

Minnesota Department of Public Safety State Fire Marshal Division

24CCP_96.2

Fire Code Change Proposal Form

(Submit via email to: fire.code@state.mn.us)

***Please complete all sections. Incomplete forms may be returned for additional information.*

Author/requestor: Forrest Williams, Supervisor (SFM)

Date: 5-14-2024 REVISED 9-25-2024

Email address: forrest.williams@state.mn.us

Telephone number: 651-769-7784

Organization/Association/Agency, if any: DPS – State Fire Marshal

Code or rule section to be changed (include code or rule title and edition year): MR 7511.1010, Subpart 2, Section 1010.1.9.8.1 and MR 1305.1010, Section 1010.1.9.8.1

Is the subject matter of the proposed change also regulated by the Minnesota Building Code?

YES: NO: UNKNOWN:

***If yes, a [building code change proposal](#) must also be completed and submitted to the Minnesota Department of Labor and Industry – Construction Codes and Licensing Division.*

General Information

Yes No

- A. Is the proposed change unique to the State of Minnesota?
- B. Is the proposed change required due to climatic conditions of Minnesota?
- C. Will the proposed change encourage more uniform enforcement?
- D. Will the proposed change remedy a problem?
- E. Does the proposal delete a current Minnesota Rule, chapter amendment?
- F. Would this proposed change be appropriate through the ICC code development process?

Proposed Language

1. The proposed code change is meant to:

Change language contained the model code book? If so, list section(s).



Minnesota Department of Public Safety State Fire Marshal Division

Change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

MR 7511.1010, Subpart 2, Section 1010.1.9.8.1 and MR 1305.1010, Section 1010.1.9.8.1

Delete language contained in the model code book? If so, list section(s).

Delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

Add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

Black text – current MN amendment

Blue text – new IBC language, accepted by TAG

Red text – proposed changes

~~1010.1.9.8.1~~ **1010.2.12.1 Delayed egress locking system.** The delayed egress electrical locking system shall be installed and operated in accordance with all of the following:

1. The delay of the delayed egress electrical locking system shall deactivate upon actuation of the *automatic sprinkler system* or *automatic fire detection system*, allowing immediate free egress.
2. The delay of the delayed egress electrical locking system shall deactivate upon loss of power to the electrical locking system or electrical lock, allowing immediate free egress.
3. The delay of the delayed egress locking electrical system shall have the capability of being deactivated at the *fire command center* and other *approved* locations.



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- ~~4. An attempt to egress shall initiate an irreversible process that shall allow egress in not more than 15 seconds when a physical effort to exit of not more than 15 pounds (67 N) is applied to the egress side door hardware for not more than one second. Initiation of the irreversible process shall activate an audible signal in the vicinity of the door. Once the delay electronics have been deactivated an approved location, relocking the delay electronics shall be by manual means only.~~

Exception to Item 4: Where approved, a delay of not more than 30 seconds is permitted on a delayed egress door.

4. An attempt to egress shall initiate an irreversible process that shall allow such egress in not more than 15 seconds when a physical effort to exit is applied to the egress side of the door hardware for not more than 3 seconds. Initiation of the irreversible process shall activate an audible signal in the vicinity of the door. Once the delay has been deactivated, rearming the delay electronics shall be by manual means only.

Exception: Where approved, a delay of not more than 30 seconds is permitted on a delayed egress door.

5. The egress path from any point shall not pass through more than one delayed egress locking system.

Exceptions to Item 5:

1. In Group I-1, Condition 2, Group I-2 or I-3 occupancies, the egress path from any point in the building shall pass through not more than two delayed egress locking systems provided that the combined delay does not exceed 30 seconds.

2. In Group I-1, Condition 1 or Group I-4 occupancies, the egress path from any point in the building shall pass through not more than two delayed egress locking systems provided the combined delay does not

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exceed 30 seconds and the building is equipped throughout with an automatic sprinkler system in accordance with Section 903.3.1.1.

6. A sign shall be provided on the door and shall be located above and within 12 inches (305 mm) of the door exit hardware.

Exception to Item 6: Where approved, in Group I occupancies, the installation of a sign is not required where care recipients who because of clinical needs require restraint or containment as part of the function of the treatment area. **This exception is moved to below item 6.3 in MBC.**

6.1. For doors that swing in the direction of egress, the sign shall read "PUSH UNTIL ALARM SOUNDS. DOOR CAN BE OPENED IN 15 [30] SECONDS."

6.2. For doors that swing in the opposite direction of egress, the sign shall read, "PULL UNTIL ALARM SOUNDS. DOOR CAN BE OPENED IN 15 [30]



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SECONDS."

6.3. The sign shall comply with the visual character requirements in ICC A117.1.

7. Emergency lighting shall be provided on the egress side of the door.

8. The delayed egress locking system units electromechanical or electromagnetic locking device shall be listed in accordance with either UL 294 or UL 1034.

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
MR 1305.1010, Section 1010.1.9.8.1

Need and Reason

1. Why is the proposed code change needed?

This proposal revises a current state amendment by incorporating updated language from the 2024 IBC/IFC. Amended item 4 is replaced with item 4 from the model code (2024 IBC/IFC). The new language clarifies that once the delayed egress door is released following the 15-second delay, the system can only be rearmed/relocked through manual intervention.

~~This change clarifies that once the door is released/unlocked following a request to exit signal, the delayed egress system cannot automatically reset and relock the door. Instead, the door must remain unlocked until reset manually.~~ The change is necessary because, without the clarification, the reader could misinterpret the existing provision for manual relocking as only applying to when the door has been released from an approved location separate from the door. The consequence of this interpretation would be to allow a delayed egress door to automatically relock after an occupant has initiated the request to exit process and passed through the doorway. This would require the next person or group of occupants, and any subsequent persons after that, to also experience an egress delay, which can pose a fire- and life-safety hazard during emergency situations by significantly increasing evacuation times and causing occupants to bottleneck at an egress doorway. This is not the intent of this section, as explained in the IFC code commentary.

