Background.  Active shooters and other unwanted intruders are of paramount concern across the nation. Many believe that one of the best ways to help prevent an incident is to maintain control over access to, as well as in and around a facility. Checking visitors in and out of a building and requiring them to be escorted by an employee helps to maintain control, yet despite preventative measures, intruders may still gain access to a facility.

In response, as part of an overall safety plan, many building owners and operators are making efforts to lock-down areas within a building in case an intruder makes it past the primary security control. Some are adopting procedures that can significantly affect fire and life safety, such as using fire alarm systems to signal a security emergency and locking and/or chaining-shut exit discharge doors from the inside.

The threat of hostile intruders gaining access to any building is real, but locking or otherwise securing egress doors in a building, even temporarily, will likely be at odds with 780 CMR (The State Building Code). The primary purpose of the building code is to ensure that building occupants are provided a safe environment and are able to efficiently exit the building in the event of an emergency. Locking egress doors is an impediment that can cause significant difficulties and unintended consequences for building occupants.

Question:  With this established, does 780 CMR allow the locking and/or securing of egress doors within a building to prevent access by unwanted intruders?

Response:  The simple answer is yes, but many factors need to be considered in order to ensure that, by preventing one problem, another has not been created.

In explanation, 780 CMR, Section 1010.1.9.1 specifically requires egress doors to be readably openable from the egress side without the use of a key or special knowledge or effort and the section prohibits door handles, pulls and other devices required to be accessible to individuals with physical limitations to require tight grasping, pinching or twisting to operate (see below).

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**CHAPTER 10 MEANS OF EGRESS**

Except as specifically permitted by this section, egress doors shall be readably openable from the egress side without the use of a key or special knowledge or effort.

1010.1.9.1 Hardware.

Door handles, pulls, latches, locks and other operating devices on doors required to be accessible by Chapter 11 shall not require tight grasping, tight pinching or twisting of the wrist to operate.

1010.1.9.2 Hardware height.

Door handles, pulls, latches, locks and other operating devices shall be installed 34 inches (864 mm) minimum and 48 inches (1219 mm) maximum above the finished floor. Locks used only for security purposes and not used for normal operation are permitted at any height.
It is important to recognize that the code defines means of egress (in part) as “a continuous and unobstructed path of vertical and horizontal egress travel from any occupied portion of a building or structure to a public way . . . “, so nearly every door can be considered a means of egress door subject to code requirements. Nonetheless, the code does allow for locking in certain buildings under certain conditions. For instance, Sections 1010.1.9.3 through 1010.1.10 establishes requirements for locks and latches, bolt locks, delayed egress, sensor release of electrically locked egress doors and other locking arrangements. When considering how to best protect occupants from harm due to access by an unwanted intruder, the key is to balance security needs with providing for occupant egress.

Before selecting a locking method to help prevent access by an intruder, building owners need to consult with the municipal building and fire code enforcement official for the jurisdiction prior to installing any device. Permits are required to install egress door locking devices for reasons detailed herein and code officials cannot turn a blind-eye to improper installations. There have been several instances where door locks or other barriers have been installed, at great expense, in schools and other buildings by well-intentioned individuals, only to have been removed when determined to be in conflict with code provisions.

Proper planning makes for effective security, but the planning cannot be done in a vacuum. Consult professionals, include code officials and others to thoroughly evaluate security concerns measured against means of egress mandates to ensure that all safety and security facets are considered. Varied locking methods have been developed to help prevent access by unwanted intruders. Many create a conflict with regard to means of egress requirements of the code, such as those identified below.
If a municipal building official or other safety official is unsure of the appropriateness of a locking arrangement or other intruder protective mechanism, he/she should seek guidance from the Office of Public Safety & Inspections (OPSI) inspector for the area (see link for list of inspectors and areas).

https://www.mass.gov/lists/state-inspector-districts#state-building-inspectors-

In some instances, a building owner may need to seek assistance through the Building Code Appeals Board (BCAB) if it is not abundantly clear whether or not a locking arrangement may satisfy both occupant safety and security concerns (see link for on-line access to BCAB).

https://massdpsportal.secure.force.com/home/home.jsp