APPLICATION

NYU Langone Health

PURPOSE

To ensure adequate life safety protection:

- When egress is obstructed
- When a standpipe, sprinkler, or fire alarm system is impaired
- When Life Safety Code deficiencies cannot immediately be corrected
- During periods of construction and renovation

To comply with federal, state, and local regulations, and NFPA 101: *The Life Safety Code*.

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POLICY AND GENERAL INFORMATION

1.0 Application

NYU Langone Health (NYULH) refers to the NYU Langone Health System, NYU Langone Hospitals, NYU Grossman School of Medicine, NYU Long Island School of Medicine, the Family Health Centers at NYU Langone, and all entities controlled by any of them.

This policy applies to:

- All NYULH owned and leased facilities
- All employees, contractors, and consultants of NYULH

2.0 Introduction

The Joint Commission (TJC) requires that hospitals develop and implement an ILS policy. The policy must include written criteria for evaluating when and to what extent the hospital implements one or more of the following special measures to compensate for increased life safety risk:

2.1 Evacuating the building, or notifying the fire department and implementing a fire watch.

2.2 Posting signs identifying alternate exits.

2.3 Inspecting exits in affected areas on a daily basis.

2.4 Providing temporary but equivalent fire alarm and detection systems for use when a fire system is impaired.

2.5 Providing additional fire-fighting equipment.

2.6 Using temporary construction partitions that are smoke-tight and made of noncombustible or limited combustible material that will not contribute to the development or spread of fire.

2.7 Increasing surveillance of buildings, grounds, and equipment, giving special attention to construction areas and storage, excavation, and field offices.

2.8 Enforcing storage, housekeeping, and debris-removal practices that reduce the building's flammable and combustible fire load to the lowest feasible level.

2.9 Providing additional training to those who work in the hospital on the use of fire-fighting equipment.

2.10 Conducting one additional fire drill per shift per quarter.

2.11 Inspecting and testing temporary systems monthly, and documenting the completion dates of the tests.

2.12 Providing education to promote awareness of building deficiencies, construction hazards, and temporary measures implemented to maintain fire safety.

2.13 Training those who work in the hospital to compensate for impaired structural or compartmental fire safety features.

2.14 Implementing other appropriate interim life safety measures (ILSMs).

3.0 Responsibilities

3.1 **NYU Langone Hospital-Long Island (NYULH-LI) Planning, Design, and Construction** is responsible for Interim Life Safety (ILS) Plans for construction on the NYUWH main campus and at the Research and Academic Center (RAC), including:

- Creating ILS plans.
- Submitting the ILS plans to either the Sr. Director of Engineering and Facilities or the Director of Environment of Care Compliance and Emergency Management for review and approval.

3.2 **NYULH-LI Engineering** is responsible for ILS Plans for operations and maintenance work on the NYULH-LI main campus and at the RAC, including:

- Creating ILS plans
- Submitting the ILS plans to either the Sr. Director of Engineering and Facilities or the Director of Environment of Care Compliance & Emergency Management for review and approval.

3.3 **Environmental Health & Safety (EH&S)** is responsible for the Interim Life Safety Program at locations other than NYULH-LI and the RAC, including:

- Developing the ILS program (the Program).
- Training personnel to implement the Program.
- Developing and issuing documents that incorporate appropriate ILSMs for construction and renovation projects.
- Conducting quality assurance (QA) inspections of construction, renovation, and facilities maintenance projects to verify that appropriate ILSMs have been implemented.

EH&S and the **NYULH-LI Fire Safety Officer** are also responsible for:

- Developing and issuing ILS Plans and illustrated Interim Evacuation Plans (e.g., when there is a need to compromise egress) that incorporate appropriate ILSMs.

EH&S is also responsible for:

- Presenting quarterly summaries of the results of QA inspections of construction and renovation projects to the Construction Safety Subcommittee of the Environment of Care Committee.
- Conducting QA inspections of facilities maintenance projects and reporting the results to Facilities.

3.4 **Facilities** (Facilities Management, Facilities Operations, Engineering), **Information Technology (IT), Real Estate,** and **RED+F Design and Construction** are responsible for compliance within their departments and divisions. Their responsibilities include, but are not limited to:

- Ensuring the Program is implemented on all construction, renovation, and maintenance projects.
- Ensuring personnel who report to them:
  - Implement the required ILSMs.
  - Conduct regular ILS inspections of projects that require ILSMs.
- Providing Security with current information on active projects (the Daily Security Site Inspection List) so Security staff can inspect exits in affected areas on a daily basis.

In the buildings they maintain, **Facilities** and **Real Estate** are also responsible for:

- Conducting an ILSM Risk Assessment for TJC Survey-related Plans for Improvement (SPFI) if a life safety code deficiency cannot be corrected within 60 days of a survey, and entering required documentation into the TJC website.
- Conducting an ILSM Risk Assessment when building maintenance-related life safety code deficiencies are not minor and/or cannot be corrected immediately (i.e., within 60 days).
- Assessing the need for ILS Plans and Interim Evacuation Plans, and creating or requesting them in accordance with this policy.
- Arranging for implementation of a fire watch (see Section 4).

- Functioning as the impairment coordinator, per Chapter 9 of the New York City (NYC) and New York State Fire Code, or applicable code in other municipalities
- Ensuring their staff notify the authorities having jurisdiction when a fire protection system (standpipe, sprinkler, fire) is out of service
  - In NYC, the Fire Department's (FDNY's) impairment unit (212.570.4300)
  - At NYULH-LI, the Nassau County Fire Marshal's office (516.573.9900), with additional notification to a chief from the Mineola Fire Department for any fire pump impairment or extensive fire alarm system impairment.
  - In other locations, the local fire marshal or fire department

RED+F Design and Construction is also responsible for:

- Summarizing data from daily inspections of construction/renovation projects and reporting it to the Construction Safety Committee.

