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JON M. DAVINE
STATE FIRE MARSHAL

TO: Heads of Fire Departments
Public School Superintendents and Charter School Leaders

FROM: Jon M. Davine, State Fire Marshal
Russell D. Johnston, Acting Commissioner of Elementary and Secondary Education

DATE: August 16, 2024

The information contained in this memorandum is a collaborative effort between the Department of Fire Services (DFS) and the Department of Elementary and Secondary Education (DESE). As the beginning of a new school year approaches, many of your departments are engaging school superintendents and principals to provide assistance with fire drills and various emergency plans. With the tragedy of school shootings on the minds of students, parents, and school officials, collaboration between fire departments and school districts may also include school safety planning for non-fire events.

When considering the best ways to prevent, prepare for, and respond to all types of emergencies in schools, life and building safety should be the primary considerations. Every school has been required to have a multi-hazard evacuation plan since 2000. Fire, police, and school officials are required to meet before the start of each school year to review that plan. Therefore, this is a good opportunity to review the requirements under various legal and regulatory authorities, including:

- 527 CMR 1.00, the Massachusetts Comprehensive Fire Safety Code, requiring fire drills;
- Chapter 159, Section 363, of the Acts of 2000, requiring multi-hazard evacuation plans;
- M.G.L. Chapter 69, section 8A, requiring medical emergency response plans; and
- M.G.L. Chapter 148, section 2A, requiring schools to report all fires to the local fire department.

School Fire Drills

The DFS *School Fire Safety Reference* (attached to this memorandum) provides an excellent primer on the information that will be necessary as you collaborate with school leadership and other public safety officials. In addition to what is outlined in this pamphlet, please also include in your preparations a

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review of Fire Code sections 10.5, *Fire Drills*, and 10.8, *Emergency Action Plans*. These two code sections set the stage for section 20.2, *Educational Occupancies*. The following are some of the major provisions contained in the referenced documents:

- The responsible school official in charge of the school or the school system shall formulate a plan for the protection and evacuation of all persons in the event of fire, and the plan shall include alternate means of egress for all persons involved. Such plan shall be presented to and approved by the head of the fire department.
- The responsible school official in charge of the school or the school system shall see that each class instructor or supervisor shall receive proper instructions on the fire drill procedures specified for the room or area in which that person carries out their duties before they assume such duties.
- The head of the fire department or their designee shall visit each school at least four times each year (preferably two to three months apart) for the purpose of conducting fire drills. These drills should be coordinated with the person in charge of the school at the time but without advance warning to other school personnel. Inadvertently posting the drill date and time publicly could allow for the drill to be used to do harm. Fire exit drills shall include the complete evacuation of all persons from the building.
- A drill of the multi-hazard evacuation plan required by Chapter 159, Section 363, of the Acts of 2000 shall be permitted to be substituted for one of the four fire drills required by 20.2.4.2 (see next section for more information).
- It is required that every student, in all schools, be advised of the fire drill procedures or take part in a fire drill within three days after entering school. The Department of Fire Services strongly recommends that students take part in a full exit drill within those first three days. However, given the considerations of weather and other factors that may hinder such a drill, some latitude is afforded to ensure students and staff are well advised of the procedure in the absence of a full exit drill.
- A record of all fire exit drills shall be kept on the premises, and persons in charge of such occupancies shall file with the head of the fire department, at least twice per year, written reports providing the following information:

- (1) Time of drill;
- (2) Date of drill;
- (3) Weather conditions when occupants were evacuated;
- (4) Number of occupants evacuated;
- (5) Total time for evacuation;
- (6) Other information relevant to the drill.

To assist in meeting the documentation requirements for fire drills contained in 20.2.4.2.1.5, an additional attachment to this memorandum is a template containing the minimum required information about the drill. The template can be adopted locally and modified to incorporate additional information as desired for such record keeping purposes.

