



Public Input No. 103-NFPA 101-2021 [Section No. 32.2.2.3.1]

32.2.2.3.1

Sleeping rooms, other than those complying with 32.2.2.3.2 or 32.2.2.3.3, and living areas in facilities without a sprinkler system installed in accordance with 32.2.3.5 shall have a second means of escape consisting of one of the following:

- (1) Door, stairway, passage, or hall providing a way of unobstructed travel to the outside of the dwelling at street or the finished ground level that is independent of, and remotely located from, the primary means of escape
- (2) Passage through an adjacent nonlockable space independent of, and remotely located from, the primary means of escape to any approved means of escape
- (3)* Outside window or door operable from the inside, without the use of tools, keys, or special effort, that provides a clear opening of not less than 5.7 ft^2 (0.53 m^2), with the width not less than 20 in. (510 mm), the height not less than 24 in. (610 mm), and the bottom of the opening not more than 44 in. (1120 mm) above the floor, with such means of escape acceptable, provided that one of the following criteria is met:
 - (4) The window is within 20 ft (6100 mm) of the finished ground level.
 - (5) The window is directly accessible to fire department rescue apparatus, as approved by the authority having jurisdiction.
 - (6) The window or door opens onto an exterior balcony.
- (7) Permanently fixed stairs or ramp are permitted to be used to allow occupants to be within 44 in. of the bottom window sill. The clear width of the stairs or ramp shall be at least the width of the window or 36 in. whichever is wider. The stairs or ramp and access thereto shall not be obstructed.
- (8) Windows having a sill height below the adjacent finished ground level that are provided with a window well meeting the following criteria:
 - (9) The window well has horizontal dimensions that allow the window to be fully opened.
 - (10) The window well has an accessible net clear opening of not less than 9 ft^2 (0.84 m^2), with a length and width of not less than 36 in. (915 mm).
 - (11) A window well with a vertical depth of more than 44 in. (1120 mm) is equipped with an approved permanently affixed ladder or with steps meeting the following criteria:
 - (12) The ladder or steps do not encroach more than 6 in. (150 mm) into the required dimensions of the window well.
 - (13) The ladder or steps are not obstructed by the window.
 - (14) Ladders or steps that comply with the requirements of 32.2.2.3.1 (4)(c)i and 32.2.2.3.1 (4)(c)ii are exempt from the requirements of 7.2.2 .

Statement of Problem and Substantiation for Public Input

It is possible that Section 32.2 could be used for occupancy change to an existing building. Sometimes

existing window locations used as a secondary means of escape may be more than 44 inches off the floor and this language would permit permanent structures (stairs or ramps) to be installed to bring a window for rescue into compliance. The structure would be permanent (unmovable) and required to be unobstructed. This would prevent them from being used for storage or blocked by storage or furnishings.

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Submittal Date: Wed May 05 15:17:02 EDT 2021
Committee: SAF-BCF

Committee Statement

Resolution: The committee agrees with the intent of the proposal, however the proposal language is unclear and needs to be revised to address the 44 inches in 32.2.2.3.1(3). It's unclear if this is intended to be an exception to the list or a new section. The TC also has concerns about the tripping hazard created underneath windows.



Public Input No. 202-NFPA 101-2021 [Section No. 32.2.3.4.4.2]

32.2.3.4.4.2

Where required by 32.2.3.4.4.1, carbon monoxide alarms or carbon monoxide detectors shall be installed in the following locations:

- (1) Outside each separate sleeping area in the immediate vicinity of the sleeping rooms
- (2) Within sleeping rooms containing fuel-burning appliances or fuel-burning fireplaces
- (3) ~~On~~ In at least one readily accessible location on every occupiable level, including basements and excluding attics and crawl spaces
- (4) Centrally located within occupiable spaces adjacent to a communicating attached garage, unless otherwise exempted by 32.2.3.4.4.3

Statement of Problem and Substantiation for Public Input

The specific locations noted in (1), (2), and (4) would not apply on a level that has neither sleeping rooms nor a garage. On such levels, the number and location of required carbon monoxide detectors is not specified. This provides a minimum requirement. Other potential options would be "immediately outside any room with fuel-fired equipment" or within a certain distance of any fuel-fired equipment, though a minimum number and location would still be needed for any levels that do not contain any fuel-fired equipment.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
<u>Public Input No. 203-NFPA 101-2021 [Section No. 32.3.3.4.9.2]</u>	

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Committee: SAF-BCF

Committee Statement

Resolution: The proposed addition of the term readily accessible may create confusion. The existing text is exactly the same as that provided in chapter 29 of NFPA 72. Installation criteria is provided in chapter 17 of NFPA 72.



Public Input No. 196-NFPA 101-2021 [Section No. 32.2.3.5.3.1]

32.2.3.5.3.1

In buildings four or fewer stories in height and not exceeding 60 ft (18.3 m) in height above grade plane, systems in accordance with NFPA 13R shall be permitted. All habitable areas, closets, ~~roofed porches, roofed decks, and roofed balconies shall~~ and exterior projections greater than 4 ft (1.2 m) deep shall be sprinklered.

Statement of Problem and Substantiation for Public Input

The current wording could be read to require sprinkler protection under all overhangs at porches, decks and balconies, regardless of the size of the overhang. The proposed language matches the requirement in NFPA 13 for exterior projections. The language in NFPA 13 has changed over the years from "exterior roofs and canopies" to "exterior projections." The concern appears to be fire burning out openings such as windows and upward into the attic where it can spread to other parts of the structure. NFPA 13 A-9.3.19.2 specifically notes that combustible furniture on balconies for occupant use should not require sprinkler protection, so there appears to be no justification for singling out porches, decks and balconies. The issue is the depth of the overhang, not occupants and furniture beneath the overhang.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
Public Input No. 197-NFPA 101-2021 [Section No. 32.2.3.5.3.2]	

Submitter Information Verification

Submitter Full Name: John Rickard
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Submittal Date: Wed May 26 10:46:09 EDT 2021
Committee: SAF-BCF

Committee Statement

Resolution: Coordination is needed between the NFPA 13R and 13D requirements and public inputs 196, 197, 198, 104, 205, and 106 from NFPA 101, and public inputs 92, 93, and 94 from NFPA 5000 related to exterior projections and attics. The TC has formed a task group to address all of the proposed revisions related to sprinklers in exterior projections and attics.



Public Input No. 197-NFPA 101-2021 [Section No. 32.2.3.5.3.2]

32.2.3.5.3.2*

An automatic sprinkler system with a 30-minute water supply, and complying with all of the following requirements and with NFPA 13D shall be permitted:

- (1) All habitable areas, closets, ~~roofed porches, roofed decks, and roofed balconies~~ and exterior projections greater than 4 ft (1.2 m) deep shall be sprinklered.
- (2) Facilities with more than eight residents shall be treated as two-family dwellings with regard to water supply.

Statement of Problem and Substantiation for Public Input

The current wording could be read to require sprinkler protection under all overhangs at porches, decks and balconies, regardless of the size of the overhang. The proposed language matches the requirement in NFPA 13 for exterior projections. The language in NFPA 13 has changed over the years from "exterior roofs and canopies" to "exterior projections." The concern appears to be fire burning out openings such as windows and upward into the attic where it can spread to other parts of the structure. NFPA 13 A-9.3.19.2 specifically notes that combustible furniture on balconies for occupant use should not require sprinkler protection, so there appears to be no justification for singling out porches, decks and balconies. The issue is the depth of the overhang, not occupants and furniture beneath the overhang.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
<u>Public Input No. 196-NFPA 101-2021 [Section No. 32.2.3.5.3.1]</u>	Identical issue

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Committee: SAF-BCF

Committee Statement

Resolution: Coordination is needed between the NFPA 13R and 13D requirements and public inputs 196, 197, 198, 104, 205, and 106 from NFPA 101, and public inputs 92, 93, and 94 from NFPA 5000 related to exterior projections and attics. The TC has formed a task group to address all of the proposed revisions related to sprinklers in exterior projections and attics.



Public Input No. 104-NFPA 101-2021 [New Section after 32.2.3.5.7.1]

TITLE OF NEW CONTENT

(New) 32.2.3.5.7.1.1 Where an automatic sprinkler system is required by 32.2.3.5, attics used for storage or fuel-fired equipment are permitted to enclose storage or fuel-fired equipment attic spaces with 1-hour fire-rated construction on all sides including floor and ceiling/roof and shall provide sprinkler protection in this enclosed area. The remainder of the attic space shall meet one of the criteria found in 32.2.3.5.7.2.