3.5 **Managers** and **Project Managers (PMs)** (e.g., design, construction, operations, maintenance, and cable management) are responsible for implementing and maintaining the Program on their projects. Their responsibilities include, but are not limited to:

- Requesting ILS risk assessments in accordance with this policy.
- Informing their contractors about the requirements of this policy.
- Obtaining Construction and/or ILS Risk Assessments, Permits and Plans; ensuring Permits and Plans are posted in plastic sheet protectors at entrances to construction/renovation projects; and ensuring contractors comply with the terms of the permits and plans.
- Notifying Facilities, Real Estate, or building management (as applicable):
  - In advance of planned work which will result in impairment of a standpipe, sprinkler, or fire alarm system.
  - Immediately of an impairment of a standpipe, sprinkler, or fire alarm system resulting from an unscheduled event.
- Arranging for implementation of a qualified fire watch (see Section 4) and ensuring that necessary notifications (e.g., to Facilities and Security, or building management) are made about the fire watch.
- Conducting regular inspections of construction/renovation projects for which ILSMs are required.

- As a rule, daily unless otherwise specified, e.g., in the completed risk assessment, or Construction or ILS Permit.
- At least once a week, for inactive sites. More frequent inspections are required if necessary to maintain site safety.

The Construction Safety Inspection Checklist is included as Appendix B.

- Promptly correcting deficiencies found on their projects.

3.6 At locations other than NYULH-LI and the RAC, **Security** and **Loss Prevention** are responsible for:

- Inspecting projects daily using the Daily Security Site Inspection List.
- Periodically reporting the results of daily inspections to RED+F Design and Construction, for incorporation into their inspection report.
- On request, and where permitted by code (see Section 4.2), assigning their staff to conduct a fire watch, as applicable.

3.7 **Department heads** are responsible for:

- Inspecting construction barriers within their departments as part of their daily leadership rounds, and reporting deficiencies to Facilities or Real Estate.
- Ensuring their subordinates receive all training required by the Program, e.g., on Interim Evacuation Plans.

4.0 Criteria for implementing a fire watch

4.1 The Authorities Having Jurisdiction (e.g., in NYC, the FDNY; outside NYC, the fire department or fire marshal) shall be notified when a standpipe, sprinkler, or fire alarm system is out-of-service.

4.2 A fire watch is required unless the AHJ specifically indicates otherwise.

- The area patrolled by each individual shall not exceed 50,000 square feet.

Within NYC

- During the first 4 hours of impairment, trained building staff (e.g., Security) may conduct the fire watch as long as the unprotected area does not exceed 50,000 square feet.
- If the impairment exceeds 4 hours or the unprotected area exceeds 50,000 square feet, the fire watch must be conducted by individuals who have an FDNY Certificate of Fitness (C of F) for Fire Guard for Impairments

Outside NYC

- For an impairment of any duration, staff shall implement an approved fire watch

4.3 Risk assessments for other common situations that could require a fire watch are summarized below. Each situation must be assessed for its specific risks.

- Situation: Putting a shield over a single smoke detector in an occupied area for more than 4 hours to prevent false alarms from dust. The shield is removed once the dust-producing activity is complete.
  - Fire watch required? No.
  - Rationale: Occupants and other active fire protection devices are present in the surrounding area.
- Situation: In a building where the Facilities engineers receive notification of activated smoke detectors, placing smoke detectors offline (e.g., where personnel may generate dust in the affected area) to prevent notification to the local fire department during a scheduled event. (Devices are operational after hours.)
  - Fire watch required? No.
  - Rationale: Facilities engineers receive notification of activated smoke detectors and respond to investigate. Also, the fire alarm system pull stations and speaker/strobes remain active.
- Situation: A scheduled shut down or drain down of the standpipe or sprinkler system or disabling of the fire alarm system.
  - Fire watch required? Yes.
  - Rationale: The standpipe, sprinkler or fire alarm system is not functional.
- Situation: An unscheduled event, such as an unanticipated system failure or shutdown. E.g., shutting off a zone valve to the sprinkler system or disabling a fire alarm zone.
  - Fire watch required? Yes.
  - Rationale: The standpipe, sprinkler or fire alarm system is not functional.
- Situation: A construction site that is neither fully sprinklered, nor has perimeter walls that are 1-hour fire-rated from slab to slab.
  - Fire watch required? Yes.
  - Rationale: NFPA 241 requires that the perimeter of the construction site contains walls that are 1 hour fire-rated unless the site is sprinklered in

accordance with NFPA 13. The NYC and NYS building and fire codes contain additional requirements.

- Note: A fire watch is acceptable for a short duration impairment, but is not a substitute for a construction site having an active sprinkler system or a perimeter fire-rated partition.

5.0 Criteria for selecting and implementing other ILSMs

5.1 Routine operations and maintenance (O&M) work

EH&S has conducted a risk assessment for routine in-house O&M activities by Facilities' employees (see Appendix C). Based on this assessment, Facilities has incorporated appropriate ILSMs into their Standard Safety Precautions for O&M work (see Section 10.0). There is no need for an additional ILS risk assessment and ILSMs for routine O&M work by Facilities' employees.

5.2 Minor deficiencies

As a rule, there is no need for an ILS risk assessment and ILSMs for minor building maintenance-related life safety code deficiencies (e.g., burnt out exit lights, damaged doors or door hardware, missing or damaged ceiling tiles, small penetrations, illegible fire door labels, open junction boxes) that can be corrected within 60 days.

- NYULH's facilities are designed, constructed, equipped, and maintained to confine a fire to the area where it starts, and to minimize the spread of smoke and fire.
- Facilities has comprehensive building maintenance programs (BMPs) for all in-patient facilities, and other buildings they operate. The BMPs incorporate regular, scheduled processes for inspecting, identifying, prioritizing, and correcting life safety code deficiencies. Critical or severe deficiencies receive the highest priority.

