

**INTERIM LIFE SAFETY MEASURES
(ILSMs)**

1. **PURPOSE:** To establish criteria for evaluating and determining when, and to what extent, Interim Life Safety Measures (ILSM) are necessary for the following conditions:
 - A. Significant existing Life Safety Code (LSC) deficiencies, and
 - B. Deficiencies or conditions due to construction.

2. **POLICY:** The need for ILSM will be addressed during project development and evaluated throughout the construction process. ILSM will apply to all construction workers as well as any medical center personnel within the construction areas or in any adjacent areas affected by the construction. ILSM will also be addressed when significant (as identified in Attachment B) existing LSC deficiencies are identified. LSC deficiencies that would be scored as a "4" (indirect impact) by The Joint Commission under the Life Safety Standards would not be considered significant. ILSM are intended to provide compensating measures when the requirements of the LSC cannot be met. All ILSM actions will be documented. Deficiencies that are not significant may be evaluated as a group and summarized in the Environment of Care Council (EOCC) minutes.

3. **RESPONSIBILITY:**
 - A. For construction activities:
 - 1) The Contracting Officer's Representative (COR) is responsible for:
 - a. Communicating and coordinating potential construction project impacts to life safety with the Safety Section.
 - b. Implementation, enforcement, and documentation of ILSM.
 - 2) The Occupational Safety & Health Specialist (OSHS) is responsible for:
 - a. Evaluating the project concerning ILSM.
 - b. Developing procedures for the implementation, enforcement, and documentation of the ILSM.
 - c. Reevaluations and extensions of ILSM throughout the project.
 - 3) The Safety Officer is responsible for:
 - a. Reviewing and approving initial ILSM evaluations to ensure compliance with applicable regulations.
 - b. Communicating and coordinating with the Chief Engineer any issues related to the implementation, documentation, and enforcement of ILSM.

- 4) The Chief Engineer is responsible for:
 - a. Ensuring all construction projects are evaluated for ILSM.
 - b. Resolving any issues related to the implementation, documentation, and enforcement of ILSM.

B. For significant existing LSC deficiencies:

- 1) The OSHS is responsible for:
 - a. Evaluating the deficiency concerning ILSM.
 - b. Developing procedures for the implementation, enforcement, and documentation of the ILSM.
 - c. Reevaluations and extensions of ILSM until correction of the deficiency.
- 2) The Safety Officer is responsible for:
 - a. Ensuring all significant existing LSC deficiencies are evaluated for ILSM.
 - b. Coordinating resource allocation for ILSM implementation, enforcement, and documentation.
 - c. Providing status reports of ILSM to the Life Safety Code Deficiency Oversight Group (LSCDOG).
 - d. Reviewing and approving the initial ILSM evaluations to ensure compliance with applicable regulations.

4. **PROCEDURES:**

- A. Prior to the start of any construction project, and continually through the duration of the project, the OSHS will evaluate the need for ILSM. The OSHS will complete an ILSM evaluation and submit it to the Safety Officer for approval.
- B. The OSHS will complete an ILSM evaluation for significant existing LSC deficiencies and submit it to the Safety Officer for approval.
- C. To complete an ILSM evaluation:
 - 1) The questions on Attachments A and B correlate to the columns on Attachments A-1 and B-1. Any deficiencies or conditions identified on Attachments A-1 or B-1 will be considered in completing the questions on Attachment A or B.

- 2) If, per the columns on Attachments A-1 or B-1, the project does not create that specific deficiency, or the existing deficiency is not related, the question on Attachment A or B will state that the ILSM was evaluated, but no action was deemed necessary.
 - 3) Using the information from Attachments A and A-1, or B and B-1 (as applicable), complete Attachment A-2 or B-2 (as applicable) by listing all the ILSM needed for compliance during the project or until the existing deficiency is corrected.
 - 4) The OSHS and the Safety Officer will review and sign Attachment A-2 or B-2.
- D. Once ILSM for construction are implemented, the project will be inspected daily by the construction contractor, with the findings recorded in the daily log. Weekly verification of ILSM will be performed by the COR or designee, and the SOHS. Any identified problems with the implementation of the ILSM will be abated as soon as possible.
- E. All necessary documentation will be maintained in the FM construction project files (ILSM for Construction) or Safety Office (ILSM for Significant Existing LSC Deficiencies) to reflect compliance with these procedures.
6. **REFERENCES:** Joint Commission Life Safety Standards
NFPA 101 Life Safety Code, 2015 edition
 7. **COLLABORATION:** Facility Management
Office of Quality Management and Safety
 8. **RESCISSION:** Memorandum 00S-214, Dated: March 2014
 9. **REVIEW DATE:** Every three years in July.



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ATTACHMENTS:

- A. Interim Life Safety Measures Evaluation Sheet (Construction)
- A-1. Interim Life Safety Measures Evaluation Tool (Construction)
- A-2. Interim Life Safety Measures Description (Construction)
- B. Interim Life Safety Measures Evaluation Sheet (Existing LSC Deficiencies)
- B-1. Interim Life Safety Measures Evaluation Tool (Existing LSC Deficiencies)
- B-2. Interim Life Safety Measures Description (Existing LSC Deficiencies)

DISTRIBUTION: All Division and Product Line Managers.