From the IFC commentary, Section 1010.1.9.8.4, item 4:

At the end of the delay, the door's locking system is required to allow the door to be opened by the occupant operating the egress door hardware (i.e., pushing on the panic bar), allowing egress. The unlocking cycle is irreversible; once it is started, it does not stop. Once the door is openable from the egress side at the end of the delay, it remains openable, allowing immediate egress until someone comes to the door and manually rearms the delay. The first user to the door may face a delay, but after that, other users would be able to exit immediately.

In addition, the new language in item 4 requires the system to begin the irreversible unlocking process when pressure is applied to the door for 3 seconds. This is an increase



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from the 1-second threshold required by earlier editions of the model code. This change brings the state building and fire codes in conformance with the 2024 IBC/IFC. Further, item 8 is replaced with updated item 8 language from the model code to include the UL 1034 listing option.

2. Why is the proposed code change a reasonable solution?
These changes are reasonable because revising the current state amendment with updated language from the 2024 IBC/IFC provides better clarification as to the intent and application of this section. Further, updating the door release initiation process from 1-second to 3-seconds brings the MBC and MSFC into alignment with the national model codes. Finally, updating item 8 allows for an additional listing option for delayed egress systems, consistent with the model code.
3. Is there additional data or information that should be considered?
No

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
The change to item 4 is cost neutral – clarification only.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
No

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Building and fire code officials, design professionals, construction industry, and property owners and operators.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None



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3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.
No
5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
The consequence of not adopting this change would be the potential for the misinterpretation and misapplication of the provisions in item 4, which could allow for the improper installation of a delayed egress door that automatically relocks after an occupant has initiated the request to exit process and passed through the doorway. This would require the next person or group of occupants, and any subsequent persons after that, to also experience an egress delay, which can pose a fire- and life-safety hazard during emergency situations by significantly increasing evacuation times and causing occupants to bottleneck at an egress doorway. This is not the intent of this section, as explained in the IFC code commentary (see Need and Reason section above). Further, by not adopting these changes, the state building code and fire code will remain in conflict with the national model code provisions for delayed egress.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.
N/A

***Please complete all sections. Incomplete forms may be returned for additional information.*



Updated July 2022



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Greg Metz

Date: 8/15/2022

Incorporated CCP 98 from Forrest Williams

Revised 5/15/2024

Revised 6/6/2024

45.2 Revised 9/20/24 after TAG mtg

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

~~IBC 1010.1.9.7~~ 1010.2.13 Controlled Egress Doors

Code or rule section to be changed: MR 1305, MR 7511.1010, Subpart 1d, Section 1010.1.9.7 and MR 1305.1010, Section 1010.1.9.7

General Information

Yes **No**

- A. Is the proposed change unique to the State of Minnesota? Yes No
- B. Is the proposed change required due to climatic conditions of Minnesota? Yes No
- C. Will the proposed change encourage more uniform enforcement? Yes No
- D. Will the proposed change remedy a problem? Yes No
- E. Does the proposal delete a current Minnesota Rule, chapter amendment? Yes No
- F. Would this proposed change be appropriate through the ICC code development process? Yes No

Proposed Language

1. The proposed code change is meant to:

change language contained the model code book? If so, list section(s).

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
MR 7511.1010, Subpart 1d, Section 1010.1.9.7 and MR 1305.1010, Section 1010.1.9.7

delete language contained in the model code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

add new language that is not found in the model code book or in Minnesota Rule.
~~IBC 1010.1.9.7~~ **1010.2.13** Controlled Egress doors in Groups I-1, I-2, R-3, and R-4

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.
No
3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

Black text – current MN amendment

Blue text – new IBC language, accepted by TAG

Red text – proposed changes

Purple text – proposed changed from CCP98 incorporation, supported by TAG

Green text – notes

~~1010.1.9.7~~ 1010.2.13 Controlled egress doors in Groups E, I-1, I-2, R-3, and R-4 occupancies.

Controlled egress door locking systems, including electromechanical locking systems and electromagnetic locking systems, shall be permitted in Group E Setting 4 Special Education Facilities, and Group I-1 Condition 2, I-2, R-3, and R-4 Condition 2 occupancies when a person's clinical needs require their containment. Controlled egress doors shall be permitted in these occupancies when the building is equipped throughout with an approved *automatic sprinkler system* in accordance with Section 903.3.1.1 and an *approved smoke detection system* installed in corridors and areas open to corridors. In Groups R-3 and R-4, smoke detection shall also be installed in common areas other than sleeping units and kitchens ~~installed in accordance with Section 907.~~ Electric locking systems and controlled egress doors shall comply with the requirements in Items 1 through 11 below. The use of Section 1010.2.13 may be revoked by the fire code official or building official for due cause.

1010.2.13 Controlled egress doors in Groups E I-1 and I-2, R-3 and R-4 occupancies.

Controlled egress electrical locking systems, where egress is controlled by authorized personnel shall be permitted on doors in the means of egress in Group E Setting 4 Special Education Facilities as designated by the Minnesota Department of Education, and Group I-1 I-2, R-3 and R-4 Condition 2 occupancies where the clinical needs of *persons* receiving care require their containment. Controlled egress doors shall be permitted in such occupancies where the *building* is equipped throughout with an *automatic sprinkler system* in accordance with **Section 903.3.1.1** or an *approved automatic smoke detection system* installed in corridors and areas open to corridors. In Groups R-3 and R-4, smoke detection shall also be installed in common areas other than sleeping units and kitchens ~~installed in accordance with Section 907.~~, provided that the doors are installed and operate in accordance with all of the following: The use of Section 1010.2.13 may be revoked by the fire code official or building official for due cause.

TAG agreed to revert back to IBC language while incorporating the addition of R-3 and R-4 occupancy classifications. IBC has picked up the term controlled egress and removed heat detection from previous language, now matching the MN amendments intent.