The BMPs include:

- Written strategies to manage items covered by the programs.
- Documented schedules for the frequency of inspecting the items.
- Periodic monitoring with an annual evaluation of the effectiveness of the programs.

- Real Estate schedules routine inspections for, and correction of life safety code deficiencies at locations they manage, none of which are in-patient occupancies.
- NYULH staff are well prepared to respond to fire incidents.
  - All staff complete mandatory annual fire safety training.
  - Staff participate in routine fire drills, per TJC requirements.
  - Fire Response Team members participate in additional training.

5.3 TJC Survey Related Plan for Improvement (SPFI)

Facilities or Real Estate conducts an ILSM Risk Assessment (for process, see Section 6 or 7) for any SPFI that cannot be immediately (i.e., within 60 days) corrected, and enters the documentation into the TJC website.

5.4 Other conditions

PMs and managers evaluate the need for ILSMs (for process, see Section 6 or 7) whenever they identify conditions that could pose a threat to life safety. This includes:

- When egress will be obstructed.
- When a fire protection system will be impaired.
- Whenever a Life Safety Code deficiency cannot be immediately (i.e., within 60 days) corrected.
- During periods of construction and renovation.

6.0 Building maintenance: ILSM risk assessment process

6.1 When building maintenance-related life safety code deficiencies are not minor and/or cannot be corrected immediately (i.e., within 60 days) and require a Time Limited Waiver (TLW) from the Centers for Medicare Services (CMS), a designated Facilities or Real Estate manager drafts an ILSM risk assessment.

- The goal is efficient and effective mitigation of any increased risk.
- The manager uses an Interim Life Safety Measures Assessment Tool (see Appendices D and E) or comparable form to document the assessment.
- The risk assessment may include the rationale (e.g., existing mitigating features) for determining what, if any, ILSMs are needed.

6.2 The manager works with the EH&S Fire Safety Program Manager or the NYULH-LI Fire Safety Officer, or their designee to finalize the risk assessment.

6.3 As needed, the manager coordinates implementation of required ILSMs (e.g., training on life safety code deficiencies and/or alternate exits).

7.0 Construction/renovation: ILSM risk assessment process

7.1 During the planning of a construction or renovation project, the PM coordinates an ILS risk assessment. The goal is efficient and effective mitigation of the risk.

7.2 At NYULH-LI main campus and the RAC, the PM uses the NYULH_LI ILSM Assessment and Precaution Plan (Appendix E) to identify and document appropriate ILSMs.

- The PM submits the document to Sr. Director of Engineering and Facilities or the Director of Environment of Care Compliance and Emergency Management for review and approval.

7.3 At other locations, the PM asks an EH&S Construction Safety Specialist (CSS) to conduct an ILS risk assessment. The CSS uses the ILSM Matrix (Appendix F) and professional judgment on a case-by-case basis, to identify appropriate ILSM and construction safety measures.

- At the end of the process, the CSS issues the PM one or more of the following:
  - A Construction Safety or Interim Life Safety Permit (a Permit). The permitting process is described in Section 8. A sample Permit is included as Appendix A.
  - An Interim Life Safety Plan.
  - An Interim Evacuation Plan.
- Permit signatories
  - The CSS creates a Permit and gives it to the PM for signature.
  - The PM signs the Permit and obtains the following additional signatures, after which the CSS signs the Permit:
    - the contractor
    - the Program Director or Facilities' Director
    - the divisional Vice President

8.0 **Implementation and monitoring of ILSMs**

8.1 The PM informs contractors of the Permit and ILSM requirements and pertinent Safety Policies (e.g., Construction Contractor Safety Requirements).

8.2 The PM coordinates implementation of the Permit and ILSM requirements (e.g. posting of signage, training on alternative exits, installation of temporary alarm system, provision of additional fire extinguishers, and informing affected departments).

8.3 During the project, the PM:

- Inspects the project site regularly using the inspection checklist in Appendix B or a comparable form, and maintains documentation in the project file.
- Works with contractors to ensure prompt correction of deficiencies identified during inspections.
- Arranges for daily testing if there is a temporary fire alarm system.

9.0 **ILS and Interim Evacuation Plans**

9.1 When the following conditions arise at NYULH-LI main campus or RAC, the PM prepares an ILS Plan and submits it for approval. At other locations, the PM or manager asks EH&S to prepare an ILS Plan:

- The number, type, or severity of life safety code deficiencies places building occupants at noteworthy increased risk.
  - E.g., when occupying new space in which there are numerous life safety code deficiencies on the “punch list”.
- The planned work or an unscheduled event:
  - Reduces the width of an egress corridor in a patient area to less than 4 feet or to the point where the corridor cannot accommodate common transport devices (e.g., stretchers or beds).
  - Reduces the width of an egress corridor in a non-patient area to less than 3 feet.
  - Obstructs or temporarily renders inaccessible any part of the horizontal or vertical evacuation route(s) for an area, including the exit access, exit stair, and exit discharge.
  - Impairs a fire protection system.

9.2 The ILS Plan may include an Interim Evacuation Plan (i.e., a drawing showing temporary evacuation routes).

9.3 NYULH-LI Engineering or an EH&S staff member with an FDNY C of F for Fire Safety Director shall review and accept each ILS Plan before it is finalized.

9.4 The PM or manager shall coordinate implementation of the requirements of the ILS Plan (e.g. informing affected departments and coordinating training on alternative evacuation plans).

10.0 Standard safety precautions for in-house operations and maintenance (O & M) activities

When small, routine O&M activities are undertaken by Facilities and/or Real Estate employees, the manager, foreman, and supervisor ensures that employees do the following:

10.1 Wear an employee ID badge above the waist with picture facing front at all times.

10.2 Do not disturb any suspect asbestos containing material. Ask the supervisor/ foreman/manager to have designated departments (e.g., EH&S, NYULH-LI Engineering) coordinate testing and abatement (if needed).

