Healthcare Facility Hub

Interim Life Safety Measures (ILSM) — Official Field Reference Summary

Current version — Oct 31, 2026
Update history: healthcarefacilityhub.org/what-are-interim-life-safety-measures-ilsm/

FEATURED COMPLIANCE DEFINITION (THE JOINT COMMISSION LS.01.02.01 & CMS 42 CFR § 482.41)

Interim Life Safety Measures (ILSM) are a mandatory series of 11 operational, physical, and administrative compensating actions required whenever construction, renovation, or physical plant deficiencies temporarily compromise a healthcare facility's fire alarm, sprinkler, smoke barrier, or egress protections. ILSM serves as the documented bridge holding risk down until full engineered protection is restored.

The Two Mandatory Triggers

- **Construction Projects:** Alterations affecting means of egress, fire/smoke barriers, detection, alarm, or suppression systems.
- **Life Safety Code Deficiencies:** Physical plant non-compliances that cannot be immediately rectified, formally documented in the facility's e-Statement of Conditions (e-SOC).

Survey Rule: Blanket ILSM ("we do all 11 every time") and missing ILSM ("we thought this small project was exempt") both fail surveys. Case-by-case documented risk assessments are legally required.

Three-Tier Operational Coordination

- **Permanent Fire Safety Plan:** Base program (RACE response, PASS extinguisher use, horizontal evacuation).
- **ILSM Program:** Temporary operational overlay compensating for specific impaired barriers, alarms, or egress routes.
- **ICRA Matrix:** Parallel infection control program (ASHE ICRA 2.0 Class III–V barriers). One project, three programs, coordinated documentation.

Assessment Boundary: Measures apply to the active work area plus all adjacent spaces whose egress, detection, or compartmentation is compromised.

STATUTORY FIRE WATCH IMPAIRMENT PROTOCOLS (NFPA 101 § 9.6.1.6, § 9.7.6.1 & JOINT COMMISSION LS.01.02.01)

Fire Alarm Outage (> 4 Hours in 24-Hr Period)

- **Statutory Trigger:** Alarm system out of service for > 4 hours.
- **Immediate AHJ Notification:** Notify local Municipal Fire Department immediately upon entering impairment.
- **Patrol Frequency:** Continuous physical patrols every **15 to 30 minutes** in all affected facility zones.
- **Dedicated Personnel:** Trained staff equipped with two-way radio/phone; *zero secondary duties permitted*.
- **Documentation:** Written Fire Watch Log tracking exact patrol times, signatures, and observed physical hazards.

Sprinkler Outage (> 10 Hours in 24-Hr Period)

- **Statutory Trigger:** Automatic suppression offline > 10 hours.
- **Mandatory Notification:** Notify local Fire Department (AHJ) AND property insurance underwriter immediately.
- **Riser Pressure Rounds:** Continuous physical rounds verifying and recording water supply zone riser pressures.
- **Supplemental Staging:** Pre-stage charged booster fire hoses and supplemental water/dry-chemical extinguishers.
- **24-Hour Threshold:** Formal evacuation pre-alert status if system outage exceeds 24 consecutive hours.

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The Mandatory 11 ILSM Elements Master Reference Table (Joint Commission Standard LS.01.02.01)

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Element	Compensating Measure	Operational Protocol & Engineering Standard	Required Frequency
ILSM 1	**Free & Unobstructed Egress**	Ensure exits, corridors, and stairwells remain clear of construction debris, carts, and staging materials. Temporary exit signage must be posted if pathways are diverted. Cross-reference NFPA 101 corridor width rules.	**Daily documented rounds**
ILSM 2	**Free Access to Emergency Services**	Maintain unencumbered roadway and door access for municipal fire department, ambulances, and emergency apparatus. Verify hydrants and Fire Department Connections (FDCs) are never obstructed by dumpsters or materials.	**Daily physical inspection**
ILSM 3	**Temporary Fire Detection Systems**	When permanent fire alarm or smoke detection systems are disabled, install temporary equivalent detection (heat detectors, wireless temporary pull stations) connected directly to the primary FACP or monitoring station.	**Monthly testing & certification**
ILSM 4	**Temporary Smoke-Tight Partitions**	Erect noncombustible, smoke-tight partitions (drywall or polycarbonate with Class A flame spread) to isolate construction zones from patient care areas. Coordinated directly with ASHE ICRA 2.0 Class III–V barrier matrices.	**Daily integrity checks**
ILSM 5	**Additional Firefighting Equipment**	Stage supplemental portable ABC dry chemical or pressurized water fire extinguishers in construction staging areas, hot work zones, and temporary storage yards.	**Weekly inspection & tags**
ILSM 6	**Combustible Storage Restrictions**	Prohibit accumulation of scrap wood, cardboard packaging, plastic sheeting, and trash. All combustible refuse must be removed at the end of each work shift in covered metal bins.	**Continuous / End-of-shift**
ILSM 7	**Additional Fire Drills**	Conduct at least one additional fire drill per shift per quarter in areas affected by construction, simulating altered egress routes and revised compartmentation boundaries.	**1 extra drill / shift / quarter**
ILSM 8	**Daily Egress Inspections**	Formal physical inspection of all designated escape routes, exit doors, stairwell pressurization doors, and release hardware in the affected zone. Logged on facility safety sheets.	**Daily pre-shift log**
ILSM 9	**Increased Hazard Surveillance**	Intensified safety surveillance rounds by facilities engineers, safety officers, and infection preventionists across construction corridors, utility shafts, and demolition boundaries.	**Minimum twice-daily rounds**
ILSM 10	**Staff Education on Deficiencies**	Educate nursing, clinical staff, and facility occupants in the affected building zone regarding blocked doors, temporary exit pathways, and impaired smoke barrier boundaries.	**Prior to work / Shift huddles**
ILSM 11	**Departmental Emergency Training**	Conduct hands-on training for staff in affected clinical departments covering fire extinguisher operation (PASS protocol), building alarm response (RACE), and horizontal evacuation through NFPA 101 fire and smoke compartments.	**Quarterly / Project startup**

Survey Defense Note (CMS Conditions of Participation: Environment of Care Binder): Every facility must integrate all daily inspection logs, contractor sign-offs, and fire watch sheets directly into the Environment of Care (EC) binder. Joint Commission and CMS surveyors specifically audit the exact timestamp interval between system impairment notification and the first logged patrol round. Form CMS-2567 citations frequently cite gaps in daily documentation.