

E57-24

IBC: 1010.2.7 (New), 1010.2.7, 1010.2.7.2 (New), 1010.2.7.3 (New); IFC: 1010.2.7 (New), [BE] 1010.2.7, 1010.2.7.2 (New), 1010.2.7.3 (New)

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

2024 International Building Code

Add new text as follows:

1010.2.7 Locking arrangements in educational occupancies. In Group E occupancies, Group B colleges and universities, Group A occupancies accessory to Group B colleges and universities, and Group I-4 occupancies, egress doors and exterior entry doors shall comply with Sections 1010.2.7.1 through 1010.2.7.3.

Revise as follows:

~~1010.2.7~~1010.2.7.1 Locking arrangements Egress doors in educational occupancies.

In Group E occupancies, Group B educational occupancies, and Group I-4 occupancies, egress Egress doors from classrooms, offices and other occupied rooms shall be provided with locking arrangements designed to keep intruders from entering the room and shall comply with all of the following conditions:

1. The doors shall be capable of being locked from inside the room.
- ~~2.~~ The doors shall be capable of being unlocked from outside the room with a key or other approved means.
- ~~3.~~ The doors shall be openable from within the room in accordance with Section 1010.2.
- ~~4.~~ Modifications shall not be made to listed panic hardware, fire door hardware or door closers.
- ~~5.~~ Modifications to fire door assemblies shall be in accordance with NFPA 80.

~~Remote locking or unlocking of doors from an approved location shall be permitted in addition to the unlocking operation in Item 1.~~

Add new text as follows:

1010.2.7.2 Exterior entry doors. Exterior doors which provide entry into the building shall be provided with locking arrangements designed to keep intruders from entering the building, and shall comply with all of the following:

1. The doors shall be lockable from the egress side of the door.
2. A minimum of one door on each building face shall be capable of being unlocked from outside the building with a key or other approved means.
3. Each egress door shall be openable from within the building in accordance with Section 1010.2.

1010.2.7.3 Remote locking and unlocking. Remote locking and unlocking of doors from an approved location shall be permitted.

2024 International Fire Code

Add new text as follows:

1010.2.7 Locking arrangements in educational occupancies. In Group E occupancies, Group B colleges and universities, Group A occupancies accessory to Group B colleges and universities, and Group I-4 occupancies, egress doors and exterior entry doors shall comply with Sections 1010.2.7.1 through 1010.2.7.3.

Revise as follows:

[BE] ~~1010.2.7~~1010.2.7.1 Locking arrangements Egress doors in educational occupancies.

~~In Group E occupancies, Group B educational occupancies, and Group I-4 occupancies, egress Egress doors from classrooms, offices and other occupied rooms shall be provided with locking arrangements designed to keep intruders from entering the room and shall comply with all of the following conditions:~~

- ~~1. The doors shall be capable of being locked from inside the room.~~
- ~~1-2. The doors shall be capable of being unlocked from outside the room with a key or other approved means.~~
- ~~2-3. The doors shall be openable from within the room in accordance with Section 1010.2.~~
- ~~3-4. Modifications shall not be made to listed panic hardware, fire door hardware or door closers.~~
- ~~4-5. Modifications to fire door assemblies shall be in accordance with NFPA 80.~~

~~Remote locking or unlocking of doors from an approved location shall be permitted in addition to the unlocking operation in Item 1.~~

Add new text as follows:

1010.2.7.2 Exterior entry doors. Exterior doors which provide entry into the building shall be provided with locking arrangements designed to keep intruders from entering the building and shall comply with all of the following:

1. The doors shall be lockable from the egress side of the door.
2. A minimum of one door of each building face shall be capable of being unlocked from outside the building with a key or other approved means.
3. Each egress door shall be openable from within the building in accordance with Section 1010.2.

1010.2.7.3 Remote locking and unlocking. Remote locking and unlocking of doors from an approved location shall be permitted.

Reason: IBC

In educational occupancies, this proposal requires, primarily, egress doors from classrooms and other occupiable rooms to be lockable from the inside of the room. This proposal also requires exterior entry doors to be lockable from inside the buildings. These proposed requirements are consistent with current practices of design and construction of new schools, and are consistent with recommendations by a wide range of school safety and security advocates, including the U.S. Dept. of Homeland Security (DHS), and the Partner Alliance for Safer Schools (PASS).

Several poignant examples:

The Sandy Hook Advisory Commission's Final Report, dated March 6, 2015, of the investigation of the tragedy at Sandy Hook Elementary School in Newtown, Connecticut, Dec. 14, 2012, recommends:

1. Requiring classroom and other safe-haven areas to have doors that can be locked from the inside.
2. All exterior doors in K-12 schools be equipped with hardware capable of implementing a full perimeter lockdown.

The May 24, 2022 incident at Robb Elementary, Uvalde, Texas, confirmed the importance of the ability to lock exterior doors from the interior of the building. Reportedly, the door the gunman used to enter the Robb Elementary building was lockable only from the outside of the building (same with other exterior doors), and from the inside it was not possible to determine if the exterior door was locked to prevent entry. These exterior doors were required to be kept locked and closed. The interior classroom doors in Robb Elementary reportedly could only be locked from outside the classroom, and teachers were required, by policy, to keep the classroom doors locked and closed. But, there was no way to confirm whether the exterior handle was locked from the inside of the classroom. For convenience, reportedly teachers would use rocks to prop open exterior doors, and they used door stops, wedges, and magnets to prevent interior door locks from latching.