Statement of Problem and Substantiation for Public Input

Section 32.2 could be required to be used for an existing building undergoing a change of occupancy. My agency is receiving many complaints from sprinkler contractors that this requirement is extraordinarily expensive for small RB&C owners to comply with-requiring the installation of new water services and pumps to meet design requirements. The concept of enclosing storage or fuel-fired equipment areas with 1-hour construction, providing sprinkler protection only in that area and using one of the detection or protection options found in 32.2.3.5.7.2 used in the remainder of the attic area came not only from sprinkler contractors, but also (now retired) NFPA staff. The attic space would still have protection and detection which deals with the origins of the attic protection language. The 1-hour enclosure provides additional protection.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
<u>Public Input No. 106-NFPA 101-2021 [New Section after 33.2.3.5.7.1]</u>	

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Committee: SAF-BCF

Committee Statement

Resolution: Coordination is needed between the NFPA 13R and 13D requirements and public inputs 196, 197, 198, 104, 205, and 106 from NFPA 101, and public inputs 92, 93, and 94 from NFPA 5000 related to exterior projections and attics. The TC has formed a task group to address all of the proposed revisions related to sprinklers in exterior projections and attics.



Public Input No. 198-NFPA 101-2021 [New Section after 32.2.3.5.7.2]

32.2.3.5.7.3

The provisions of 32.2.3.5.7.1 and 32.2.3.5.7.2 shall be permitted to be applied separately to portions of the attic separated by smoke partitions that extend from the ceiling to the underside of the floor or roof deck above.

Statement of Problem and Substantiation for Public Input

Sprinklering the entire attic is required even where living and storage spaces or fuel-fired equipment are separated from the rest of the attic. This provision would allow enclosing spaces that have living, storage or fuel-fire equipment in smoke partitions and sprinklering only that portion of the attic that is exposed to these areas.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
<u>Public Input No. 205-NFPA 101-2021 [New Section after 33.2.3.5.7.2]</u>	

Submitter Information Verification

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Submittal Date: Wed May 26 11:07:39 EDT 2021
Committee: SAF-BCF

Committee Statement

Resolution: Coordination is needed between the NFPA 13R and 13D requirements and public inputs 196, 197, 198, 104, 205, and 106 from NFPA 101, and public inputs 92, 93, and 94 from NFPA 5000 related to exterior projections and attics. The TC has formed a task group to address all of the proposed revisions related to sprinklers in exterior projections and attics.



Public Input No. 372-NFPA 101-2021 [New Section after 32.2.3.5.8.15]

32.2.3.5.9 Portable Fire Extinguishers.

Portable fire extinguishers shall be provided in accordance with Section 9.9.

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Statement of Problem and Substantiation for Public Input

Reason: The concept of trading off portable extinguishers in sprinklered buildings has been largely abandoned by fire protection principles. The National Fire Codes of both NFPA 1 and the ICC- IFC require portable fire extinguishers in all occupancy classes including storage which addresses property protection and property loss as well as, the safety of the building occupants.

A portable fire extinguisher is an effective item of fire protection which allows for small fires to be tackled by the occupants of a building and saves 100s of thousands of dollars in property loss.

It is important to appreciate that while different to official assumptions and desire for evacuation, research shows the public's priorities to be rational and appropriate. The public's experience of fire is vastly different to that of the professionals involved in the planning for and responding to fire.

Some key findings from research studies have been identified and the public's-oriented outcomes include, avoidance of embarrassment, inconvenience, damage to the premises or property, concern for others, pets and possessions and lastly personal injury.

The evidence further identifies that the public is willing and will accept minor consequences in their pursuit of achieving personal humanistic priorities and instinct. Concern for people, pets and possessions are strong and established drivers of behavior in the event of a fire. Therefore, this should be no surprise to see it as an influential feature of most individual's response to a fire.

Limiting a fire to the smallest area within a building is a sensible aspiration.

Official policy and attitudes are most singularly directed at avoiding the risk when the public encounters a fire. This is well meaning but the research has shown that this DOES NOT I REPEAT DOES NOT align with the public's attitude or the ability of the general public.

Thus, it is important to give the public the intelligently designed and placed tools intended for their use and not the necessarily firefighters. NFPA 10 states: 5.1.2 The selection of extinguishers shall be independent of whether the building is equipped with automatic sprinklers, standpipe and hose, or other fixed protection equipment. Other codes, and other occupancy chapters have abandoned this concept in recognition of the fact that portable extinguishers are a valuable, cost-effective layer of fire protection, and are intended for a different purpose than sprinklers. To avoid addressing fires in their earliest stages is counter-intuitive, and studies have shown that people will almost always attempt to extinguish a fire if it's small and they believe they can mitigate the hazard. If a fire extinguisher is not available, people have (and will continue to) use makeshift means to try to extinguish the fire, which is far less safe than using a portable extinguisher that is designed for safe and effective use by novices. (Ref: An Evaluation of the Role of Fire Extinguishers by David Wales)

A significant amount of data has been collected to support the requirement for portable extinguishers, including: WPI/EKU Study: "Ordinary People and the Effective Operation of Fire Extinguishers", which clearly showed that the vast majority of people who have never used an extinguisher can operate one safely and effectively.

2013 NFPA Report: "U.S. Experience with Sprinklers" reports that there were 48,460 reported structure fires annually in buildings equipped with sprinkler systems between 2007-2011, and 40,440 (83 percent) never grew large enough to activate the system. Based on this report alone, it's clear that

people are reacting to small fires and extinguishing them prior to sprinkler activation.

In a CPSC study published in 2009, the agency determined through telephone surveys that only a small percentage of residential fires are reported to fire departments (about five percent). According to this report, approximately 379,000 residential fires are extinguished each year using portable fire extinguishers – this includes both reported and unreported fires.

A study by Richard Bukowski in 2014, the life cycle cost of portable fire extinguishers was determined to be between one and a half and four cents per foot annually; if coverage could be maximized to that allowable by code, the cost drops to between a half cent and one cent per foot annually. It's unlikely that any other layer of fire protection is so cost-effective.

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Committee: SAF-BCF

Committee Statement

Resolution: The focus of the Life Safety Code should be on evacuation and should not encourage occupants, especially staff, to use extinguishers in lieu of assisting residents with evacuation.



Public Input No. 360-NFPA 101-2021 [Section No. 32.2.4]

32.2.4 Alcohol-Based Hand-Rub Dispensers.

~~Alcohol~~ The installation and maintenance of Alcohol -based hand-rub dispensers in accordance with 8 dispensers and the storage of alcohol-based hand rub solutions in accordance with 8 .7.3. 3 shall- 3 shall be permitted. _

Statement of Problem and Substantiation for Public Input

Our current health situation with the latest viral outbreak has led to a need to increase the number of alcohol based hand sanitizer dispensers within many different types of occupancies. Although alcohol based hand sanitizer was addressed in this chapter and many other requirements were also located in this chapter, the requirements did not apply to storage of sanitizer when not in use or many other provisions that could be applicable. Providing a pointer to section 8.7.3.3 will provide a direct link to all the requirements needed for safe installation, use, and maintenance of alcohol based hand rub dispensers as well as the storage of any alcohol based hand rub materials not in use.