10.3 If mold is observed, ask the supervisor/foreman/manager to have designated departments (e.g., EH&S, NYULH-LI Engineering) coordinate an assessment and provide recommendations.

10.4 If a heat gun, torch, or grinder will be used to remove paint, ask the supervisor/foreman/manager to have designated departments (e.g., EH&S, NYULH-LI Engineering) coordinate testing for lead containing paint.

10.5 Set up the work area so as to contain dust and debris. Use an enclosure, such as a room or control cube, or erect smoke-tight barriers around the work area.

10.6 Do not block exits from the floor or work area. Maintain egress corridor width of 4 feet in a patient care area and 3 feet in any other area.

10.7 Do not block access to emergency equipment such as fire alarm pull stations, fire extinguishers, or emergency medical gas shutoff valves.

10.8 Run a HEPA-filtered air cleaner in the work area if the work will generate dust.

10.9 If the work produces flame, sparks or slag, obtain a daily Hot Work Permit from the supervisor/foreman/manager, implement the required protective measures, and have the permit readily accessible.

10.10 Remove all oxygen and flammable gas cylinders from the work area when not in use and at the end of each day.

10.11 Schedule the project to minimize the impact of noise and vibration.

10.12 Follow NYULH's tobacco-free workplace policy.

10.13 Remove flammable and combustible materials from the work area when the work is finished for the day.

10.14 Remove accumulated waste before leaving for the shift.

Related Safety Policies

104: Tobacco Free Facilities
111: Fire Incident Protocol
115: Fire Alarm System Testing and Maintenance
120: Construction Safety Requirements
122: Fire Prevention
127: Fire Drills
131: Fire Alarm System Impairment
143: Hot Work Permit
Facilities Policy T.01: Penetrations in Smoke/Fire Walls/Slabs and Repair

Appendix A	Sample Construction Safety/Interim Life Safety Permit
Appendix B	Construction Safety Inspection Checklist
Appendix C	ILSM Risk Assessment for Routine Work by Facilities Maintenance Employees
Appendix D	ILSM Assessment Tool
Appendix E	NYULH-LI ILSM Assessment and Precaution Plan
Appendix F	ILSM Matrix

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Replaces	2/2020
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Summary of Revisions

Revision Date	Section	Changes
March 2021	Throughout	Changes NYU Winthrop to NYU Langone Hospital-Long Island
February 2020	1.0	Incorporates Winthrop and NYU Long Island School of Medicine
	4.2	Clarifies requirements outside of NYC
	5.1, 5.2	Incorporates information previously in Section 6
	7.3	Incorporates information on permit signatories, previously in Section 8
	8.0	Changes name from "Process for the Construction Safety/ILS Permitting" to "Implementation and Monitoring of ILSMs"
	Reviewed by	Adds review by NYU Winthrop Hospital,
	Appendix E	New
June 2019	2.1, 2.2, 2.14	New
	3.2	Adds Facilities responsibility for responding to TJC survey findings, and for ILS risk assessments for non-routine maintenance
	3.5	Adds responsibility for daily inspections of construction barriers
	4.0	Adds fire watch requirements for areas outside of NYC
	5.1	New
	Section 6	New
	Appendices	Reorders Appendices Adds Appendix C: ILSM Risk Assessment for Routine Work by Facilities Maintenance Employees

March 2018	Throughout	Updates logo and organizational references
	5.2	Clarifies criteria for selecting and implementing other ILSMs
	7.0	Clarifies Interim Life Safety and Interim Evacuation Plan
	8.9	Clarifies need for daily hot work permit
	Appendix C	Adds appendix – Interim Life Safety Matrix
June 2017	3.2	Clarifies that RED+F Design and Construction reports inspection data to the Construction Safety Committee
	3.4	Clarifies that Security reports inspection data to RED+F Design and Construction.
	4.0	Adds section, to address, more clearly, TJC requirement for criteria
	4.2	Added last example
February 2017	Application	Changes NYULMC to NYU Langone Removes reference to Lutheran Medical Center's policy
	1.0	Defines NYU Langone
	Review by	Adds review by EOC Committees of HJD, Lutheran, and Lutheran Family Health Centers
May 2016	2.2	Clarifies when Facilities notifies the FDNY impairment unit.
	3.1	Clarifies when a fire watch and a certified Fire Guard are required.
February 2016	Policy & General Information	References Lutheran's ILS program.
	4.3	Adds information regarding signatories to the ILS Permit
	Summary of Revisions	Adds Summary of Revisions
	Appendix A	Changes signature block in accordance with Section 4.3

Sample Construction Safety/Interim Life Safety Permit

NYU Langone Health

Interim Life Safety (ILS) Permit

Reason for Permit: Construction Project	
Location:	
Project Coordinator:	Project Start Date:
Contractor Performing Work:	Project Completion:
Supervisor's Name:	Telephone:
Brief description of project: Demolition, abatement and renovation of existing space.	

The contractor shall comply with all federal, state and local laws, rules and regulations, and NYULH Safety Policies.

