

LOUISIANA DEPARTMENT OF PUBLIC SAFETY & CORRECTIONS PUBLIC SAFETY SERVICES



OFFICE OF STATE FIRE MARSHAL

School Leaders and Managers,

Here at the State Fire Marshal's Office, our top priority is to protect life and property from the hazards of fire and explosion. This is especially critical in environments occupied by our communities' most vulnerable members-- children and the elderly.

We understand you share that priority, though your scope of protection, these days, extends far beyond what many of us could have ever imagined.

As has occurred following past school tragedies, we are anticipating your questions regarding what can and cannot be done to alter your campus security and/or access as it pertains to fire and life safety code requirements.

Please see the below Interpretive Memos issued in 2018 that are still applicable today. Most importantly in these memos is directives on the type of locking devices and mechanisms that are allowable (i.e. dead bolts, door stops, etc.), so please review these careful and fully.

In addition, please see this helpful link on NFPA 3000 addressing this topic: https://www.nfpa.org/News-and-Research/Publications-and-media/Press-Room/Breaking-news/Active-shooter

If when reviewing these documents you find yourself with additional questions, please feel free to reach out to our Plan Review staff for clarification by calling our main office line at 1-800-256-5452 and asking for the Plan Reviewer on Duty at the time of your call. You are also welcome to visit the "Contact Us" page on our website, lasfm.org, choosing your area of the state, and contacting one of the enforcement staff members listed or that you have worked with for inspections in the past.

Thank you all for your assistance in helping us help you navigate this difficult challenge ahead of you and the families you serve.

Chief Dan Wallis Louisiana State Fire Marshal



LOUISIANA DEPARTMENT OF PUBLIC SAFETY & CORRECTIONS PUBLIC SAFETY SERVICES



OFFICE OF STATE FIRE MARSHAL

MEMORANDUM 2018-03 (This MEMO replaces IM 2013-01)

TO: Parish School Boards

Public, Parochial, Private and Charter Schools

All Educational Facilities

All Fire Chiefs

Fire Prevention Bureaus

Parish and Municipal Building Officials

OSFM Staff

FROM: H. "Butch" Browning

State Fire Marshal

DATE: March 1, 2018

RE: Classroom Security for Existing Educational (grades K - 12) and Day-Care Facilities

This office has received numerous requests for variances to code required locking arrangements in reaction to the recent outbreak of violence occurring in schools nationwide. The adopted codes are designed to safeguard life and property from the hazards of fire, disaster, and panic caused by various events. They are shaped by historic fires and other disasters and incorporate redundant features that provide for very specific locking arrangements. Both the Life Safety Code and the International Building Code provide for specific means of door locking.

The intent of this memo is to address the current unprecedented security needs of our educational system and the economic hardships associated with retrofitting existing hardware installations while maintaining a reasonable degree of assurance that such security locking measures will not adversely affect means of egress and life safety.

Specifically, this memo addresses requirements that will allow for one additional releasing operation on existing classroom doors. The NFPA 101 Life Safety Code, Section 7.2.1.5.10.2, and the International Building Code, Section 1010.1.9.5, both limit the number of operations required to release a locked door to one. The following equivalent method of compliance with the requirements of these code sections will be accepted by this office in order to permit not more than two releasing operations in limited circumstances:

1. This memo applies only to existing educational and day-care occupancies that are subject to economic and structural restraints that prohibit a code compliant retrofit. This is secondary to basic site and building entry (i.e. fencing, metal detectors, guards, etc.). New building designs and construction shall include locking devices that are currently allowed by the adopted codes.