Currently Robert Upson is also chairing an NFPA 30 task group, and Bruce Johnson is chairing an NFPA 1 task group to address this subject within those standards respectively. So a recommendation should be made to this committee to put forth a committee input and create a task group to review this requirement throughout and ensure correlation with NFPA 1 and NFPA 30 task groups that are already reviewing this.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
Public Input No. 316-NFPA 101-2021 [Section No. 8.7.3.3]	
Public Input No. 324-NFPA 101-2021 [New Section after 11.4.3.6]	
Public Input No. 325-NFPA 101-2021 [Section No. 12.4.6]	
Public Input No. 326-NFPA 101-2021 [Section No. 13.4.6]	
Public Input No. 327-NFPA 101-2021 [Section No. 14.4.5]	
Public Input No. 329-NFPA 101-2021 [Section No. 15.4.5]	
Public Input No. 330-NFPA 101-2021 [Section No. 16.4.5]	
Public Input No. 332-NFPA 101-2021 [Section No. 16.6.4]	
Public Input No. 333-NFPA 101-2021 [Section No. 17.4.5]	
Public Input No. 334-NFPA 101-2021 [Section No. 17.6.4]	
Public Input No. 336-NFPA 101-2021 [Section No. 18.4.4]	
Public Input No. 337-NFPA 101-2021 [Section No. 19.4.4]	
Public Input No. 339-NFPA 101-2021 [Section No. 20.4.4]	
Public Input No. 340-NFPA 101-2021 [Section No. 21.4.4]	
Public Input No. 342-NFPA 101-2021 [Section No. 22.4.7]	
Public Input No. 344-NFPA 101-2021 [Section No. 23.4.7]	
Public Input No. 347-NFPA 101-2021 [Section No. 26.3.2.1]	
Public Input No. 349-NFPA 101-2021 [Section No. 28.4.2]	
Public Input No. 354-NFPA 101-2021 [Section No. 29.4.2]	
Public Input No. 357-NFPA 101-2021 [Section No. 30.4.3]	

[Public Input No. 361-NFPA 101-2021 \[Section No. 32.3.4.2\]](#)

[Public Input No. 363-NFPA 101-2021 \[Section No. 33.2.4\]](#)

[Public Input No. 364-NFPA 101-2021 \[Section No. 33.3.4.2\]](#)

[Public Input No. 365-NFPA 101-2021 \[Section No. 36.4.6\]](#)

[Public Input No. 367-NFPA 101-2021 \[Section No. 37.4.6\]](#)

[Public Input No. 368-NFPA 101-2021 \[Section No. 38.4.4\]](#)

[Public Input No. 370-NFPA 101-2021 \[Section No. 40.4.3\]](#)

[Public Input No. 371-NFPA 101-2021 \[Section No. 42.4.3\]](#)

Submitter Information Verification

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Submittal Date: Tue Jun 01 11:02:30 EDT 2021

Committee: SAF-BCF

Committee Statement

Resolution: [FR-6601-NFPA 101-2021](#)

Statement: The revised language provides direct reference to the ABHR requirements found within 8.7.3 and also addresses storage practices for this material.



Public Input No. 203-NFPA 101-2021 [Section No. 32.3.3.4.9.2]

32.3.3.4.9.2

Where required by 32.3.3.4.9.1, carbon monoxide detectors shall be installed in all of the following locations:

- (1) Within rooms containing fuel-burning appliances or fuel-burning fireplaces, unless otherwise exempted by 32.3.3.4.9.4
- (2) Centrally located within occupiable spaces served by the first supply air register from a fuel-burning HVAC system
- (3) ~~On~~ In at least one readily accessible location on every occupiable level
- (4) Within adjacent communicating occupiable spaces to an attached garage, unless otherwise exempted by 32.3.3.4.9.3

Statement of Problem and Substantiation for Public Input

The specific locations noted in (1), (2), and (4) would not apply on a level that has neither sleeping rooms nor a garage. On such levels, the number and location of required carbon monoxide detectors is not specified. This provides a minimum requirement. Other potential options would be "immediately outside any room with fuel-fired equipment" or within a certain distance of any fuel-fired equipment, though a minimum number and location would still be needed for any levels that do not contain any fuel-fired equipment.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
Public Input No. 202-NFPA 101-2021 [Section No. 32.2.3.4.4.2]	Identical issue

Submitter Information Verification

Submitter Full Name: John Rickard
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Submission Date: Wed May 26 15:57:06 EDT 2021
Committee: SAF-BCF

Committee Statement

Resolution: The proposed addition of the term readily accessible may create confusion. Installation criteria is provided in chapter 17 of NFPA 72.



Public Input No. 276-NFPA 101-2021 [Section No. 32.3.3.6.7]

32.3.3.6.7*

Doors protecting corridor openings shall be self-latching and provided with positive latching hardware or shall in a fire emergency become positively latched by means of an automatic fail-safe device that is activated by an automatic fire detector provided the doors are also self-closing or automatic-closing .

A. 32.3.3.6.7

Doors protecting corridor openings in residential board and care facilities have long been required to have positive latching hardware.

An alternative to the positive latching hardware requirement, introduced in NFPA 101-2024, which is based on the provisions of NFPA 80 Section 6.4.4.3.3, is equivalently applicable to doors not required to comply with NFPA 80 (doors not required to be fire-rated).

The alternative is an automatic fail-safe device that positively latches the door when activated by an automatic fire detector. This alternative is permitted if the doors are also either self-closing or automatic-closing – to ensure the door moves to a closed position upon activation of an automatic fire detector to become positively latched. This alternative is an option on doors required to comply with NFPA 80 as well as door not required to comply with NFPA 80 (doors not required to be fire-rated).

NFPA 80 Section 6.4.4.3.3, as part of the locks and latches requirements, states: Latching arrangements that do not provide positive latching in the normal mode shall be permitted to be used provided that, in a fire emergency, the door becomes positively latched by means of an automatic fail-safe device that is activated by an automatic fire detector.

Statement of Problem and Substantiation for Public Input

On doors protecting corridor openings in residential board and care facilities, as an acceptable alternative to doors provided with positive latching hardware our BHMA members are being asked if it is possible to apply the provisions of NFPA 80 Section 6.4.4.3.3 on fire-rated and non-fire-rated corridor doors. This proposal assumes that if it's acceptable to apply the provisions of NFPA 80 Section 6.4.4.3.3 to doors required to comply with NFPA 80 (doors required to be fire-rated), then it should also be acceptable to apply these same provisions to doors not required to comply with NFPA 80 (doors not required to be fire-rated).

The additional requirement for use of the automatic fail-safe devices is the doors are also required to be either self-closing or automatic-closing. This is to ensure the door moves to a closed position upon activation of an automatic fire detector and becomes positively latched.

NFPA 80 Section 6.4.4.3.3, as part of the locks and latches requirements, states: Latching arrangements that do not provide positive latching in the normal mode shall be permitted to be used provided that, in a fire emergency, the door becomes positively latched by means of an automatic fail-safe device that is activated by an automatic fire detector.

Also proposing Annex A materials to complement proposed revisions to 32.3.3.6.7.

Related Public Inputs for This Document

Related Input

Relationship

[Public Input No. 272-NFPA 101-2021 \[Section No. 18.3.6.3.5\]](#)

[Public Input No. 273-NFPA 101-2021 \[Section No. A.19.3.6.3.5\]](#)

[Public Input No. 274-NFPA 101-2021 \[Section No. 20.3.7.1\]](#)

[Public Input No. 275-NFPA 101-2021 \[Section No. 21.3.7.1\]](#)

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Committee: SAF-BCF

Committee Statement

Resolution: The proponent needs to clarify what is meant by an automatic fire detector and ensure that detection is provided that meets the intent of 32.3.3.6 for the doors to resist the passage of smoke and meets the NFPA 72 provisions for door release service. The proposed revisions would fit better in chapters 7 or 8 so that other chapters may use the same provision.



Public Input No. 361-NFPA 101-2021 [Section No. 32.3.4.2]

32.3.4.2 Alcohol-Based Hand-Rub Dispensers.

~~Alcohol~~ The installation and maintenance of Alcohol -based hand-rub dispensers in accordance with 8 dispensers and the storage of alcohol-based hand rub solutions in accordance with 8 .7.3. 3 shall- 3 shall be permitted._

Statement of Problem and Substantiation for Public Input

Our current health situation with the latest viral outbreak has led to a need to increase the number of alcohol based hand sanitizer dispensers within many different types of occupancies. Although alcohol based hand sanitizer was addressed in this chapter and many other requirements were also located in this chapter, the requirements did not apply to storage of sanitizer when not in use or many other provisions that could be applicable. Providing a pointer to section 8.7.3.3 will provide a direct link to all the requirements needed for safe installation, use, and maintenance of alcohol based hand rub dispensers as well as the storage of any alcohol based hand rub materials not in use.