- ~~1. The egress control locks shall unlock upon actuation of either the *automatic sprinkler system* or the *automatic smoke detection system* within the means of egress served by the locked area.~~
 1. The door's electric locks shall unlock on actuation of the *automatic sprinkler system* or *automatic smoke detection system* allowing immediate free egress.
TAG repealed item 1 to revert back to IBC language.
- ~~2. The egress control locks shall unlock upon loss of power controlling the lock or lock mechanism.~~

2. The door's electric locks shall unlock on loss of power to the electrical locking system or to the electric lock mechanism allowing immediate free egress.
TAG repealed item 2 to revert back to IBC language.
- ~~3. The egress control locking system shall have the capability of being unlocked by a signal or switch from the fire command center, a nursing station or other approved location. The signal or switch shall directly break power to the lock.~~
3. The electrical locking system shall be installed to have the capability of unlocking the electric locks by a switch located at the *fire command center*, a nursing station or other *approved* location. The switch shall directly break power to the electric lock.
TAG repealed item 3 to revert back to IBC language.
4. A *building* occupant shall not be required to pass through more than one door equipped with a controlled egress lock before entering an *exit*.
5. The procedures for the operations of the unlocking system shall be described and approved as part of the emergency planning and preparedness required by Minnesota Rules, Chapter 7511, the *Minnesota State Fire Code*.
- ~~5. The procedures for unlocking the doors shall be described and approved as part of the emergency planning and preparedness required by Chapter 4 of the *International Fire Code*.~~
TAG agreed to retain amendment.
6. All ~~clinical~~ staff shall have the keys, codes, or other means necessary to operate the controlled egress locking devices or systems.
6. All clinical staff shall have the keys, codes or other means necessary to operate the controlled egress electrical locking systems.
Slight difference between 'egress locking devices or systems' vs. 'egress electrical locking systems.'
7. Emergency lighting shall be provided at both sides of a door equipped with a controlled egress locking device.
- ~~7. Emergency lighting shall be provided at the door.~~
TAG agreed to retain amendment.
8. ~~Twenty-four-hour resident or patient supervision is provided within the secured area. On-site supervision within the secured area is provided whenever the secured area is occupied by a care recipient, person where their clinical needs require containment.~~
MN specific item. TAG agreed to change term a person with clinical needs from care recipient.
- ~~9. The controlled egress locking devices are designed to fail in the open position.~~
MN specific item. TAG agreed to repeal amendment.
10. Floor levels within the building or portion of the building with controlled egress locking devices shall be divided into at least two compartments by smoke barriers meeting the requirements of Section 709.
MN specific item. TAG agreed to retain amendment and associated exception 3.
11. The electromechanical or electromagnetic locking device shall be *listed* in accordance with either UL 294 or UL 1034.
TAG agreed to accept IBC language.
12. In Group E Occupancies, application is limited to setting 4 special education facilities for exterior doors and associated vestibule doors at the main entrance only.

Exceptions:

1. Items 1 through 4 shall not apply to doors in Group I-2 and Group R-4 occupancies where ~~to~~ areas are occupied by persons who, because of clinical needs, require restraint or containment as part of the function of a psychiatric treatment area.
 2. Items 1 through 4 shall not apply to doors to areas where a listed egress control system is utilized to reduce the risk of child abduction from nursery and obstetric areas of a Group I-2 hospital.
 3. Item 10 shall not apply to exiting Group R-3 or R-4 Condition 1 occupancies where all of the following conditions apply:
 - (i) The construction of smoke barrier compartmentation is not practical;
 - (ii) Existing sleeping rooms are provided with smoke-tight construction;
 - (iii) Existing sleeping rooms have an emergency escape and rescue opening complying with Section ~~1030~~ 1031.
4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
- No.

Need and Reason

1. Why is the proposed code change needed?

To allow use of these provisions in Setting 4 special education schools where Minnesota's climate puts these students who are prone to elope, at risk of hypothermia or heat related illnesses if they should happen to compulsively leave the facility unprepared for extreme temperatures.

To limit the application to occupancy groups that allow care for persons incapable of self-preservation who, because of psychiatric conditions may compulsively elope; and not inhibit the free movement of care recipients who understand the risk of elopement. Group 1-1 care recipients are either fully capable of self-preservation or require limited assistance, those individuals are understanding of the risk of elopement additional locking is not required nor permitted in accordance with MN licensing, therefor it is reasonable to remove Group I-1 from the occupancy classifications.

To include a clause which authorizes a building official or fire official to demand the locking provisions to be changed when facilities are mis-using the provisions.

The current language requires a smoke detection system installed in accordance with Section 907. However, this reference isn't clear as Section 907 it too general in nature, covering the fire alarm system requirements for numerous occupancy classifications. The current language also doesn't state in what areas smoke detection is specifically required. The ambiguous nature of the language can cause confusion, resulting in inconsistent design, enforcement, and application of these provisions.

2. Why is the proposed code change a reasonable solution?

The proposed changes clarify the application to locations where persons must be inhibited from elopement for their own safety because they are incapable of making those safe decisions for themselves.

It's reasonable to provide clarification to current rule language in order to better demonstrate the intent and application.

3. What other considerations should the TAG consider?

None

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
This proposal should on average be cost neutral, though it may even reduce costs in jurisdictions where this provision was interpreted to require smoke detection in all areas (i.e., full coverage).
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
No.

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Architects, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.

Building code officials, fire code officials, design professionals, fire alarm contractors, property owners and operators.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.

The proposed change is the lowest impact option with the potential to produce desired results.
5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Continued confusion over application of these provisions, and application of these locking provisions in occupancies where people are fully capable of self-preservation.

Because the current language doesn't state in what areas smoke detection is required, the absence of a rule change will continue to enable inconsistent application among various jurisdictions throughout the state. This rule change intends to provide clarity regarding exactly where smoke detection is required, resulting in uniform application and enforcement.

7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.

No

8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

***Note: Incomplete forms may be returned to the submitter with instruction to complete the form. Only completed forms can considered by the TAG.

