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PETER J. OSTROSKY
STATE FIRE MARSHAL

MEMORANDUM

To: Heads of Fire Departments
From: Peter J. Ostroskey, State Fire Marshal
Date: May 1, 2017
Re: Disguised Doors

It was recently brought to our attention that at least one assisted living facility in Massachusetts has disguised egress doors as pictured in the attachment. In accordance with 780 CMR 1008.1 and 527 CMR 1.00: 14.4.2.1 egress doors must not be obscured by decorations, mirrors, or other means of concealment or disguise. Egress doors must be readily distinguishable from the adjacent construction and finishes and must be easily recognizable as doors.

In addition to this instance, the engineering department has been made aware of several projects where an existing space is transformed into a “puzzle room” or “entertainment room”. Occupants are locked into these spaces and solve a series of puzzles to reveal a hidden door or a key to allow access into the next room or out of the space. The participants range from school-aged children to adults. 780 CMR 1015.1 and 1008.1.9 are clear that at least one egress door must be provided for up to 49 occupants and the egress door(s) must be readily openable from the egress side without the use of a key or special knowledge. Acceptable means of door locking are provided in 780 CMR Sections 1008.1.9.3 through 1008.1.9.10 although there is no provision that allows occupants to be locked into a room without another means of egress. For these projects, we recommend that a code-compliant egress door is readily distinguishable and is marked “Emergency Exit” or similar to avoid confusion for the game participants.

If you find an instance where an egress door is concealed, obscured, or improperly locked so as to constitute a hazardous condition, 527 CMR 1.00: 1.7.15 can be enforced. As this condition is also a violation of the building code, MGL c.148 s.28A requires the fire official to notify the building official of the violation. If you need assistance mitigating an existing door obscuration or have questions regarding a new installation where doors are concealed or locked, please contact our code compliance helpdesk at 978.567.3375.

*Administrative Services • Division of Fire Safety
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