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Official Policy Manual	Section: Administration			
	Directive: ILSM – Interim Life Safety Measures			
	Policy Owner: Director, Administrative Support Services Group			

Interim Life Safety Measures

Interim Life Safety Measures (ILSM) are health and safety measures developed by The Joint Commission and put in place to protect patients, visitors, and staff who work in the hospital.

The purpose of an ILSM program is to mitigate potential untoward fire and smoke conditions at all times when features of life safety are deficient, compromised, or removed from service due to construction, maintenance, or breakdown/repair.

ILSM is about protecting patients and all others who might be unable to easily evacuate. The intent is to provide a safe environment for all occupants in the hospital at all times, and especially during times of construction or repair.

ILSM actions are utilized by OMH to compensate for Life Safety Code deficiencies present within buildings. Safety Departments will be involved as follows:
- Will have input as to the ILSM requirements
- Will complete an overall list for ILSM Risk Assessment.
- Train staff on the need for ILSM and steps being taken.
- Monitor areas to ensure required ILSM are being carried out.

The following content is provided from The Joint Commission:

Standard: LS.01.02.01: The organization protects occupants during periods when the Life Safety Code is not met or during periods of construction.

Note: This standard applies to behavioral health care settings that provide sleeping arrangements for four or more individuals served as a required part of their care, treatment, or services.

When the organization identifies Life Safety Code deficiencies that cannot be immediately corrected or during periods of construction, the organization does the following:

1. The organization has a written ILSM policy that covers situations when Life Safety Code deficiencies cannot be immediately corrected or during periods of construction. The policy includes criteria for evaluating when and to what extent the organization implements LS.01.02.01, EPs 2–15, to compensate for increased life safety risk. The criteria include the assessment process to determine when interim life safety measures are implemented. Note: For any Life Safety Code (LSC) deficiency that cannot be immediately corrected during survey, the organization identifies which ILSMs in its policy will be implemented until the issue is corrected.

2. When the organization identifies Life Safety Code deficiencies that cannot be immediately corrected or during periods of construction, the organization evacuates the building or notifies the fire department (or other emergency response group) and initiates a fire watch when a fire alarm system is out of service more than 4 out of 24 hours or a sprinkler system is out of service more than 10 hours in a 24-hour period in an occupied building. Notification and fire watch times are documented. (For full text, refer to NFPA 101-2012: 9.6.1.6; 9.7.6; NFPA 25-2011: 15.5.2)

❖ When the organization identifies Life Safety Code deficiencies that cannot be immediately corrected or during periods of construction, the organization does the following (See #3-#12):

3. Posts signage identifying the location of alternative exits to everyone affected.
4. Inspects exits in affected areas on a daily basis. The organization determines when these inspections are needed.
5. Provides temporary but equivalent fire alarm and detection systems for use when a fire system is impaired. The organization determines when these systems are needed.
6. Provides additional firefighting equipment. The organization determines when to provide this equipment.
7. Uses 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. The organization determines when to use these partitions.
8. Increases surveillance of buildings, grounds, and equipment, giving special attention to construction areas and storage, excavation, and field offices. The organization determines when to increase surveillance.
9. Enforces storage, housekeeping, and debris-removal practices that reduce the building's flammable and combustible fire load to the lowest feasible level. The organization determines when these practices are needed.
10. Provides additional training to those who work in the organization on the use of firefighting equipment. The organization determines when to provide additional training.
11. Conducts one additional fire drill per quarter. The organization determines when these additional fire drills are needed. (See also EC.02.03.03, EP 1)
12. Inspects and tests temporary systems monthly. The completion date of the tests is documented. The organization determines when these inspections and tests are needed.
13. The organization conducts education to promote awareness of building deficiencies, construction hazards, and temporary measures implemented to maintain fire safety. The organization determines when this education is needed.
14. The organization trains those who work in the organization to compensate for impaired structural or compartmental fire safety features. The organization determines when this training is needed.
   Note: Compartmentalization is the concept of using various building components (for example, fire-rated walls and doors, smoke barriers, fire-rated floor slabs) to prevent the spread of fire and the products of combustion so as to provide a safe means of egress to an approved exit. The presence of these features varies, depending on the building occupancy classification.
15. The organization's policy allows the use of other ILSMs not addressed in EPs 2–14.
   Note: The "other" ILSMs used are documented by selecting "other" and annotating the associated text box in the organization's Survey-Related Plan for Improvement (SPFI) within the Statement of Conditions™ (SOC).