



## Interim Life Safety Measures (ILSM) Standard Operating Procedure

<b>Target Group:</b> Cleveland Clinic United States locations		<b>Original Date of Issue:</b> 06/01/2001	<b>Version</b> 7
<b>Approved by:</b> Board of Directors- Main, BOG/MEC- Main	<b>Date Last Approved/Reviewed:</b> 02/24/2021	<b>Prepared by:</b> Jeffrey Hildreth (Director Environmental Health and Safety)	<b>Effective Date</b> 02/24/2021
<b>Avon Hospital:</b> MEC approval date: 3/15/2021 Board approval date: 5/19/2021 Effective Date: 5/19/2021		<b>Euclid Hospital:</b> <b>MEC approval date:</b> 3/12/2021 Board approval date: 5/19/2021 Effective Date: 5/19/2021	
<b>Fairview Hospital:</b> MEC approval date:3/15/2021 Board approval date: 5/19/2021 Effective Date: 5/19/2021		<b>Hillcrest Hospital:</b> MEC approval date:3/10/2021 Board approval date: 5/19/2021 Effective Date: 5/19/2021	
<b>Lutheran Hospital:</b> MEC approval date: 4/22/2021 Board approval date: 5/19/2021 Effective Date: 5/19/2021		<b>Marymount Hospital:</b> MEC approval date:3/22/2021 Board approval date: 5/19/2021 Effective Date: 5/19/2021	
<b>Medina Hospital:</b> MEC approval date: 3/16/2021 Board approval date: 5/19/2021 Effective Date: 5/19/2021		<b>South Pointe Hospital:</b> MEC approval date:3/16/2021 Board approval date: 5/19/2021 Effective Date: 5/19/2021	
<b>CCCHR:</b> MEC approval date: 04/02/2021 Board approval date: 04/02/2021 Effective Date: 04/02/2021		<b>Weston, Florida:</b> MEC approval date:3/22/2021 Board approval date: 5/19/2021 Effective Date: 5/19/2021	
<b>Martin Health:</b> MEC approval date:8/24/2022 Board approval date: 8/24/2022 Effective Date: 8/24/2022		<b>Coral Springs, FL ASC/FHC:</b> MEC approval date:3/22/2021 Board approval date: 5/19/2021 Effective Date: 5/19/2021	
		<b>Weston, Florida:</b> MEC approval date:3/22/2021 Board approval date: 5/19/2021 Effective Date: 5/19/2021	

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## Purpose

To protect occupants during periods when the *Life Safety Code*<sup>™</sup> is not met or during periods of work activities.

## Definitions

**Cleveland Clinic United States locations-** Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, South Pointe, Children's Hospital for Rehabilitation, Weston Hospital, Coral Springs Ambulatory Surgery Center, Martin Health, and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Express Care Centers, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

**Compartmentalization** – the dividing of a building into compartments to limit the spread of fire and restrict the movement of smoke.

**Interim Life Safety Measures-** a series of compensatory life safety actions that guide patient care areas during work activities, determined by requirement through the use of the interim life safety measure risk assessment, when deficiencies are identified while performing preventative maintenance on life safety systems, or when life safety code deficiencies are identified and cannot be immediately corrected.

**Means of Egress-** is a continuous and unobstructed way of exit travel from any point in a building or structure to a public way and consists of three separate and distinct parts: the way of exit access, the exit, and the way of exit discharge.

**Means of Egress Impaired** – If the path of exit access, the exit, or the way of exit discharge are affected in any way that blocks, impede, or impacts occupants from using them.

**Smoke Tight-** A continuous membrane, or a membrane with discontinuities created by protected openings, where such membrane is designed and constructed to restrict the movement of smoke. Firestopping materials such as putty, pillows or caulk can be used to create protected openings. Smoke tightness can also be achieved by using temporary partitions that are made of noncombustible or limited-combustible material that will not contribute to the development or spread of fire.

**Life Safety Code** – National Fire Protection Association 101, 2012 edition. The Code address those construction, protection, and occupancy features necessary to minimize danger to life from fire, including smoke, fumes, or panic. The Code establishes minimum criteria for the design of egress facilities to allow prompt escape of occupants from buildings or, where desirable, into safe areas within buildings.

**Work Activities-** Activities conducted by caregivers or contractors that compromise the safety features of the building or generate additional hazards that can't be mitigated immediately. Examples included but are not limited to carrying out maintenance or upkeep, running cables for telecommunications repairs, or renovating an area of the hospital to better accommodate patient care.

## Instructions

When the hospital identifies *Life Safety Code*<sup>™</sup> deficiencies that cannot be immediately corrected or during periods of construction, interim life safety measures (ILSM) will be implemented.

### Interim Life Safety Measures Implementing Criteria

The criteria for evaluating when and to what extent the hospital implements special measures to compensate for increased life safety risk include, but are not limited to, the following:

**Table 1**

<b>Code Deficiency or Activity Criteria</b>	<b>Interim Life Safety Measure</b>
1. Means of egress reduced to less than 72” in healthcare occupancies or 44” in business occupancies, or stairwells in any occupancy type have any obstructions, for any duration that cannot be immediately cleared in event of an alarm	<ul style="list-style-type: none"> <li>• Inspect exits in affected areas on a daily basis for duration of impact <b>LS.01.02.01 EP4</b></li> <li>• Post signage identifying the location of alternative exits to everyone affected. <b>LS.01.02.01 EP3</b></li> <li>• Train affected occupants on alternate egress routes <b>LS.01.02.01 EP13</b></li> </ul>
2. Means of egress in healthcare occupancies reduced to less than 72” or stairwells have any obstructions for more than 48 continuous hours	<ul style="list-style-type: none"> <li>• Conduct an additional fire drill once per shift per quarter for affected area <b>LS.01.02.01 EP11</b></li> </ul>
3. Sprinkler system is out of service more than 10 hours in a 24-hour period in an occupied building	<ul style="list-style-type: none"> <li>• Notifies the fire department (or other emergency response group) <b>LS.01.02.01 EP1</b></li> <li>• Initiate fire watch and document fire watch times. <b>LS.01.02.01 EP1</b></li> <li>• Provides additional firefighting equipment <b>LS.01.02.01 EP6</b></li> </ul>
4. Fire alarm system is out of service more than 4 out of 24 hours in an occupied building.	<ul style="list-style-type: none"> <li>• Notifies the fire department (or other emergency response group) <b>LS.01.02.01 EP1</b></li> <li>• Initiate fire watch and document fire watch times. <b>LS.01.02.01 EP1</b></li> <li>• Provide temporary but equivalent fire alarm and detection systems <b>LS.01.02.01 EP5</b></li> <li>• Inspect and test temporary systems monthly <b>LS.01.02.01 EP12</b></li> </ul>
5. Combustible loading, debris accumulation, additional storage, or extra fuel load.	<ul style="list-style-type: none"> <li>• Provide additional firefighting equipment <b>LS.01.02.01 EP6</b></li> <li>• Increase surveillance of buildings, grounds, and equipment, giving special attention to construction areas and storage, excavation, and field offices <b>LS.01.02.01 EP8</b></li> <li>• Enforce storage, housekeeping, and debris-removal practices that reduce the building’s flammable and combustible fire load to the lowest feasible level (debris must be removed daily at the end of each shift) <b>LS.01.02.01 EP9</b></li> </ul>
6. Impairment to compartmental fire safety features (rated barriers, partitions, doors, dampers)	<ul style="list-style-type: none"> <li>• Implement temporary fire stopping measures until permanent approved method is installed (fire stopping pillows, mineral wool, etc.)</li> </ul>

	<p><b>LS.01.02.01 EP7</b></p> <ul style="list-style-type: none"> <li>• Train those who work in the organization to compensate for impaired structural or compartmental fire safety features. <b>LS.01.02.01 EP14</b></li> <li>• 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. <b>LS.01.02.01 EP7</b></li> </ul>
7. Hot work operations	<ul style="list-style-type: none"> <li>• Provide additional firefighting equipment <b>LS.01.02.01 EP6</b></li> <li>• Conduct active fire watch for duration of hot work activity. Fire watch times are documented. <b>LS.01.02.01 EP1</b></li> <li>• Inspect the immediate area before and after hot work operations for fire hazard risks <b>LS.01.02.01 EP15</b></li> <li>• Notify the organization when hot work operations will occur and are complete <b>LS.01.02.01 EP15</b></li> <li>• Conduct additional fire watch as directed upon completion of hot work <b>LS.01.02.01 EP15</b></li> </ul>
8. Access for emergency responders or any essential equipment impaired, restricted, or rerouted	<ul style="list-style-type: none"> <li>• Promote awareness of building deficiencies, construction hazards, and temporary measures implemented to maintain fire and life safety <b>LS.01.02.01 EP13</b></li> <li>• Post signage indicating alternate routes for emergency response or essential equipment locations <b>LS.01.02.01 EP15</b></li> </ul>

The implementation of Interim Life Safety Measures to address a deficiency or during periods of construction shall be documented.

When project scope changes, new risk assessment(s) shall be conducted, implementing new ILSM measures as appropriate.

### **Regulatory Requirement/References**

Joint Commission Environment of Care Standards  
NFPA 101, Life Safety Code, 2012 edition  
NFPA 241, Standard for Safeguarding Construction, Alteration, and Demolitions operations, referenced standard.  
OSHA 29 CFR 1910 and 1926  
Ohio Fire Code, current edition  
Local, State, and federal building, health, safety, and environmental codes and regulations.

### **Oversight and Responsibility**

The Environment of Care Committee (Main Campus), is responsible to review, revise, and update this standard operating procedure to maintain compliance with regulatory or other requirements.

It is the responsibility of each hospital, institute, department and discipline to implement the policy and to draft and operationalize related procedure to the policy if applicable.

Management staff, employees, property management companies, construction and non-construction contractors, and consultants shall comply with this policy, the procedures issued thereto, and the interim life safety measures addressing a particular deficiency or activity.

### **Other Background Information**

Issuing Office: Environmental Health and Safety, Enterprise Quality and Safety

Task Force/Committee: Environment of Care Committee (Main Campus), reapproved February 27<sup>th</sup>, 2016 sent to other US EOCs February 19<sup>th</sup>, 2016.

Revision 7 approved by Environment of Care Committee (Main Campus) January 20, 2021

### **Appendices**

Cleveland Clinic Interim Life Safety Risk Assessment  
SBAR Communication Tool 3-2023