



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

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To: BOCES District Superintendents
Superintendents of Public Schools
Public School Administrators
Charter School Administrators
Nonpublic School Administrators

From: Christina Coughlin, PhD.

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Subject: SCHOOL SECURITY and DOOR HARDENING

The New York State Education Department, (NYSED) is committed to the safety and protection of all students, staff, and visitors in New York's school buildings. Under state law, NYSED is responsible for ensuring that school buildings are compliant with the fire and building code, are regularly inspected for fire safety, that emergency drills are conducted, and that there are plans in place to address emergencies, such as intrusions by people with hostile intent.

To protect the occupants of our school buildings, we work closely with other state agencies with related duties and expertise, as well as with school leaders throughout the state to reduce risks. In response to intruder issues, concerned school leaders ask us what can be put on classroom doors to help keep a building intruder out of classroom spaces. The response to that question requires us to balance the need for increased security and the requirements for free exit (egress), thereby protecting students from fire as well as maintaining accessibility for students with disabilities.

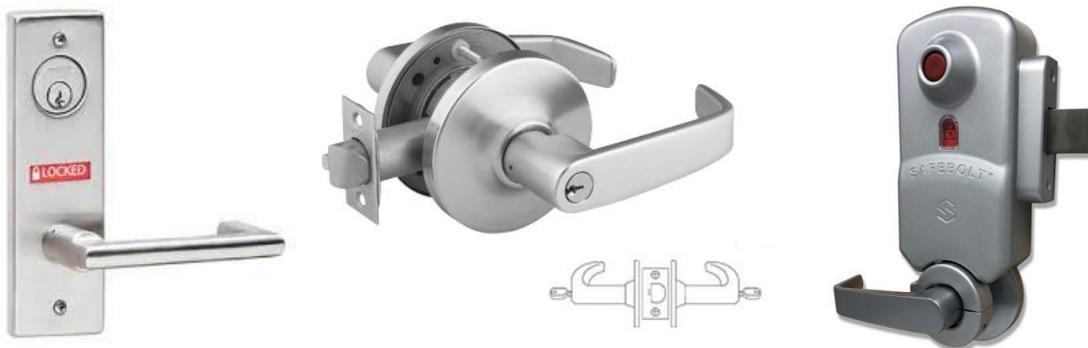
Improper use or misunderstanding of after-market security devices cannot create situations where occupants of a space may be trapped. Fire deaths have been caused in situations where the occupants were not able to exit the space or building. Free egress must always be maintained.

This is addressed by the New York State Uniform Fire Prevention and Building Codes (Uniform Code) which specifically addresses the requirements for intruder protection door hardware in schools. The Uniform Code makes it clear that certain aftermarket devices are not permitted in classroom settings, because they create unacceptable risks in the event of fire. Please see the code references available at the end of this document, as well as the NYSED Manual of Planning Standards requirements which establish standards for egress from school facilities.

Acceptable Door Hardening Products:

Many door hardware manufacturers provide products that meet the need to secure a classroom door quickly and easily from inside the classroom or other space in a school building while complying with the requirement to allow free egress from the space. The Office of Facilities Planning recommends consultation with a commercial door hardware supplier who is well versed in the code. Examples of acceptable products include:

- Classroom security function door hardware that allows a lock to be secured from inside a classroom, while still allowing free egress from the inside and entry from the outside with the use of a key or other approved means which are readily available at similar cost as traditional classroom function locksets. A door lock with a push-button lock on the interior, that when engaged, does not prevent the door from being opened from the inside is one example.
- Door hardware that is easily lockable in case of emergency from inside a classroom with an authorized credential (key, card, code, fob, fingerprint, push-button, etc.), without opening the door, which still allows for free egress from the inside.
- Some visual examples of available code-compliant products:



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:

Compliant locking door hardware, as outlined above, is the preferred method of intruder protection. NYSED understands that schools may want to provide additional protection beyond locking hardware. If a district wishes to instruct staff that in an emergency it is permissible to use furniture to block the doors as an additional measure to slow the access of an intruder, it must be written Board policy and included in the Building Level Emergency Plan. Furniture should not be moved to block doors during emergency drills.

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>.

Further Research: The challenges of maintaining the balance between safety from hostile intruders and the need to maintain free exit from the building has been recognized by national organizations such as Partner Alliance for Safer Schools (PASS). This organization has done extensive research and has developed resources on this topic here: <https://passk12.org/classroom-door-barricade-device-resources/>.

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

APPENDIX: The applicable sections of the Uniform Code and Manual of Planning Standards cited below seek to ensure that the means used to lock a door do so in a safe manner.

2020 Fire Code of New York State (2020 FCNYS) – Applicable to new and existing buildings

- **FCNYS 1031.2.2 Locking arrangements in educational occupancies.** *(This was new to the 2020 version of the Fire Code.)*

In Group E occupancies, Group B educational occupancies and Group I-4 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:

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.
 4. Modifications to fire door assemblies shall be in accordance with NFPA 80.
- **FCNYS 1010.1.9 Door Operations:** Except as specifically permitted by this section, egress doors shall be readily openable from the egress side without the use of a key or special knowledge or effort.
 - **FCNYS 1010.1.9.1 Hardware:** Door handles, pulls, latches and other operating devices on doors required to be accessible by Chapter 11 of the Building Code of New York State shall not require tight grasping, tight pinching or twisting of the wrist to operate.
 - **FCNYS 1010.1.9.2 Hardware height:** Door handles, pulls, latches, locks and other operating devices shall be installed 34 inches minimum and 48 inches maximum above the finish floor. Locks used only for security purposes and not used for normal operation are permitted at any height.

2020 Building Code of New York State (2020 BCNYS)

- **BCNYS 1010.1.4.4 Locking Arrangements in Educational Occupancies** – This section is a parallel provision to FCNYS 1031.2.2 above, and new to the 2020. The International Code Council (ICC) has published the following article which explains the addition of this code section, and may be an additional valuable resource: https://www.iccsafe.org/wp-content/uploads/2018SC-IBC_1010.1.4.4.pdf

NYSED Manual of Planning Standards (MPS) 1998:

- Section S105 Door Hardware: Hardware on doors from spaces of pupil occupancy shall always allow free egress to exit the space without direct manipulation of any type of 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));