Multi-Hazard Drills

Under Chapter 159, Section 363, of the Acts of 2000, “the superintendent of each school district shall, prior to the beginning of the school year, meet with the fire chief and police chief of the city, town or district to formulate a school specific ‘multi-hazard evacuation plan’ for each school under the superintendent’s supervision. Said multi-hazard evacuation plan shall encompass, but not be limited to, evacuations for fires, hurricanes and other hazardous storms or disasters in which serious bodily injury might occur, shootings and other terrorist activities, and bomb threats. Said plan shall be designed for each school building after a review of each building. Said plan shall include, but not be limited to: (1) establishment of a crisis response team; (2) a designation as to who is in charge of said team and designated substitutes; (3) a communication plan; (4) crisis procedures for safe entrance to and exit from the school by students, parents and employees; and (5) policies for enforcing school discipline and maintaining a safe and orderly environment during the crisis. Each district, with the assistance of the local police and fire departments, shall annually review and update as appropriate said plan. At the beginning of each school year, students at each school shall be instructed as to the plan that is developed.”

Since school staff members should have received advanced training in recognizing hazards, they should be the first to enter a hallway in the event of a hazard. Hazards could include smoke, fire, or an intruder intending to do harm. Staff should practice situational awareness and be prepared to use alternate egress means or make decisions based on the hazards presented. The following are questions that may be posed to staff members during training:

- Do we leave? Or do we stay and shelter in place?
- If we cannot escape through the primary means, what are the alternate means?
- Are windows or other escape routes available?
- What methods can be used to notify officials if the primary egress is blocked?

When assessing emergency plans, these questions should be considered, and the resulting answers should be included in the plan and, at a minimum, practiced through staff training exercises. Consideration and sensitivity should be incorporated into the discussion when explaining and conducting these drills.

Lockdown plans may be incorporated within the multi-hazard evacuation plan, and they may be practiced as one of the four required drills each year.

A Note on Fire Alarms

Fire alarms are a primary safety feature in public buildings. They provide early detection and notification of a potential fire and initiate the evacuation sequence. While a fire alarm system may be used by a school intruder to inflict harm on the building occupants, removing fire alarms or altering the response to a fire alarm notification signal is not the best solution. Delayed evacuation or a “shelter-in-place” fire alarm response may have deadly consequences in the event of a rapidly growing fire.

Removing required fire alarms from public buildings directly conflicts with the intention of the building and life safety codes and disregards the history of lives saved from fires directly resulting from the

effective and reliable technology of fire alarms. School staff and students must be made aware that any fire alarm activation could be alerting them to a catastrophic event.

Classroom and Egress Doors

Classroom and egress doors must comply with the provisions of the State Building Code. These doors are critical components in the means of egress system and must be maintained in a manner that allows students and staff to exit the building safely. Specifically, the code requires all egress doors to be readily openable from the egress side with a single operation and without the use of a key, special knowledge, or effort.

The majority of retrofit classroom door security and barricade devices do not comply with this requirement and are not permitted to be installed. There are door locking devices available which comply with the requirements of the building code and can provide a level of safety while still maintaining egress from within the classrooms and other spaces. For the installation of any door hardware in new or existing buildings, refer to Chapter 10 of the Building Code and consult with the authority that has jurisdiction for specific requirements and allowances.

Door locking devices must comply with the following:

- Door hardware must meet accessibility requirements and not require tight grasping, pinching, or twisting of the wrist to operate.
- Door hardware must be installed between 34” and 48” above the finished floor.
- Manually operated bolt locks or surface locks are not permitted to be used.
- The unlatching of any door or door leaf must not require more than one action.
- Doors may be electromagnetically locked in accordance with 780 CMR 1010.1.9.9.
- Panic or fire exit hardware is required on latching doors along the means of egress that serve 50 or more people.

The best policy is to ensure classroom doors are provided with single action locks and to keep the doors closed and locked at all times during school operation. Doors may prevent entering anytime, but they must not restrict exiting.

School Fire Reporting Law

M.G.L. c. 148, s. 2A, requires public and private school principals to notify the local fire department of any unauthorized fire within the school building or on school grounds. The local fire department is, in turn, required to report this information to the Office of the State Fire Marshal through the Massachusetts Fire Incident Reporting System (MFIRS).

Youth fire setting is a serious phenomenon that may indicate problems, issues, or needs at home. Adults do not help the young fire setter if they do not react appropriately to every fire: The child may not get the help they need, and the entire school community is put at risk. The Department of Fire Services has created a reporting document that local fire departments may customize for use in their communities. The document, Form FP-200, is attached to this memorandum, along with guidance for fire departments on coding the associated response in MFIRS.