Minnesota Department of Public Safety State Fire Marshal Division

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Fire Code Change Proposal Form

(Submit via email to: fire.code@state.mn.us)

***Please complete all sections. Incomplete forms may be returned for additional information.*

Author/requestor: Forrest Williams

Date: 1-10-2024

Email address: forrest.williams@state.mn.us

Telephone number: 651-769-7784

Organization/Association/Agency, if any: DPS – State Fire Marshal

Code or rule section to be changed (include code or rule title and edition year): MR 7511.1010.1.11 & MR 1305.1010.1.11

Is the subject matter of the proposed change also regulated by the Minnesota Building Code?
YES: NO: UNKNOWN:

***If yes, a [building code change proposal](#) must also be completed and submitted to the Minnesota Department of Labor and Industry – Construction Codes and Licensing Division.*

General Information

Yes No

- A. Is the proposed change unique to the State of Minnesota?
- B. Is the proposed change required due to climatic conditions of Minnesota?
- C. Will the proposed change encourage more uniform enforcement?
- D. Will the proposed change remedy a problem?
- E. Does the proposal delete a current Minnesota Rule, chapter amendment?
- F. Would this proposed change be appropriate through the ICC code development process?

Proposed Language

1. The proposed code change is meant to:

Change language contained the model code book? If so, list section(s).



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Change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

MR 7511.1010.1.11

Delete language contained in the model code book? If so, list section(s).

Delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

Add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

1010.1.11 Special detention arrangements. Special detention arrangements meeting the requirements of Sections 1010.1.11.1 through 1010.1.11.4 are permitted only for rooms, other than cells, where a single occupant is ~~the occupants are being~~ temporarily restrained for safety or security reasons. Special detention arrangements shall not be used on egress doorways serving multiple occupants. The use of Sections 1010.1.11.1 through 1010.1.11.4 may be revoked by the **building/fire** code official for due cause.

1305 to read 'building code official'

7511 to read 'fire code official'

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No

Need and Reason

1. Why is the proposed code change needed?



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This state amendment has often been misinterpreted by code officials and design professionals, believing this type of locking arrangement can be employed on any egress door, even those serving multiple occupants, provided the reason is for occupant security or safety. However, the intent of this section is to allow a single occupant, who's behavior may pose a danger to themselves or others, to be temporarily detained within a room until the threat has passed. The most common use of special detention arrangements is in Group E (educational) occupancies, specifically in special education areas to assist with behavioral issues.

2. Why is the proposed code change a reasonable solution?
It helps clarify the intent of the language and promotes uniform application and enforcement of the provisions. No substantive change are made to the amendment.
3. Is there additional data or information that should be considered?
No

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No change in cost.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
n/a
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No change in cost.
4. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
No

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
None, as there is no substantive change to the code provisions.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None.



Minnesota Department of Public Safety State Fire Marshal Division

3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
n/a
4. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.
No. The purpose is only for clarification of intent and to promote consistent application and enforcement.
5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
By not making these clarifications, fire and building code officials and design professionals will continue to misapply these provisions. Once these mistakes are identified, they must be corrected, causing additional and unnecessary costs to the property owner.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No.
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.
n/a

***Please complete all sections. Incomplete forms may be returned for additional information.*



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Minnesota Department of Public Safety State Fire Marshal Division

24CCP_101

Fire Code Change Proposal Form

(Submit via email to: fire.code@state.mn.us)

***Please complete all sections. Incomplete forms may be returned for additional information.*

Author/requestor: [Forrest Williams, Supervisor \(SFM\)](#)

Date: [5-17-2024](#)

Email address: forrest.williams@state.mn.us

Telephone number: [651-769-7784](tel:651-769-7784)

Organization/Association/Agency, if any: [DPS – State Fire Marshal](#)

Code or rule section to be changed (include code or rule title and edition year): [2024 IFC/IBC 1010.2.6 \(stairway doors\)](#)

Is the subject matter of the proposed change also regulated by the Minnesota Building Code?
YES: NO: UNKNOWN:

***If yes, a [building code change proposal](#) must also be completed and submitted to the Minnesota Department of Labor and Industry – Construction Codes and Licensing Division.*

General Information

Yes No

- A. Is the proposed change unique to the State of Minnesota?
- B. Is the proposed change required due to climatic conditions of Minnesota?
- C. Will the proposed change encourage more uniform enforcement?
- D. Will the proposed change remedy a problem?
- E. Does the proposal delete a current Minnesota Rule, chapter amendment?
- F. Would this proposed change be appropriate through the ICC code development process?

Proposed Language

1. The proposed code change is meant to:

Change language contained the model code book? If so, list section(s).



Minnesota Department of Public Safety State Fire Marshal Division

2024 IFC/IBC 1010.2.6 (stairway doors)

Change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

MR 7511.1010, Section 1010.1.9.12 and MR 1305.1010, Section 1010.1.9.12

Delete language contained in the model code book? If so, list section(s).

Delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

Add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

(2024 IFC/IBC)

[BE] 1010.2.6 Stairway doors.

Interior stairway means of egress doors shall be openable from both sides without the use of a key or special knowledge or effort.

Exceptions:

1. In stairways serving not more than four stories, doors are permitted to be locked from the side opposite the egress side.

~~1.2.~~ Stairway discharge doors shall be openable from the egress side and shall only be locked from the opposite side.

~~2.3.~~ This section shall not apply to doors arranged in accordance with Section 403.5.3 of the International Building Code.



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Minnesota Department of Public Safety State Fire Marshal Division

~~3.4.~~ Stairway exit doors shall not be locked from the side opposite the egress side, unless they are openable from the egress side and capable of being unlocked simultaneously without unlatching by any of the following methods:

~~3.1.4.1~~ Shall be capable of being unlocked individually or simultaneously upon a signal from the fire command center, where present, or a signal by emergency personnel from a single location inside the main entrance to the building.

~~3.2.4.2~~ Shall unlock simultaneously upon activation of a fire alarm signal when a fire alarm system is present in an area served by the stairway.

