INTERIM LIFE SAFETY IMPLEMENTATION POLICY

PURPOSE: The purpose of this policy is to establish criteria to assess appropriate implementation of Interim Life Safety Measures to help maintain a safe environment for all patients, visitors and staff by evaluating the loss of a life safety feature during the course of construction/renovation or when a life safety code deficiency is identified and cannot be immediately corrected.

DEFINITIONS: Interim Life Safety Measure – Action or activity developed, implemented, and managed when Life Safety deficiencies are identified that cannot be immediately corrected.

POLICY: When should ILSM be implemented? Implementation of the Interim Life Safety Measures is required in or adjacent to all construction areas and throughout buildings where Life Safety Code deficiencies are identified and cannot be immediately corrected.

When should the ILSM form be used? Whenever it is determined that a Life Safety system has been or will be impaired, the Vanderbilt University Medical Center Staff member responsible for the project shall assess all deficiencies (applicable to that phase of the project) using the matrix provided on the ILSM Assessment form.

How often must the ILSM form be completed? Activities of duration less than two (2) weeks: only one ILSM form shall be filled out at the beginning of the life safety system impairment.

Activities of duration greater than (2) weeks: one ILSM form shall be completed for the beginning of the life safety system impairment and thereafter every Friday for the duration of the project.
Who receives the ILSM form when it is completed?
One (1) copy of the ILSM Assessment Form shall be:
- kept by the responsible shop, Construction Company, etc. completing the form.
- sent to the Vanderbilt department supervising the work (if applicable).
- sent to the Hospital Safety Engineer in the Department of Institutional Safety.

How to fill out the ILSM Form
Step #1: Answering the questions in this initial step will determine if an ILSM Assessment is required for the project/activity.
Step #2: General Project/Task Information – Once it is determined that an assessment is required; all project information shall be recorded in this table step.
Step #3: ILSM Matrix – Any code deficiencies, construction, maintenance, or testing related issues that apply to the particular project being reviewed should be checked on the ILSM matrix. For each item checked on the ILSM matrix, all of the applicable Interim Life Safety Measures (marked with an “X” in the associated row) are verified to be in place. If all ILS Measures are in place, a “Y” is placed in the associated column. If any required ILS measure is not in place, an “N” is placed in the column. NOTE: For any ILS measure NOT in place, actions shall be taken immediately to resolve the issue as soon as practical.
Step #4: Interim Life Safety Implementation Measures – provides a list of the ILSM requirements for each item checked in the matrix.
Assessment completion information is recorded in this section.

RESPONSIBILITY: It shall be the responsibility of each Planning and Project Manager, Assistant Director, Manager, etc. having supervisory responsibility for a project, testing, or maintenance activity to ensure that the appropriate Interim Life Safety Measures for each job are in place and are kept current. Additionally, it is their responsibility to ensure that the ILSM form is correctly filled out for any and all activities under their purview.

REFERENCES: LS.01.02.01 EP3
42CFR 482.41
SA 40-10.05 – Interim Life Safety Implementation