Lockdown plans

This edition of the Code Outreach Program is intended to guide readers on the provisions for lockdown plans, lockdown plan drills, and locking arrangements in Group E occupancies.

The 2020 Fire Code of New York State (2020 FCNYS) includes a revision and expansion of Section 404 titled “Evacuation and Lockdown Plans.” A lockdown is defined in the 2020 FCNYS as:

An emergency situation, in other than a Group I-3 occupancy, requiring that the occupants be sheltered and secured in place within a building when normal evacuation would put occupants at risk.

Lockdown plans

Lockdown plans are required to comply with Section 404.2.3 of the 2020 FCNYS and must be approved by the fire code official. Lockdown plans must contain the following (see Section 404.2.3.1):

- "Identification of individuals authorized to issue a lockdown order" and those "authorized to issue a lockdown termination order."
- "Security measures used during normal operations, when the building is occupied, that could adversely affect egress or fire department operations."
- "A description of identified emergency and security threats addressed by the plan, including lockdown procedures to be implemented for each threat condition."
- "Means and methods of initiating a lockdown plan for each threat condition [...]."
- "Procedures for reporting to the fire department any lockdown condition affecting egress or fire department operations."
- "Procedures for determining and reporting the presence or absence of occupants to emergency response agencies during a lockdown."
- "Means for providing two-way communication between a central location and each area subject to being secured during a lockdown."
- "Identification of the prearranged signal for terminating the lockdown."
- "Procedures for unlocking doors and verifying that the means of egress has been returned to normal operations upon the termination of the lockdown."
- "Training procedures and frequency of lockdown plan drills.”

Note also that according to Section 406.3.4, “where a facility has a lockdown plan, employees shall be trained on their assigned duties and procedures in the event of an emergency lockdown.”

Lockdown plan drills

Lockdown plan drills “shall be conducted in accordance with the approved plan” and “shall not be substituted for fire and evacuation drills required by Section 405.2.” (See 404.2.3.2 of the 2020 FCNYS.)

Per Section 403.5.4, the frequency and timing of emergency evacuation drills in Groupe E occupancies shall be in accordance with the requirements of Education Law §807(1) which provides that four of the required drills shall be lockdown drills. Questions pertaining to the regulations of the New York State Education Department (NYSED) should be directed to NYSED Facilities Planning.

Reliability and Maintenance of the Means of Egress

Some security devices and locking arrangements, which are designed to keep intruders from entering a room during a lockdown, "restrict, control, or delay egress" (Section 1031.2.1), and could be "obstructions or impediments to full instant use” of the means of egress (Section 1031.2). However, Section 1031.2.2 indicates that “In Group E occupancies, […] egress doors from classrooms, offices and other occupied rooms shall be permitted to be provided with locking arrangements designed to keep intruders from entering the room” (emphasis added). The section does not give a blanket approval for these types of locking arrangements, to employ this Section, all the conditions listed in the Section shall be met:

1. The door shall be capable of being unlocked from outside the room with a key or other approved means.
2. The door shall be openable from within the room in accordance with Section 1010.1.9.
3. Modifications shall not be made to existing listed panic hardware, fire door hardware or door closers.
4. Modifications to fire door assemblies shall be in accordance with NFPA 80.

These maintenance provisions resemble those in the design and construction provisions of Section 1010.1.4.4 of the 2020 FCNYS. Note that Section 1010.1.4.4 includes provisions for the remote operation of locks.

Please look for our next edition of the Code Outreach Program at the beginning of next month.

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