Thank you for your attention to the information and guidance in this memorandum. Please feel free to contact DFS and/or DESE with any questions you may have.

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Department of Fire Services

Commonwealth of Massachusetts



School Fire Safety Reference: Massachusetts Laws and Regulations

2024-2025 School Year

This reference document is intended to assist fire chiefs and school officials with common school fire safety requirements under Massachusetts General Laws and 527 CMR 1.00, the Massachusetts Comprehensive Fire Safety Code. For additional resources, contact the Fire Safety Division at 978-567-3300.

School Fire Drills

527 CMR 1.00, s. 20.2.4.2.1.4

Fire departments are required to conduct fire drills in schools at least four times a year. Within three days of the start of school, students must be familiarized with the exit plan or participate in a drill.

Multi-Hazard & MERP Plans

Acts of 2000, Chapter 159, Section 363

M.G.L. c. 69, s. 8A

School superintendents are required to meet with the local police and fire chiefs to develop a Multi-Hazard Evacuation Plan. Schools must also develop a Medical Emergency Response Plan and resubmit it every three years. DFS has a *School Bomb Threat Response Guide* pamphlet to help with all-hazard planning.

Place of Assembly (Theatres, Auditoriums, Gyms, Cafeterias)

527 CMR 1.00, s. 20.1.5.10.4

Schools need a certificate of inspection from the building official, which will set the occupancy limit. Severe penalties may be imposed for violating occupancy limits and blocked egress. The regulations on school decorations, drapery, and curtains may also be relevant.

Crowd Manager Requirements

527 CMR 1.00, s. 20.1.5.6

A crowd manager is needed in facilities that feature live bands or recorded music generating above-normal sound levels and which have a specific area designated for dancing. Schools might need a trained crowd manager on-duty when holding school dances. For details on crowd manager requirements or to take the online training program, please visit www.mass.gov/dfs and search for *crowd manager*.

Upholstered Furniture, Re-Upholstered Furniture, and Molded Chairs

527 CMR 1.00, s. 12.6.2

Upholstered furniture releases toxic smoke when it burns and should be resistant to fire. This section sets requirements for furniture flammability testing. Some requirements under this section are different for sprinklered and unsprinklered buildings.

Decorations, Curtains, Draperies and Window Treatments

527 CMR 1.00, s. 12.6.1

This section sets the flammability certification standards for draperies, curtains, and other hanging or suspended furnishings and decorations.

Theatrical Special Effects

527 CMR 1.00, c. 65

DFS Advisory 1/5/2007 & 8/1/2014

Schools need a permit from the local fire department to use special effects and pyrotechnics, including flash powder and flash paper. Their use must be conducted only by licensed individuals.

Paper Wall Decorations

527 CMR 1.00, s. 20.2.4.4.3

This section regulates how, where, and how much paper decorations may safely be displayed on walls in sprinklered and un-sprinklered buildings. When building new schools, consider this regulation and include covered bulletin board design to safely display paper materials.

Fire Doors

527 CMR 1.00, s. 12.4.1

Blocking or wedging a fire door open is prohibited.

Fire Extinguishers

527 CMR 1.00, s. 13.6

Emergency Wash Stations

527 CMR 1.00, s. 10.23

These sections define where, how many, and what kind of fire extinguishers and emergency wash stations schools need, as well as their testing and inspection requirements. Labs are required to have emergency wash systems (showers) or fire blankets and signage.

Fire Lanes

527 CMR 1.00, c. 18

This chapter covers regulations on designating, maintaining, and preventing the obstruction of fire lanes. Fire lanes must be kept clear at all times.

Fire Protection Systems

527 CMR 1.00, c. 13

This chapter requires schools to inspect, test, and maintain fire alarm, fire sprinkler, and kitchen suppression systems.

Chemistry Labs

527 CMR 1.00, c. 26

Permits and special storage arrangements may be required based on the type and quantity of chemicals stored. Think about the life cycle and disposal requirements of lab chemicals when purchasing or storing them. (See also *527 CMR 1.00, s. 10.23*, for emergency wash stations, fire blankets and signage.)

