

**NFPA 101, Life Safety Code Comparison (2006 to 2024)**  
**Chapter 33 - Existing Board and Care**

NFPA 101 - 2006 Section	NFPA 101 - 2024 Section	Summary of Change	Effect
N/A	33.1.3.3: No board and care occupancy shall have its sole means of egress or means of escape pass through any nonresidential or non-health care occupancy in the same building.	Newer language limits egress options in multiple occupancy / tenant buildings.	Would be a very uncommon situation...minimal impact.
33.1.7: <b>Changes in Group Evacuation Capability.</b> A change in evacuation capability to a slower level shall be permitted where the facility conforms to the requirements applicable to new construction, conversions, and the new evacuation capability.	33.1.8* <b>Changes in Group Evacuation Capability.</b> A change in evacuation capability to a slower level shall be permitted where the facility conforms to one of the following requirements: (1) The requirements of Chapter 32 applicable to new board and care facilities. (2) The requirements of Chapter 33 applicable to existing board and care facilities for the new evacuation capability, provided that the building is protected throughout by an approved, supervised automatic sprinkler system complying with 32.3.3.5.	Newer language permits additional options when there is a change to a slower evacuation level. Facility can still follow "existing" requirements as long as the building is sprinklered in accordance with NFPA 13.	Beneficial.
N/A	33.2.1.4 <b>Multiple-Level Buildings.</b> For purposes of applying requirements of this chapter that utilize the term level of exit discharge, including determination of stories in height as addressed in 4.6.3, the level of exit discharge shall be permitted to be the combination of floor levels as addressed in 33.2.1.4.1, 33.2.1.4.2, or 33.2.1.4.3.	New language provides clarity around what is considered the level of exit discharge.	Clarity in more recent editions is beneficial.
N/A	33.2.2.5.5.3: Door-locking arrangements shall be permitted where the clinical needs of residents require specialized security measures or where residents pose a security threat, provided all of the following conditions are met: (1) Staff can readily unlock doors at all times in accordance with 33.2.2.5.5.4 (2) The building is protected by an approved automatic sprinkler system in accordance with 33.2.3.5	Newer language permits door locking arrangements based on clinic needs provisions. 33.3.2.2.2 also permits this for large facilities.	Additional door locking options are beneficial.
N/A	33.2.3.2.6 <b>Medical Gas.</b> Medical gas storage shall be in accordance with Section 8.7 and the provisions of NFPA 99 applicable to operation, maintenance, and testing.	New to the 2021 edition. Requires medical gas storage to be in compliance with NFPA 99. 33.3.3.2.4 addresses this for large facilities.	Good practice and should have minimal consequence since quantities are usually small in Board and Care.

