Title: Life Safety/Fire Safety Management Plan

Policy #: EOC-04

Purpose:  
The BIDMC Life Safety Management Plan defines the program to minimize the probability that a fire or other event, which may adversely impact Life Safety, will occur and to minimize the direct and indirect effects such an event would have on life and property.

Scope:  
The Life Safety/Fire Safety Management Plan applies to all properties and facilities owned, occupied, or managed by Beth Israel Deaconess Medical Center (BIDMC), including clinical, research, and administrative areas on the main campus and at off-site locations. In some cases, certain responsibilities under the Life Safety/Fire Safety Management Plan are shared with or delegated to local managers and/or outside parties such as landlords, tenants, or contractors. As applicable to particular locations, the Life Safety/Fire Safety Management Plan also covers BIDMC patients, employees, clinical or research staff, and visitors present in these locations.

Policy Statement:

The Life Safety/Fire Safety Program shall, at a minimum:

1. Apply and adhere to the most current applicable edition of the Life Safety Code of the National Fire Protection Association (NFPA) and other pertinent local, state, and federal codes and standards.

2. Apply the "Protect in Place" concept to fire protection in patient care areas.

3. Use proper equivalencies granted under the federally approved Fire Safety Evaluation System for health care facilities as a means of evaluating alternative arrangements used to achieve compliance with the Life/Fire Safety Code.

4. Ensure that every calendar year a Life Safety Assessment is prepared by a qualified person/agency for all health care occupancies and continued progress in addressing and preventing life safety deficiencies is demonstrated.

5. Develop plans of correction regarding fire safety deficiencies when necessary.
6. Ensure safe access and egress for all potential occupants, including those who are physically disabled.

7. Maintain Life Safety/Fire Safety during all levels of construction.

8. Ensure grounds safety.

9. Test detection, notification, and suppression systems to assure continual functionality.

10. Train and educate staff with regard to Life Safety/Fire Safety measures.

Responsibilities

A. Administration

The administration of BIDMC accepts responsibility for the Life Safety/Fire Safety program’s leadership, effectiveness, and continuous review and improvement. The administration grants authority for managing all aspects of the Life Safety/Fire Safety Management plan to the collective efforts of the Director of Engineering and Infrastructure, Director, Capital Facilities, Director of Maintenance Operations, Director of Environmental Health & Safety, and the Senior Director of Facilities Planning, Compliance & Construction (or their equivalents).

B. Director of Maintenance Operations (or equivalent)

The Director of Maintenance Operations, or equivalent, is responsible for coordinating all aspects of life and fire safety equipment maintenance including, but not limited to, fire detection, fire alarm, fire suppression, extinguishers, and all other equipment relating to the overall life safety program. The Director of Maintenance Operations shall ensure that all inspection, testing and maintenance of life safety and fire safety equipment is completed and documented according to regulatory guidelines and The Joint Commission (TJC) requirements. The Director of Maintenance Operations shall lead the investigation of fire events and fire alarm and suppression incidents caused by infrastructure and/or building equipment failure or malfunction with the assistance of the Director of Environmental Health & Safety and others as appropriate.

C. Director of Environmental Health & Safety (or equivalent)

The Director of Environmental Health & Safety, or equivalent, has the responsibility for coordinating and documenting an effective fire drill program in accordance with regulatory guidelines, and for ensuring an effective staff fire safety education program. The Director of Environmental
Health & Safety, in coordination with other key departments, will take the lead in investigating fire events, life safety deficiencies, other life safety events caused by human error, and the review of staff/equipment life safety responses to such events.

D. Directors of Engineering and Infrastructure (EI) and Capital Facilities (CF) or equivalents:

The Directors of EI and CF or equivalents, are responsible for assuring life safety components are maintained at all times, including during times of construction by coordinating activities with appropriate BIDMC and contractor personnel. Director must also ensure that the proactive construction risk assessment (PCRA), the interim life safety measures (ILSM) plan, and infection control risk assessments (ICRA) and other regulatory requirements (e.g. NFPA 241) are completed prior to infrastructure construction. The Director of Infrastructure is responsible for assuring all infrastructure construction activities comply with applicable fire standards. The Directors of EI and CF, in collaboration with the Directors of Maintenance Operations and Environmental Health and Safety (EH&S) shall be responsible for regulatory compliance with Federal, State, and local codes and ordinances as they apply to Life Safety systems.

E. Department Heads / Managers

The department heads/managers are responsible for Life Safety/Fire Safety within their departments. They set the example and inspire a focus in those they supervise by assuring that Life Safety/Fire Safety policies and procedures are understood and carried out with regard to compliance with applicable fire standards.

F. Employees

Employees are responsible for cooperating with all aspects of the Life Safety/Fire Safety Program and maintaining a competent level of understanding of their roles and responsibilities within the plan. They are also required to complete annual mandatory education programs and have a firm understanding of Life Safety/Fire Safety as specifically applied in the departments in which they work.

Procedures and Monitoring

A. The Life Safety/Fire Safety Management Program shall consist of policies and procedures directed to fire prevention and the protection of patients, staff, visitors, and property. At a minimum, the program shall address:

1. Assurance of Life Safety/Fire Safety for all building occupants during
everyday occupancy and all stages of construction and renovation.

2. All construction projects are evaluated to determine whether Interim Life Safety Management (ILSM) applies. When necessary, ILSM will be implemented per BIDMC policy.

