



LOUISIANA DEPARTMENT OF PUBLIC SAFETY & CORRECTIONS
PUBLIC SAFETY SERVICES

OFFICE OF STATE FIRE MARSHAL



H. "BUTCH" BROWNING, JR.
STATE FIRE MARSHAL

RESCINDING

INTERPRETIVE MEMORANDUM 2020 – 01

To: OSFM Business, Institution, and Industry Partners
OSFM Staff

From: Joe Delaune, Chief Architect/Plan Review, OSFM
Chief H. "Butch" Browning, State Fire Marshal

Date: March 10, 2021

RE: Emergency Egress Drill Procedures during the COVID-19 Pandemic

Interpretive Memorandum 2020-01 was released on July 21st, 2020 and had allowed for modifications to the required emergency egress drill procedures during the COVID-19 Pandemic. As we move to "Phase 3" of reopening, and vaccines become more widely available, buildings are now being re-occupied at higher capacities. We all hope to return to more normal operations soon! During this transition, our priorities must remain focused on the dangers of fire, panic or other emergency as well as COVID-19.

Therefore, effective immediately, the modifications and allowances for simulated "stay in place" emergency egress drills that were outlined by IM 2020-01 are RESCINDED. Emergency action plans and emergency egress drill procedures shall include all code required provisions, and routine drills shall continue at the frequencies outlined by the NFPA 101 Life Safety Code and by the NFPA 1 Fire Code for the particular occupancy type.

Building management should consider making arrangements for social distancing of any particular individual that may be in a higher risk category and has not yet been vaccinated during relocation drills. These individuals must be aware of these procedures if they choose to occupy the building.

Summary of Requirements:

Summaries of the minimum requirements of the NFPA 101 Life Safety Code and the NFPA 1 Fire Code are outlined below. Refer to these referenced documents for full descriptions and for additional detailed information.

Educational Occupancies:

Emergency action plans shall be provided and shall include the following:

1. Procedures for reporting of emergencies
2. Occupant and staff response to emergencies
3. Evacuation, relocation and shelter-in-place procedures appropriate to the building, its occupancy, emergencies, and hazards
4. Appropriateness of the use of elevators
5. Design and conduct of fire drills
6. Type and coverage of building fire protection systems
7. Other items as required.

Approved training programs designed for education and training and for the practice of emergency egress to familiarize occupants with the drill procedure, and to establish conduct of the emergency egress as a matter of routine, shall be permitted to receive credit on a one-for-one basis for not more than four of the required emergency egress drills, provided that a minimum of four emergency egress drills are completed prior to the conduct of the first such training and practice program.

Emergency egress drills shall be conducted as follows:

1. Not less than one emergency egress drill shall be conducted every month the facility is in session, unless both of the following criteria are met:
 - (a) In climates where the weather is severe, the monthly emergency egress drills shall be permitted to be deferred.
 - (b) The required number of emergency egress drills shall be conducted, and not less than four shall be conducted before the drills are deferred.
2. All occupants of the building shall participate in the drill.
3. One additional emergency egress drill, other than for educational occupancies that are open on a year-round basis, shall be required within the first 30 days of operation.

All emergency drill alarms shall be sounded on the fire alarm system. [**101:** 14.7; **1:** 20.2]

Day-Care Occupancies:

Emergency action plans shall be provided and shall include the following:

1. Procedures for reporting of emergencies

2. Occupant and staff response to emergencies
3. Evacuation, relocation and shelter-in-place procedures appropriate to the building, its occupancy, emergencies, and hazards
4. Appropriateness of the use of elevators
5. Design and conduct of fire drills
6. Type and coverage of building fire protection systems
7. Other items as required.

Emergency egress and relocation drills shall be conducted as follows:

1. Not less than one emergency egress and relocation drill shall be conducted every month the facility is in session, unless both of the following criteria are met:
 - (a) In climates where the weather is severe, the monthly emergency egress and relocation drills shall be permitted to be deferred.
 - (b) The required number of emergency egress and relocation drills shall be conducted, and not less than four shall be conducted before the drills are deferred.
2. All occupants of the building shall participate in the drill.
3. One additional emergency egress and relocation drill, other than for day-care occupancies that are open on a year-round basis, shall be required within the first 30 days of operation. [**101**: 16.7; **1**: 20.3]

Residential Board and Care Occupancies:

The administration of every residential board and care facility shall provide to all supervisory personnel written copies of an emergency action plan for protecting all persons in the event of fire, for keeping persons in place, for evacuating persons to areas of refuge, and for evacuating persons from the building when necessary. The plan shall include special staff response, including the fire protection procedures needed to ensure the safety of any resident, and shall be amended or revised whenever any resident with unusual needs is admitted to the home. All employees are to be periodically instructed and kept informed with respect to their duties and responsibilities under the plan, and such instruction shall be reviewed by the staff not less than every 2 months.

Residents shall be trained to assist each other in case of fire to the extent that their physical and mental abilities permit them to do so without additional personal risk. All residents participating in the emergency action plan shall be trained in the proper actions to be taken in the event of fire. Training shall include actions to be taken if the primary escape route is blocked.