School Fire Reporting Law

M.G.L. c. 148, s. 2A

State law requires schools to report all fires to the local fire department. It also requires fire departments to report all school fires to the Massachusetts Fire Incident Reporting System (MFIRS).

No Smoking in Schools

20 U.S. Code § 6083

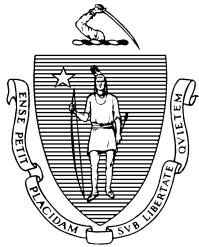
M.G.L. c. 270, s. 22

Smoking is prohibited in most public places in Massachusetts, including all schools, colleges, and universities.

Fire Safety Education

M.G.L. c. 71, s. 1

State law requires public schools to provide instruction on the prevention and treatment of burn injuries, such as that provided by local fire departments through the Department of Fire Services' Student Awareness of Fire Education (S.A.F.E) grant program.



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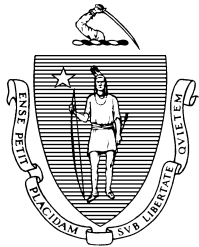


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Mandatory School Fire Reporting and MFIRS

Massachusetts schools are required to report any unauthorized fire within a school building or on school grounds to their local fire department immediately. School officials should use the DFS Form FP-200 (attached) to make this report within 24 hours. Fire departments are in turn required to complete and submit a report to the Massachusetts Fire Incident Reporting System (MFIRS) anytime they receive a report of a school fire. This guidance will help fire departments fulfill the MFIRS reporting requirements.

1. If your department responds to a reported fire at a school and performs common fire ground activities such as extinguishment, ventilation, search, etc., the MFIRS report should be completed as it would be for any other fire incident.
2. If your first notification from the school is through a School Fire Reporting Form FP-200 and you send an engine or ladder company, an investigator, an officer, or an inspector, code the MFIRS report as the type of situation that occurred (structure fire, confined structure fire, brush fire, dumpster fire, etc.) and use the times that the person(s) investigating left the station, arrived at the scene, and cleared the scene. If the response is only an investigation or follow up to the school's report, be sure that the MFIRS report field on the Basic Module is coded as *Action Taken = 87 – Investigation, fire out on arrival* first and does not have the *Action Taken = 11 – extinguish*.
 - Incident Type: Between 100 and 199
 - Alarm Time: Time the person(s) or company left the station
 - Arrival Time: Time the person(s) or company arrives at the school
 - Last Unit Cleared Time: Time the last person(s) or company leaves the school
 - Action Taken: 87 – Investigation, fire out on arrival
3. If no one from your fire department responds, set the *Alarm*, *Arrival*, and *Last Unit Cleared* fields to the time you were notified by the school. Code the *Incident Type* as the type of fire reported by the school, and code *Action Taken* as 82 - *Notify Other Agencies* (DFS).
 - Incident Type: Between 100 and 199
 - Alarm Time: Time notified by school
 - Arrival Time: Same as Alarm Time
 - Last Unit Cleared Time: Same as Alarm and Arrival Time
 - Action Taken: 82 – Notify Other Agencies



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Mandatory Report of Any School Fire (Form FP-200)

M.G.L. C 148, Section 2A. "The principal of any **public or private school** that provides instruction to pupils in any of grades 1 to 12, inclusive, shall **immediately** report any incident involving the unauthorized ignition of any fire within the school building or on school grounds to the local fire department. The principal shall submit a written report of the incident to the head of the fire department within 24 hours on a form furnished by the department of fire services. The report shall be filed without regard to the extent of the fire or whether there was a response by the fire department. The head of the fire department shall report such incident to the marshal in accordance with section 2."

This form is part of the mandatory reporting requirement under M.G.L. Chapter 71, Section 37L.
Remember to call 9-1-1 for any fire not already extinguished upon discovery.

