Design and Installation Conflicts Between the Life Safety Code and Building Security

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This month’s Lessons Learn Bulletin focuses on conflicts between the requirements of the National Fire Protection Association (NFPA) 101 Life Safety Code and the use of Electronic Access Control hardware for building security.

**Lesson Learned Statement:** Electronic Access Control is an electronic system utilizing an ID badge and electrified lock to allow properly credentialed individuals into restricted areas or spaces. The installation must comply with the requirements of NFPA 101 Life Safety Code.

**Discussion:** Over the years, Environmental Health and Safety has seen an increase in the installation of electronic access control hardware in both new and existing buildings throughout the campus. Often times this type of hardware is installed on the egress side of doors which conflicts with the NFPA 101 Life Safety Code.

For example, many of our newer buildings have been designed with spaces that require you to reenter the building to exit the space through a code compliant exit. These spaces include loading docks and courtyards, just to name a few. Often times, Electronic Access Control hardware is installed on the door leading back into the building that serves as the exit or exit access. This violates the requirements of the NFPA 101 Life Safety Code. Although, these designs reduce the amount of space needed for the area, it greatly limits securing a building from exterior to interior.

The NFPA 101 Life Safety Code has very specific requirements that must be followed when installing Electronic Access Control hardware. First, the applicable occupancy chapter must be reviewed to determine if Electronic Access Control Hardware can be installed and what limitations may apply. For example, if the building is new and classified as business occupancy, you would start with **Chapter 38, Section 38.2.2.2 Doors. Under doors, Sections 38.2.2.2.5 and 38.2.2.2.6, directs you to Chapter 7.** A review of **Chapter 7, Section 7.2.1.6, Special Locking Arrangements**, will provide you specific installation requirements for installing Electronic Access Control hardware. By understanding and following these requirements it will ensure your installation complies with the NFPA 101 Life Safety Code.

Environmental Health and Safety is currently rewriting the **Institutional Access Control Policy**, once completed and approved, it will include steps to ensure designs are evaluated and installations are approved by Environmental Health and Safety, Fire and Life Safety, before moving forward. This will help to reduce conflicts early in projects.

If you have questions concerning this bulletin or need assistance, please contact Environmental Health and Safety’s Fire and Life Safety group at 713-792-2888 or email us at askEHS@mdanderson.org.