3. Reporting and investigating Life Safety/Fire Safety deficiencies. When Life Safety/Fire Safety deficiencies are found at the Medical Center, an ILSM assessment is completed to ensure the Life Safety risks in the area are mitigated.

4. Inspecting and testing of fire protection systems, equipment and components.

5. Training, especially the “Protect in Place” approaches to Life Safety/Fire Safety.

6. Compliance with applicable fire standards for furnishings, electrical appliances and decorations.

7. Smoking is prohibited on BIDMC property. Please refer to EOC-16 No Smoking Policy

B. Construction and Renovation

1. When planning demolition, construction, or renovation, and during unplanned repairs and regular maintenance activities, BIDMC conducts a proactive risk assessment using risk criteria to identify hazards that could potentially compromise care, treatment, and services in occupied areas of the hospital’s buildings.

2. The control measures implemented during construction activities to reduce risk and minimize impact to occupied areas consider air quality requirements, infection control, utility requirements, noise, vibration, and emergency procedures and they are monitored for compliance.

3. The assessments are conducted in conjunction with Environmental Health and Safety, Infection Control, Maintenance, Facilities Planning, Design & Construction, Nursing and others as required.

4. Refer to the following Policies/Procedures:
   - EC-81 Proactive Construction Risk Assessment (PCRA)
   - EC-39 Interim Life Safety Measures (ILSM) and Plan
   - EC-75 Fire Watch Procedures
   - EC-56 Barrier Sealing and Penetration Procedure
   - EC-26 Contractor, Subcontractor, Consultant and/or Vendor Policy
   - IC-CRM 5 Guidelines for Construction, Renovation and Maintenance Risk Assessment
   - IC-CRM6 Guidelines for Construction, Renovation, Maintenance
C. Program Indicators

1. The “Protect in Place” approach for life safety/fire safety must be adhered to in inpatient areas because the rapid evacuation of bedridden patients is impractical. Therefore, all Life Safety/Fire Safety Systems must be maintained and tested as defined by applicable local, state and federal codes and standards. Staff, patients, and visitors will initially remain in areas (fire or smoke compartments separated from the site of origin) unaffected by fire or smoke. If needed, evacuation of affected areas would first be horizontally to an adjacent, unaffected smoke compartment. Vertical evacuation, including to the exterior, is the final stage and Fire Safety/Life Safety should be managed with the objective of avoiding this impractical movement. Staff, patients, and visitors in outpatient and administrative areas will respond according to building notification announcements. Refer to EC-36 Fire Response "Code Red" Policy for specific information.

2. Fire protection systems and equipment are inspected and tested according to TJC and NFPA requirements.

3. New furnishings, fabrics, carpets and similar items are not put into use unless the medical center has received manufacturers’ specifications on flame/smoke spread and said materials comply with local, state, federal and facility standards. Refer to: EC-40 Interior Finishes and Furnishings Procedure

4. General Life Safety/Fire Safety training takes place initially during medical center myPATH Employee Comprehensive Education. Employees take annual Life Safety/Fire Safety refresher training through myPATH. Department-specific training is provided by the manager or designee when the employee gets to their work area. Additional education is also provided by EH&S during fire drills, safety and hazard surveillance rounds. Additional training is provided by EH&S if deficiencies noted during drills and/or actual events. Construction contractors are oriented annually through the Department of Facilities Planning, Design and Construction. All Construction Contractors are given a pocket guide book that explains relevant Fire Safety/Life Safety policies and describes how to access more information. The guide booklet also covers emergency response.

5. Fire drills are held at the rate of one per shift per quarter per building in all patient care areas and annually in business occupancies. Drills are
scheduled in a manner that ensures that patterns in the days/times of drills do not develop. When quarterly fire drills are required, they are unannounced and held at unexpected times and under varying conditions.

6. The effectiveness of fire response training is evaluated annually.

D. Thresholds for Evaluation

All aspects of the Life Safety/Fire Safety management identified in section A will have compliance requirements of 100%. Anything less will require immediate and or continuous evaluation and follow up.

E. Review and Documentation

All tests, drills, deficiencies, and reviews will be documented. The Fire and Life Safety Team meets regularly to review current trends in the areas of code red events, fire drills, ILSM, and Fire/Life Safety systems. The goal of this team is to correct negative trends through increased communication and knowledge sharing between the departments responsible for the management of Fire and Life Safety. This team is comprised of representatives from Facilities, Maintenance, Public Safety, Environmental Health and Safety, and the fire alarm installation and maintenance contractor. Summation of tests, drills, and deficiencies are reported to the Environment of Care Committee quarterly. In addition, a Project Panel Review (PPR) team meets weekly to review and approve all shutdowns, PCRA, ILSM and other life safety assessments to assure meeting standards.

F. Effectiveness

The objectives, scope and effectiveness of the Fire Safety/Life Safety Management Plan and program will be reviewed annually by the BIDMC Environment of Care Committee. The EOC Committee will submit recommended program improvements.

Approved By:

Vice President Sponsor: W. Armstrong, Sr. VP Capital Facilities and Engineering

Senior Management Team: 1/28/19  Peter Healy

President
Requestor Name: Gary Schweon, Director, EHS

Original Date Approved: 6/98

Next Review: 1/2020

Revised: 8/04, 9/05, 2/07, 2/08, 3/09, 4/10, 5/11, 10/12, 9/13, 10/14, 10/15, 12/16, 12/17, 1/19

Eliminated:

References: