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*Executive Office of Public Safety and Security*  
*Department of Fire Services*



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**MEMORANDUM**

**To:** Heads of Fire Departments  
**From:** Peter J. Ostroskey, State Fire Marshal  
**Date:** July 29, 2020  
**Subject:** School Emergency Planning and COVID-19

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Fire service personnel are encouraged to work with building, health, law enforcement and school officials in a comprehensive approach to re-opening schools during the COVID-19 pandemic. It is important that fire, emergency, and health concerns are all part of the planning process. Fire officials should thoroughly examine the proposed protocols and procedures to ensure they are code compliant, continuously evaluated, and communicated in order to protect our residents. Participation in the planning stages, as required per Section 363 of Chapter 159 of the Acts of 2000, is more important than ever as schools look to reopen in the fall. Continued dialogue with all stakeholders will lead to the best understanding and development and implementation of effective classroom programming and safety procedures. **Remember that the best response begins with effective planning.**

**Response to COVID-19 Guidelines**

In response to COVID-19, many schools are considering rearranging classroom layouts and utilizing rooms such as cafeterias and gymnasiums for classroom purposes to meet the distancing guidelines from the Department of Elementary and Secondary Education (DESE). It is advised that the local fire department reach out to school administrators to participate in the joint decision-making process to coordinate an effective plan that incorporates fire and life safety concerns. The following are safety provisions that should be considered and coordinated among fire, building and school officials during this planning stage:

- Aisles to classroom exits must be a minimum of 36 in. when serving 50 or less people, or 44 in. when serving between 50 and 100 people. [780 CMR 1020.2]
- If pathways are designated for one-way travel during the school day, barriers cannot be placed to block access to exits of means of egress in the case of an emergency. Corridors

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must be at least 44 in. wide when serving more than 50 people, or 72 in. wide when serving over 100 people. [780 CMR 1020.2]

- Barriers to create separation between desks, or within larger spaces such as gymnasiums, must not reduce egress or impede sight lines to exit signs or fire alarm devices. Barrier materials and locations of new barriers must be approved by the local building official.
- Storage of unused or moved furniture should not exceed 12 ft. in height, should not be within 18 in. from sprinkler heads above, and the designated storage areas or rooms should be approved by the local building official for that specific use.
- Alcohol-based hand sanitizer dispensing units must be located for use in accordance with 527 CMR 1.00. Storage of hand sanitizer bottles and refills must meet the requirements for storing Class IB flammable liquids. Storage of more than 10 gallons of hand sanitizer requires a permit from the local fire department since it is considered a flammable liquid.
  - The maximum capacity of dispensing units in areas open to corridors is 41 oz. (0.32 gal or 1.2 L).
  - The maximum capacity of dispensing units in rooms or suites of rooms and separated from corridors is 67 oz. (0.53 gal or 2.0L).
  - The minimum separation distance between dispensers is 48 inches. [527 CMR 1.00: 10.22.1(2)]
  - No dispensers shall be located above, within 1 in. to the side of, or within 1 in. below an ignition source, such as an electrical outlet, or open flame. [527 CMR 1.00: 60.5.2(2)]
  - Dispensers can only be installed directly over carpeted floors in sprinklered areas of the building. [527 CMR 1.00: 60.5.2(3)].
  - Dispenser operation must comply with manufacturer's instructions and 527 CMR 1.00: 60.5.2(9).

### **Fire and Evacuation Drills**

As school officials work to develop their return to school plans, alternative student scheduling may be part of the plan which might require additional fire drills in order to comply with the 527 CMR 1.00: *Massachusetts Comprehensive Fire Safety Code*. Every student, in every school, must be advised of the fire drill procedures, or take part in a fire drill within three days after entering school. These altered schedules may include splitting students into 2 or more sessions on different days.

As often happens throughout the school year, students may move to a different school. DFS strongly recommends that students take part in a full exit drill within their first three days at the new school as well. Weather and other factors may hinder such a drill and some latitude is afforded to ensure students and staff are well advised of the procedures in that absence of a full evacuation drill.

Fire evacuation drills must be conducted on a regular basis and should happen at expected and unexpected times and under varying conditions to prepare for an actual emergency (527 CMR 1.00: 10.5.4). The following is a summary of the requirements of 527 CMR 1.00: 20.2.4.2:

- The responsible school official must formulate a plan for the protection and evacuation of all occupants in the event of fire and must include alternate means of egress.
- The school official plan must ensure that staff are properly trained on the plan and fire drill procedures.
- All students must be advised of the fire drill procedures or participate in a fire drill within three days of the start of the school year.
- The head of the fire department, or their designee, must visit the school at least four times a year for the purpose of conducting fire drills and ensuring that staff understand the procedures and follow protocols. These drills should be conducted without advance warning (except for the school official). A fire drill conducted within three days of the start of school may count towards the four required drills.
- Records of fire exit drills must be kept on the school grounds and provided to the head of the fire department at least twice a year. In order to aid in this record keeping requirement, a template containing the information required to meet the provisions of 527 CMR 1.00 is included with this memo
- Fire exit drills must include the complete evacuation of everyone from the building.
- A drill of the multi-hazard evacuation plan, required by the provisions of St. 2000, c.159, s. 363, can be substituted for one of the required fire drills.

Practicing fire drills is essential to an effective response to fire alarms during a real emergency. Drills should be scheduled in advance, but notification of a drill should be limited to those personnel necessary for the successful operation of the drill. Inadvertently posting the drill date and time publicly could allow for the drill to be used to do harm.

### **Additional Information and Resources**

For code compliance questions contact the Department of Fire Service's Code Compliance Helpdesk at 978-567-3375, which is staffed from 8:00am to 4:00pm, Monday through Friday.

All references within this document are to:

- 780 CMR, *Massachusetts State Building Code*, 9<sup>th</sup> edition (based on the 2015 IBC and MA state amendments), and
- 527 CMR 1.00, *Massachusetts Comprehensive Fire Safety Code*, 2018 edition (based on the 2015 NFPA 1 and MA state amendments).

**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
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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.