

## E57-15 Part I

**202 (New), 1010.1.4.4 (New), 1010.1.4.4.1 (New);  
(IFC[BE] 1010.1.4.4 (New), 1010.1.4.4.1 (New))**

### **Proposed Change as Submitted**

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

## **2015 International Building Code**

**Add new definition as follows:**

### **SECTION 202 DEFINITIONS**

**CREDENTIAL.** A tangible object, knowledge, or human physical characteristic required for locking and unlocking. A key to operate a lock cylinder; a magnetic card to swipe in a magnetic card reader; knowledge of a specific code for keypad operations; and a fingerprint for a fingerprint scanner; are examples of credentials, and their potential uses.

**Add new text as follows:**

**1010.1.4.4 Group E classrooms.** In Group E occupancies, classroom doors shall be lockable from within the classroom without opening the classroom door. All the following conditions shall apply:

1. The classroom door shall be unlockable and openable from within the classroom and shall comply with Section 1010.1.9.
2. The classroom door shall be unlockable and openable from outside the classroom by the use of a key or other credential.

**1010.1.4.4.1 Remote operation of locks.** Remote operation of locks complying with Section 1010.1.4.4 shall be permitted.

**Reason:** Many jurisdictions have taken measures to address the high priority concern of safety of occupants in K-12 classrooms in the event of a threatening situation. While well-intended and likely to have a degree of positive impact, these actions create disparate requirements from jurisdiction to jurisdiction, and some actions may inadvertently compromise certain aspects of life safety while attempting to address others.

This proposal for the IBC provides requirements which balance the challenges of providing protection for students and teachers in the classroom with that of free and immediate egress at all times without use of keys, tools, or special knowledge.

In addition to the security concerns, classroom doors are required to meet accessibility requirements which include door operating hardware configuration and location, door hardware operational forces, and a smooth surface of the bottom 10" of the push side of the door.

Door locksets with "classroom security function" are readily available today at the same cost as traditionally-used "classroom function" door locksets. The most common configuration of a classroom security function lockset is the ability to lock the door from inside the classroom with a key preventing entry to the classroom; and for egress, the door may be unlatched and opened from inside the classroom without a key by rotating the lever handle. On the outside of the classroom, consistent with tradition, the door may be locked with a key, and unlocked and

opened with a key.

This code change proposal will require all Group E classroom doors to be lockable from the inside of the classroom preventing entry to the classroom, without the need to open the door. This proposal does not prescribe specifically how the door is to be lockable from inside the classroom.

Additional requirements are the door is to be unlockable and readily openable inside the classroom without the use of a key or special knowledge or effort, as required in IBC Section 1010.1.9. Subsections of 1010.1.9 include requirements for hardware height (between 34 and 48 inches above the floor), and for hardware configuration (for doors required to be accessible, which would be almost all classroom doors, the door operating hardware shall not require tight grasping, tight pinching or twisting of the wrist to operate). An additional requirement of this proposal is the classroom door is to be unlockable and openable from outside the classroom by a key or other lock credential.

**Cost Impact:** Will not increase the cost of construction  
No cost impact. Door locksets with the classroom security function are the same cost as traditionally specified door hardware locksets (with the classroom function).

E57-15 Part I :  
1010.1.4.4 (New)-  
WOESTMAN5537

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## **Public Hearing Results**

### **Part I**

#### **Committee Action:**

**Disapproved**

**Committee Reason:** Criteria for Group E classrooms to lock down safely is needed. Types of devices that are blocking devices that do not allow for unlocking from the outside are currently being used and are a safety hazard. However, the committee strongly felt that this should be an option, not a requirement. There should be correlation with the signage requirement in Section 1010.1.9.3. The definitions in the IBC and IEBC should match - change 'and' to 'or' in the last sentence.

#### **Assembly Action :**

**None**

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## **Individual Consideration Agenda**

### ***Public Comment 1:***

**Proponent :** Edward Kulik, representing ICC Building Code Action Committee (bcac@iccsafe.org) requests Approve as Modified by this Public Comment.