~~3.3.4.3~~ Shall unlock upon failure of the power supply to the electric lock or the locking system.

~~4.5.~~ Stairway exit doors shall be openable from the egress side and shall only be locked from the opposite side in Group B, F, M and S occupancies where the only interior access to the tenant space is from a single exit stairway where permitted in Section 1006.3.4.

~~5.6.~~ Stairway exit doors shall be openable from the egress side and shall only be locked from the opposite side in Group R-2 occupancies where the only interior access to the dwelling unit is from a single exit stairway where permitted in Section 1006.3.4.

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
[MR 7511.1010, Section 1010.1.9.12](#) and [MR 1305.1010, Section 1010.1.9.12](#)

Need and Reason

1. Why is the proposed code change needed?
The 2024 IFC/IBC has revised this section by adding an additional exception, so this change incorporates a current state amendment into the updated IFC/IBC language, thus maintaining the current allowance for stairway doors serving 4 or fewer stories to be locked on the side opposite egress in order to prevent building reentry while allowing for additional release options now included in the model code.

Notes from TAG discussion: History of this language is it mirrors NFPA 101 and is a cost savings for less than 4 story buildings. If repealed it would increase the cost of construction as additional programming would be necessary for compliance.

2. Why is the proposed code change a reasonable solution?
This change is reasonable because the allowance currently exists under MN Rules, 7511 and 1305.



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Minnesota Department of Public Safety State Fire Marshal Division

3. Is there additional data or information that should be considered?
This language is similar to NFPA 101, Life Safety Code, which allows stairway enclosure doors serving 4 or fewer stories to be locked on the side opposite egress in order to prevent building reentry.

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
Cost neutral, as this provision already exists under current rule.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
No

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Fire and building code officials, design professionals, construction industries, electrical contractors, and building owners and operators.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No. This provision already exists under current MN Rules.
4. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.
No



Minnesota Department of Public Safety State Fire Marshal Division

5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
N/A. This provision already exists under current MN Rules.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
The cost of construction would increase for multi-story buildings having 4 or fewer stories. Under current rule, interior stairway doors serving 4 or fewer stories are allowed to have the doors secured from the non-egress side in order to prevent reentry for the purposes of maintaining building/tenant security. By not incorporating our current exemption for stairways serving 4 or fewer stories, an electrified door-release system would be necessary in order for these doors to be secured against building reentry.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.
N/A

***Please complete all sections. Incomplete forms may be returned for additional information.*



Updated July 2022



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Greg Metz

Date: 8/12/2022

Revised: 6/6/2024

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 1028.5 Exit Discharge Access to Public Way

Code or rule section to be changed: MR 1305

General Information

Yes **No**

- A. Is the proposed change unique to the State of Minnesota? Yes No
- B. Is the proposed change required due to climatic conditions of Minnesota? Yes No
- C. Will the proposed change encourage more uniform enforcement? Yes No
- D. Will the proposed change remedy a problem? Yes No
- E. Does the proposal delete a current Minnesota Rule, chapter amendment? Yes No
- F. Would this proposed change be appropriate through the ICC code development process? Yes No

Proposed Language

1. The proposed code change is meant to:

- change language contained the model code book? If so, list section(s).
- change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
- delete language contained in the model code book? If so, list section(s).
- delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
- add new language that is not found in the model code book or in Minnesota Rule.
IBC 1028.5 Access to Public Way

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.
No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

IBC 1028.5 Access to a public way. The *exit discharge* shall provide a direct and unobstructed access to a *public way*. The surface of the exit discharge to the public way shall be a maintainable surface able to be cleared free of ice and snow.

Exception: Where access to a *public way* cannot be provided, a safe dispersal area shall be provided where all of the following are met:

1. The area shall be of a size to accommodate not less than 5 square feet (0.46 m²) for each *person*.
 2. The area shall be located on the same lot not less than 50 feet (15.24 m) away from the *building* requiring egress.
 3. The area shall be permanently maintained and identified as a safe dispersal area. The safe dispersal area shall be a maintainable surface able to be kept free and clear of ice and snow.
 4. The area shall be provided with a safe and unobstructed path of travel from the *building* having a maintainable surface able to be kept free and clear of ice and snow.
4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No.

Need and Reason

1. Why is the proposed code change needed?
Exit discharge to turf or landscaped areas are ineffective as means of egress during the six months when the ground can be covered with ice and snow.
2. Why is the proposed code change a reasonable solution?
It does not dictate specific surface requirements but does reinforce that means of egress must be unobstructed. In Minnesota, snow and ice can obstruct the means of egress
3. What other considerations should the TAG consider?
None

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No cost change. This is a code clarification specific to Minnesota climate. The model code already requires means of egress to be clear and unobstructed. The addition merely clarifies that snow and ice are obstructions.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
No.

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Architects, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.

The proposed change is the lowest impact option with the potential to produce desired results.
5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Continued arguments over whether it is acceptable for exit discharge doors to discharge to a stoop and then landscaping or turf.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

***Note: Incomplete forms may be returned to the submitter with instruction to complete the form. Only completed forms can be considered by the TAG.



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Greg Metz

Date: 9/7/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 3007.2.1 Fire Service Access Elevator
Sprinkler system prohibited locations

Code or rule section to be changed: MR 1305

General Information

Yes **No**

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

change language contained the model code book? If so, list section(s).

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in the model code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

add new language that is not found in the model code book or in Minnesota Rule.
IBC 3007.2.1 Prohibited Locations

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.
No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

IBC 3007.2.1 Prohibited locations. Automatic sprinklers shall not be installed in machine rooms, elevator machinery spaces, control rooms, control spaces, and elevator hoistways of fire service access elevators.

Exception: Health care occupancies that are: 1) required to have NFPA 13 systems; 2) licensed by the Minnesota Department of Health; and 3) participate in Title XVIII (Medicare) or Title XIX (Medicaid) of the Social Security Act.

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No.

