



Mehville Fire Protection District

Memorandum

From: Ed Berkel

Date: March 19, 2018

Re: Lockdown/evacuation drill policy

The recent tragic shooting in Florida has resulted in renewed attention to Lockdown and Evacuation drill policies. During the shooting, the perpetrator used the building evacuation system to get the occupants into the hallways. This has led school officials to question, "Do we have to have manual pull stations? Do we have to start evacuation right away?" This is a good time to review the policies and the Fire Code sections that pertain to Lockdown and Evacuation.

Attached to this memo and pertinent portions of Fire Code Sections 404 and 1010, which address lockdown plans, Section 907, which addresses manual fire alarms; and Section 405, which addresses evacuation drills. These requirements should be part of your planning that is disseminated to the facility staff. We have also attached a Lockdown Plan template. It is important to remember that the positive steps taken in fire codes, education, and fire drills since the tragic 1958 Our Lady of Angels fire that killed 92 children have saved countless lives. It falls upon all of us – schools, law enforcement, fire safety – to work together to find ways to keep kids safe from this new threat without impacting the level of safety we have worked so hard to create.

Note that regarding manual pull stations, there are code allowed exceptions for an educational occupancy to NOT have manual pull stations in public areas. Should your facility meet one of the three exceptions, you would be required to obtain the proper permit(s) PRIOR to removal of the manual pull stations. Regarding evacuation, there are no provisions in the Fire Code that would allow for delayed evacuation.

A Lockdown Plan is required to be developed and approved by my office PRIOR to implementation. It is especially important in that Item 4.4 requires that ancillary locking means or methods are a part of the plan AND must be in compliance with requirements of the Building/Fire Code related to for egress and accessibility (See 1010.1.4.4 below). There are a multitude of devices being marketed for this use, but many do not meet the code requirements. Our particular concern is that it must be openable from outside the room.

The answer to the second question regarding when to start evacuation is less straightforward. Currently, there are no provisions in the Fire Code that would allow for delayed evacuation. Fire Code sections 907.2, 405.2, 405.3, and 405.4, attached to this memo, address.

from the desk of ...
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Things to Consider

- If there is no known threat, students and staff should immediately evacuate as normal upon the activation of a fire alarm.
- Staff is advised to remain alert and should be empowered to adjust their responses based upon the conditions they encounter. For example, if under lockdown they smell smoke or are otherwise threatened by fire, they should react to the greater perceived threat. Also, if a bad actor is in one wing of a school, administrators may be able to advise staff in other wings to evacuate. On the other hand, if evacuating they notice in the corridor a student who has been expelled or anything else that concerns them, they should consider delaying evacuation. Many schools now teach staff to look into corridors before sending their kids out. In the past, standard practice was to send the kids first.
- Individual staff empowerment is the key. Teachers are well-educated and most can be counted on to act in a sensible manner if given the leeway to do so. We are in an age where cookie cutter responses to emergencies are no longer going to work.

Other Resources

There are a number of resources available on the World Wide Web. One excellent resource is the School Safety Information website: <https://www.schoolsafetyinfo.org/>

There are all sorts of resources available to download from their site as well as links to additional information on other websites. They have made available for download five volumes of their publication *Sharing Ideas & Resources to Keep Our Nation's School Safe*. The link to the download page is:

<https://www.schoolsafetyinfo.org/library/5-volumes-school-safety.html>

Department of Homeland Security Active Shooter Poster:

<https://www.dhs.gov/publication/active-shooter-poster>

City of Houston and U.S. Department of Homeland Security Active Shooter Training video:

<https://www.youtube.com/watch?v=5VcSwejU2D0>

MU's Surviving an Active Shooter video:

<https://www.youtube.com/watch?v=ELBEOggWZY0>

PERTINENT FIRE CODES

Lockdown Plans

404.2.3 Lockdown plans. Lockdown plans shall only be permitted where such plans are approved by the fire code official and are in compliance with Sections 404.2.3.1 and 404.2.3.2.

404.2.3.1 Lockdown plan contents. Lockdown plans shall include the following:

1. Identification of individuals authorized to issue a lockdown order.
2. Security measures used during normal operations, when the building is occupied, that could adversely affect egress or fire department operations.
3. A description of identified emergency and security threats addressed by the plan, including specific lockdown procedures to be implemented for each threat condition.
4. Means and methods of initiating a lockdown plan for each threat, including:
 - 4.1. The means of notifying occupants of a lockdown event, which shall be distinct from the fire alarm signal.
 - 4.2. Identification of each door or other access point that will be secured.
 - 4.3. A description of the means or methods used to secure doors and other access points.
 - 4.4. A description of how locking means and methods are in compliance with the requirements of this code for egress and accessibility.
5. Procedures for reporting to the fire department any lockdown condition affecting egress or fire department operations.
6. Procedures for determining and reporting the presence or absence of occupants to emergency response agencies during a lockdown.
7. Means for providing two-way communication between a central location and each area subject to being secured during a lockdown.
8. Identification of the prearranged signal for terminating the lockdown.
9. Identification of individuals authorized to issue a lockdown termination order.
10. Procedures for unlocking doors and verifying that the means of egress has been returned to normal operations upon termination of the lockdown.
11. Training procedures and frequency of lockdown plan drills.