N/A	<p>33.2.3.5.7: Attics shall be protected in accordance with 33.2.3.5.7.1 or 33.2.3.5.7.2.</p> <p>33.2.3.5.7.1: Where an automatic sprinkler system is installed, attics used for living purposes, storage, or fuel-fired equipment shall be protected with automatic sprinklers that are part of the required, approved automatic sprinkler system in accordance with 9.7.1.1.</p> <p>33.2.3.5.7.2: Where an automatic sprinkler system is installed, attics not used for living purposes, storage, or fuel-fired equipment shall meet one of the following criteria:  (1) Attics shall be protected throughout by a heat detection system arranged to activate the building fire alarm system in accordance with Section 9.6.  (2) Attics shall be protected with automatic sprinklers that are part of the required, approved automatic sprinkler system in accordance with 9.7.1.1.  (3) Attics shall be of noncombustible or limited-combustible construction.  (4) Attics shall be constructed of fire-retardant-treated wood in accordance with NFPA 703.  (5) Attics shall be protected by heat alarms arranged to provide occupant notification in accordance with 33.2.3.4.3.</p>	Newer requirements address attic protection. Depending on the use of the attic space, the attic must either be sprinklered, have heat detection, be constructed of non-combustible construction (with no storage). This requirement was the direct result of a fatal fire at a group home. The same requirement for large facilities is found in 33.3.3.5.4.	This could potentially have an impact on existing buildings that do not currently have sprinkler protection throughout their attics.
N/A	<p>33.2.4 <b>Alcohol-Based Hand-Rub Dispensers.</b>  The installation and maintenance of alcohol-based hand-rub dispensers and the storage of alcohol-based hand-rub solutions in accordance with 8.7.3.3 shall be permitted.</p>	Clarifies the location or ABHR dispensers and storage. 33.3.4.2 addresses the same for large facilities.	Minimal impact...good to have guidelines.
33.3.2.9 <b>Emergency Lighting.</b> Emergency lighting in accordance with Section 7.9 shall be provided in all buildings with more than 25 rooms, unless each sleeping room has a direct exit to the outside of the building at ground level.	<p>33.3.2.9 <b>Emergency Lighting.</b>  Emergency lighting in accordance with Section 7.9 shall be provided in all facilities meeting any of the following criteria:  (1) Facilities having an impractical evacuation capability  (2) Facilities having a prompt or slow evacuation capability with more than 25 sleeping rooms, unless each sleeping room has a direct exit to the outside of the building at the finished ground level.</p>	All facilities with impractical evacuation require emergency lighting regardless of the number of sleeping rooms.	Minimal impact
33.3.3.5.6 <b>Portable Fire Extinguishers.</b> Portable fire extinguishers in accordance with 9.7.4.1 shall be provided near hazardous areas.	33.3.3.5.7 <b>Portable Fire Extinguishers.</b> Portable fire extinguishers shall be provided in accordance with Section 9.9.	2006 only required fire extinguishers at hazardous area locations. They are now required to meet NFPA 10...throughout the building.	Minimal impact...NFPA 10 has been the best practice for quite some time.
N/A	33.3.3.6.6.4 In buildings protected throughout by an approved automatic sprinkler system installed in accordance with 33.3.3.5, doors shall be equipped with latches for keeping the doors tightly closed.	While resident sleeping rooms or other ancillary room doors in a sprinklered building are not required to be self-closing, this provision does require them to be latching.	Minimal impact
33.3.3.7.4 Smoke barriers shall not be required in buildings protected throughout by an approved automatic sprinkler system installed in accordance with 33.3.3.5.	33.3.3.7.4 Smoke barriers shall not be required in buildings having prompt or slow evacuation capability where protected throughout by an approved automatic sprinkler system installed in accordance with 33.3.3.5.	2006 did not require smoke barriers in a fully sprinklered building regardless of the evacuation designation. 2024 requires smoke compartmentation for impractical evacuation designation even with sprinkler protection.	Possible impact on older buildings that were not designed and constructed with smoke barrier walls and are classified as impractical evacuation.
N/A	33.3.3.8.1 Cooking facilities shall be protected in accordance with 9.2.3, unless otherwise permitted by 33.3.3.8.2, 33.3.3.8.3, or 33.3.3.8.4.	Newer editions provide specific guidance on how residential style cooking equipment can be incorporated into the building for a home-like feel. This was not addressed and generally seen as not permitted in 2006.	Beneficial

N/A	33.7.6 <b>Staff.</b> Staff shall be on duty and in the facility at all times when residents requiring evacuation assistance are present.	New section in newer editions requiring staff on-site at all times.	Minimal unless operating under private home health model where aids are not employees.
N/A	33.7.7 <b>Inspection of Door Openings.</b> Door assemblies for which the door leaf is required to swing in the direction of egress travel shall be inspected and tested not less than annually in accordance with 7.2.1.14.	New requirement in more recent editions. Will require annual inspection, testing and maintenance schedule and documentation.	Likely impact...many organizations not doing this.

**NFPA 25, Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems Comparison (2011 to 2023)**  
**Chapters 4, 5, 6, 8, 13, 14**

NFPA 25 - 2011 Sections	NFPA 25 - 2023 Sections	Summary of Change	Effect
<p>4.1.1.2 Inspection, testing, and maintenance shall be performed by personnel who have developed competence through training and experience.</p>	<p>4.1.1.3 Inspection, testing, and maintenance shall be performed by qualified personnel.</p> <p>4.1.1.3.1* Qualified personnel shall meet at least one of the following qualifications:</p> <p>(1) Meets the requirements and training for a given field acceptable to the authority having jurisdiction</p> <p>(2) Is certified by a nationally recognized fire protection certification organization acceptable to the authority having jurisdiction</p> <p>(3) Is registered, licensed, or certified by a state or local authority to perform inspection, testing, and maintenance of water-based fire protection systems</p>	<p>New language...introduces term "qualified". Not to be confused with "licensed". AHJ's could get confused. Could limit in-house ITM.</p>	<p>Likely minimal as most facilities outsource their sprinkler ITM. However, it is more restrictive.</p>

## NFPA 96, Standard for the Ventilation Control and Fire Protection of Commercial Cooking Operations (2011 to 2024)

NFPA 96 - 2011 Sections	NFPA 96 - 2024 Sections	Summary of Change	Effect
N/A	12.1.4. Instructions shall be provided to new employees on hiring and to all employees annually on the use of portable fire extinguishers and the manual actuation of the fire-extinguishing system.	New Requirement for training new food service staff upon hire and all kitchen staff annually.	New and applicable to all.