

Clarification for access control egress doors

Additional information to our Health Care Associations concerning OSFM and access control egress doors. Below is the code requirement for K222-Egress Doors. We ask that each facility Administrator do an assessment of your facility and the types of locks you have throughout your building.

You will be asked to provide this information to our surveyor at the beginning of an inspection. You will need to provide a clinical need, security threat and/or a special need assessment for any area of the building equipped with Access Control Locks. If a facility currently has access-controlled egress doors for the entire facility, this will most likely be a citation. You as a facility must justify that there are clinical needs or special needs for all residents/patients in the facility.

This will not affect 15-second delayed egress locks that are installed on exit doors.

What does the code require?

K222 - Egress Doors:

Doors in a required means of egress shall not be equipped with a latch or a lock that requires the use of a tool or key from the egress side unless using one of the following special locking arrangements:

CLINICAL NEEDS OR SECURITY THREAT LOCKING

Where special locking arrangements for the clinical security needs of the patient are used, only one locking device shall be permitted on each door and provisions shall be made for the rapid removal of occupants by: remote control of locks; keying of all locks or keys carried by staff at all times; or other such reliable means available to the staff at all times. 18.2.2.2.5.1, 18.2.2.2.6, 19.2.2.2.5.1, 19.2.2.2.6

SPECIAL NEEDS LOCKING ARRANGEMENTS

Where special locking arrangements for the safety needs of the patient are used, all of the Clinical or Security Locking requirements are being met. In addition, the locks must be electrical locks that fail safely so as to release upon loss of power to the device; the building is protected by a supervised automatic sprinkler system and the locked space is protected by a complete smoke detection system (or is constantly monitored at an attended location within the locked space); and both the sprinkler and detection systems are arranged to unlock the doors upon activation. 18.2.2.2.5.2, 19.2.2.2.5.2, TIA 12-4