Currently Robert Upson is also chairing an NFPA 30 task group, and Bruce Johnson is chairing an NFPA 1 task group to address this subject within those standards respectively. So a recommendation should be made to this committee to put forth a committee input and create a task group to review this requirement throughout and ensure correlation with NFPA 1 and NFPA 30 task groups that are already reviewing this.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
Public Input No. 316-NFPA 101-2021 [Section No. 8.7.3.3]	
Public Input No. 324-NFPA 101-2021 [New Section after 11.4.3.6]	
Public Input No. 325-NFPA 101-2021 [Section No. 12.4.6]	
Public Input No. 326-NFPA 101-2021 [Section No. 13.4.6]	
Public Input No. 327-NFPA 101-2021 [Section No. 14.4.5]	
Public Input No. 329-NFPA 101-2021 [Section No. 15.4.5]	
Public Input No. 330-NFPA 101-2021 [Section No. 16.4.5]	
Public Input No. 332-NFPA 101-2021 [Section No. 16.6.4]	
Public Input No. 333-NFPA 101-2021 [Section No. 17.4.5]	
Public Input No. 336-NFPA 101-2021 [Section No. 18.4.4]	
Public Input No. 337-NFPA 101-2021 [Section No. 19.4.4]	
Public Input No. 339-NFPA 101-2021 [Section No. 20.4.4]	
Public Input No. 340-NFPA 101-2021 [Section No. 21.4.4]	
Public Input No. 342-NFPA 101-2021 [Section No. 22.4.7]	
Public Input No. 344-NFPA 101-2021 [Section No. 23.4.7]	
Public Input No. 347-NFPA 101-2021 [Section No. 26.3.2.1]	
Public Input No. 349-NFPA 101-2021 [Section No. 28.4.2]	
Public Input No. 354-NFPA 101-2021 [Section No. 29.4.2]	
Public Input No. 357-NFPA 101-2021 [Section No. 30.4.3]	
Public Input No. 360-NFPA 101-2021 [Section No. 32.2.4]	

[Public Input No. 363-NFPA 101-2021 \[Section No. 33.2.4\]](#)

[Public Input No. 364-NFPA 101-2021 \[Section No. 33.3.4.2\]](#)

[Public Input No. 365-NFPA 101-2021 \[Section No. 36.4.6\]](#)

[Public Input No. 367-NFPA 101-2021 \[Section No. 37.4.6\]](#)

[Public Input No. 368-NFPA 101-2021 \[Section No. 38.4.4\]](#)

[Public Input No. 370-NFPA 101-2021 \[Section No. 40.4.3\]](#)

[Public Input No. 371-NFPA 101-2021 \[Section No. 42.4.3\]](#)

Submitter Information Verification

Submitter Full Name: Kelly Nicoletto

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Submittal Date: Tue Jun 01 11:07:14 EDT 2021

Committee: SAF-BCF

Committee Statement

Resolution: [FR-6612-NFPA 101-2021](#)

Statement: The revised language provides direct reference to the ABHR requirements found within 8.7.3 and also addresses storage practices for this material.



Public Input No. 204-NFPA 101-2021 [New Section after 32.3.5.2.3]

32.3.5.2.4

Direct-vent gas fireplaces and solid fuel-burning fireplaces shall be installed, maintained and used in accordance with 9.2.2.

Statement of Problem and Substantiation for Public Input

This adds a needed reference to NFPA 54 for direct-vent gas fireplaces and NFPA 211 for solid fuel-burning fireplaces.

Submitter Information Verification

Submitter Full Name: John Rickard

Organization: P3 Consulting

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Submittal Date: Wed May 26 16:10:49 EDT 2021

Committee: SAF-BCF

Committee Statement

Resolution: FR-6611-NFPA 101-2021

Statement: This adds a needed reference to NFPA 54 for direct-vent gas fireplaces and NFPA 211 for solid fuel-burning fireplaces.



Public Input No. 28-NFPA 101-2021 [Section No. 32.3.6]

[See attached [Public Comment No. 166 - Rejected but held](#)]

32.3.6 Reserved.

Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
101_A2023_SAF_BCF_PC166.pdf	Public Comment No. 166 - Rejected but held	

Statement of Problem and Substantiation for Public Input

NOTE: This Public Input appeared as "Rejected but held" in Public Comment No. 166 of the A2020 Second Draft Report for NFPA 101 and per the Regs at 4.4.8.3.1.

Submitter Information Verification

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Organization: NFPA

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Submission Date: Mon Feb 01 10:00:07 EST 2021

Committee: SAF-BCF

Committee Statement

Resolution: A listing for emergency call systems is unnecessary without the inclusion of requirements for when and where these systems are needed for life safety, in accordance with the scope of this document. The proposed requirement is not addressed in this chapter. Additionally, this would create an enforcement issue as it's unclear what "healthcare providers on premises" means.



Public Comment No. 166-NFPA 101-2019 [New Section after 32.3.6]

TITLE OF NEW CONTENT -- Residential Board and Care

Type your content here ...

32.3.6 Emergency Call Systems

32.3.6.1 General. When provided in facilities with healthcare providers on premises, the Emergency Call System shall listed to UL 2560.

Statement of Problem and Substantiation for Public Comment

An Emergency Call System “listed” to UL 2560 provides 3rd Party tested and audited assurance of safeguards against critical hazards such as fire and electrical shock whereas, a “non-listed” system would not have been independently assessed or audited as providing such assurance. An Emergency Call System that is “not-listed” to an electrical safety standard does not provide the same level of safety and reliability as does one which has been tested, evaluated and “listed” by a Nationally Recognized Testing Laboratory (NRTL). This proposed change does not require the installation of an Emergency Call System. However, this proposed change does require that when an Emergency Call System is installed that it be listed to a nationally recognized standard

Additional justifications

- Resident safety is receiving greater attention in Assisted Living (AL) and Independent Living (IL) facilities as these housing options proliferate and facilities provide varying levels of safety measures in a diverse regulatory environment.
- Many, but not all, AL and IL facilities install e-call systems and use them to market the safety of their facilities and the services they provide. Residents and families rely on the functionality and reliability of these systems when selecting from housing options.
- There are a great variety of e-call systems from many manufacturers that offer differing features. Most of these systems are wireless, which introduces significant reliability concerns.
- UL 2560 was developed to provide a “minimum safety standard” for functionality and reliability of e-call systems so that residents and families can be assured that e-call systems installed in facilities will perform at a standard level of functionality.
- Given this environment, NFPA 101 should provide assurance that if a facility installs an e-call system, it meets the requirements of 2560 out of concern for the safety of residents and the intended reliance of these systems for emergency communications.

Related Item

- PI 354

Submitter Information Verification

Submitter Full Name: Megan Hayes

Organization: Nema

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City:

State:

Zip:

Submission Date: Tue May 07 10:14:21 EDT 2019

Committee: SAF-AAC



Public Input No. 105-NFPA 101-2021 [Section No. 33.2.2.3.1]

33.2.2.3.1

In addition to the primary route, each sleeping room shall have a second means of escape consisting of one of the following, unless the provisions of 33.2.2.3.2, 33.2.2.3.3, or 33.2.2.3.4 are met:

- (1) Door, stairway, passage, or hall providing a way of unobstructed travel to the outside of the dwelling at street or the finished ground level that is independent of, and remotely located from, the primary means of escape
- (2) Passage through an adjacent nonlockable space independent of, and remotely located from, the primary means of escape to any approved means of escape
- (3)* Outside window or door operable from the inside, without the use of tools, keys, or special effort, that provides a clear opening of not less than 5.7 ft^2 (0.53 m^2), with the width not less than 20 in. (510 mm), the height not less than 24 in. (610 mm), and the bottom of the opening not more than 44 in. (1120 mm) above the floor, with such means of escape acceptable, provided that one of the following criteria is met:
 - (4) The window is within 20 ft (6100 mm) of the finished ground level.
 - (5) The window is directly accessible to fire department rescue apparatus, as approved by the authority having jurisdiction.
 - (6) The window or door opens onto an exterior balcony.
- (7) Permanently fixed stairs or ramp are permitted to be used to allow occupants to be within 44 in. of the bottom window sill. The clear width of the stairs or ramp shall be at least the width of the window or 36 in. whichever is wider. The stairs or ramp and access thereto shall not be obstructed.
- (8) Windows having a sill height below the adjacent finished ground level that are provided with a window well meeting the following criteria:
 - (9) The window well has horizontal dimensions that allow the window to be fully opened.
 - (10) The window well has an accessible net clear opening of not less than 9 ft^2 (0.84 m^2), with a length and width of not less than 36 in. (915 mm).
 - (11) A window well with a vertical depth of more than 44 in. (1120 mm) is equipped with an approved permanently affixed ladder or with steps meeting the following criteria:
 - (12) The ladder or steps do not encroach more than 6 in. (150 mm) into the required dimensions of the window well.
 - (13) The ladder or steps are not obstructed by the window.

