

# DECODED:

## Annual Inspection of Egress Doors



From the well-known blog [idighardware.com](http://idighardware.com), Lori Greene brings some much-needed clarity to codes.

BY LORI GREENE, AHC/CDC, FDAI, FDHI, CCPR

**T**HERE HAS BEEN A LOT OF PUBLICITY ABOUT THE ANNUAL INSPECTIONS required for fire door assemblies, but we must also be familiar with the inspection and testing requirements for egress doors. These requirements were added in the 2009 edition of NFPA 101, *Life Safety Code*, and are also found in the 2012 edition.

In the 2012 edition of NFPA 101, these inspections are covered in Section 7.2.1.15, Inspection of Door Openings. Inspections of specified egress doors are required not less than annually by NFPA 101 if so stated in Chapters 11-43, the occupancy chapters. The occupancy chapters that refer to Section 7.2.1.15 are Assembly (12.7.1.3, 13.7.1.3), Educational (14.7.3.3, 15.7.3.3), Day Care (16.7.3.4, 17.7.3.4), and Residential Board and Care (32.7.7, 33.7.7). Section 7.2.1.15 also addresses the annual inspection of fire doors (performed in accordance with NFPA 80) and smoke doors (performed in accordance with NFPA 105) for fire doors and smoke doors in all occupancy types.

The egress door inspection and testing requirements do not apply to every door in a facility, but the following doors in the referenced occupancy types must be addressed:

- Door leaves equipped with panic hardware or fire exit hardware in accordance with 7.2.1.7 – Panic hardware is required by NFPA 101 for doors in Assembly, Educational, and Day Care occupancies serving an occupant load of 100 or more, but this inspection requirement also applies to other doors that are equipped with panic hardware or fire exit hardware where not specifically required, according to the NFPA 101 Handbook.
- Door assemblies in exit enclosures – typically stairwells and exit passageways
- Electrically controlled egress doors – electrically-locked doors that are released by a door-mounted release device, such as panic hardware with an integral request-to-exit switch
- Door assemblies with special locking arrangements subject to 7.2.1.6 – includes Delayed Egress Locking Systems (7.2.1.6.1), Access-Controlled Egress Door Assemblies (7.2.1.6.2), and Elevator Lobby Exit Access Door Assemblies Locking (7.2.1.6.3)
- For Residential Board and Care, the requirements apply to doors that are required to swing in the direction of egress, typically doors serving areas with an occupant load of 50 or more and doors used in an exit enclosure.

Inspecting doors in these locations helps to ensure that the doors used most frequently and that are more prone to wear and tear are operating properly. Similar to the NFPA 80 standards for fire door inspections, door assemblies must be visually inspected from both sides of the opening to assess the condition. Functional testing

must be performed by individuals who can demonstrate knowledge and understanding of the type of doors subject to testing. A written record must be signed and kept for review by the Authority Having Jurisdiction (AHJ); this documentation provides an enforcement tool to ensure that the inspections are done properly. Any deficiencies noted during the inspection must be repaired or replaced “without delay.” There is a set of guidelines in NFPA 80 for a written performance-based program that allows the inspection period to exceed 12 months, and this can also be applied to egress doors.

**FROM THE  
2012 EDITION OF NFPA 101:**

**7.2.1.15.7 As a minimum, the following items shall be verified:**

1. Floor space on both sides of the openings is clear of obstructions, and door leaves open fully and close freely.
2. Forces required to set door leaves in motion and move to the fully open position do not exceed the requirements in 7.2.1.4.5.
3. Latching and locking devices comply with 7.2.1.5.
4. Releasing hardware devices are installed in accordance with 7.2.1.5.10.1.
5. Door leaves of paired openings are installed in accordance with 7.2.1.5.11.
6. Door closers are adjusted properly to control the closing speed of door leaves in accordance with accessibility requirements.
7. Projection of door leaves into the path of egress does not exceed the encroachment permitted by 7.2.1.4.3.
8. Powered door openings operate in accordance with 7.2.1.9.
9. Signage required by 7.2.1.4.1(3), 7.2.1.5.5, 7.2.1.6, and 7.2.1.9 is intact and legible.

10. Door openings with special locking arrangements function in accordance with 7.2.1.6.
11. Security devices that impede egress are not installed on openings, as required by 7.2.1.5.12.

The AHJ may require annual inspections for additional doors if he or she determines that there is a hazard to building occupants. Annual inspections of fire doors, egress doors and smoke doors will help to ensure that they perform as designed, tested and required by code. Even if the annual inspection requirements are not being enforced in your jurisdiction, every building owner or property manager is required to maintain their fire doors, egress doors and smoke doors in proper operating condition.

**NOTE:** NFPA 101 requires all exit facilities, including stairways and doors, in Educational and Day Care occupancies to be inspected daily by principals, teachers or staff to ensure that they are in proper condition. This is not the same type of inspection required to be performed and documented annually, but with knowledgeable staff, this practice could go a long way toward code-compliant egress doors. Annex A specifically mentions that attention should be given to keeping egress doors unlocked and to avoiding non-compliant hold-open devices on fire doors. 

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