

NFPA 101®-2018 Edition

Life Safety Code®

TIA Log No.: 1436

Reference: 15.2.2.2.4(3)(new)

Comment Closing Date: April 16, 2019

Submitter: Aleksy Szachnowicz, Anne Arundel County Public Schools

www.nfpa.org/101

1. Add new 15.2.2.2.4(3), revise (4), and renumber subsequent items to read as follows:

15.2.2.2.4* Classroom Door Locking to Prevent Unwanted Entry. Classroom doors shall be permitted to be locked to prevent unwanted entry provided that the locking means is approved and all of the following conditions are met:

(1) The locking means shall be capable of being engaged without opening the door.

(2) The unlocking and unlatching from the classroom side of the door can be accomplished without the use of a key, tool, or special knowledge or effort.

(3) Two non-simultaneous releasing operations shall be permitted.

~~(34)~~ The releasing mechanisms for unlocking and unlatching shall be located at a height not less than 34 in. (865 mm) and not exceeding 48 in. (1220 mm) above the finished floor.

~~(45)~~ Locks, if remotely engaged, shall be unlockable from the classroom side of the door without the use of a key, tool, or special knowledge or effort.

~~(56)~~ The door shall be capable of being unlocked and opened from outside the room with the necessary key or other credential.

~~(67)~~ The locking means shall not modify the door closer, panic hardware, or fire exit hardware.

~~(78)~~ Modifications to fire door assemblies, including door hardware, shall be in accordance with NFPA 80.

~~(89)~~ The emergency action plan, required by 15.7.1, shall address the use of the locking and unlocking means from within and outside the room.

(910) Staff shall be drilled in the engagement and release of the locking means, from within and outside the room, as part of the emergency egress drills required by 15.7.2.

Substantiation: A first revision to the 2018 edition of NFPA 101 has been accepted in the 2021 edition First Draft that permits two non-simultaneous lock and/or latch releasing operations on existing classroom doors to provide a reasonable, practical, cost-effective, and safe means of locking classroom doors under lockdown (e.g., targeted violence) scenarios. Schools, however, need a code-compliant remedy now and are unable to wait until the 2021 edition is issued and adopted in their jurisdictions. Compliance with the current requirement can require replacing the existing lock/latch mechanism with a “hotel style” lockset. In a school district with hundreds, or even thousands of classroom doors, such replacement can be cost-prohibitive. Lacking the provision for two releasing operations on existing classroom doors, some schools are opting to purchase aftermarket barricade devices or utilize other “homemade” solutions (e.g., sliding sections of fire hose over the door closer arm, rope, wedges, etc.), which restrict entry by a would-be assailant, but also restrict emergency egress and entry by school staff and emergency responders. Barricade devices can also be utilized by an assailant to contain occupants in a classroom and prevent assistance from entering. A more cost effective locking device can be added to existing doors that will satisfy all of the current requirements with the exception of not requiring more than one lock/latch releasing operation to open the door. The additional operation can be readily mitigated by the extensive emergency action plan and evacuation drill requirements already in place. The use of dangerous, non-compliant barricade devices will continue to proliferate until the Code offers a reasonable solution such as that offered by this TIA.

Emergency Nature: The current requirement for existing classroom doors to be opened with not more than one lock/latch releasing operation is leading some school districts to resort to dangerous barricade devices for targeted violence incidents. A modification to the current Code is needed, such as that accepted for the 2021 edition First Draft, to allow schools to install locking mechanisms requiring not more than two non-simultaneous operations to open the door. Failure to modify the current Code immediately will contribute to the continued use of barricade devices and put the safety of students and school staff at an unnecessarily high level of risk.

Anyone may submit a comment by the closing date indicated above. Please identify the TIA number and forward to the Secretary, Standards Council. [SUBMIT A COMMENT](#)