



LOUISIANA DEPARTMENT OF PUBLIC SAFETY & CORRECTIONS
PUBLIC SAFETY SERVICES



H. "BUTCH" BROWNING, JR.
STATE FIRE MARSHAL

OFFICE OF STATE FIRE MARSHAL

INTERPRETIVE MEMORANDUM 2019 - 01

To: OSFM Industry Partners
OSFM Staff

From: Joe Delaune, Chief Architect/Plan Review, OSFM

Approved by: Chief Butch Browning, State Fire Marshal

Date: March 30, 2019

RE: **Special Locking Arrangements**

This memorandum replaces IM 2009-03 dated October 1, 2009 and is intended to clarify the requirements for submittals to this office for proposed special locking system installations.

R.S. 40:1574 requires the submittal of plans and specifications for all proposed new construction, repairs, remodeling, building additions, and renovations of buildings to this office for satisfactory review and acceptance, prior to the work being performed. The addition of special locking arrangements to a building is a renovation that affects the means of egress from a building, therefore a plan review by this office is required prior to installation.

Special locking systems are defined by the NFPA 101 Life Safety Code and by the IBC and are categorized into one of the following types:

1) DELAYED-EGRESS LOCKING SYSTEMS

Delayed-egress locks are allowed only where permitted by the applicable occupancy requirements and must comply with all applicable requirements of NFPA 101 and IBC. New delayed-egress locking system units shall be **listed in accordance with UL 294**. NOTE: An approved supervised automatic sprinkler system or an approved automatic fire detection system is required for the building in order to use this system. Emergency lighting is also required at doors that are equipped with delayed-egress locks. Only one (1) delayed-egress lock is permitted in any path of egress to a public way.

2) ACCESS-CONTROLLED (SENSOR RELEASED) EGRESS DOOR LOCKING SYSTEMS

Access-controlled (Sensor Released) egress doors are allowed only where permitted by the applicable occupancy requirements and must comply with all applicable requirements of NFPA 101 and IBC. New access-controlled (sensor released) egress door locking system units shall be **listed in accordance with UL 294**. NOTE: The Assembly Occupancy chapter does not permit access-controlled egress door systems to be energized while the building is occupied by the assembly.

3) SPECIALIZED CARE LOCKING ARRANGEMENTS

These locking systems must comply with ALL requirements outlined in **Interpretive Memorandum 2019-02** issued by this office titled "Specialized Care Locking Arrangements". New specialized care locking system units shall be **listed in accordance with UL 294**. NOTE: This system type is limited to Health Care occupancies and Residential Board and Care occupancies.

4) ELECTRIC STRIKES AND LATCH RETRACTING DOOR HARDWARE

Electric strikes and latch retracting door hardware proposed for installation on INTERIOR DOORS are required to be submitted to this office for satisfactory review prior to installation. Electric strikes and latch retracting door hardware proposed for installation on exterior doors, where free unimpeded egress is provided in accordance with NFPA 101, will be permitted to be installed without submittal to this office for review. Please note that NFPA 80 requires electric strikes and latch retracting door hardware on fire rated door assemblies to be listed and to fail such that positive latching is maintained.

5) ELECTRICALLY CONTROLLED (ELECTROMAGNETICALLY LOCKED) EGRESS DOORS

These locking system types are permitted by NFPA 101 and IBC under specific conditions, and are recognized by the use of an electromagnetic lock released by an appropriately listed, mechanically activated releasing device affixed to the door (door hardware release) that results in direct interruption of power to the electromagnetic lock when activated. New electrically controlled (electromagnetically locked) egress door locking system units shall be **listed in accordance with UL 294**.

6) OTHER TYPES

Miscellaneous other special locking types include, but are not limited to, elevator lobby door locking, "lockups", bank locking systems, non-egress door locking, and pedestrian/vehicle gates.

Note: Locking within Detention and Correctional housing areas complying with the requirements of NFPA 101 are **not** considered to be special locking arrangements.

INSTRUCTIONS for PLAN SUBMITTAL of SPECIAL LOCKING ARRANGEMENTS

The following information is required to be submitted anytime that one of the above categorized special locking types are proposed to be installed in buildings other than One- or Two- Family Dwellings. A satisfactory review must be performed by this office prior to any installation of special locking components.

- 1) Submit your plans, shop drawings, and other supporting documentation through our secure online portal at: <https://lasfm.louisiana.gov/>. Please note that the occupancy classification identified shall correspond to the requirements of NFPA 101. When associated with another scope of work in the building, "link" the submittal with that project during the online application process, (i.e. AR- renovation or new construction or AP- equivalency determinations).
- 2) The license number of the contractor performing the work, licensed by this office and having the proper property protection endorsement(s), must be identified on the application. "Statewide Electrical Contractors" must provide/upload a copy of the license with the submittal documents. See RS 40:1664 ("Life Safety and Property Protection Licensing Act") for regulations concerning special locking arrangements.
- 3) Connection of a special locking system to a building's fire alarm system shall be performed by a properly licensed fire alarm contractor, unless the Locking System Contractor possesses a fire alarm endorsement with this office as a Fire Alarm System Contractor.
- 4) A floor plan of the building in sufficient detail to evaluate the impact of the locked doors on required egress is required. A plan that is limited to the area immediately surrounding the door to be locked is typically insufficient. Identify each locking location with an assigned number and

locate each required releasing device on the side of the door where it is intended to be installed, so that the direction of free unimpeded egress is clearly understood.

- 5) Special locking devices must be listed for the intended purpose. Provide/upload a copy of the laboratory listing for each of the following components:
 - a) Locks and other specialized hardware, including but not limited to, electromagnetic locks, electrified mortise locks, electric strikes, delayed-egress locks, latch retracting panic or fire exit hardware, etc.
 - b) Sensors (required for access-controlled (sensor released) egress doors)
 - c) Manual releasing devices (required for access-controlled (sensor released) egress doors and specialized care locking arrangements)
- 6) A complete and accurate description of the locking system is required for a clear understanding of the locking and releasing operations.
- 7) Be aware that locks and other devices that project into the minimum clearances required for means of egress are not permitted.
 - a) Adopted codes limit and restrict protrusions and projections into the means of egress.
 - b) The prescribed minimum headroom clearance for door openings is 6'-8" nominal above the finished floor.
 - c) The prescribed minimum clear unobstructed door width is 32". This minimum width may increase based upon the number of occupants served by the door.
- 8) Panic hardware and fire exit hardware will not be required on doors where access-controlled egress doors or delayed-egress locks are permitted by code for the occupancy.
NOTE: UL 305 and UL 10C listings for panic hardware and fire exit hardware will not be required by this office where UL 294 listed special locking arrangements are provided and permitted by code for the occupancy. This exception does not apply for doors serving high hazard (Group H) occupancies.