Emergency egress and relocation drills shall be conducted not less than six times per year on a bimonthly basis, with not less than two drills conducted during the night when residents are sleeping. The drills normally involve the actual evacuation of all residents to an assembly point, as specified in the emergency action plan, and shall provide residents with experience in egressing through all exits and means of escape, excluding actual escape through windows for purposes of the drill. The drills are permitted to be announced to the residents in advance. Residents who cannot meaningfully assist in their own evacuation or who have special health problems shall not be required to actively participate in the drill. [101: 32.7; 1: 20.5]

Dormitories:

Emergency egress and relocation drills are required to be held with sufficient frequency to familiarize occupants with all types of hazards and to establish conduct of the drill as a matter of routine. Drills are typically to be conducted during peak occupancy periods and include suitable procedures to ensure that all persons subject to the drill participate.

Floor diagrams reflecting the actual floor plan, exit locations, and room names are to be posted on, or immediately adjacent to, every guest or resident room door.

Fire safety information shall be provided to allow guests to make the decision to evacuate to the outside, to evacuate to an area of refuge, to remain in place, or to employ any combination of the three options. [101: 28.7; 1: 20.8.2]

Health Care Occupancies:

The administration of every health care occupancy shall make available to all supervisory personnel, written copies of a fire safety plan for the protection of all persons in the event of fire, for their evacuation to areas of refuge, and for their evacuation from the building when necessary. The fire safety plan shall address the use and transmission of alarms, emergency phone calls, staff response to alarms, isolation of fire, evacuation of the immediate area, smoke compartments, floors and buildings, extinguishment of fire, and identification and operation of exit doors. All employees are to be periodically instructed and kept informed with respect to their duties under the plan, in life safety procedures, and in the use of devices. A copy of the plan is to be readily available at all times in the telephone operator's location or at the security center.

Fire drills in health care occupancies shall include the transmission of a fire alarm signal and simulation of emergency fire conditions. Infirm or bedridden patients are not required to be moved during drills to safe areas or to the exterior of the building. Drills are to be conducted quarterly on each shift to familiarize facility personnel (nurses, interns, maintenance engineers, and administrative staff) with the signals and emergency action required under varied conditions. Coded announcements instead of audible alarms are permitted between the hours of 9:00 p.m. and 6:00 a.m. [101: 18.7; 1: 20.4]

Ambulatory Health Care Occupancies:

The administration of every ambulatory health care facility shall provide all supervisory personnel written copies of a plan for the protection, and evacuation when necessary, of all persons in the event of fire. The plan shall address each applicable requirement listed in NFPA 101:20.7. All employees are to be periodically instructed and kept informed with respect to their duties under the plan, which shall be readily available at all times when the facility is open. Fire drills in ambulatory health care facilities shall include the simulation of emergency fire conditions. Patients shall not be required to be moved during drills to safe areas or to the exterior of the building. Drills are to be conducted quarterly on each shift to familiarize all facility personnel with the emergency action required under varied conditions.

[**101:** 20.7; **1:** 20.6]

Detention and Correctional Occupancies:

The administration of every detention or correctional facility shall provide all supervisory personnel with written copies of a plan for the protection of all persons in the event of fire, for their evacuation to areas of refuge, and for evacuation from the building when necessary. The plan shall address the staffing requirements, unlocking requirements, and other duties required in the event of an emergency, and is to be coordinated with, and reviewed by, the Chief of the responding fire department.

All employees of detention and correctional occupancies are to be instructed and drilled with respect to their duties under the plan. Employees shall be instructed in the proper use of portable fire extinguishers and other manual fire suppression equipment upon initial employment and annually. [**101:** 22.7; **1:** 20.7]

Hotels:

Employees of hotels are to be instructed and drilled in the duties they are to perform in the event of fire, panic, or other emergency. Upon discovery of a fire, employees are to activate the fire alarm system, notify the fire department, and carry out orderly evacuation procedures. Staff drills are held at quarterly intervals and cover such points as the operation and maintenance of the available first aid, fire appliances, the testing of devices to alert guests, and a study of instructions for emergency duties.

Floor diagrams reflecting the actual floor plan, exit locations, and room names are to be posted on, or immediately adjacent to, every guest or resident room door.

Fire safety information shall be provided to allow guests to make the decision to evacuate to the outside, to evacuate to an area of refuge, to remain in place, or to employ any combination of the three options. [**101**: 28.7; **1**: 20.8.2]

Assembly Occupancies:

Duties and responsibilities for crowd managers and crowd manager supervisors are to be documented within a written emergency plan as required by 12.7.13 of NFPA 101. In addition, crowd managers and crowd manager supervisors are tasked with maintaining social distancing and occupant load capacities during the COVID-19 pandemic. In theaters, (motion picture or other), auditoriums, and other similar venues with audiences exceeding 300, an audible announcement is to be made, or projected images are to be shown, prior to the start of each program that notifies occupants of the location of the exits to be used in case of a fire or other emergency. [**101**: 12.7; **1**: 20.1]

Apartment Buildings:

Emergency instructions shall be provided annually to each dwelling unit to indicate the location of alarms, egress paths, and actions to be taken, both in response to a fire in the dwelling unit and in response to the sounding of the alarm system. [**101**: 30.7.1; **1**: 20.9]

Mercantile Occupancies:

In every Class A or Class B mercantile occupancy, employees shall be periodically trained to perform the relocation, evacuation, and other duties required in the event of an emergency. [**101**: 36.7.2; **1**: 20.12]

Business Occupancies:

In all business occupancy buildings occupied by more than 500 persons, or by more than 100 persons above or below the street level, employees and supervisory personnel shall be periodically instructed to perform the relocation, evacuation, and other duties required in the event of an emergency, and shall hold drills periodically where practicable. [**101**: 38.7.2; **1**: 20.13]