#### **Modify as Follows:**

### **2015 International Building Code**

#### **SECTION 202 DEFINITIONS**

~~**CREDENTIAL.** A tangible object, knowledge, or human physical characteristic required for locking and unlocking. A key to operate a lock cylinder; a magnetic card to swipe in a magnetic card reader; knowledge of a specific code for keypad operations; and a fingerprint for a fingerprint~~

~~scanner, are examples of credentials, and their potential uses.~~

**1010.1.4.4 Group E classrooms. Locking arrangements in educational occupancies.** In Group E and Group B educational occupancies, egress doors from classrooms, offices and other occupied rooms shall be permitted to be provided with locking arrangements designed to keep intruders from entering the room where all of the following conditions are met: In Group E occupancies, classroom doors shall be lockable from within the classroom without opening the classroom door. All of the following conditions shall apply:

- ~~1. The classroom door shall be unlockable and openable from within the classroom and shall comply with Section 1010.1.9.~~
- ~~2. The classroom door shall be unlockable and openable from outside the classroom by the use of a key or other credential.~~
1. The door shall be capable of being unlocked from outside the room with a key or other approved means.
2. The door shall be openable from within the room in accordance with Section 1010.1.9.
3. Modifications shall not be made to listed panic hardware, fire door hardware or door closers.

**1010.1.4.4.1 Remote operation of locks.** Remote operation of locks complying with Section 1010.1.4.4 shall be permitted.

**Commenter's Reason:** This public comment addresses the committee comments as follows.

"Criteria for Group E classrooms to lock down safely is needed. Types of devices that are blocking devices that do not allow for unlocking from the outside are currently being used and are a safety hazard." Comment - We agree and this public comment addresses these concerns.

"However, the committee strongly felt that this should be an option, not a requirement." The original proposal mandated that locks had to be provided on all classroom doors, period. This decision should be the responsibility of the school administration in consultation with local security, law enforcement and emergency responders. This public comment does not mandate that locks be provided on classrooms, but describes the safety features they should have if provided for intruder protection.

"There should be correlation with the signage requirement in Section 1010.1.9.3." Addressed - A requirement was added that the door must be openable from within the room in accordance with Section 1010.1.9. the public comment does not allow locking arrangements to impede the egress aspects of the door, e.g. no double deadbolts.

"The definitions in the IBC and IEBC should match - change 'and' to 'or' in the last sentence." Accomplished, did not add a definition of "Credential" with the public comment, and the last sentence was not included in the public comment.

This public comment addresses a real danger facing schools today, addresses all of the concerns raised by the committee, and is consistent with the provisions in our EB 23-15 public comment.

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E57-15 Part I

## **E57-15 Part II**

**202 (New), 406 (New), 406.1 (New), 406.2 (New),  
406.2.1 (New), 704.2 (New), 704.2.1 (New)**

### **Proposed Change as Submitted**

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

## **2015 International Existing Building Code**

**Add new definition as follows:**

### **SECTION 202 DEFINITIONS**

**CREDENTIAL.** A tangible object, knowledge, or human physical characteristic required for locking or unlocking. A key to operate a lock cylinder; a magnetic card to swipe in a magnetic card reader; knowledge of a specific code for keypad operations; and a fingerprint for a fingerprint scanner; are examples of credentials, and their potential uses.

**Add new text as follows:**

### **SECTION 406 MEANS OF EGRESS**

**406.1 General.** Alterations shall be such that the existing building or structure is no less conforming to the provisions of the International Building Code than the existing building or structure was prior to the alteration.

**406.2 Existing occupancy Group E classrooms.** In Group E occupancies, existing classroom doors shall be lockable from within the classroom without opening the classroom door. All the following conditions shall apply:

1. The classroom door shall be unlockable and openable from within the classroom and shall comply with Section 1010.1.9. of the International Building Code.
2. The classroom door shall be unlockable and openable from outside the classroom by the use of a key or other credential.

**406.2.1 Remote operation of locks.** Remote operation of locks complying with 406.2 shall be permitted.

**704.2 Group E occupancy classroom.** In Group E occupancies, classroom doors shall be lockable from within the classroom without opening the classroom door. All the following conditions shall apply:

1. The classroom door shall be unlockable and openable from within the classroom and shall comply with Section 1010.1.9. of the International Building Code.
2. The classroom door shall be unlockable and openable from outside the classroom by the use of a key or other credential.

**704.2.1 Remote operation of locks.** Remote operation of locks

complying with 704.2 shall be permitted.

