



DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS

Public Safety Services



BOBBY JINDAL
GOVERNOR

H. BUTCH BROWNING
STATE FIRE MARSHAL

INTERPRETIVE MEMORANDUM 2013-01

To: The Honorable Governor Bobby Jindal
Colonel Michael D. Edmonson
Speaker Chuck Kleckley
Senator John A. Alario, Jr., President
Representative John M. Schroder
Principals and Staff of Louisiana Schools and Day-cares
Licensed Locksmiths
Licensed Burglar Alarm Contractors
Arkansas, Louisiana and Texas Locksmith Association
Louisiana Life Safety and Security Association
Parish and Municipal Building Officials
All OSFM Staff

From: Chief Butch Browning, State Fire Marshal *BB*

Date: January 16, 2013

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 7.2.1.5.9.2, and the International Building Code, Section 1008.1.9.5, 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.

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OFFICE OF THE STATE FIRE MARSHAL

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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 101:7.2.1.5.9.1 and IBC 1008.1.9.2).

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.

LJD/DZ