

THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / Albany, NY 12234

Christina Coughlin Assistant Commissioner Office of School Governance, Policy, and Religious and Independent Schools Kathleen R. DeCataldo, Esq Assistant Commissioner Office of Student Support Services

March 5, 2019

To: District Superintendents

Superintendents of Schools

From: Christina Coughlin

Kathleen DeCataldo, Esq,

On E. Cx

Katnieen DeCataldo, Esq,

Subject: SCHOOL SECURITY and DOOR HARDENING

Protecting students and staff in school buildings from outside-the-classroom threats is a priority for students, parents, school districts and the New York State Education Department (NYSED), with attention increasing in the wake of school and other mass shooting events. Our office receives numerous inquiries regarding which devices are appropriate to provide increased safety for students and staff in classrooms and other locations in school facilities. In response, we continue to strongly stress the importance of balancing safe and unimpeded egress for school building occupants with increased protection.

The desire of school administrators and school boards to do everything possible to protect their students and staff may lead to choices that appear to solve the need for increased security, but inadvertently create other issues that affect the safety of students and staff. When considering the need for increased security, the requirements for free egress, fire protection, and handicap accessibility must be considered in conjunction with the need for security. The need to balance increased security with the requirement to maintain free egress has been recognized by national organizations such as Partner Alliance for Safer Schools (PASS) and Secure Schools Alliance. Severe weather, natural disasters and other types of emergencies, together with emergency responder access, are also important factors to consider.

Please see the following references to New York State Fire Prevention and Building Code and NYSED Manual of Planning Standards requirements, which establish standards for egress from school facilities:

2015 International Fire Code (IFC):

- IFC 1010.1.9: "egress doors shall be readily openable from the egress side without the use of a key or special knowledge or effort"; and

- IFC 1010.9.1.5: "the unlatching of any door or leaf shall not require more than one operation".

NYSED Manual of Planning Standards (MPS):

- Section S105 Door Hardware: Hardware on doors from spaces of pupil occupancy <u>shall</u> <u>always allow free egress to exit the space</u> without direct manipulation of any type locking device (MPS S105-1(a));
- Section S105 Door Hardware: Doors opening on a corridor are required to be maintained closed (MPS S105-1(b); and

Prohibited After-Market Door Hardening Products: The health and safety of building occupants must always be a priority. The possibility of entrapment of occupants in a classroom, office or assembly space because of improper use or understanding of after-market security devices is not permitted. Fatalities have been caused by the occupants not being able to exit the space or building in the event of a fire. Free egress must always be maintained. Products which are prohibited include:

- magnetic strips that prevent doors from latching;
- products that restrict the door from being opened;
- products that restrict door hardware from operating as designed;
- any devices that prevent free egress from the space; and
- if the door is required to be fire-rated, the door should not be modified in any way that invalidates the required fire-rating of the door and/or listing/labeling of the door hardware.

Acceptable Door Hardening Products: Many door hardware manufacturers provide products that meet the need to quickly and easily secure the door from within the classroom or other space, while complying with the requirement to allow free egress from the space. Examples include:

- Intruder function classroom door hardware that allows a lock to be secured from within the classroom, while still allowing free egress from the inside and entry from the outside with the use of a key or other approved means (readily available at similar cost as traditional classroom function locksets); and
- Door hardware that is easily lockable in case of emergency from within the classroom with an authorized credential (key, card, code, fob, fingerprint, push-button, etc.), without opening the door, while still allowing free egress from the inside.

Vision Panels: The Manual of Planning Standards Section S106 Doors requires classroom doors, stair and corridor doors to have vision panels (MPS S106(a)). As such, vision panels may not be covered. However, the Office of Facilities Planning has permitted temporary covering of vision panels in classroom doors in an emergency. The temporary covering of vision panels must be written Board policy and included in the Building Level Emergency Plan.

Additional Note: In an emergency, faculty and staff may temporarily block doors to slow the access of an intruder.

However, the Fire Code and Manual of Planning Standards sections cited above seek to ensure that the means used to block the door do not require any special information or ability to allow egress (for instance, if the intruder set a fire), so that occupants can leave the building quickly in such circumstances. The temporary blocking of doors must be written Board policy and included in the Building Level Emergency Plan.

Funding: Funding for compliant door hardware is available through building aid reimbursement and the NYSAFE Act claim process. The NYSAFE Act claim process does not require submission to the Office of Facilities Planning for approval. Please see this link to the NYSAFE Act Guidance Document on our website:

http://www.p12.nysed.gov/facplan/documents/NYSAFEActImplementation.pdf.

If you have additional questions or concerns, please contact the Office of Facilities Planning at: (518) 474-3906.