**INTERIM LIFE SAFETY MEASURES (ILSM) EVALUATION SHEET
For Conditions as a Result of Construction**

Project No: _____ Date: _____

Project Title: _____

The following ILSM will be evaluated individually and initiated as needed to compensate for conditions due to construction. ILSM implementation will be documented on Attachment A-2.

- A. Is notification of the Milwaukee Fire Department and VA Police required?
Yes No N/A

- B. Is a fire watch required?
Yes No N/A

- C. Is additional egress signage required?
Yes No N/A

- D. Is relocation of permitted wheeled equipment required?
Yes No N/A

- E. Is daily inspection of means of egress required?
Yes No N/A

- F. Is temporary fire detection equipment, including monthly testing, required?
Yes No N/A

- G. Are additional portable fire extinguishers and training on their use required?
Yes No N/A

- H. Are temporary fire barriers required?
Yes No N/A

- I. Are temporary smoke barriers required?
Yes No N/A

- J. Is additional hazard surveillance required?
Yes No N/A

- K. Is reduction of combustibles required?
Yes No N/A

L. Is an additional fire drill per shift per quarter required?
Yes No N/A

M. Is additional staff training on awareness and compensating for diminished life safety features required?
Yes No N/A

Interim Life Safety Measures (ILSM) Evaluation Tool

Interim Life Safety Measures (ILSM) for Evaluation	A	B	C	D	E	F	G	H	I	J	K	L	M
Deficiencies or Conditions as a Result of Construction	Notify Fire Department and VA Police												
	Sprinkler system impairment > 10 hrs	X	X							X	X		
	Sprinkler system removal						X	X		X	X		
	Fire alarm system impairment > 8 hrs	X	X							X			
	Fire alarm system removal					X				X			
	Fire hydrant out of service	X				X				X			
	Exit closed for construction			X		X				X		X	
	Reduced corridor or exit access width/height				X	X				X			X
	Excessive travel distance to an exit			X	X	X				X			X
	Excessive common path of travel			X	X	X				X			X
	Dead-end corridor			X		X				X			X
	Impeded access for emergency responders	X				X				X			X
	Smoke barrier or partition compromised					X			X				X
	Fire barrier compromised					X		X				X	
	Ceiling system removal in sprinklered area					X					X		
Hot work (welding, cutting, brazing)		X			X		X			X	X		

INTERIM LIFE SAFETY MEASURES (ILSM) EVALUATION SHEET
For Significant Existing Life Safety Code Deficiencies

Date: _____

Unique Identifier: _____

Deficiency:

The following ILSM will be evaluated individually and interim measures initiated as needed to compensate for significant existing Life Safety Code (LSC) deficiencies as identified on the left hand column on Attachment B-1. Where a deficiency is not listed on the left hand column of Attachment B-1, all questions below should be addressed.

A. Is notification of the Milwaukee Fire Department and VA Police required?

Yes No N/A

B. Is a fire watch required?

Yes No N/A

C. Is additional egress signage required?

Yes No N/A

D. Is relocation of permitted wheeled equipment required?

Yes No N/A

E. Is daily inspection of means of egress required?

Yes No N/A

F. Is temporary fire detection equipment, including monthly testing, required?

Yes No N/A

G. Are additional portable fire extinguishers and training on their use required?

Yes No N/A

H. Is additional hazard surveillance required?

Yes No N/A

I. Is reduction of combustibles required?

Yes No N/A

J. Is an additional fire drill per shift per quarter required?

Yes No N/A

K. Is additional staff training on awareness and compensating for diminished life safety features required?

Yes No N/A

Interim Life Safety Measures (ILSM) Evaluation Tool

Interim Life Safety Measures (ILSM) for Evaluation	A	B	C	D	E	F	G	H	I	J	K
	Notify Fire Department and VA Police	Post fire watch	Post signage identifying alternate exits, install additional exit signage	Relocate carts and equipment out of area	Inspect means of egress daily	Install temporary fire detection equipment tied into building fire alarm system and perform certification test	Provide additional portable fire extinguishers and training	Conduct additional hazard surveillance	Reduce combustible materials in construction area	Conduct one additional fire drill per shift per quarter (situation dependent)	Provide additional staff training on awareness and compensating for diminished life safety features
Existing Significant Life Safety Code Deficiencies											
Noncompliant fire barrier											X
Noncompliant smoke barrier											X
Improperly protected vertical openings											X
Fire or smoke damper inoperational											X
Hazardous area not properly protected							X				X
Excessive common path of travel			X	X	X						X
Excessive dead end corridor			X	X	X						X
Excessive travel distance to an approved exit			X	X	X						X
Lack of two remote exits			X	X	X						X
Noncompliant locking arrangement			X	X	X						X
Fire alarm system out of service	X	X								X	X
Fire protection system out of service	X	X					X			X	X