Statement of Problem and Substantiation for Public Input

Existing window locations may be more than 44 inches off the floor and this language would permit permanent structures (stairs or ramps) to be installed to bring a window for rescue into compliance. The structure would be permanent (unmovable) and required to be unobstructed. This would prevent them from being used for storage or blocked by storage or furnishings.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
Public Input No. 103-NFPA 101-2021 [Section No. 32.2.2.3.1]	

Submitter Information Verification

Submitter Full Name: Catherine Stashak
Organization: Office of the Illinois State Fire Marshal
Street Address:
City:
State:
Zip:
Submittal Date: Wed May 05 16:13:06 EDT 2021
Committee: SAF-BCF

Committee Statement

Resolution: The committee agrees with the intent of the proposal, however the proposal language is unclear and needs to be revised to address the 44 inches in 33.2.2.3.1(3). It's unclear if this is intended to be an exception to the list or a new section. The TC also has concerns about the tripping hazard created underneath windows.



Public Input No. 270-NFPA 101-2021 [New Section after 33.2.3.4.4.7]

33.2.3.4.5 Carbon Monoxide Alarms and Carbon Monoxide Detection Systems.

33.2.3.4.5.1 Carbon monoxide alarms or carbon monoxide detectors in accordance with Section 9.12 and 33.2.3.4.5 shall be provided in existing, small board and care facilities where either of the following conditions exists:

(1) Where small board and care facilities have communicating attached garages, unless otherwise exempted by 33.2.3.4.5.3

(2) Where small board and care facilities contain fuel-burning appliances or fuel-burning fireplaces

33.2.3.4.5.2 Where required by 33.2.3.4.5.1, carbon monoxide alarms or carbon monoxide detectors shall be installed in the following locations:

(1) Outside each separate sleeping area in the immediate vicinity of the sleeping rooms

(2) Within sleeping rooms containing fuel-burning appliances or fuel-burning fireplaces

(3) On every occupiable level, including basements and excluding attics and crawl spaces

(4) Centrally located within occupiable spaces adjacent to a communicating attached garage, unless otherwise exempted by 33.2.3.4.5.3

33.2.3.4.5.3 Carbon monoxide alarms and carbon monoxide detectors as specified in 33.2.3.4.5.1(1) shall not be required in the following locations:

(1) In garages

(2) Within small board and care facilities with communicating attached garages that are open parking structures as defined by the building code

(3) Within small board and care facilities with communicating attached garages that are mechanically ventilated in accordance with the mechanical code

Statement of Problem and Substantiation for Public Input

The recently published NFPA Fire Protection Research Foundation report “CO Detection and Alarm Requirements: Literature Review” highlights major deficits in current code requirements to adequately protect occupants from high level CO exposure incidents in buildings that house permanently installed CO hazards. The addition of these proposed requirements will prevent deaths and injuries to occupants of existing small board and care facilities by providing a baseline level of protection from high level CO exposure.

CO detection requirements are currently in place to protect occupants of new small board and care facilities. There is need for equivalent requirements for existing buildings where the risk of CO exposure is likely higher due to aging appliances and outdated construction. People are most vulnerable to the effects of CO while they are sleeping. Many of these facilities provide care to populations most at risk from the effects of CO

The lethality of CO is undisputed. The severity of poisoning injury depends not only on the level and duration of CO exposure, but also on the individual. Those most at risk from the effects of CO: infants and children, older people, pregnant women/unborn babies, and those with underlying health conditions. There is no formula that can accurately predict how CO will impact a particular person nor

what level or duration of exposure can be tolerated without suffering prolonged harm, irreversible brain damage, or death. For many victims who survive exposure to high levels of CO, the effects do not end with the poisoning incident. They can be severe enough to cause death weeks to months later. High level CO exposure can also result in irreversible effects, including life-altering brain injury.

The lifesaving value of CO detection is undisputed. CO detection has been commercially available for at least 30 years and has proven reliability. There is no substitute for the early detection that these devices provide, alerting to danger before conditions escalate to a level of causing harm.

As a homeowner it is a reasonable expectation to be aware of the hazards of CO and take responsibility to install CO detection to protect yourself. However, as an occupant of a building that is under someone else's charge, there is no way of knowing of equivalent hazards nor whether action has been taken to install safeguards. Combined with no human ability to detect CO, this leaves occupants critically vulnerable during any type of CO exposure incident where no detection is installed. Their life safety is entirely at the mercy of circumstances they have no knowledge of and no control over, assuming a risk they had no choice in taking. Further, most people likely assume CO detection requirements are already in place for these types of occupancies because they are advised to have CO alarms installed in their homes. This puts them at even greater disadvantage during an exposure incident as they likely assume there will be an environmental alert to the presence of potentially dangerous levels of CO.

The risk of CO poisoning is not unique to any particular occupancy type, it is an inherent risk associated with CO hazards that exist within a building. It is not safe to occupy, and especially to sleep, in any building where there are permanently installed CO hazards without the protection of installed CO detection.

The proposed requirements match requirements already in place for new facilities. Please act to ensure that occupants are equivalently protected from exposure to high levels of CO in existing small board and care facilities. If equivalent detection equipment is deemed too cumbersome or cost prohibitive, please consider alternatives such as battery-operated or plug-in CO alarm options.

Submitter Information Verification

Submitter Full Name: Kris Hauschildt
Organization: Jenkins Foundation
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City:
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Submittal Date: Sat May 29 17:22:10 EDT 2021
Committee: SAF-BCF

Committee Statement

Resolution: The language presented by the submitter is equal to that for new residential board and care occupancies and is deemed to be excessive. The TC recommends that the submitter revise the language to be more feasible for existing small residential board and care occupancies. The TC has formed a task group to propose requirements for existing residential board and care for second draft.



Public Input No. 106-NFPA 101-2021 [New Section after 33.2.3.5.7.1]

TITLE OF NEW CONTENT

(New) 33.2.3.5.7.1.1 Where an automatic sprinkler system is installed, attics used for storage or fuel-fired equipment are permitted to enclose storage or fuel-fired equipment attic spaces with 1-hour fire-rated construction on all sides including floor and ceiling/roof and shall provide sprinkler protection in this enclosed area. The remainder of the attic space shall meet one of the criteria found in 33.2.3.5.7.2.

Statement of Problem and Substantiation for Public Input

My agency is receiving many complaints from sprinkler contractors that this requirement is extraordinarily expensive for small RB&C owners to comply with-requiring the installation of new water services and pumps to meet design requirements. The concept of enclosing storage or fuel-fired equipment areas with 1-hour construction, providing sprinkler protection only in that area and using one of the detection or protection options found in 33.2.3.5.7.2 used in the remainder of the attic area came not only from sprinkler contractors, but also (now retired) NFPA staff. The attic space would still have protection and detection which deals with the origins of the attic protection language. The 1-hour enclosure provides additional protection.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
<u>Public Input No. 104-NFPA 101-2021 [New Section after 32.2.3.5.7.1]</u>	

Submitter Information Verification

Submitter Full Name: Catherine Stashak
Organization: Office of the Illinois State Fire Marshal
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City:
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Zip:
Submittal Date: Wed May 05 16:21:22 EDT 2021
Committee: SAF-BCF

Committee Statement

Resolution: Coordination is needed between the NFPA 13R and 13D requirements and public inputs 196, 197, 198, 104, 205, and 106 from NFPA 101, and public inputs 92, 93, and 94 from NFPA 5000 related to exterior projections and attics. The TC has formed a task group to address all of the proposed revisions related to sprinklers in exterior projections and attics.



Public Input No. 205-NFPA 101-2021 [New Section after 33.2.3.5.7.2]

33.2.3.5.7.3

The provisions of 33.2.3.5.7.1 and 33.2.3.5.7.2 shall be permitted to be applied separately to portions of the attic separated by smoke partitions that extend from the ceiling to the underside of the floor or roof deck above.

