What is the Joint Commission’s stance on ILSM during construction?

THE DIRECT ANSWER

The Joint Commission requires Interim Life Safety Measures (ILSM) whenever construction activity — or a Life Safety Code deficiency — compromises the building's normal fire and life safety protections. ILSM is not optional and not informal: it's a documented, enforced set of compensatory measures that stays in place until the deficiency is corrected or the construction ends.

WHEN ILSM IS TRIGGERED

- Two triggers: (1) any construction project that affects life safety features (egress, compartmentation, fire alarm, suppression), and (2) any identified Life Safety Code deficiency that can't be corrected immediately.

THE 11 ILSM MEASURES

- Free and unobstructed exits — escape routes maintained for occupants and construction workers; construction-area exits inspected daily.
- Emergency access — unobstructed access for fire, police, and emergency forces.
- Fire systems operational — alarm, detection, and suppression in working order; temporary equivalent systems provided when any system is impaired, inspected and tested monthly.
- Smoketight partitions — temporary construction partitions built of noncombustible or limited-combustible materials that won't contribute to fire spread.
- Additional firefighting equipment — provided, with personnel trained in its use.
- Smoking prohibition — enforced in and adjacent to construction areas per EOC standards.
- Housekeeping and debris removal — storage and housekeeping practices that keep flammable/combustible load at the lowest feasible level.

FIELD QUESTION

Are ILSM required for small renovation projects?

If the project affects life safety features — egress paths, compartmentation, alarm or suppression — yes, regardless of project size. The assessment is case-by-case, but small doesn't mean exempt.

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