The Project Manager will review this permit with the contractor to ensure that the following construction safety and interim life safety measures are implemented on this project and will conduct daily hazard surveillance inspections:

- The contractor shall comply with all requirements set forth in the site specific ICRA permit issued for this project.
- The project shall be planned and scheduled to minimize the impact of noise and vibration for patients and staff.
- Project Manager shall coordinate removal of all NYULH supplies and equipment (e.g. chemicals, compressed gas cylinders, appliances, etc.) from the project space prior to the start of work.
- Contractor shall not disturb asbestos-containing materials. Abatement must be coordinated through Environmental Health and Safety (EH&S).
- All construction personnel shall wear NYULH Security I.D. badges at all times.
- All means of egress shall be kept unobstructed at all times. Exits shall be inspected daily. Stairwell doors shall not be propped or otherwise kept open. Exit signs with directional arrows shall be installed within the work area to aid in worker evacuation. The contractor shall not store any tools, materials or equipment outside the work area (e.g. in corridors, stairwells, etc.).
- A mounted, 10lb. ABC dry chemical fire extinguisher with tag showing annual and monthly inspection record, is required for every 2,500 square feet of space. The distance between any 2 fire extinguishers shall not exceed 75 feet. A 10lb. ABC dry chemical extinguisher must also be immediately available by hot work or wherever flammable liquids or compressed gas cylinders are stored.
- Hot work to be performed requires issuance of a **daily** NYULH Hot Work Permit. Contractor shall comply with all provisions of OSHA 1926 subpart J, the NYC Fire Code (including any storage and usage permit requirements) / Or Local Fire Code, and NYULH Safety Policy 143 (Hot Work). Compressed gas cylinders shall be removed from the job site at the end of each work day. All welding requires the use of an operable smoke-eater at the point of the welding. A dedicated fire guard shall be in place at all times during hot work.

Sample Construction Safety/Interim Life Safety Permit

- The project site shall be maintained under 0.02" of negative pressure at all times with air exhausted out of the building.
- The width of the corridor shall not be reduced to less than 4 feet nor can any established means of egress be changed or eliminated unless specifically authorized by NYULH's Fire Safety Director along with issuance of Interim Life Safety and Interim Evacuation Plans.
- Temporary hard and soft construction partitions shall be smoke tight. Hard partitions shall be constructed of non-flammable material (drywall). Soft (plastic) partitions shall be fire retardant sheeting.
- All construction materials introduced into this site by the contractor (e.g. plywood, plastic sheeting, tarps, etc.) shall be fire-retardant or non-combustible. Inspect daily to verify that flammable and combustible load is maintained at the lowest level feasible.
- Shutdown of all existing utilities in the construction area (e.g. electric, HVAC, plumbing, etc.) shall be coordinated with NYULH Facilities Operations. A temporary lighting and power system shall be installed by a licensed electrical contractor. If any contractors require tie-in of a temporary electrical panel, this work shall be done by NYULH Facilities Operations. No work shall be performed on live systems unless pre-planned, specifically authorized by EH&S and Facilities Operations, and conducted in accordance with all NFPA 70e requirements. Live electrical panels shall be properly covered and locked at all times. All power tools and equipment shall be GFCI protected.
- Contractor shall arrange for shutdown of the fire alarm, detection and/or suppression systems if the possibility of an accidental activation exists due to planned work activities (see NYU LH Safety Policy 145). Sprinkler heads and piping and fire alarm speaker/strobes, pull stations and their associated wiring, shall be protected against physical damage. Any damage caused to these systems shall be immediately reported to both NYULH Facilities Operations and the Project Manager.
- The Project Manager shall notify EH&S a) in advance of work which will result in an impairment of a standpipe, sprinkler or fire alarm system or b) immediately of an impairment of a standpipe, sprinkler or fire alarm system resulting from an unscheduled event, arrange for implementation of a fire watch and ensure that necessary notifications are made to Facilities and Security.
- NYULH Security Department shall be given advanced notice of all work to be performed after hours, work that needs to be performed in sensitive, controlled or restricted areas, and any work that may adversely affect patients, staff or the public.
- All work on the building's fire suppression systems shall be performed by a licensed plumber or fire suppression contractor in accordance with the NYC Building Code and/or local laws.
- The PM shall notify the contractor that smoking is completely prohibited on campus, indoors and out. Contractor shall post an adequate number of "No Smoking" signs to comply with NYC Fire Code Section 1401.1, or local fire code. PM shall inspect daily for cigarette butts and follow up on problems.
- Ground penetrating radar shall be used to ensure no striking of in-slab utilities.

Sample Construction Safety/Interim Life Safety Permit

- Penetrations in floors, walls and ceilings, uncovered or created during the course of the project, must be fire-stopped immediately utilizing NYULH Facilities Operations approved Hilti brand fire-stopping products.
- Chemicals and products used are to be low or no VOC unless specifically approved by the EH&S. Flammable or combustible liquids, chemicals and products shall be stored in an approved fire safety cabinet. Safety Data Sheets (SDSs) for all products shall be readily available on site.
- Debris containers shall be wiped down and capped with plastic prior to leaving the job site. Debris removal and material deliveries to the site shall be made via the service elevators at times when minimal interaction with patients and staff is expected.
- Construction personnel shall wear hard hats and use other personal protective equipment when the work calls for same.
- Construction personnel shall use the right size and type ladder for the work they are performing. A-frame ladders shall not be used in the closed position. Due to the potential electrical hazard metal ladders pose, only fiberglass or wood ladders shall be used. Ladders shall be inspected daily before use. Damaged ladders shall be thrown out. Workers shall not stand on the top 2 rungs of, stand backwards on or straddle, any ladder. Where the work does not allow 3 points of contact to be maintained on the ladder, another more stable work platform (e.g. bakers scaffold) shall be used.
- **All** construction personnel shall be protected against falls from height greater than 6 feet at all times utilizing the hierarchy of controls. Use of a fall arrest system is a last resort and shall only be implemented where no other practical means (e.g. guardrail, aerial lift, or scaffold) exists. A controlled access zone shall be established wherever the potential for falling persons, tools or materials exists. Workers at height shall tether their tools.
- The contractor shall properly handle, and dispose of, hazardous waste on site in accordance with the NYULH Hazardous Waste from Contractors policy 108a. Typical waste encountered or created during the demolition project includes:
  - Fluorescent bulbs (mercury)
  - Lighting ballasts (PCBs)
  - Smoke detectors (radioactive isotopes)
  - Aerosol cans