Despite billions of dollars invested in hardening schools nationally, 1 in 4 U.S. public schools lack classroom doors that can be locked from the inside, according to a survey conducted two years ago by the National Center on Education Statistics, a federal research office. Doors that can be quickly and easily locked can mean the difference between life and death when a shooter is on school grounds.

Safety commissions, teachers, fire safety groups, and both gun rights and gun control groups have all advocated for doors which can be locked from the inside since the Columbine High School, Columbine, Colorado, shooting in 1999.

Sources:

<https://passk12.org/>

<https://www.cisa.gov/topics/physical-security/school-safety>

<https://passk12.org/>

https://portal.ct.gov/-/media/Malloy-Archive/Sandy-Hook-Advisory-Commission/SHAC_Final_Report_3-6-2015.pdf

https://house.texas.gov/_media/pdf/committees/reports/87interim/Robb-Elementary-Investigative-Committee-Report-update.pdf

<https://apnews.com/article/politics-shootings-texas-school-safety-2c97d26b56e8b081aa725ee2235e4a3b>

<https://www.nbcnews.com/news/us-news/uvalde-classrooms-lacked-security-door-locks-rcna37358>

https://nces.ed.gov/programs/digest/d21/tables/dt21_233.50.asp

<https://www.cft.org/california-teacher/our-fight-win-security-doorlocks>

<https://www.firemarshals.org/resources/Documents/NASFM%20Classroom%20Door%20Security%2020210217.pdf>

<https://www.defensivestrategies.org/downloads/NRA-National-School-Shield-Report.pdf>

<https://everytownresearch.org/report/how-to-stop-shootings-and-gun-violence-in-schools/>

The proposed requirements do not mandate the use of specific locks or lock functions – that should be left up to the schools and educational institutions.

IFC

In educational occupancies, this proposal requires, primarily, egress doors from classrooms and other occupiable rooms to be lockable from the inside of the room. This proposal also requires exterior entry doors to be lockable from inside the buildings. These proposed requirements are consistent with recommendations by a wide range of school safety and security advocates, including the U.S. Dept. of Homeland Security (DHS), and the Partner Alliance for Safer Schools (PASS).

Several poignant examples:

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The May 24, 2022 incident at Robb Elementary, Uvalde, Texas, confirmed the importance of the ability to lock exterior doors from the interior of the building. Reportedly, the door the gunman used to enter the Robb Elementary building was lockable only from the outside of the building (same with other exterior doors), and from the inside it was not possible to determine if the exterior door was locked to prevent entry. These exterior doors were required to be kept locked and closed. The interior classroom doors in Robb Elementary reportedly could only be locked from outside the classroom, and teachers were required, by policy, to keep the classroom doors locked

and closed. But, there was no way to confirm whether the exterior handle was locked from the inside of the classroom. For convenience, reportedly teachers would use rocks to prop open exterior doors, and they used door stops, wedges, and magnets to prevent interior door locks from latching.

Despite billions of dollars invested in hardening schools nationally, 1 in 4 U.S. public schools lack classroom doors that can be locked from the inside, according to a survey conducted in 2020 by the National Center on Education Statistics, a federal research office.

Doors that can be quickly and easily locked can mean the difference between life and death when a shooter is on school grounds. Safety commissions, teachers, fire safety groups, and both gun rights and gun control groups have all advocated for doors which can be locked from the inside since the Columbine High School, Columbine, Colorado, shooting in 1999.

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https://house.texas.gov/_media/pdf/committees/reports/87interim/Robb-Elementary-Investigative-Committee-Report-update.pdf

<https://apnews.com/article/politics-shootings-texas-school-safety-2c97d26b56e8b081aa725ee2235e4a3b>

<https://www.nbcnews.com/news/us-news/uvalde-classrooms-lacked-security-door-locks-rcna37358>

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<https://www.defensivestrategies.org/downloads/NRA-National-School-Shield-Report.pdf>

<https://everytownresearch.org/report/how-to-stop-shootings-and-gun-violence-in-schools/>

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Cost Impact: Increase

Estimated Immediate Cost Impact:

Greater than \$10.

Estimated Immediate Cost Impact Justification (methodology and variables):

IBC

From an IBC perspective, the proposal includes new requirements that would be applicable to locks on interior doors, and applicable to locks on exterior doors. However, from a practical perspective, the proposed requirements for locks on interior and exterior doors are consistent with current practices of design and construction of new schools. Thus, from a cost perspective, the actual increase in cost is nil.

The amount of greater than \$10 is submitted to satisfy ICC's requirement for quantifying cost.

This proposal will increase the cost of construction by at least \$10 for hardware, installation, etc., however the significant safety benefits secured by making this change will far outweigh any increased costs incurred. Discussions about specific costs and prices would violate ICC's Council Policy 50 (CP-50), conflict with legal advice given to the staff and members of the Builders Hardware Manufacturers Association, and defy legal guidance provided to associations by government antitrust regulators.

IFC

From an IFC perspective, the proposal includes new requirements that would be applicable to existing buildings for locks on interior doors, and for locks on exterior doors. 1 in 4 U.S. public schools lack classroom doors that can be locked from the inside, according to a survey conducted in 2020 by the National Center on Education Statistics, a federal research office. The proposed requirements are consistent with recommendations by a wide range of school safety and security advocates, including the U.S. Dept. of Homeland Security, and the Partner Alliance for Safe Schools (PASS).

The devastating events in schools have demonstrated the need for locks on interior doors that are lockable from inside the room, and have demonstrated the need for locks on exterior doors that are also lockable from inside the building. That's the bottom line of what this proposal requires.

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