

<b>Colorado Department of Public Health and Environment Health Facilities and Emergency Medical Services Division Policy Manual</b>		Section: <b>LIFE SAFETY</b>
		Part:
Subject: <b>Life Safety Code Plan Review Stages</b>		Page:
Date: December 2009	<input type="checkbox"/> Replacement page(s) of part _____ <input type="checkbox"/> Addition of page(s) to part _____ <input checked="" type="checkbox"/> New Section	

**SUMMARY**

This Policy and Procedure shall clarify the position of the HFEMSD (Division) in relation to expected timeframes for completion of the six stages of plan review under the Department’s adopted Life Safety Code (LSC) plan review for health facility construction projects.

**BACKGROUND**

The HFEMSD has implemented construction plan review for new and remodel construction occurring within all of its regulated health facility types. As part of this implementation, the Life Safety Code Program (which is responsible for conducting these plan reviews) has implemented a six stage approach to tracking the progress of these plan reviews from reception of the plan review documents from the facility through final acceptance of the constructed or remodeled facility for licensure. This policy outlines the six stages, the steps to be taken during each stage, and establishes guidelines for timeframes to complete each stage.

**POLICY GUIDANCE**

**Overall Guidance:**

It should be noted that the plan review process is not intended to stop, slow or hold construction from progressing. The intent of the Division’s plan review process is, first and foremost, to prevent construction of a facility proposed for licensure under the Division’s regulations which (due to a discrepancy in code interpretation or intent) cannot be licensed. Facilities should consult with their design professionals for appropriate design and construction application to the various needs of their facility. All of the stages outlined below are meant only to provide guidance to design professionals, facility owners, and construction professionals. The facility and its contractors are free to proceed with construction at any time with the understanding that they do so at their own risk. It is important to note that if a deficient construction feature is identified by the LSC inspector it shall be corrected by the facility before final acceptance for licensure.

**STAGE I:**

**(Typically to be completed within 10 business days of LSC plan review team receipt of a complete initial package)**

Under this stage the Division reviews the submitted plan review package for basic completeness of the submittal package (including a correctly completed plan review initial submittal form, plan documents in the correct format, and plan review fees submittal). Also evaluated during this stage is that the fees for the plan review have been correctly calculated. During this stage Division staff set up the project in the plan review tracking system, establish official points of contact for the project, and notify the facility that their project has been received and assigned to a Life Safety Code Inspector.

**STAGE II:**

**(Typically completed within 30 to 60 calendar days of LSC plan review team receipt of a complete package.)**

Under this stage the assigned LSC inspector reviews the submitted construction documents for basic elements of the LSC and Division regulations related to building construction. Examples of things which are typically reviewed under this stage include (but are not limited to): Construction Type, Maximum Stories, Occupancy Separations, Smoke Barriers and Smoke Compartments, Vertical Openings, and Egress Components. For remodel projects, this might entail appropriate routing of elements of a designed duct system, proper calculation of sprinkler flow projections, and appropriate design calculations for fire alarm battery backup. Also during this stage the LSC inspector will typically consult with the appropriate health program manager to identify any programmatic concerns with the submitted design. This stage concludes with an initial plan review comments letter which starts the 24 month period for completion of the project by the facility.

**STAGE III:**

**(Typically completed within 30 calendar days of LSC plan review team receipt of a complete package.)**  
**(Stages III to VI should be completed within 24 months of the end of Stage II)**

Under this stage the assigned LSC inspector reviews any deferred submittal documents (if applicable) as well as may also conduct a more thorough code examination/research of items identified during the Stage II review.

Typically, automatic fire suppressions system and fire alarm plans are submitted as deferred submittals. The design professionals who prepare these documents design their routing layout after approval by the Authority Having Jurisdiction (AHJ) of the general building plans. These design documents are prepared to reflect the various challenges to the system design presented by the routing of mechanical systems, rated walls, plumbing, etc and hence are delayed until these challenges have been established and accepted by the AHJ.

This stage will typically conclude with a deferred submittal comments letter outlining concerns (if any) identified during the review

**STAGE IV:**

**(Typically completed on an ongoing basis during the project construction.)**  
**(Stages III to VI should be completed within 24 months of the end of Stage II)**

During this stage the LSC inspector is conducting various ongoing inspections of the construction process, consulting with design and construction professionals about revisions and alterations of the reviewed plans, and even performing some preliminary inspections to shorten the final acceptance inspection under stage VI. Generally there is an ongoing discourse between the inspector and these professionals to ensure compliance with Division policies, regulations and statutes.

**STAGE V:**


**(Typically completed within 30 calendar days of receipt of all required documentation and requisite programmatic approvals.)**  
**(Stages III to VI should be completed within 24 months of the end of Stage II)**

During this stage the Division ensures that all applicable documentation of compliance with other local and state AHJs has been achieved; that the appropriate health program has (if applicable) reviewed the procedures and processes to take place within the newly constructed / altered space; and that all the necessary requirements for certification (if applicable) and licensing have been received and are in order before conducting the Division's final LSC acceptance inspection of the facility. This stage is closed upon issuance of a folder to the LSC team containing the sign offs of acceptance executed by the local Building, Zoning, and Fire departments along with a current Certificate of Occupancy reflecting the proposed use.

**STAGE VI:**

**(Typically completed on an ongoing basis during the project construction.)**  
**(Stages III to VI should be completed within 24 months of the end of Stage II)**

This stage consists of the final onsite inspection conducted by the LSC team to ensure ultimate compliance with the Division's applicable LSC and regulations. Some limited scope remodels may not require a final onsite inspection but rather may be accepted based on submittal of documentation of completion (example might include photo documentation or a final inspection acceptance documents from the local AHJs) . This stage is concluded by the signing of the final acceptance form for the construction project by the assigned LSC inspector and the LSC Program Manager.

Approved by  Title: Life Safety Code Mgr. Date: 12/22/2009

Approved by  Title: Division Director Date: 12/22/2009