Statement of Problem and Substantiation for Public Input

This allows the provisions of 32.2.3.5.7.3 to apply in existing buildings without adding any retroactive requirements.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
<u>Public Input No. 198-NFPA 101-2021 [New Section after 32.2.3.5.7.2]</u>	Parallel new and existing provisions

Submitter Information Verification

Submitter Full Name: John Rickard
Organization: P3 Consulting
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City:
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Submittal Date: Wed May 26 16:30:24 EDT 2021
Committee: SAF-BCF

Committee Statement

Resolution: Coordination is needed between the NFPA 13R and 13D requirements and public inputs 196, 197, 198, 104, 205, and 106 from NFPA 101, and public inputs 92, 93, and 94 from NFPA 5000 related to exterior projections and attics. The TC has formed a task group to address all of the proposed revisions related to sprinklers in exterior projections and attics.



Public Input No. 366-NFPA 101-2021 [New Section after 33.2.3.5.8.15]

33.2.3.5.9 Portable Fire Extinguishers.

Portable fire extinguishers shall be provided in accordance with Section 9.9.

Statement of Problem and Substantiation for Public Input

Reason: The concept of trading off portable extinguishers in sprinklered buildings has been largely abandoned by fire protection principles. The National Fire Codes of both NFPA 1 and the ICC- IFC require portable fire extinguishers in all occupancy classes including storage which addresses property protection and property loss as well as, the safety of the building occupants.

A portable fire extinguisher is an effective item of fire protection which allows for small fires to be tackled by the occupants of a building and saves 100s of thousands of dollars in property loss.

It is important to appreciate that while different to official assumptions and desire for evacuation, research shows the public's priorities to be rational and appropriate. The public's experience of fire is vastly different to that of the professionals involved in the planning for and responding to fire.

Some key findings from research studies have been identified and the public's-oriented outcomes include, avoidance of embarrassment, inconvenience, damage to the premises or property, concern for others, pets and possessions and lastly personal injury.

The evidence further identifies that the public is willing and will accept minor consequences in their pursuit of achieving personal humanistic priorities and instinct. Concern for people, pets and possessions are strong and established drivers of behavior in the event of a fire. Therefore, this should be no surprise to see it as an influential feature of most individual's response to a fire.

Limiting a fire to the smallest area within a building is a sensible aspiration.

Official policy and attitudes are most singularly directed at avoiding the risk when the public encounters a fire. This is well meaning but the research has shown that this DOES NOT I REPEAT DOES NOT align with the publics' attitude or the ability of the general public.

Thus, it is important to give the public the intelligently designed and placed tools intended for their use and not the necessarily firefighters. NFPA 10 states: 5.1.2 The selection of extinguishers shall be independent of whether the building is equipped with automatic sprinklers, standpipe and hose, or other fixed protection equipment. Other codes, and other occupancy chapters have abandoned this concept in recognition of the fact that portable extinguishers are a valuable, cost-effective layer of fire protection, and are intended for a different purpose than sprinklers. To avoid addressing fires in their earliest stages is counter-intuitive, and studies have shown that people will almost always attempt to extinguish a fire if it's small and they believe they can mitigate the hazard. If a fire extinguisher is not available, people have (and will continue to) use makeshift means to try to extinguish the fire, which is far less safe than using a portable extinguisher that is designed for safe and effective use by novices. (Ref: An Evaluation of the Role of Fire Extinguishers by David Wales)

A significant amount of data has been collected to support the requirement for portable extinguishers, including: WPI/EKU Study: "Ordinary People and the Effective Operation of Fire Extinguishers", which clearly showed that the vast majority of people who have never used an extinguisher can operate one safely and effectively.

2013 NFPA Report: "U.S. Experience with Sprinklers" reports that there were 48,460 reported structure fires annually in buildings equipped with sprinkler systems between 2007-2011, and 40,440 (83 percent) never grew large enough to activate the system. Based on this report alone, it's clear that people are reacting to small fires and extinguishing them prior to sprinkler activation.

In a CPSC study published in 2009, the agency determined through telephone surveys that only a small percentage of residential fires are reported to fire departments (about five percent). According to this report, approximately 379,000 residential fires are extinguished each year using portable fire extinguishers – this includes both reported and unreported fires.

A study by Richard Bukowski in 2014, the life cycle cost of portable fire extinguishers was determined to be between one and a half and four cents per foot annually; if coverage could be maximized to that allowable by code, the cost drops to between a half cent and one cent per foot annually. It's unlikely that any other layer of fire protection is so cost-effective.

Submitter Information Verification

Submitter Full Name: Marvin Garriss
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Affiliation: The National Association of State Fire Marshals, The International Fire Marshal's Association - Georgia Chapter / The Georgia Fire Prevention Association and FEMA
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City:
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Zip:
Submittal Date: Tue Jun 01 11:26:52 EDT 2021
Committee: SAF-BCF

Committee Statement

Resolution: The focus of the Life Safety Code should be on evacuation and should not encourage occupants, especially staff, to use extinguishers in lieu of assisting residents with evacuation.



Public Input No. 363-NFPA 101-2021 [Section No. 33.2.4]

33.2.4 Alcohol-Based Hand-Rub Dispensers.

~~Alcohol~~ The installation and maintenance of Alcohol -based hand-rub dispensers in accordance with 8 dispensers and the storage of alcohol-based hand rub solutions in accordance with 8 .7.3. 3 shall- 3 shall be permitted.

Statement of Problem and Substantiation for Public Input

Our current health situation with the latest viral outbreak has led to a need to increase the number of alcohol based hand sanitizer dispensers within many different types of occupancies. Although alcohol based hand sanitizer was addressed in this chapter and many other requirements were also located in this chapter, the requirements did not apply to storage of sanitizer when not in use or many other provisions that could be applicable. Providing a pointer to section 8.7.3.3 will provide a direct link to all the requirements needed for safe installation, use, and maintenance of alcohol based hand rub dispensers as well as the storage of any alcohol based hand rub materials not in use.

Currently Robert Upson is also chairing an NFPA 30 task group, and Bruce Johnson is chairing an NFPA 1 task group to address this subject within those standards respectively. So a recommendation should be made to this committee to put forth a committee input and create a task group to review this requirement throughout and ensure correlation with NFPA 1 and NFPA 30 task groups that are already reviewing this.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
Public Input No. 316-NFPA 101-2021 [Section No. 8.7.3.3]	
Public Input No. 324-NFPA 101-2021 [New Section after 11.4.3.6]	
Public Input No. 325-NFPA 101-2021 [Section No. 12.4.6]	
Public Input No. 327-NFPA 101-2021 [Section No. 14.4.5]	
Public Input No. 326-NFPA 101-2021 [Section No. 13.4.6]	
Public Input No. 329-NFPA 101-2021 [Section No. 15.4.5]	
Public Input No. 330-NFPA 101-2021 [Section No. 16.4.5]	
Public Input No. 332-NFPA 101-2021 [Section No. 16.6.4]	
Public Input No. 333-NFPA 101-2021 [Section No. 17.4.5]	
Public Input No. 334-NFPA 101-2021 [Section No. 17.6.4]	
Public Input No. 342-NFPA 101-2021 [Section No. 22.4.7]	
Public Input No. 336-NFPA 101-2021 [Section No. 18.4.4]	
Public Input No. 337-NFPA 101-2021 [Section No. 19.4.4]	
Public Input No. 339-NFPA 101-2021 [Section No. 20.4.4]	
Public Input No. 340-NFPA 101-2021 [Section No. 21.4.4]	
Public Input No. 344-NFPA 101-2021 [Section No. 23.4.7]	
Public Input No. 349-NFPA 101-2021 [Section No. 28.4.2]	
Public Input No. 347-NFPA 101-2021 [Section No. 26.3.2.1]	
Public Input No. 354-NFPA 101-2021 [Section No. 29.4.2]	
Public Input No. 357-NFPA 101-2021 [Section No. 30.4.3]	

[Public Input No. 360-NFPA 101-2021 \[Section No. 32.2.4\]](#)

[Public Input No. 361-NFPA 101-2021 \[Section No. 32.3.4.2\]](#)

[Public Input No. 364-NFPA 101-2021 \[Section No. 33.3.4.2\]](#)

[Public Input No. 365-NFPA 101-2021 \[Section No. 36.4.6\]](#)

[Public Input No. 367-NFPA 101-2021 \[Section No. 37.4.6\]](#)

[Public Input No. 368-NFPA 101-2021 \[Section No. 38.4.4\]](#)

[Public Input No. 370-NFPA 101-2021 \[Section No. 40.4.3\]](#)

[Public Input No. 371-NFPA 101-2021 \[Section No. 42.4.3\]](#)

Submitter Information Verification

Submitter Full Name: Kelly Nicoletto

Organization: UL LLC

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Submittal Date: Tue Jun 01 11:12:36 EDT 2021

Committee: SAF-BCF

Committee Statement

Resolution: [FR-6613-NFPA 101-2021](#)

Statement: The revised language provides direct reference to the ABHR requirements found within 8.7.3 and also addresses storage practices for this material.



