Nursing Home/Facilities

Means of Egress, Door Locking Arrangements
February 2004

The *Life Safety Code 2000 Edition* states that doors within a required means of egress shall not be locked. (Chapter 18.2.2.2.4 and Chapter 19.2.2.2.4)

**Exception 1:** Magnetic locking devices that do not release in 15 or 30 seconds shall be permitted where the clinical needs of the patients require specialized security measures for their safety.

**Exception 2:** Delayed-egress locks complying with *Life Safety Code 2000 Edition* Chapter 7.2.1.6.1 shall be permitted, provided that not more than one such device is located in any egress path.

Questions and Answers

1. **Can you have two delayed egress locks (magnetic locks) in the same path of egress? For example, can delayed egress locks be on a cross corridor door and then on the front door?**

No, according to *Life Safety Code 2000 Edition* Chapter 18.2.2.2.4 and Chapter 19.2.2.2.4 Exception No. 2: Delayed-egress locks complying with 7.2.1.6.1 shall be permitted, provided that not more than one such device is located in any egress path.

2. **A facility has a delayed magnetic locking device on an exit door to a courtyard/patio and also has a delayed magnetic locking device on the gate of the courtyard/patio. Does this constitute two delayed locks in the path of egress even though one is outside on the gate on the fence?**

Yes, this would constitute two delayed locks and is not permissible under the *Life Safety Code 2000 Edition* Chapter 18.2.2.2.4 and Chapter 19.2.2.2.4 exception No. 2.

3. **Can a facility have a door leading into or out of a special needs unit locked and have a delayed lock on the front door?**

Yes, under *Life Safety Code 2000 Edition* Chapter 18.2.2.2.4 and Chapter 19.2.2.2.4 exception No. 1, door-locking arrangements without delayed egress shall be permitted in health care occupancies, or portions of health care occupancies, where the clinical needs of the patients require specialized security measures for their safety, provided that staff can readily unlock such doors at all times. You cannot have two delayed locks in any path of egress. Note: A door with a magnetic lock that does not have the delayed release function is classified as a locked door.
4. **Is a facility with one resident or a few residents, who are diagnosed with Alzheimer’s or dementia, allowed to lock its doors?**

No. *Life Safety Code 2000 Edition* Chapter 18.2.2.2.4 and Chapter 19.2.2.2.4 exception No. 1 provides that a facility shall be permitted to use magnetic locking devices that do not release in 15 or 30 seconds where the clinical needs of the patients require specialized security measures for their safety. A facility must provide evidence that special security measures are necessary. The fact that a home has a few residents with Alzheimer’s or dementia is not enough to meet the exception to the Life Safety Code requirement. Further, a locked door may not be used as a substitute for required supervision of residents. The use of locked doors must also comply with any local or state fire code requirements.

**Note:** Under Ohio nursing home licensing rules, a locked room is considered a restraint and, therefore, requirements pertaining to the use of restraints may apply.

5. **Is it permissible for a door with a magnetic locking device that has gone into alarm mode, e.g. pressure applied or alarm system activated, to automatically relock when it shuts?**

No, according to *Life Safety Code 2000 Edition* Chapter 7.2.1.6.1, if the door is in alarm mode, be it from activation of the fire alarm system or released by the application of pressure, the relocking of such device shall be by manual means only. This can be accomplished by resetting the fire alarm system or entering a numeric code into the key pad.

6. **Is a door lock that is activated by a bracelet or other device that is part of a system such as “WanderGuard” or “SecureCare” considered a delayed lock?**

Yes, because when the door lock is activated it falls under requirements stated in *Life Safety Code 2000 Edition* Chapter 18.2.2.2.4 and Chapter 19.2.2.2.4.

7. **The Life Safety Code 2000 Edition states that a delayed lock must release within 15 seconds when pressure is applied. The exception allows a delay not exceeding 30 seconds when approved by the authority having jurisdiction (AHJ). When is this allowed and who determines if it is acceptable?**

Yes, it is permissible to extend the delay time to 30 seconds upon approval of the AHJ, and, in this case that would be the Life Safety Code Specialist for the Ohio Department of Health. The exception will be granted on a case by case basis. No waiver will be necessary.
8. **Are you required to post signage stating “push until alarm sounds - doors open in 15 (or 30) seconds” in special need units?**

Yes, the posting of a sign stating “push until alarm sounds – doors open in 15 (or 30) seconds” in accordance with the Life Safety Code 2000 Edition Chapter 7.2.1.6.1 regarding delayed locks must be met.

9. **Can a facility’s maintenance man work on the magnetic door locking system?**

Because magnetic locking devices are tied into the fire alarm, only trained personnel who meet the requirements specified in NFPA 72 National Fire Alarm Code in Chapter 7-1.2.2 shall be authorized to work on such devices.

**Chapter 7-1.2.2**

Service personnel shall be qualified and experienced in the inspection, testing, and maintenance of fire alarm systems. Examples of qualified personnel shall be permitted to include, but shall not be limited to, individuals with the following qualifications:

1. Factory trained and certified;
2. National Institute for Certification in Engineering Technologies fire alarm certified;
3. International Municipal Signal Association fire alarm certified;
4. Certified by a state or local authority; or
5. Trained and qualified personnel employed by an organization listed by a national testing laboratory for the servicing of fire alarm systems.

**Note:** Responses to questions are intended to assist providers in their efforts to comply with the Life Safety Code in a general manner. Terms that are used may not be well understood by readers who are unfamiliar with building and fire safety codes. Consultation with qualified fire safety engineers or other qualified professionals is advisable. *Compliance with Life Safety Code requirements is determined at the time of a survey.*