For Fire Department use

Report received by: _____

Date: _____

Date: _____

Name of School: _____

Name of School District: _____

City/Town: _____

Name of Reporting Person: _____

(Principal or designee)

Signature of Reporting Person: _____

Telephone # of Reporting Person: _____

Date & Time of Fire (if known): _____

Date & Time Fire Discovered: _____

(If different than when it occurred)

Who Discovered the Fire: _____

(Name and Function: teacher, administrator, custodian, or student)

Location of Fire: ☐ Inside ☐ Outside

More Specific Location: _____

(e.g. floor and function such as "in a trash container in the 2nd floor boys lavatory")

Form FP-200

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Evidence-Based Safety and Security Decisions Regarding Classroom Barricade Devices

Each school tragedy seems to reignite the conversation regarding the use of classroom door barricade devices (non-code-compliant blocking devices). These devices provide a false perception of safety. Here are some facts about why using classroom door barricade devices is dangerous:

Evacuation. Vital fire and life safety codes have been developed over decades; often based on lessons learned from tragedies. Classroom door barricade devices can prevent children from being able to evacuate during an emergency, including a fire.

Emergency Response. Door barricade devices can make it challenging, or even impossible, for responders to access the room quickly if there is an assailant inside, or if someone needs medical attention. In these critical situations, every second counts. If emergency responders cannot enter quickly, lives could be at risk.

Accessibility. Untrained students, teachers, people with disabilities and community groups utilizing the school building may not be familiar with the operation of barricade devices or may have difficulty using devices that do not comply with federal ADA law. This not only negates any safety features but could result in performance issues leading to deadly consequences.

Safety for everyone, in every situation, every day.

All students, educators, staff, and visitors, regardless of age or ability, deserve to be safe in a school building. There are many ways to improve school safety and security without the use of door barricade devices. For more information on classroom door barricade devices, please visit our website at PASSK12.org.

About Us

PASS is a 501c3 non-profit organization comprised of parents, educators, law enforcement, and security professionals with the sole purpose of improving school safety. It is our mission to provide schools with information, tools, and insight to enhance school safety.



FACTS

A classroom door lock has **NEVER** been breached during an active shooter event.¹

In past school shootings, doors barricaded by the assailants have **delayed emergency responders.**^{2,3,4}

In an educational facility, a fire is more than **1000x** more likely to occur than an active shooter event.^{5,6}

¹ https://portal.ct.gov/-/media/Malloy-Archive/Sandy-Hook-Advisory-Commission/SHAC_Final_Report_3-6-2015.pdf?sc_lang=en&hash=BDF55EC4ACE382E87941870AD9BF2A34

² <https://www.washingtonpost.com/wp-dyn/content/article/2007/04/26/AR2007042602558.html>

³ <https://www.denverpost.com/2006/09/27/hostage-horror/>

⁴ <https://www.washingtonpost.com/wp-dyn/content/article/2007/08/23/AR2007082300243.html>

⁵ <https://www.nfpa.org/News-and-Research/Data-research-and-tools/US-Fire-Problem/Fires-by-occupancy-or-property-type>

⁶ <https://www.fbi.gov/about/partnerships/office-of-partner-engagement/active-shooter-resources>

Record of Emergency Egress Drill (Fire Drill)
527 CMR 1.00 Massachusetts Comprehensive Fire Safety Code

Name of School: _____

Type of Drill:
(Circle one)

Fire Drill
527 CMR 1.00:20.2.4.2.1.4

Multi Hazard Drill
St. 2000, c.159, s. 363

Time of Drill: Start: _____ End: _____
20.2.4.2.1.5 (1)

Date of Drill: _____
20.2.4.2.1.5 (2)

Weather conditions when occupants were evacuated: _____
20.2.4.2.1.5 (3)

Number of occupants evacuated: _____
20.2.4.2.1.5 (4)

Total time for evacuation: _____ (minutes: seconds)
20.2.4.2.1.5 (5)

Other information relevant to the drill:
20.2.4.2.1.5 (6)

Were all fire alarms sounded: Yes _____ No _____
20.2.4.2.4

The evacuation proceeded in a smooth and orderly manner: Yes _____ No _____
10.5.3

Comments: _____
(Attach addition sheet(s) if necessary)

Did the drill contain varied conditions to simulate unusual conditions: Yes _____ No _____
10.5.4

Any other information relevant to the drill: _____
(Attach addition sheet(s) if necessary)

Drill conducted by: _____
Print Name

Signature

527 CMR 1.00:20.2.4.2.1.5 Records. A record of all fire exit drills shall be kept on the premises and persons in charge of such occupancies shall file written reports at least twice a year with the head of the fire department with the information contained on this form.