



NASFM Member Survey-Fire Code and Classroom Door Barricades

1. Does your state have proposed or adopted legislation that circumvents/ignores the adopted Fire Codes involving classroom doors?

2. Does your state allow barricading devices to be used on classroom doors during an active shooter situation?

State	Question 1 response	Question 2 response	Comments
Maryland	No	No	
Alaska	No	No	
California	No	No	Law enforcement was allowing but typically local fire does not (when they find them or are alerted to the situation)
Oklahoma	No	No	
Alabama	No	No	
Maine	No	No	
Michigan	No	Yes	
Indiana			In Indiana when approached by school corporations wanting to disable fire rated class room doors during an active shooter incident, they have been directed to file for a variance through the Fire and Building Safety Commission.

March 30, 2015

Connecticut	No	No	<p>Question # 1 is No, we do not, however we did have one company try which we were able to stop.</p> <p>#2 No again, same company as above was denied a fire code modification for his device he is now challenging our decision to our codes and standards committee.</p>
Montana	No	No	
South Carolina	No	Discussions underway	<p>The current practices, anecdotal information, and what students are being told to do are in and of themselves code violations. Some of the situations would be far more difficult to contend with than some of commercial devices currently coming to market. Having recently had a college campus shooting here it has become abundantly clear that ignoring the issue, or simply saying no to any code violation, is not the answer.</p> <p>I am encouraged that NASFM is being proactive and I would support development of a "Best Practices" type of document.</p>
Utah	No	No	
New Jersey	No	Yes	School security measures are not permitted to usurp fire code requirements. We

			have allowed classroom devices that prohibit the door from being opened from the outside but it must be easily operable from the inside. All schools are required to develop and maintain a school security plan. This plan MUST be developed in concert with the local fire marshal. We did support legislation that reduced the number of school fire drills from two per month to one per month and replaced it with a school security drill.
New Hampshire	No	No	No, doors are required to be equipped with hardware that allows locking from the inside but free egress if the emergency changes requiring an evacuation from the room.
New Mexico	No	No	We are currently reviewing, but no determination made yet on question 2.
South Dakota	No	No	
Wyoming	No	No	
Kansas	No	Yes	Kansas does not have proposed or adopted legislation that circumvents the adopted fire codes. We were able to prevent the legislature from doing that by issuing a state wide variance and

March 30, 2015

			allowing barricading devices that do not permanently attach to the door to be used only during active shooter situations and when training for those situations. If we had not issued the variance there was a possibility of the legislature removing our authority to enforce the fire and life safety code in the schools.
Minnesota	No	No	Detailed rationale from MN for their position follows this table.
Texas	No	No	In TX there is no state-wide fire code. Local AHJ's do not allow barricade devices.
Ohio	Yes	No	Legislation has been introduced.
Massachusetts	No	No	
New York	No	No	
Arkansas	Yes	Yes	See Arkansas comments below
Colorado	No	No	See detailed comments below
Washington	No	No	Home rule is in effect in WA so local jurisdictions may make determinations to allow barricade devices.

Minnesota rationale:

The use of a security device on a required egress door violates both the Minnesota State Fire Code and Minnesota State Building Code. Both codes require egress doors to be immediately operable without special knowledge or effort.

1008.1.8 Door operations. Except as specifically permitted by this section egress doors shall be readily openable from the egress side without the use of a key or special

knowledge or effort.

1008.1.8.1 Hardware. Except as permitted by Section 1008.1.8.3, door handles, pulls, latches, locks and other operating devices on doors shall only require a single operation to release the door from the egress side.

From a practical standpoint, enforcement is difficult since security devices are typically employed only during lockdown emergencies. However, there is a concern that individual teachers may decide to utilize door security devices during normal operations in order to provide an extra level of security for their classroom. If a Deputy State Fire Marshal Inspector finds a security device in use on a required egress door, an order will be issued for its immediate removal.

Classroom security concerns during a lockdown emergency are well understood, and fortunately this problem is easily solved without the need to employ door security devices. Code-compliant egress/security hardware is available on the market that allows an exit door to be securely locked from the classroom side with the added security of a deadbolt lock (commonly known as a “classroom security lock with deadbolt”). Activation of the locking hardware is quick and simple by operation of a thumb-turn device or key from the classroom side (these locks are available in either configuration). Such hardware fully complies with both the state fire and building codes because normal operation of the handle on the egress side automatically releases the latch and deadbolt. These hardware sets only take a fraction of a second and a single operation to throw the deadbolt lock, whereas security devices must first be removed from storage and additional time is necessary for installation. Some devices require several steps for installation, and may prove difficult under stressful conditions.