- 2. Only one single cylinder dead bolt lock with a thumb turn on the on the interior (classroom) side per door shall be permitted. Locks shall be activated within the classroom by teachers at their discretion for emergency purposes only. Double cylinder locks shall not be permitted. Keyed access shall be provided from the corridor side. All single cylinder locks shall be keyed alike and responsible school staff shall have keys available at all times.
- 3. Signage shall be placed adjacent to each door with such locking device that reads "LOCK IS FOR TEACHER'S USE ONLY".
- 4. Locks shall be located not less than 34 inches, and not more than 48 inches, above the finished floor (per NFPA 101:7.2.1.5.10.1 and IBC 1010.1.9.2).
- 5. Installation of acceptable locking hardware shall not void the door listing. Modifications to labeled doors located in in fire rated corridor walls shall be performed in accordance with the authorized door manufacturer's recommendations.
- 6. Work shall be performed by a qualified and trained employee of the school system or by a locking system contractor licensed by this office (OSFM).
- 7. A reliable means of two way communication between each classroom subject to locking and the main office is recommended. Where the fire alarm system is capable of providing such communication and is used for this purpose, signals shall be distinct from other emergency signals in accordance with NFPA 72 requirements. Any modifications shall be performed by a licensed contractor.
- 8. Operational procedures that address defend-in-place requirements shall be coordinated with the emergency egress and relocation drills required for fire emergencies. Such procedures shall CLEARLY differentiate between required evacuation of the premises due to fire and the defend-in-place requirements of other emergencies. Drills shall be held with sufficient frequency to familiarize occupants with the drill requirements. All building occupants including both teachers and students shall participate in such drills.
- 9. This memo does not apply to large rooms having an occupant capacity that exceeds 50 persons.
- 10. Installations shall be submitted to this office for review using the "Special Locking Arrangements Request for Installation" form and supporting documentation.

All other code requirements shall remain in place. Any proposed modifications or special installations that do not comply with the adopted codes or the provisions outlined above shall be submitted to this office for review using the "Request for Appeal – Proposed Equivalency to Code" process.

Refer to Formal Interpretation 2009-03 for submittal requirements and other information regarding other special locking installations: http://sfm.dps.louisiana.gov/doc/interpmemos/im_2009-03.pdf

Should you have any questions regarding this matter, please contact the Plan Review Section of this office at 1-800-256-5452 or 225-925-4920 or visit our website at LASFM.org.



LOUISIANA DEPARTMENT OF PUBLIC SAFETY & CORRECTIONS PUBLIC SAFETY SERVICES



OFFICE OF STATE FIRE MARSHAL

MEMORANDUM 2018-02

TO: Parish School Boards

Public, Parochial, Private and Charter Schools

All Educational Facilities

All Fire Chiefs

Fire Prevention Bureaus

Parish and Municipal Building Officials

OSFM Staff

FROM: H. "Butch" Browning

State Fire Marshal

DATE: March 1, 2018

RE: Fire Alarms and Operations in Educational Occupancies

In response to the numerous inquiries since the most recent tragedy in Parkland Florida, the OSFM is working diligently to ensure that fire safety and fire prevention remains ready and able to protect lives in an all hazard emergency environment. To diminish fire safety protection in the spirit of addressing an active shooter threat is an ill-advised policy. In the past, fire and explosives have been utilized, causing mass casualties. Most buildings are not designed, nor constructed, in a manner that provides protection to occupants who shelter in place or seek an area of refuge. In fact, fire alarms may be the only active device that can bring about safe evacuation and egress. Many schools use other passive fire suppression allowances so as not to be required to provide automatic fire sprinklers or fire detection devices. The key to any emergency preparedness is to plan and train and the OSFM certainly encourages an approach that includes federal, state and local stakeholders working collaboratively to build site specific preparedness, code compliance and response plans for any building at risk.

I would like to provide clarification and direction as to the State fire code requirements relating to the operation of fire alarm systems within educational occupancies in Louisiana.

- 1. Fire Alarms No deactivation, tampering, or modification of fire alarm systems and associated supervised life-safety and egress systems will be allowed. Any fire alarm work, repair or modifications require plan review approval and work performed by OSFM licensed fire alarm contractors. Louisiana law requires strict compliance with the NFPA 72 standard.
- 2. Fire Drills One fire drill must be conducted monthly. Special accommodations are allowed where concerns exist for malicious activation of fire alarms. Such methods as scheduling fire drills and sharing it in advance with staff/authorized persons and employing sufficient personnel to monitor the drill similarly to other outdoor events as part of normal school operation are allowed.

3. Enhancements to fire safety and fire protection features in accordance with NFPA 101, Life Safety Code – Upgrading buildings to a more current edition of NFPA 101, Life Safety Code can allow for the use of delayed alarms to include positive alarm sequence, as well as the installation of other active fire suppression systems that allow for the removal of numerous fire pull stations in existing conditions.

As we continue to collect input from across the county and industry and subject matter experts, the OSFM intends to create additional guidance designed to ensure the highest level of prevention, safety and resiliency for all buildings to eliminate death, injury, and property loss. In unison with an all-hazards approach to protecting our children, we stand ready to provide any onsite assistance we can.

HBB