Public Input No. 221-NFPA 101-2021 [New Section after 33.3.3.4.8.3]

33.3.3.4.9 Carbon Monoxide Detection.

33.3.3.4.9.1 Carbon monoxide detectors in accordance with Section 9.12 and 33.3.3.4.9 shall be provided where any of the following conditions exist:

(1) Where facilities have communicating attached garages, unless otherwise exempted by 33.3.3.4.9.3

(2) Where fuel-burning appliances or fuel-burning fireplaces are in the facility

33.3.3.4.9.2 Where required by 33.3.3.4.9.1, carbon monoxide detectors shall be installed in all of the following locations:

(1) Within rooms containing fuel-burning appliances or fuel-burning fireplaces, unless otherwise exempted by 33.3.3.4.9.4

(2) Centrally located within occupiable spaces served by the first supply air register from a fuel-burning HVAC system

(3) On every occupiable level

(4) Within adjacent communicating occupiable spaces to an attached garage, unless otherwise exempted by 33.3.3.4.9.3

33.3.3.4.9.3 Carbon monoxide detectors as specified in 33.3.3.4.9.1(1) shall not be required in the following locations:

(1) In garages

(2) Within facilities with communicating attached garages that are open parking structures as defined by the building code

(3) Within facilities with communicating attached garages that are mechanically ventilated in accordance with the mechanical code

33.3.3.4.9.4 Within resident units containing fuel-burning appliances or fuel-burning fireplaces, carbon monoxide alarms shall be permitted to be used.

Statement of Problem and Substantiation for Public Input

The recently published NFPA Fire Protection Research Foundation report “CO Detection and Alarm Requirements: Literature Review” highlights major deficits in current code requirements to adequately protect occupants from high level CO exposure incidents in buildings that house permanently installed CO hazards. The addition of these proposed requirements will prevent deaths and injuries to occupants of existing board and care facilities by providing a baseline level of protection from high level CO exposure.

CO detection requirements are currently in place to protect occupants of new board and care facilities. There is need for equivalent requirements for existing buildings where the risk of CO exposure is likely higher due to aging appliances and outdated construction. People are most vulnerable to the effects of CO while they are sleeping. In addition, many of these facilities provide care to populations who are most at risk from the effects of CO.

The lethality of CO is undisputed. The severity of poisoning injury depends not only on the level and duration of CO exposure, but also on the individual. Those most at risk from the effects of CO: infants and children, older people, pregnant women/unborn babies, and those with underlying health conditions. There is no formula that can accurately predict how CO will impact a particular person nor what level or duration of exposure can be tolerated without suffering prolonged harm, irreversible brain damage, or death. For many victims who survive exposure to high levels of CO, the effects do not end with the poisoning incident. They can be severe enough to cause death weeks to months later. High level CO exposure can also result in irreversible effects, including life-altering brain injury.

The lifesaving value of CO detection is undisputed. CO detection has been commercially available for at least 30 years and has proven reliability. There is no substitute for the early detection that these devices provide, alerting to danger before conditions escalate to a level of causing harm.

As a homeowner it is a reasonable expectation to be aware of the hazards of CO and take responsibility to install CO detection to protect yourself. However, as an occupant of a building that is under someone else's charge, there is no way of knowing of equivalent hazards nor whether action has been taken to install safeguards. Combined with no human ability to detect CO, this leaves occupants critically vulnerable during any type of CO exposure incident where no detection is installed. Their life safety is entirely at the mercy of circumstances they have no knowledge of and no control over, assuming a risk they had no choice in taking. Further, most people likely assume CO detection requirements are already in place for these types of occupancies because they are advised to have CO alarms installed in their homes. This puts them at even greater disadvantage during an exposure incident as they likely assume there will be an environmental alert to the presence of potentially dangerous levels of CO.

The risk of CO poisoning is not unique to any particular occupancy type, it is an inherent risk associated with CO hazards that exist within a building. It is not safe to occupy, and especially to sleep, in any building where there are permanently installed CO hazards without the protection of installed CO detection.

These proposed requirements match requirements already in place for new facilities. Please act to ensure that people are equivalently protected from exposure to high levels of CO in existing board and care facilities. If equivalent detection equipment is deemed too cumbersome or cost prohibitive, please consider alternatives such as battery-operated or plug-in CO alarm options.

Submitter Information Verification

Submitter Full Name: Kris Hauschildt
Organization: Jenkins Foundation
Street Address:
City:
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Zip:
Submission Date: Thu May 27 22:42:41 EDT 2021
Committee: SAF-BCF

Committee Statement

Resolution: The language presented by the submitter is equal to that for new residential board and care occupancies and is deemed to be excessive. The TC recommends that the submitter revise the language to be more feasible for existing large residential board and care occupancies. The requirement for detection on every floor might not be justified in all cases. CO alarms might be a reasonable alternative to detectors in large facilities. The TC has formed a task group to propose requirements for existing residential board and care for second draft.



Public Input No. 364-NFPA 101-2021 [Section No. 33.3.4.2]

33.3.4.2 Alcohol-Based Hand-Rub Dispensers.

~~Alcohol~~ The installation and maintenance of Alcohol -based hand-rub dispensers in accordance with 8 dispensers and the storage of alcohol-based hand rub solutions in accordance with 8 .7.3. 3 shall- 3 shall be permitted. _

Statement of Problem and Substantiation for Public Input

Our current health situation with the latest viral outbreak has led to a need to increase the number of alcohol based hand sanitizer dispensers within many different types of occupancies. Although alcohol based hand sanitizer was addressed in this chapter and many other requirements were also located in this chapter, the requirements did not apply to storage of sanitizer when not in use or many other provisions that could be applicable. Providing a pointer to section 8.7.3.3 will provide a direct link to all the requirements needed for safe installation, use, and maintenance of alcohol based hand rub dispensers as well as the storage of any alcohol based hand rub materials not in use.

Currently Robert Upson is also chairing an NFPA 30 task group, and Bruce Johnson is chairing an NFPA 1 task group to address this subject within those standards respectively. So a recommendation should be made to this committee to put forth a committee input and create a task group to review this requirement throughout and ensure correlation with NFPA 1 and NFPA 30 task groups that are already reviewing this.

Related Public Inputs for This Document

<u>Related Input</u>	<u>Relationship</u>
Public Input No. 316-NFPA 101-2021 [Section No. 8.7.3.3]	
Public Input No. 324-NFPA 101-2021 [New Section after 11.4.3.6]	
Public Input No. 325-NFPA 101-2021 [Section No. 12.4.6]	
Public Input No. 326-NFPA 101-2021 [Section No. 13.4.6]	
Public Input No. 327-NFPA 101-2021 [Section No. 14.4.5]	
Public Input No. 329-NFPA 101-2021 [Section No. 15.4.5]	
Public Input No. 330-NFPA 101-2021 [Section No. 16.4.5]	
Public Input No. 332-NFPA 101-2021 [Section No. 16.6.4]	
Public Input No. 333-NFPA 101-2021 [Section No. 17.4.5]	
Public Input No. 334-NFPA 101-2021 [Section No. 17.6.4]	
Public Input No. 336-NFPA 101-2021 [Section No. 18.4.4]	
Public Input No. 337-NFPA 101-2021 [Section No. 19.4.4]	
Public Input No. 339-NFPA 101-2021 [Section No. 20.4.4]	
Public Input No. 340-NFPA 101-2021 [Section No. 21.4.4]	
Public Input No. 342-NFPA 101-2021 [Section No. 22.4.7]	
Public Input No. 344-NFPA 101-2021 [Section No. 23.4.7]	
Public Input No. 347-NFPA 101-2021 [Section No. 26.3.2.1]	
Public Input No. 349-NFPA 101-2021 [Section No. 28.4.2]	
Public Input No. 354-NFPA 101-2021 [Section No. 29.4.2]	
Public Input No. 357-NFPA 101-2021 [Section No. 30.4.3]	

