

P35-21

Proposed Change as Submitted

Proponents: John Woestman, Kellen Company, representing Builders Hardware Manufacturers Assoc. (BHMA)
(jwoestman@kellencompany.com)

2021 International Plumbing Code

Revise as follows:

403.3.6 Door locking. Where a toilet room is provided for the use of multiple occupants, the egress door for the room shall not be lockable from the inside of the room. This section does not apply to family or assisted-use toilet rooms.

Exception: The egress door of a multiple occupant toilet room shall be permitted to be lockable from inside the room where all the following criteria are met:

1. The egress door shall be lockable from the inside of the room only by authorized personnel by the use of a key or other approved means.
2. The egress door shall be readily openable from the egress side with not more than one releasing motion and without the use of a key or special knowledge or effort.
3. The egress door shall be capable of being unlocked from outside the room with a key or other approved means.

Reason: Complementing the requirements in 2021 IBC Section 1010.2.8 regarding locking arrangements in educational occupancies, the proposed exception would facilitate door locking of multiple occupant toilet rooms in emergency situations by authorized personnel. Our BHMA members are recognizing that schools desire the same intruder protection in multiple occupant toilet rooms as classrooms – but the code explicitly does not permit locking of the egress doors of multiple occupant toilet rooms.

Proposed Criteria 1 limits the ability to lock the egress doors of a multiple occupant toilet room to authorized individuals provided with the key or other approved means.

Proposed Criteria 2 is consistent with long standing requirements in the IBC to require doors in the means of egress to, from the egress side, be openable (unlock and unlatch) with not more than one releasing motion and without using a key, or special knowledge or effort.

Proposed Criteria 3 is consistent with locks permitted on classroom doors per IBC Section 1010.2.8.

An additional benefit of this proposed exception is the proposed exception would allow, for example, a male custodian to lock the door when cleaning the women's restroom, and prevent "surprise" use of the restroom.

The proposed exception prevents unauthorized personnel from locking the door from the inside, which meets the original intent of this section.

Cost Impact: The code change proposal will not increase or decrease the cost of construction

The exception is "shall be permitted" and non-mandatory. Of course, if building owners choose to install locks on egress doors from multiple occupant toilet rooms, a cost would be incurred.

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Public Hearing Results

Committee Action:

Disapproved

Committee Reason: The proposal seems to be all over the map. For example, how can be required for key locking from the inside of the door where the door must be unlockable from the inside of the door without the use of a key? (12-2)

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Individual Consideration Agenda

Public Comment 1:

IPC: 403.3.6

Proponents: John Woestman, representing Builders Hardware Manufacturers Assoc. (BHMA) (jwoestman@kellencompany.com) requests As Modified by Public Comment

Modify as follows:

2021 International Plumbing Code

403.3.6 Door locking . Where a toilet room is provided for the use of multiple occupants, the egress door for the room shall not be lockable from the inside of the room. This section does not apply to family or assisted-use toilet rooms.

Exception: The egress door of a multiple occupant toilet room shall be permitted to be lockable from inside the room where all the following criteria are met:

1. The egress door shall be lockable from the inside of the room only by authorized personnel by the use of a key or other approved means.
2. The egress door shall be readily openable from ~~the egress side with not more than one releasing motion and without the use of a key or special knowledge or effort~~ the toilet room in accordance with IBC Section 1010.2.
3. The egress door shall be capable of being unlocked from outside the room with a key or other approved means.

Commenter's Reason: The proponent for this proposal failed to inform the committee members of the need and benefits of the proposed revisions, and failed to communicate the similarities of the proposed revisions to existing requirements in the IBC for door locking.

The current IPC requires the egress door of a multiple occupant toilet room to not be lockable from inside the toilet room. For many occupancies, that's appropriate.

However, considering active shooter situations in K-12 schools, for example, there's a real concern that teachers with their students would not have a safe refuge from a shooter in a multi-occupant toilet room if the toilet room door cannot be lockable from inside the room. Picture a kindergarten teacher leading the class to the cafeteria when shots ring out, and the multi-occupant toilet room is the nearest potential place of refuge and safety.

This proposal, improved with the public comment modification, provides appropriate requirements via the proposed exception to 403.3.6 for building owners that wish to provide the ability for authorized personnel to lock the door from the inside of a multi-occupant toilet room. This proposed option is not limited to K-12 schools as the ability for authorized personnel to lock the door from inside of a toilet room may be desired in other occupancies.

The criteria for permitting the egress door of a multi-occupant toilet room to be lockable from inside the room includes:

1. Requiring the use of a key, or other approved means, to lock the door from the inside.
 - a. This restricts the ability to lock the door from the inside to only those authorized to do so. In a K-12 school, that could be teachers, administrators, and custodians. The provision for "other approved means" would permit, for example, electronic remote locking of doors for a building-wide lockdown.
2. Revising Item 2, and requiring the egress door to be openable from inside the toilet room in accordance with IBC Section 1010.2 – which is a current requirement for egress doors – is repeated here to stress the importance. IBC Section 1010.2 and subsections requires egress doors to be openable with a single motion, and without the use of a key or special knowledge or effort, and includes requirements for hardware height, locks and latches, etc.
 - a. Door hardware is readily available from multiple manufacturers that is lockable from inside the room only by authorized personnel (by a key, etc.), and unlockable by anybody inside the room without using a key, tool, special knowledge or effort.
3. Requiring the door to the multi-occupant toilet room to be unlockable from outside of the room by a key or other approved means ensures authorized personnel have the ability to gain access to the toilet room, should that need arise.
 - a. This requirement is consistent with current requirements in the IBC for Group E and Group B occupancies for locks permitted on classrooms, offices, and other occupied rooms per IBC Section 1010.2.8.

Cost Impact: The net effect of the public comment and code change proposal will not increase or decrease the cost of construction. The exception is “shall be permitted” and non-mandatory. Of course, if building owners choose to install locks on egress doors from multiple occupant toilet rooms, a cost would be incurred.

Public Comment# 2797