Another concern with security devices is there may be circumstances during a lockdown situation when it may be necessary to quickly exit the classroom or building, including:

1. Fire set by the intruder
2. Explosive device detonated by the intruder
3. Intruder or accomplice attempting to enter or fire a weapon into the classroom through an exterior window
4. Incendiary device (or other hazard) thrown into the classroom through an exterior window

Additionally, if the teacher were to become incapacitated for any reason, the children (especially the younger ones) may be incapable of removing the security device. This not only would prevent the students from exiting the room, but would also prevent timely access by emergency personnel.

Another major concern with door security devices is the possibility that it could be employed by a student(s) within the classroom for the purpose of committing physical assault, sexual assault, or worse. The security device would prevent the teacher, school staff, and emergency responders from entering the classroom, creating an unintended safety liability for the district. Conversely, compliant egress door hardware allows staff or emergency personnel the ability to quickly unlock a classroom door from the outside by use of a key.

March 30, 2015

For all these reasons it is believed the use of security devices, although offering a possible solution to one problem, creates several additional and unacceptable hazards. Furthermore, the use of code-compliant classroom security locking hardware solves the lockdown security problem while maintaining free egress and allowing room access to school staff and emergency personnel.

Arkansas Comments and situation:

First let me apologize for getting distracted and failing to respond to the survey. A large part of my distraction was due to dealing with this very issue at the Capitol. Jim, as you know, we did have a bill filed this session to allow locking or barricade devices. While the focused use of these devices was in schools, the bill is written such that they can be used in any occupancy group. The bill was filed on the Senate end of the Legislature and was through committee and across the Senate floor before we could even react. I spoke against the bill on in a House committee but was not given adequate time to address the issue. The bill later passed in the full House. A lot of concerns were raised and at least one State Representative went to the Governor and asked him to veto the bill. I was called to meet with the Governor (along with an FBI agent who had been contacted by the Representative wanting the bill vetoed) and express my concerns. I along with the agent expressed our concerns but the bill was later signed into law. We (ASP) are still reviewing the matter.

Colorado Comments:

Question 1: No. No such legislation has been proposed or adopted. However, Colorado has recently adopted regulations which attempt to balance the security concerns of schools with the fire safety concerns written into the adopted fire and building codes.

As in other states, Colorado inspectors discovered that many school districts had initiated procedures which violated the Codes. The most common of these procedures involved the use of magnetic strips which were placed over the latch on classroom doors. In the event of a lockdown, the strip would be removed allowing the door to lock. This procedure violated the latching requirements of NFPA 80. A number of corrective notices were written and a joint appeal from several school districts found its way to the State's School Board of Appeals. The Board denied the appeal as the procedure clearly violated the adopted Codes.

However, recognizing the valid concerns of the school districts, the Board recommended that the Director consider amendments to the Code which would address both security and fire safety. In response, the Division recently adopted the 2015 International Code set for all public schools within the State. The IBC, IEBC, and IFC were amended to require that classroom door hardware would allow doors to latch automatically and to be quickly locked from inside the room. Existing, non-compliant hardware would be replaced. Such hardware satisfied the concerns of school safety personnel while complying with the adopted Codes. Exceptions to the automatic latching requirement were granted for classrooms within fully sprinklered buildings and in schools in which all classrooms have exits directly to the outside. These exceptions recognize that corridors within these facilities are not required by the Codes to be rated: Thus the Codes do not require doors into these corridors to latch automatically.

It was apparent that replacing all classroom door hardware would cause a significant, unbudgeted, financial burden on many school districts. Recognizing this, the amendments allow a three year grace

March 30, 2015

period for schools to seek funding and budget for the hardware replacement. In the interim, schools are allowed to continue to use approved devices, such as the magnetic strips, under strict conditions. These include, among others, that: school personnel are trained in their use; the district has adopted a policy for their use; devices are removed whenever a room is unoccupied; school administrators monitor the condition of hardware after every fire drill to ensure that the policy is being followed.

In proposing the amendments, the Division sought input from all affected stakeholders. Feedback was received from the Colorado Chapter of ICC (CCICC), the Fire Marshal's Association of Colorado (FMAC), The Colorado Association of School Security and Law Enforcement Officers (CASSLEO), the Colorado School Plant Managers Association (CSPMA), the Colorado Association of School Boards (CASB), and door hardware manufacturers. Much of their feedback was incorporated into the final Regulations. As a result, each of these groups spoke in support at the public hearing: There was no opposition.

A complete listing of the adopted regulations, including the amendments, can be found here: (<http://www.sos.state.co.us/CCR/eDocketDetails.do?trackingNum=2014-00975>).

Question 2: No. Several school districts have sought approval for these devices. These requests were denied, primarily because the devices would limit free egress from the classroom and prevent access by authorized personnel.