404.2.3.2 Drills. Lockdown plan drills shall be conducted in accordance with the approved plan. Such drills shall not be substituted for fire and evacuation drills required by Section 405.2.

404.3 Maintenance. Fire safety and evacuation plans shall be reviewed or updated annually or as necessitated by changes in staff assignments, occupancy or the physical arrangement of the building.

404.4 Availability. Fire safety and evacuation plans shall be available in the workplace for reference and review by employees, and copies shall be furnished to the fire code official for review on request.

404.4.1 Distribution. The fire safety and evacuation plans shall be distributed to the tenants and building service employees by the owner or owner's agent. Tenants shall distribute to their employees applicable parts of the fire safety plan affecting the employees' actions in the event of a fire or other emergency.

405.2 Frequency. Required emergency evacuation drills shall be held at the intervals specified in Table 405.2 or more frequently where necessary to familiarize all occupants with the drill procedure.

Table 405.2 FIRE AND EVACUATION DRILL FREQUENCY AND PARTICIAPATION		
GROUP OR OCCUPANCY	FREQUENCY	PARTICIPATION
Group E	Monthly	All occupants

In severe climates, the fire code official shall have the authority to modify the emergency evacuation drill frequency.

405.3 Leadership. Responsibility for the planning and conduct of drills shall be assigned to competent persons designated to exercise leadership.

405.4 Time. Drills shall be held at unexpected times and under varying conditions to simulate the unusual conditions that occur in case of fire.

[BE] 1010.1.4.4 Locking arrangements in educational occupancies. In Group E and Group B educational occupancies, egress doors from classrooms, offices and other occupied rooms shall be permitted to be provided with locking arrangements designed to keep intruders from entering the room, where all of the following conditions are met:

1. The door shall be capable of being unlocked from outside the room with a key or other approved means.
2. The door shall be openable from within the room in accordance with Section 1010.1.9.
3. Modifications shall not be made to listed panic hardware, fire door hardware or door closers.

[BE] 1010.1.4.4.1 Remote operation of locks. Remote operation of locks complying with Section 1010.1.4.4. shall be permitted.

[BE] 1010.1.9.2 Hardware height. Door handles, pulls, latches, locks and other operating devices shall be installed 34 inches (864 mm) minimum and 48 inches (1219 mm) maximum above the finished floor. Locks used only for security purposes and not used for normal operation are permitted at any height.

907.2 Where required – new buildings and structures. Portions deleted Not fewer than one manual fire alarm box shall be provided in an approved location to initiate a fire alarm signal for fire alarm systems employing automatic fire detectors or waterflow detection devices. Where other sections of this code allow elimination of fire alarm boxes due to sprinklers, a single fire alarm box shall be installed.

907.2.3 Group E. A manual fire alarm system that initiates the occupant notification signal utilizing an emergency voice/alarm communication system meeting the requirements of Section 907.5.2.2 and installed in accordance with Section 907.6 shall be installed in Group E occupancies. Where automatic sprinkler systems or smoke detectors are installed, such systems or detectors shall be connected to the building fire alarm system.

Exceptions:

1. A manual fire alarm system is not required in Group E occupancies with an occupant load of 50 or less.
2. Emergency voice/alarm communication systems meeting the requirements of Section 907.5.2.2 and installed in accordance with Section 907.6 shall not be required in Group E occupancies with occupant loads of 100 or less, provided that activation of the manual fire alarm system initiates an approved occupant notification signal in accordance with Section 907.5.
3. Manual fire alarm boxes are not required in Group E occupancies where all of the following apply:
 - a. Interior corridors are protected by smoke detectors.
 - b. Auditoriums, cafeterias, gymnasiums and similar areas are protected by heat detectors or other approved detection devices.
 - c. Shops and laboratories involving dusts or vapors are protected by heat detectors or other approved detection devices.
4. Manual fire alarm boxes shall not be required in Group E occupancies where all of the following apply:
 - a. The building is equipped throughout with an approved automatic sprinkler system installed in accordance with Section 903.3.1.1.
 - b. The emergency voice/alarm communication system will activate on sprinkler water flow.
 - c. Manual activation is provided from a normally occupied location.