Signatory	Name	Signature	Date
Project Manager			
Contractor's competent person			
Program Director			
Vice President			
EH&S			

Construction Safety Inspection Checklist

Project Name: _____ PIM#:_____ SOM or HC:_____ Inspected by:_____

Bldg/Flr/Location: _____ Contractor: _____ Date (week of): _____

Project Manager: _____ VP/Sr. Director: _____ Inspection Type: _____ ICRA:_____

Inspection Completed	M	T	W	Th	F
	☐	☐	☐	☐	☐

Category Deficiency	Deficient					Comments
Access control	M	T	W	Th	F	
Construction site unlocked and unattended	☐	☐	☐	☐	☐	
IT or electrical closets unlocked	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	
Barriers	M	T	W	Th	F	
Entrance unzipped	☐	☐	☐	☐	☐	
Inadequate (e.g. unsealed, not fire-rated, uncovered vents)	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	
Ceiling tiles	M	T	W	Th	F	
Damaged or missing	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	
Compressed gas cylinders	M	T	W	Th	F	
Stored on site	☐	☐	☐	☐	☐	
Unsecured	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	
Doors	M	T	W	Th	F	
Don't self close, latch or lock	☐	☐	☐	☐	☐	
Excess clearance (>3/4" under or >1/8" above/sides)	☐	☐	☐	☐	☐	
Propped open	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	
Egress	M	T	W	Th	F	
Inadequate (<3' within; <4' outside)	☐	☐	☐	☐	☐	
Obstructed	☐	☐	☐	☐	☐	
Other (e.g. egress doors locked during work)	☐	☐	☐	☐	☐	
Electrical hazards	M	T	W	Th	F	
Damaged electrical cords	☐	☐	☐	☐	☐	
Electrical cords on the ground	☐	☐	☐	☐	☐	
Electrical panels open	☐	☐	☐	☐	☐	
Exposed wiring	☐	☐	☐	☐	☐	
GFCI protection missing	☐	☐	☐	☐	☐	
Work on live electrical	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	
Exit signs	M	T	W	Th	F	
Inadequate	☐	☐	☐	☐	☐	
Fall protection	M	T	W	Th	F	
Improper use of ladders	☐	☐	☐	☐	☐	
Inadequate	☐	☐	☐	☐	☐	
Fire detection/notification/suppression	M	T	W	Th	F	
Pull stations/speakers/strobes obstructed	☐	☐	☐	☐	☐	
Sprinkler system impaired	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	
Fire extinguisher	M	T	W	Th	F	
Missing annual inspection	☐	☐	☐	☐	☐	
Missing monthly inspection	☐	☐	☐	☐	☐	
Not hung or hung at wrong height (<36" or >60")	☐	☐	☐	☐	☐	
Wrong size/type	☐	☐	☐	☐	☐	
Other (e.g. discharged, inadequate as per ILS permit)	☐	☐	☐	☐	☐	
Flammables/Chemicals	M	T	W	Th	F	
Improper/excess storage	☐	☐	☐	☐	☐	
Products with VOCs, odor, or >1 NFPA rating	☐	☐	☐	☐	☐	
Other (e.g. cabinet required)	☐	☐	☐	☐	☐	

Category Deficiency	Deficient					Comments
HEPA filter	M	T	W	Th	F	
Hose ripped	☐	☐	☐	☐	☐	
Not in use	☐	☐	☐	☐	☐	
Overloaded	☐	☐	☐	☐	☐	
Other (e.g. exhaust point not sealed)	☐	☐	☐	☐	☐	
Hot Work	M	T	W	Th	F	
Combustibles in vicinity	☐	☐	☐	☐	☐	
Fire guard not present	☐	☐	☐	☐	☐	
Smoke eater not used	☐	☐	☐	☐	☐	
Housekeeping	M	T	W	Th	F	
Clutter	☐	☐	☐	☐	☐	
Improper food/drink storage/waste disposal	☐	☐	☐	☐	☐	
Inadequate dust control	☐	☐	☐	☐	☐	
Slip, trip, fall hazards	☐	☐	☐	☐	☐	
Other (e.g. dusty clothing outside site)	☐	☐	☐	☐	☐	
ID badges	M	T	W	Th	F	
Missing/not worn	☐	☐	☐	☐	☐	
Lighting	M	T	W	Th	F	
Inadequate	☐	☐	☐	☐	☐	
Missing or improperly assemled protective covers	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	
MSDS/SDS	M	T	W	Th	F	
Inadequate staff knowledge	☐	☐	☐	☐	☐	
Missing MSDS/SDS or binder	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	
Negative pressure	M	T	W	Th	F	
Inadequate	☐	☐	☐	☐	☐	
Penetrations	M	T	W	Th	F	
Created or existing	☐	☐	☐	☐	☐	
PPE	M	T	W	Th	F	
Missing hard hats	☐	☐	☐	☐	☐	
Missing other PPE	☐	☐	☐	☐	☐	
Signs/permits	M	T	W	Th	F	
Missing Hot Work permit	☐	☐	☐	☐	☐	
Missing ICRA permit	☐	☐	☐	☐	☐	
Missing ILS permit	☐	☐	☐	☐	☐	
Missing Penetrations permit	☐	☐	☐	☐	☐	
Missing Pre-Construction Validation permit	☐	☐	☐	☐	☐	
Missing Warning Construction Site sign	☐	☐	☐	☐	☐	
Other (e.g. missing ILS plan)	☐	☐	☐	☐	☐	
Smoking	M	T	W	Th	F	
Evidence of smoking	☐	☐	☐	☐	☐	
Sticky mats	M	T	W	Th	F	
Missing	☐	☐	☐	☐	☐	
Saturated	☐	☐	☐	☐	☐	
Storage/Supplies	M	T	W	Th	F	
Construction materials in unauthorized location	☐	☐	☐	☐	☐	
Construction materials stockpiled	☐	☐	☐	☐	☐	
Materials not fire-rated/non-combustible	☐	☐	☐	☐	☐	
Non-construction materials unprotected in const. site	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	
Waste	M	T	W	Th	F	
Excess storage	☐	☐	☐	☐	☐	
Not covered/moistened/wiped during transport	☐	☐	☐	☐	☐	
Hazardous waste not properly managed	☐	☐	☐	☐	☐	
Universal waste not properly managed	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	
Other	M	T	W	Th	F	
Food prep equipment in construction site	☐	☐	☐	☐	☐	
Other	☐	☐	☐	☐	☐	

ILSM Risk Assessment for Routine Work
By Facilities Maintenance Employees

Interim Life Safety Measure (ILSM)	**Comment**
Evacuate the building, or notify the fire department and implement a fire watch.	Not required: routine work typically doesn't meet requirements for implementing a fire watch (refer to NYULH ILS Program Section 4.0) or evacuation.
Post signs identifying alternate exits.	Not required: scale and duration of work typically doesn't affect existing exits.
Inspect exits in affected areas on a daily basis.	Not required: scale and duration of work typically doesn't affect existing exits.
Provide temporary but equivalent fire alarm and detection systems for use when a fire system is impaired.	Not required: routine work does not impair existing fire alarm and detection monitor systems.
Provide additional fire-fighting equipment.	Required for hot work, as per NYULH Hot Work program.
Use temporary construction partitions that are smoke-tight and made of noncombustible or limited combustible material that will not contribute to the development or spread of fire.	Not required: scale and duration of work typically doesn't require construction partitions and/or does not increase the risk of fire.
Increase surveillance of buildings, grounds, and equipment, giving special attention to construction areas and storage, excavation, and field offices.	Not required: scale and duration of work typically doesn't impact extended areas to require increased surveillance.
Enforce storage, housekeeping, and debris-removal practices that reduce the building's flammable and combustible fire load to the lowest feasible level.	Included in SOPs and standard safety practices.
Provide additional training to those who work in the hospital on the use of fire-fighting equipment.	Not required: routine work is not expected to increase the risk of fire to necessitate additional training. All NYULH employees complete annual Emergency Management and Workplace Safety Training, which includes training on the use of firefighting equipment.
Conduct one additional fire drill per shift per quarter.	Not required: scale and duration of work does not necessitate additional drills.
Inspect and test temporary systems monthly, and document the completion dates of the tests.	Not required: routine work does not impair existing systems.
Provide education to promote awareness of building deficiencies, construction hazards, and temporary measures implemented to maintain fire safety.	Not required: routine work is not expected to create building deficiencies, construction hazards or requirements for temporary fire safety measures. All NYULH employees complete annual Emergency Management and Workplace Safety Training, which includes training on the use of firefighting equipment.
Train those who work in the hospital to compensate for impaired structural or compartmental fire safety features.	Not required: routine work is not expected to impair structural or compartmental fire safety features. Where work may create penetrations, additional measures are required, as per the Above Ceiling and Barrier Integrity Permit.
Implement other appropriate interim life safety measures (ILSMs).	SOPs for routine work include processes for maintaining life safety and implementing adequate ILSMs to address life safety risks (e.g., related to egress, hot work, compressed gases) that may arise during work.

Comment:

Routine work performed by Facilities maintenance employees (e.g., plumbing, electrical, painting) is typically small scale, involving minimal disturbance of fire safety features. When maintenance employees breach fire barriers, e.g., by penetrating walls or removing doors, they install temporary barriers. Based on the scale and duration of routine maintenance work, the standard safety precautions that are implemented as per the ILS Program, and the specific measures included in routine task SOPs, existing measures are typically sufficient and additional ILSM are not required for routine work.

ILSM Risk Assessment Tool

Deficiency	
ID Number	
Building	
Location	
Potential and/or Identified Deficient Issues	

Impact Evaluation	Yes / No / NA	Measures Implemented
1. Will all required exits be free and unobstructed? E.g., no construction materials, equipment, or debris block free use of all exits adjacent to the construction site or impacted by the project. All existing exit signs will remain in place and operational.		
2. Will any exterior access points to the building be blocked? E.g., access to emergency departments, entrances, and exit discharges will be maintained free of obstruction, storage, or other impediments.		
3. Will any fire alarm systems & suppression systems be compromised and/or altered? Any temporary system must be tested monthly. A fire watch & fire dept. notification must be implemented when fire systems are compromised for more than 4 hours in a 24-hour period.		
4. Will there be a need to erect construction partitions that are smoke tight, fire resistant, non-combustible, slab to slab, and wall to wall?		
5. Will any additional fire extinguishers and equipment be necessary & provided on site? Equipment must be functional and tests and inspections are up to date.		
6. Will the Smoking prohibition need to be communicated, monitored and enforced?		
7. Will construction storage need to be minimized and housekeeping & debris removal policies communicated, monitored and enforced?		
8. Will additional fire drills be necessary for staff in affected areas and/or within construction area (contractor staff)?		
9. Will surveillance of the area be necessary?		
10. Will any additional training of staff and/or contractors be necessary to compensate for impaired structural or compartmental features of fire safety?		
11. Will facility-wide safety education programs need to be communicated to promote awareness of fire safety building deficiencies, construction hazards, and ILSM?		
12. List any other Life Safety Code deficiency / concerns identified:		
13. List any other Life Safety Code deficiency / concerns identified:		
14. List any other Life Safety Code deficiency / concerns identified:		

Additional Comments:
On [insert date] [insert name] [insert department] notified [insert name] [insert department] that staff who work in the area must [insert what they must do] whenever there is a fire alarm.