**Reason:** Many jurisdictions have taken measures to address the high priority concern of safety of occupants in K-12 classrooms in the event of a threatening situation. While well-intended and likely to have a degree of positive impact, these actions create disparate requirements from jurisdiction to jurisdiction, and some actions may inadvertently compromise certain aspects of life safety while attempting to address others.

This proposal for the IEBC provides guidance which balances the challenges of providing protection for students and teachers in the classroom with that of free and immediate egress at all times without use of keys, tools, or special knowledge.

In addition to the relatively recent demand to protect students and teachers from outside-the-classroom threats, many classroom doors are required to function as fire-rated doors (opening protectives); and fire-rated doors are required to be always self-latching when closed to ensure the doors perform its fire protection function in the event of a fire. Additionally, classroom doors are required to meet accessibility requirements which include door operating hardware configuration and location, door hardware operational forces, and a smooth surface of the bottom 10" of the push side of the door.

This code change proposal will not require existing Group E classroom doors to be lockable from the inside of the classroom without the need to open the door. This proposal does provide guidance if modifications are made to the door in an effort to control access to the classroom.

This proposal does not prescribe specifically how the door is to be lockable from inside the classroom.

Additional requirements are the door is to be unlockable and readily openable inside the classroom without the use of a key or special knowledge or effort, as required in IBC Section 1010.1.9. Subsections of IBC 1010.1.9 include requirements for hardware height (between 34 and 48 inches above the floor), and for hardware configuration (for doors required to be accessible, which would be almost all classroom doors, the door operating hardware shall not require tight grasping, tight pinching or twisting of the wrist to operate). An additional requirement of this proposal is the classroom door is to be unlockable and openable from outside the classroom by a key or other lock credential.

If the door locking hardware is under consideration for replacement, door locksets with "classroom security function" are readily available today at essentially the same cost as traditionally-used "classroom function" door locksets. The most common configuration of a classroom security function lockset is the ability to lock the door from inside the classroom with a key preventing entry to the classroom; and for egress, the door may be unlatched and opened from inside the classroom without a key by rotating the lever handle. On the outside of the classroom, consistent with tradition, the door may be locked with a key, and unlocked and opened with a key.

**Cost Impact:** Will not increase the cost of construction

This proposal does not require retrofitting of existing doors with new hardware. IF door locking hardware replacement is being considered, the requirements of this proposal provide guidance.

E57-15 Part II : 406  
(New)-WOESTMAN5538

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## **Public Hearing Results**

### **Part II**

**Committee Action:**

**Approved as Submitted**

**Committee Reason:** Though there were some concerns with the mandatory verbiage used, provisions dealing with the ability to safely lockdown within a

classroom are needed. The committee suggested that this proposal should not be limited to Group E occupancies as these safety concerns exist in other occupancies. Note that proposal EB23-15 deals with a similar topic.

**Assembly Motion:**

**Disapprove**

**Online Vote Results:**

**Successful**

Support: 67.72% (235) Oppose: 32.28% (112)

**Assembly Action :**

**Disapproved**

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### **Individual Consideration Agenda**

#### *Public Comment 1:*

**Proponent : Assembly Action  
requests Disapprove.**

**Commenter's Reason:** This code change proposal is on the agenda for individual consideration because the proposal received a successful assembly action. The assembly action for Disapprove was successful by a vote of 67.72% (235) to 32.28% (112) by eligible members online during the period of May 14 - May 28, 2015.

#### *Public Comment 2:*

**Proponent : Edward Kulik, representing ICC Building Code Action  
Committee (bcac@iccsafe.org) requests Disapprove.**

**Commenter's Reason:** We like what the proponent was trying to accomplish with this proposal but prefer the approach used in EB 23-15, with or without the clarification provided in our public comment. One reason for this preference is that E 57-15, part 2 mandates that classroom doors be provided with locks, which could be a significant expense for school districts, and may not be warranted based on other security measures adopted in individual schools. In comparison EB 23-15 does not require retrofitting of classroom doors with locks, but if the school district chooses to retrofit doors with locks it provides requirements on how it can be safely done.

#### *Public Comment 3:*

**Proponent : Region VII, representing ICC Region VII requests  
Disapprove.**

**Commenter's Reason:** The committee itself had concerns in regards to mandatory language and that it should not be limited to Group E occupancies. Note part 1 of this same change was not approved and a successful assembly motion for disapproval was overwhelmingly successful.

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E57-15 Part II