[Public Input No. 360-NFPA 101-2021 \[Section No. 32.2.4\]](#)

[Public Input No. 361-NFPA 101-2021 \[Section No. 32.3.4.2\]](#)

[Public Input No. 363-NFPA 101-2021 \[Section No. 33.2.4\]](#)

[Public Input No. 365-NFPA 101-2021 \[Section No. 36.4.6\]](#)

[Public Input No. 367-NFPA 101-2021 \[Section No. 37.4.6\]](#)

[Public Input No. 368-NFPA 101-2021 \[Section No. 38.4.4\]](#)

[Public Input No. 370-NFPA 101-2021 \[Section No. 40.4.3\]](#)

[Public Input No. 371-NFPA 101-2021 \[Section No. 42.4.3\]](#)

Submitter Information Verification

Submitter Full Name: Kelly Nicoletto

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Submittal Date: Tue Jun 01 11:18:16 EDT 2021

Committee: SAF-BCF

Committee Statement

Resolution: [FR-6614-NFPA 101-2021](#)

Statement: The revised language provides direct reference to the ABHR requirements found within 8.7.3 and also addresses storage practices for this material.



Public Input No. 27-NFPA 101-2021 [Section No. 33.3.6]

[See attached Public Comment No. 167 - Rejected but held]

33.3.6 Reserved.

Additional Proposed Changes

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
101_A2023_SAF_BCF_PC167.pdf	Public Comment No. 167 Rejected but held	

Statement of Problem and Substantiation for Public Input

NOTE: This Public Input appeared as "Rejected but Held" in Public Comment No. 167 of the A2020 Second Draft Report for NFPA 101 and per the Regs at 4.4.8.3.1.

Submitter Information Verification

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Organization: NFPA

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Submission Date: Mon Feb 01 09:49:30 EST 2021

Committee: SAF-BCF

Committee Statement

Resolution: A listing for emergency call systems is unnecessary without the inclusion of requirements for when and where these systems are needed for life safety, in accordance with the scope of this document. The proposed requirement is not addressed in this chapter. Additionally, this would create an enforcement issue as it's unclear what "healthcare providers on premises" means.



Public Comment No. 167-NFPA 101-2019 [New Section after 33.3.6]

TITLE OF NEW CONTENT - Existing Residential Board and Care

Type your content here ...

33.3.6 Emergency Call Systems

33.3.6.1 General. When provided in existing facilities with healthcare providers on premises, the new Emergency Call System shall listed to UL 2560.

Statement of Problem and Substantiation for Public Comment

An Emergency Call System “listed” to UL 2560 provides 3rd Party tested and audited assurance of safeguards against critical hazards such as fire and electrical shock whereas, a “non-listed” system would not have been independently assessed or audited as providing such assurance. An Emergency Call System that is “not-listed” to an electrical safety standard does not provide the same level of safety and reliability as does one which has been tested, evaluated and “listed” by a Nationally Recognized Testing Laboratory (NRTL). This proposed change does not require the installation of an Emergency Call System. However, this proposed change does require that when an Emergency Call System is installed that it be listed to a nationally recognized standard

Additional justifications

- Resident safety is receiving greater attention in Assisted Living (AL) and Independent Living (IL) facilities as these housing options proliferate and facilities provide varying levels of safety measures in a diverse regulatory environment.
- Many, but not all, AL and IL facilities install e-call systems and use them to market the safety of their facilities and the services they provide. Residents and families rely on the functionality and reliability of these systems when selecting from housing options.
- There are a great variety of e-call systems from many manufacturers that offer differing features. Most of these systems are wireless, which introduces significant reliability concerns.
- UL 2560 was developed to provide a “minimum safety standard” for functionality and reliability of e-call systems so that residents and families can be assured that e-call systems installed in facilities will perform at a standard level of functionality.
- Given this environment, NFPA 101 should provide assurance that if a facility installs an e-call system, it meets the requirements of 2560 out of concern for the safety of residents and the intended reliance of these systems for emergency communications.

Related Item

- PI 355

Submitter Information Verification

Submitter Full Name: Megan Hayes

Organization: Nema

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Submission Date: Tue May 07 10:19:40 EDT 2019

Committee: SAF-AAC



Public Input No. 314-NFPA 101-2021 [Section No. A.3.3.32.3]

A.3.3.32.3 Thermal Barrier.

Finish ratings, as published in the UL *Fire Resistance Directory*, ~~are~~ Online Search Tool Product IQ; www.UL.com/PiQ are one way of determining thermal barrier. A test method was developed in order to assess whether a material, product, or assembly constitutes a thermal barrier (see NFPA 275). It requires thermal barriers to meet both a test for fire resistance (temperature transmission test), which limits temperature rise on the unexposed side, and a test for reaction-to-fire (integrity fire test), intended to demonstrate that the material can prevent or delay ignition of the material on the unexposed side. The reaction to fire test is one of the following: NFPA 286, ANSI/FM 4880, UL 1040, or UL 1715.

Statement of Problem and Substantiation for Public Input

The Building Materials Directory is no longer published and products are now incorporated into UL's Product IQ online database.

Submitter Information Verification

Submitter Full Name: Kelly Nicoletto

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Submittal Date: Mon May 31 17:04:50 EDT 2021

Committee: SAF-BCF

Committee Statement

Resolution: [FR-6616-NFPA 101-2021](#)

Statement: The Building Materials Directory is no longer published and products are now incorporated into UL's Product IQ online database.



Public Input No. 128-NFPA 101-2021 [Section No. A.3.3.198.12]

A.3.3.198.12 Residential Board and Care Occupancy.

The following are examples of facilities that are classified as residential board and care occupancies:

- (1) Group housing arrangement ~~for physically or mentally handicapped persons~~ for persons with physical or intellectual disabilities who normally attend school in the community, attend worship in the community, or otherwise use community facilities
- (2) Group housing arrangement ~~for physically or mentally handicapped persons~~ for persons with physical or intellectual disabilities who are undergoing training in preparation for independent living, for paid employment, or for other normal community activities
- (3) Group housing arrangement for the elderly that provides personal care services but that does not provide nursing care
- (4) Facilities for social rehabilitation, alcoholism, drug abuse, or mental health ~~problems that~~ problems that contain a group housing arrangement and that provide personal care services but do not provide acute care
- (5) Assisted living facilities
- (6) Other group housing arrangements that provide personal care services but not nursing care

Statement of Problem and Substantiation for Public Input

The NFPA Disability Access Review and Advisory Committee (DARAC) requests an update to the terminology used to describe individuals with disabilities. In general, we suggest using “people first” language to avoid characterizing a person or group of persons entirely by their disability. Also, where possible, we recommend substituting the appropriate technical term when describing building elements that are accessible to individuals with disabilities, rather than describing the element as being “for” such people. For example, we would say “accessible parking” instead of “handicap parking”. The substitute terms we recommend are found to be more acceptable to the disability community and its supporters and, therefore, demonstrate greater respect.

We used following resources to develop our input:

- “Guidelines for Writing About People with Disabilities” ADA National Network at <https://adata.org/factsheet/ADANN-writing>
- “Disability Style Guide” National Center on Disability and Journalism at <https://ncdj.org/style-guide/>
- “Resources for Reporters Writing About Blindness and Vision Loss” American Foundation for the Blind at <https://www.afb.org/news-publications/press-room/reporter-resources-writing-about-blindness-vision-loss>
- “Five Tips for Writing About People with Disabilities” Adaptive Sports Center at <https://www.adaptivesports.org/blog/announcements/five-tips-writing-about-people-disabilities>
- “Fact Sheet: Drug Addiction and Federal Disability Rights Laws” U.S. Department of Health and Hum Services: Office for Civil Rights at <https://www.hhs.gov/sites/default/files/drug-addiction-aand-federal-disability-rights-laws-fact-sheet.pdf>
- “People First Language” District of Columbia Office of Disability Rights at <https://odr.dc.gov/page/people-first-language>

Submitter Information Verification

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Submittal Date: Thu May 06 14:46:56 EDT 2021
Committee: SAF-BCF

Committee Statement

Resolution: [FR-6617-NFPA 101-2021](#)

Statement: The TC agrees with the substantiation provided by DARAC.