_____ _____

Prepared by – Print Name Date

_____

NYULH-LI ILSM Assessment and Precaution Plan

Description of Project, Noted Deficiency or SOC: _____

_____

Location: _____ **Project Manager:** _____

Instructions: Determine whether any of the "ILSM Triggers" listed below apply to the project, life safety deficiency at hand. Determine if noted ILSM precautions # apply; delete any that do not apply; add others as applicable.

ILSM PRECAUTIONS

1. Notify fire department and other emergency response group
2. Initiate fire watch
3. Post signage identifying alternate exit(s) to all affected
4. Perform daily inspections of exits and affected areas
5. Provide temporary, but equivalent, fire protection systems
6. Provide additional fire extinguishers/fire-fighting equipmen
7. Use temporary construction partitions as control measure "smoke Tight or non/limited combustible material
8. Increase surveillance of buildings, grounds and equipment giving special attention to construction areas and storage, excavation, and field offices,
9. Enforce storage, housekeeping, and debris removal practice that reduce the building's flammable and combustible fire lo to the lowest feasible level,
10. Provide additional training of staff working on the use of fi extinguishers and/or other fire-fighting equipment,
11. Conduct one additional fire drill per shift per quarter,
12. Conduct monthly tests and inspections of temporary system
13. Conduct education to promote awareness of building deficiencies, construction hazards, and temporary measures implemented to maintain fire safety,
14. Train staff assigned to compensate for impaired structural c compartmental fire safety features
15. Enforce No Smoking policy inside any and all buildings an designated No Smoking outdoor areas,
16. Complete required repairs and advise Engineering Dept. to check completed work for proper protection including all penetrations

Description of ILSM Trigger	Applicable?		ILSM Precaution # List all that apply
	Yes	No	
Will any hot work be performed? (Welding, cutting, brazing, soldering, or other activities utilizing an open			Implement hot work permit or #2, 6, 9, 15, 7 if combustibles within 35'
Will any egress pathways or exists be altered or obstructed?			3, 4, 13
Will access to emergency services be restricted or rerouted, or will access for emergency responders (police, fire dept., EMS) be impaired or restricted?			3, 4, 13
Will any fire detection or alarm system be out of service or impaired > 4 hrs.?			All precautions, except 3 and 7
Will any part of the fire suppression or sprinkler system be out of service or impaired > 10 hours?			
Will any smoke/fire walls, doors, barrier or assemblies be compromised?			4, 7, 8, 9, 14, 15, 16
Will the fire safety of personnel in adjacent areas be affected?			4, 8, 9, 10, 13, 15
Will it be necessary to install temporary construction partitions?			3, 4, 8, 9, 14, 15
Will the project result in the accumulation of debris and/or materials and increase the flammable or combustible load in the work area?			4, 8, 9, 10, 13, 15
Will the project activity present any other safety-related hazards? If so, specify and select applicable precautions.			

Additional comments related to the required measures:_____ _____

_____ _____ _____

Submitted by - Print Name & Signed initials | Title | Date

Acknowledge with initial signature

Approved by: ☐Safety ☐Engineering & Facilities Maintenance ☐Hospital Police ☐Other (specify):

Interim Life Safety Measures Matrix

Date:																								
Completed by:																								
Project:																								
Comments:																								
Impairment/Deficiency	**Measures to be implemented**																							
	Interim life safety permit	Interim life safety plan / evacuation plan	Notify fire department	Fire watch	Alternate exit signage	Inspect exits daily	Occupancy reduced or restricted	Install rated partition/door	Install smoke-tight partition	Seal penetrations with fire-resistive materials	Additional fire alarm/detection/suppression	Additional fire-fighting equipment	Increased hazard surveillance	Use flame-retardant/non-combustible materials	Limit/control/restrict flammables/combustibles	Prohibit staged/stored materials in occupied areas	Limit materials stored in construction area	Additional fire drill(s)	Test temporary equipment/systems monthly	Staff Notification	Staff Training	Other
Egress																								
Reduce width of healthcare facility corridors to less than 4'; non-healthcare corridor to less than 3' less																								
Blocking/rerouting of an egress corridor, exit, exit discharge, etc.																								
Absence of two remote exits																								
Elimination of required exit(s)																								
Excessive travel distance or common path of travel to an approved exit																								
Creation or increase of dead end corridor(s)																								
Obstruction of exit signage																								
Other																								
Fire/life safety																								
Removal/impairment of a rated fire/smoke barrier or door																								
Impairment of fire alarm system (e.g. smoke/heat detectors, panel, etc.)																								
Impairment of standpipe																								
Impairment of fire pump																								

Interim Life Safety Measures Matrix

Impairment/Deficiency	Interim life safety permit	Interim life safety plan / evacuation plan	Notify fire department	Fire watch	Alternate exit signage	Inspect exits daily	Occupancy reduced or restricted	Install rated partition/door	Install smoke-tight partition	Seal penetrations with fire-resistive materials	Additional fire alarm/detection/suppression	Additional fire-fighting equipment	Increased hazard surveillance	Use flame-retardant/non-combustible materials	Limit/control/restrict flammables/combustibles	Prohibit staged/stored materials in occupied areas	Limit materials stored in construction area	Additional fire drill(s)	Test temporary equipment/systems monthly	Staff Notification	Staff Training	Other
Impairment of sprinkler system																						
Simultaneous impairment of more than one fire protection system																						
Impairment of fire protection system to last more than 8 hours																						
Other																						
Construction – Type																						
New Building																						
Existing building rehabilitation by type (per NFPA 101, chapter 43)																						
Repair - Renovation - Modification - Reconstruction - Change of use/occupancy - Addition																						
Penetrations in construction partition walls; fire/smoke																						
Opening between drop ceiling and underside of slab to occupied space																						
Staging/storage of tools, material, equipment and debris																						
Combustible/flammable materials/products in construction area																						
Hot work operations																						
Removal of fireproofing																						
Other																						