Need and Reason

1. Why is the proposed code change needed?
To coordinate with federal standards requirements for licensing of federally funded healthcare facilities so that they may maintain their healthcare licenses.
2. Why is the proposed code change a reasonable solution?
It addresses the specific requirement of the healthcare licensing industry without including other building types where sprinkler discharge in the elevator equipment areas could be problematic.
3. What other considerations should the TAG consider?
None

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No cost change. The change is consistent with MBC 903.3.1.1.1 Exempt Locations, Item 7 exception.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
No.

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Architects, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.

2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.

The proposed change is the lowest impact option with the potential to produce desired results.
5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Mis-coordinated code sections and continued confusion as to whether sprinklers can be installed in elevator machine rooms or not.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

***Note: Incomplete forms may be returned to the submitter with instruction to complete the form. Only completed forms can considered by the TAG.



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Greg Metz

Date: 9/7/2022

Email address: greg.metz@state.mn.us

Model Code: IBC 2024

Telephone number: 651-284-5884

Code or Rule Section:

Firm/Association affiliation, if any: DLI/CCLD

IBC 3301.1 Scope.

Code or rule section to be changed: MR 1305

General Information

Yes **No**

- A. Is the proposed change unique to the State of Minnesota? Yes No
- B. Is the proposed change required due to climatic conditions of Minnesota? Yes No
- C. Will the proposed change encourage more uniform enforcement? Yes No
- D. Will the proposed change remedy a problem? Yes No
- E. Does the proposal delete a current Minnesota Rule, chapter amendment? Yes No
- F. Would this proposed change be appropriate through the ICC code development process? Yes No

Proposed Language

1. The proposed code change is meant to:

change language contained the model code book? If so, list section(s).

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in the model code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

add new language that is not found in the model code book or in Minnesota Rule.
IBC 3301.1 Scope.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.
No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~strikeout~~ words proposed to be deleted. Include the entire code (sub) section or rule subpart that contains your proposed changes.

3301.1 Scope. The provisions of this chapter shall govern safety during construction and the protection of adjacent public and private properties. Fire safety during construction shall also comply with the applicable provisions of Chapter 33 of the International Fire Code.

3301.2 Partial Occupancy. Where an existing building is intended to be partially occupied during construction, the following conditions shall be met:

1. The means of egress for occupied portions of the building shall comply with travel distance limits and number of exits required. Temporary means of egress may include temporary exterior fire escapes or exterior stairways constructed of any materials allowed by code.
2. For buildings equipped with an automatic sprinkler system and part or all of the system is required to be non-operational for a period of time, the travel distance limits and number of required exits shall be provided as for non-sprinkled buildings. Fire extinguishers shall be placed within 75 feet of travel distance from any occupied location within the building.
3. Spaces located beyond the allowable travel distance limits shall be cordoned off to not be occupied and shall be signed "Limits of safe occupancy, construction workers only beyond this point."
4. There shall be not less than a one-hour fire barrier separating the construction work area from occupied portions of the building.
5. Means of egress from occupied portions shall not pass through a construction work area.
6. Means of egress including temporary means of egress shall include exit discharge to the public way or safe dispersion area that can be maintained free and clear of ice and snow.

Renumber following code sections accordingly.

3301.3 ~~3301.2~~ Storage and Placement

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No.

Need and Reason

1. Why is the proposed code change needed?
The code does not provide any guidance on safe partial occupancy of buildings undergoing renovation and construction.
2. Why is the proposed code change a reasonable solution?
It clarifies what is required for basic occupant safety and provides guidance for handling areas beyond the limits of safe occupancy. The requirements are consistent with current code, and are merely included to reduce construction costs by clarifying requirements in a less subjective manner while maintaining occupant safety during construction.
3. What other considerations should the TAG consider?
None

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain.
No cost change.

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain.
N/A
3. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
4. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
No.

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Architects, Engineers, Construction Contractors, Building Officials and Inspectors, Fire Officials, building owners.
2. What are the probable costs to the agency and to any other State agencies of implementing and enforcing of the proposed rule? Is there an anticipated effect on state revenues?
None
3. Are there less costly intrusive methods for achieving the purpose of the proposed rule?
No
4. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result.

The proposed change is the lowest impact option with the potential to produce desired results.
5. What are the probable costs of complying with the proposed rule, including the portion of the total costs that will be borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
None.
6. What are the probable costs or consequences of not adopting the proposed rule, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of governmental units, businesses, or individuals?
Wide variations in requirements for partial occupancy leading to inconsistency in requirements and elevated construction costs to mitigate the uncertainty.
7. Are you aware of any federal regulation or federal requirement related to this proposed code change? If so, please list the federal regulation or requirement and your assessment of any differences between the proposed rule and the federal regulation or requirement.
No
8. Please include an assessment of the cumulative effect of the rule with other federal and state regulations related to the specific purpose of the rule.

***Note: Incomplete forms may be returned to the submitter with instruction to complete the form. Only completed forms can be considered by the TAG.



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Steve Poor

Date: 6/20/2024

Email address: steve.poor@minneapolismn.gov

Model Code: Minnesota State Building Code

Telephone number: 612-364-4657

Code or Rule Section: Section 3103

Firm/Association affiliation, if any: City of Minneapolis

Topic of proposal: Temporary structures

Code or rule section to be changed: Section 3103

Intended for Technical Advisory Group ("TAG"): June 27, 2024

General Information

Yes No

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

change language contained the model code book? If so, list section(s).

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

Section 3103

delete language contained in the model code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striethrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

SECTION 3103 TEMPORARY STRUCTURES

General. The provisions of Sections through shall apply to structures erected for a period of less than ~~180~~ 210 days. Tents, umbrella structures and other membrane structures erected for a period of less than ~~180~~ 210 days shall comply with the International Fire Code. Those erected for a longer period of time shall comply with applicable sections of this code.

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)

This change will allow restaurants and other businesses that use temporary structures during Minnesota winters to ensure the temporary structure can be up throughout all months of inclement weather.

