

NFPA 101®-2012

Life Safety Code®

TIA Log No. 1114

Reference: 19.2.2.2.5.2

Comment Closing Date: September 9, 2013

Submitter: David Klein, US Department of Veterans Affairs; William Koffel, Koffel Associates

1. Revise 19.2.2.2.5.2 to read as follows:

19.2.2.2.5.2* Door-locking arrangements shall be permitted where patient special needs require specialized protective measures for their safety, provided that all of the following are met:

- (1) Staff can readily unlock doors at all times in accordance with 19.2.2.2.6.
- (2) A total (complete) smoke detection system is provided throughout the locked space in accordance with 9.6.2.9, or locked doors can be remotely unlocked at an approved, constantly attended location within the locked space.
- (3)* The building is protected throughout by an approved, supervised automatic sprinkler system in accordance with ~~19.3.5.1~~ 19.3.5.7.
- (4) The locks are electrical locks that fail safely so as to release upon loss of power to the device.
- (5) The locks release by independent activation of each of the following:
 - (a) Activation of the smoke detection system required by 19.2.2.2.5.2(2)
 - (b) Waterflow in the automatic sprinkler system required by 19.2.2.2.5.2(3)

Submitter's Substantiation: This TIA was initiated by a unanimous vote of 22 to 0 of the Technical Committee on Health Care Occupancies (SAF-HEA) at its Second Draft meeting of the current revision cycle for the 2015 edition of NFPA 101. I (David Klein) serve as the Chair of the Technical Committee on Health Care Occupancies. The second submitter, Bill Koffel, is an Alternate member of the Technical Committee on Health Care Occupancies and the Chair of the Correlating Committee on Safety to Life.

The error that is being corrected by this TIA occurred as an editorial error in the processing of the 2009 edition of NFPA 101 and the error was carried forward into the 2012 edition. The provision of 19.2.2.2.5.2 was added in 2009 and subitem (3) was meant to mandate the presence of sprinklers in any health care occupancy that availed itself of the option to lock doors where patient special needs require specialized protective measures for their safety. The reference was meant to be to 19.3.5.7, rather than 19.3.5.1. The incorrect reference to 19.3.5.1 might incorrectly lead the user to omit sprinklers from health care occupancies other than nursing homes.

Emergency Nature: The SAF-HEA committee has taken action to correct the error, detailed above in the Submitter's Substantiation, for the 2015 edition of NFPA 101, but the error remains in print in the 2012 edition which is expected to be adopted for enforcement by the Centers for Medicaid and Medicare Services (CMS) as a replacement for the 2000 edition that CMS currently enforces. CMS has a history of adopting a new edition of NFPA 101 and not adopting subsequent editions for approximately a decade. The 2012 edition of NFPA 101 is expected to be applicable to health care occupancies in the United States for a long time. The error, if not corrected, can lead to the potentially unsafe situation where doors will be locked in a hospital or limited care facility without the requisite sprinkler system protection being present. The subject is of an emergency nature as addressed in 5.3(a) of the Regulations Governing the Development of NFPA Standards in that the document contains an error that was overlooked during a regular revision process.

Anyone may submit a comment by the closing date indicated above. To submit a comment, please identify the number of the TIA and forward to the [Secretary, Standards Council](#), 1 Batterymarch Park, Quincy, MA 02169-7471.