

HITF
MAY 2003
NFPA 101, Life Safety Code 2002 Edition
Section 19.7.5

BACKGROUND: With the increased use of the 2000 edition of the Life Safety Code we are seeing different interpretations of the Exceptions to Sections 19.7.5.2 and 19.7.5.3 of the 2000 edition.

As background, these exceptions were added to the Code in the 1997 edition because Medicare/Medicaid Regulations require nursing homes to allow patients to bring in their own furniture and mattresses to allow for as much of a residential environment as possible. With out these exceptions, the Regulations would be in conflict with the Life Safety Code in nonsprinklered facilities, thus the additional requirement for the smoke detector.

Many AHJ's are interpreting that the smoke detector is required even in sprinklered buildings, which we disagree. Admittedly the language in the exceptions might be better if it stated the exception only applies to nonsprinklered rooms, but it doesn't need to state that.

The appropriate Sections in Chapter 10 clearly state that upholstered furniture and mattresses are not required to be regulated if they are located in rooms or spaces protected by sprinklers. Likewise if you look at the requirements for new health care occupancies you will note there are no requirements for furniture or mattresses provided by the patient. The reason being that sprinklers are mandated in new health care facilities.

In existing sprinklered buildings it would make no sense that if the facility provided unregulated mattresses or furniture there would be no requirement for the smoke detector, but if the patient provided the mattresses or furniture there would be a requirement for the smoke detector.

QUESTION: Is a smoke detector required to be installed in a patient sleeping room protected by an approved automatic sprinkler system when either upholstered furniture or mattresses are provided by the patient per the Exceptions to Sections 19.7.5.2 and 19.7.5.3?

RESPONSE NO. The provisions of 19.7.5.2 and 19.7.5.3 intend to refer to the criteria of Chapter 10. Sections 10.3.2, 10.3.3 and 10.3.4 do not specify or set any regulations for mattresses and upholstered furniture in existing healthcare occupancies that are protected with automatic sprinklers.