2. Why is the proposed code change a reasonable solution?

This change extends the current 180 day rule to add an extra month.

3. What other factors should the TAG consider?

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.

No – it will not change inspection costs.

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.

5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.

No – this is a minor change to existing code.

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?

Hospitality businesses

2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.

***Note: The information you provide in this code change proposal form is considered Public Data and used by the TAG to consider your proposed modification to the code. Any code change proposal form submitted to DLI may be reviewed at public TAG meetings and used by department staff and the Office of Administrative Hearings to justify the need and reasonableness of any proposed rule draft subject to administrative review and is available to the public.

****Note: Incomplete forms will be returned to the submitter with instruction to complete the form. Only completed forms will be accepted and considered by the TAG. The submitter may be asked to provide additional information in support of the proposed code change.



CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Carsten Jonas

Date: 7/3/2024

Email address: carstenmjonas@gmail.com

Model Code: IBC/IFC

Telephone number: 7813638193

Code or Rule Section: N/A

Firm/Association affiliation, if any: Self

Topic of proposal: Exit signs

Code or rule section to be changed: New section 1013.7

Intended for Technical Advisory Group ("TAG"): 1305/Fire Code Compatibility

General Information

Yes No

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

- change language contained the model code book? If so, list section(s).
- change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
- delete language contained in the model code book? If so, list section(s).
- delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
- add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.
No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.
1013.7 Pictograms. In lieu of or in addition to the word "EXIT", exit signs may include the pictogram for an emergency exit as standardized by the International Organization for Standardization in Standard 7010.
4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
 No.

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)
 For many years, a pictogram (symbol) to indicate an emergency exit has been internationally standardized (see attached PDF for an example). This symbol has been adopted in jurisdictions around the world, including other English-speaking ones such as Canada, Australia, New Zealand, and the United Kingdom.
 The pictogram makes exit signs readily understandable by anyone regardless of the language they speak. In addition, when it is used with a directional arrow (as the example in the attached PDF shows), this arrow is much larger compared to the arrow on textual exit signs.
 This enhances safety by making it easier for occupants to find the exit, especially if it's a building that they're not familiar with.
 It should be noted that the pictogram has been used in some buildings in Massachusetts and New York State. These installations were likely individual variances.
2. Why is the proposed code change a reasonable solution?
 This change will allow the pictogram on exit signs in all buildings. This change does not require it, so new and existing buildings that prefer to continue using textual exit signs will still be permitted to do so.
3. What other factors should the TAG consider?
 Eventually requiring the pictogram on exit signs in occupancies that are likely to attract international visitors (e.g. some Group A occupancies such as airport terminals, and Group R-1 occupancies such as hotels.)

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
 No, the manufacturing costs and installation procedures for an exit sign that has the pictogram are identical to one that uses the word "EXIT".
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
 N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
 N/A
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.

No, the inspection procedures for an exit sign that has the pictogram are identical to one that uses the word "EXIT".

5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.

No, there is no cost impact from this change.

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Building owners and patrons.

2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.

Another option could have been to wait for an IBC/IFC code change. However, earlier this year at the ICC Committee Action Hearings in Orlando, there was significant confusion over the applicability of the proposed change as the IBC/IFC change proposal (E78-24) appeared to only apply to externally illuminated exit signs, not internally illuminated ones. This state-level amendment proposal is designed to avoid this confusion by creating a new subsection that applies to both types of exit signs.

3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?

The probable costs or consequences if this change were not adopted are:

People may be less easily able to recognize the direction of the emergency exit due to the small directional arrows on textual exit signs.

International visitors to Minnesota may be less likely to recognize emergency exits in buildings.

Conversely, Minnesotans who travel internationally may be less likely to recognize emergency exits in buildings they visit on their travels.

Building owners who, in the absence of this code change, wish to use the pictogram on the exit signs in their building will have to apply for a variance.

4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.

A potential issue that may come up is a purported conflict between this code change and OSHA regulations. (In areas where MNOSHA does not have its own regulations, it enforces the federal OSHA regulations. There do not appear to be MNOSHA-specific regulations regarding exit signs, so the federal OSHA regulations are applicable and I'll use them for this analysis.)

Despite what initially appears to be a conflicting requirement in 29 CFR 1910.37(b), 29 CFR 1910.35 provides that compliance with applicable provisions of NFPA 101, 2009 edition, will be considered compliant with regards to applicable provisions of OSHA's means of egress requirements. Since its 2003 edition, NFPA 101 expressly allows the pictogram on exit signs, including in lieu of the word "EXIT", if allowed by the state/local jurisdiction, per sections 7.10.3.2 and A.7.10.3.2, the latter of which states: "Pictograms are permitted to be used in lieu of, or in addition to, signs with text."

Therefore, OSHA regulations do not preempt or otherwise conflict with this code change.

***Note: The information you provide in this code change proposal form is considered Public Data and used by the TAG to consider your proposed modification to the code. Any code change proposal form submitted to DLI may be reviewed at public TAG meetings and used by department staff and the Office of Administrative Hearings to justify the need and reasonableness of any proposed rule draft subject to administrative review and is available to the public.

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CCP24_110 example

Example of what the pictogram looks like (with a directional arrow):





CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Gregory Metz

Date: 7/18/2024

Email address: Greg.Metz@State.MN.US

Model Code: 2024 IBC

Telephone number: 651-284-5884

Code or Rule Section: 3314.1

Firm/Association affiliation, if any: DLI/CCLD

Topic of proposal: Fire Watch

Code or rule section to be changed: 3114.1 Fire Watch

Intended for Technical Advisory Group ("TAG"): MR 1305

General Information

Yes No

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

change language contained the model code book? If so, list section(s).

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in the model code book? If so, list section(s).

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.
No

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

3314.1 Fire watch during construction. ~~A~~ When required by the fire code official, fire watch shall be provided during nonworking hours ~~for construction that exceeds 40 feet (12 192 mm) in height above the lowest adjacent grade at any point along the building perimeter~~, for new multi-story construction ~~with an aggregate area exceeding 50,000 square feet (4645 m²) per story or as required by the fire code official.~~

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)

Model code mandates a fire watch under certain conditions for building size and when construction exceeds normal limits of firefighting capability from the ground. The model code imposes expensive staffing for fire watch when the service may not be necessary.

