) or requesting Work Orders (MHD) in writing for repair of the deficiencies. Such repair of pre-existing conditions shall not be the responsibility of the worker performing the permitted Above Ceiling Work, unless otherwise mutually agreed upon and authorized.

As work is executed, all proper infection control precautions and Interim Life Safety Measures shall be in place before the work starts and shall be adhered to throughout the duration of the above ceiling work.

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.

All work shall be installed in accordance with all applicable standards and regulations. Proper installation includes the following:

- Penetrations in corridor walls (below ceilings) and ceilings shall be sealed to limit the transfer of smoke.
- All penetrations or breaches in smoke barriers shall be sealed with rated assemblies to achieve a Fire Resistance Rating (FRR) equal to the existing rating of the barrier (½ or 1 hour FRR).
- All penetrations or breaches in fire barriers shall be sealed with rated assemblies to achieve a Fire Resistance Rating (FRR) equal to the existing rating of the barrier (1 or 2 hour FRR).
- In achieving required ratings for the assemblies, the Contractor shall only use fire sealant materials (such as caulking) and systems (such as sleeves) approved by Jefferson. All work shall be installed in strict accordance with manufacturer's instructions.
- All piping, tube, conduits, cable, and equipment shall be properly installed with hangers. In particular, no piping, conduit, cabling, or equipment shall be attached to or supported by any component of the sprinkler system, including sprinkler piping, hangers, all-thread, etc. Sprinkler piping shall be supported by properly installed hangers attached to the building structure.
- All cabling and conduit shall be properly supported and not laid on ceilings.
- All electrical junction boxes shall be closed.
- All piping shall be properly labeled per ANSI/ASME A13.1.
- Work shall be installed to maintain access for servicing and repairs to all existing or newly installed equipment, smoke dampers, and valves.

### **Inspection and Completion of Permit**

Contractors shall closely check all their own work for proper installation and satisfactory completion before requesting a final inspection. For external contractors, any rework associated with repair or replacement of improperly installed and unsatisfactory work will be the responsibility of the contractor and will be at the contractor's sole cost. In addition, fines will be assessed against external contractors per incidence of work rejected for installation deficiencies to offset the cost of re-inspection. Such costs are noted on the Above Ceiling Permit form and will be deducted from commitments to the Contractor. The amount paid at final billing will be net of the total assessment of fines.

Final inspection and closeout of the permit by the Facilities Compliance Department (CC), or the Facilities Representative (MHD) shall be a condition of final payment to the Contractor. Inspection of completed work shall be requested of the by the responsible manager of the work in writing. Generally within two working days of such request, inspection will be made by the Facilities Compliance Department (CC) or the Facilities Representative (MHD). The Contractor or the responsible manager of the work shall be present at the inspection.

On larger projects of multiple weeks, multiple phases, or multiple areas or locations, the Contractor is encouraged to request interim reviews of the work. Such interim inspections may result in final approval for the work completed in that phase or area.

Upon final inspection of the work, if the work has been deemed to have been properly installed, the Facilities Compliance Department (CC) or the Facilities Representative (MHD) will note the completion of the work on the permit form and transmit a copy to the responsible manager.

Retention of permit forms and related documentation will be the responsibility of the Facilities Compliance Department (CC) or the Facilities Representative (MHD). Such records shall be retained for a period of at least 10 years from closeout of the permit.

To assure consistency between campuses, and in fulfillment of the compliance role, the Facilities Compliance Department shall periodically survey and confirm proper execution of the Above Ceiling Work Permit process at all campuses. Such survey shall include a random inspection of ongoing above ceiling work with confirmation that permits are in place and an audit of completed and in process permits. Such surveys and audits shall be conducted at least semi-annually. In addition to copying the Facilities Compliance Department on all electronic approval correspondence, MHD will provide copies of any additional permit documentation to the Facilities Compliance Department on a monthly basis.

### **RELATED PROCEDURES**

- Facilities Operations / Facilities Management Department Procedure 204.36 – *Code Deficiencies and Maintenance Activities ILSM Procedures*
- Planning Design and Construction Department Procedure 118 – *Construction and Renovation ICRA – PCRA – ILSM Procedures*

**Attachments:** *Above Ceiling Work Permit*

**Original Issue Date:** 3/11/2013

**Revision Date(s):** 9/11/2017

**Review Date(s):** 9/5/2017

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

---

**Approved by:**  
Christopher J. Reitz

AIA CHFM CHC CLSS-HC LEED AP  
Director, Facilities Compliance