2. Why is the proposed code change a reasonable solution?
The proposed change gives the discretion to the fire official to require a fire watch or not.
3. What other factors should the TAG consider?

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
The change will decrease construction costs by not mandating fire watch for all buildings taller than three stories (40 feet) or 50,000 square feet.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
N/A
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
N/A
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is

any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.

no

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Architects, engineers, developers, building owners, code officials, firefighters

2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
No

3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Added cost to buildings, especially multi-family housing with no ultimate benefit to the owner or occupants.

4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.

No

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3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

202 – both codes. (Add this definition to the list.)

BREAK-GLASS COVER. A protective cover that consists of a frame and a breakable piece of glass or other frangible element and is installed over a manual fire alarm box in order to act as a deterrent to false alarms.

902.1 – Fire Code only. (Add this definition to the list of Chapter 2 definitions.)

BREAK-GLASS COVER.

New section – both codes:

907.4.2.5.1 Break-glass covers.

Break-glass covers shall be permitted to be installed, provided that the following requirements are met:

1. The break-glass cover shall be equipped with an appurtenance to allow the glass to be broken in case of fire, without undue risk of injury.
2. A means shall be provided to allow authorized personnel to open the break-glass cover without breaking the glass.
3. When the means specified in item 2 is used to open the break-glass cover, the manual fire alarm box shall be capable of being reset and operationally tested, without removing or disassembling additional elements of the break-glass cover such as a mounting bracket.

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No.

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)
Currently, if a building is facing a problem of malicious false alarms, an option that may seem compelling, and is currently allowed by the code for many occupancies, is to remove the manual fire alarm boxes. This increases the risk that the alarm will not be promptly activated in the event of an actual fire.
In addition, even if one manual fire alarm box remains installed (e.g. in a security office), this is problematic for high-rise buildings, as it inherently conflicts with floor-by-floor alarm signaling.

A different option against false alarms is to use "lift-up" protective covers, but these are better suited for protection from accidental damage (e.g. in a school gymnasium) as opposed to malicious false alarms.
This change is meant to provide an additional, voluntary option – break-glass covers – to discourage malicious false alarms without interfering with legitimate alarms.
Currently, the IBC and IFC are silent on break-glass covers – while I am aware of installations in Minnesota and other states, approval is up to the whim of the building official and fire official, and several products currently on the market contain a notice in their documentation: "Obtain local fire marshal approval prior to installation".
2. Why is the proposed code change a reasonable solution?
Break-glass covers provide a strong deterrent effect against false alarms, without preventing the alarm from being activated in an actual fire. This change allows, but does not require, break-glass

covers on a statewide basis, eliminating the guesswork of whether or not the local officials will approve it.

This code change has several criteria that break-glass covers must meet in order to avoid potential unintended consequences, specifically:

1. A means must be provided to allow the glass to be broken in case of fire, without risk of injury. This means is usually a piece of metal that hangs from the cover's frame. (This is because if the glass had to be struck by hand, the person reporting the fire would be at risk of being cut.)
2. A means must be provided to allow the cover to be opened by authorized personnel without needing to break the glass. (This is because if the glass had to be broken every time the manual fire alarm box is tested, it would be very wasteful.)
3. The manual fire alarm box must be capable of being reset and operationally tested when authorized personnel open the cover using the means in item 2, without having to disassemble the break-glass cover's mounting bracket. (This is because if a mounting bracket had to be taken off the wall every time the manual fire alarm box is tested or reset, it would be unnecessarily time-consuming and cumbersome.)

3. What other factors should the TAG consider?

Whether to work with the Legislature to strengthen the criminal laws regarding false alarms (MN Statute 609.686). Currently the crime of giving a false fire alarm is only a misdemeanor even though a false 911 call is a gross misdemeanor (MN Statute 609.78, subdivision 2).

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
Slight cost increase for buildings that choose to install break-glass covers, offset by a decrease in business interruption due to the reduced risk of false alarms.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
Yes, the benefit is that the break-glass covers deter malicious false alarms. False alarms lead to serious operational disruption for the building, significant expenses in the fire department response, as well as "alarm fatigue" where occupants ignore the alarm signal because they automatically assume it is false. Therefore, the benefits of installing break-glass covers outweigh the cost.
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
The cost would be incurred by building owners that choose to install break-glass covers.
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
There is no compliance cost as the proposed code change does not require break-glass covers, it just allows them provides criteria that must be met if they are voluntarily installed. There would be no significant increase to enforcement costs, as enforcing the criteria would require no more than a couple additional minutes to inspect each manual fire alarm box that is protected by a break-glass cover.
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
No, this code change allows but does not require break-glass covers, so there is no cost of complying.

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Building owners and fire departments.

2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
Current means could include reducing most or all manual fire alarm boxes, however, this also increases the risk that the alarm will not be promptly activated in an actual fire – and it conflicts with floor-by-floor alarm signaling in high-rise buildings.

This proposed change does not take away this existing option, rather, it allows another option.

3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
Building owners would have to choose between leaving their manual fire alarm boxes unprotected and at risk of false alarms, removing the manual fire alarm boxes entirely which increases the risk that the alarm will not be promptly activated in an actual fire, or hoping that the building and fire officials will approve the use of break-glass covers. It is even possible that a building official and a fire official could offer conflicting opinions regarding break-glass covers as the existing code is silent on this matter.

4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.
No.

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Example of a break-glass cover. The means for authorized personnel to open the cover is not visible from this angle, but on this model it is a tamper-resistant screw located at the bottom of the frame, which allows the frame to be removed with the glass:



Example of a break-glass cover where the means for authorized personnel to open the cover is a keylock. The lock unlocks the top bezel, which allows the glass to slide up and out:

