

4-1.3 DECISION NO. D-36

CLARIFICATION OF THE APPLICATION OF FIRE PROTECTION/LIFE SAFETY CODE(S)

Issue:

The Indian Health Service (IHS) have in the past been applying the Life Safety Code (LSC), NFPA 101, and the building codes regarding life safety requirements for new and existing structures differently.

Decision:

The Health Facilities Advisory Committee (HFAC) recommended, effective immediately, the following guidelines apply to all new and existing IHS health care facilities and quarters.

The NFPA shall be used exclusively in IHS for determining and maintaining the life safety requirements for all occupancies in new and existing buildings. The building codes shall not be used for life safety requirements. In fact, when there is a conflict between any NFPA codes and a building code, NFPA codes shall govern.

Exceptions:

1. Existing structures that in the past were designed using a building code for determining life safety requirements must have all life safety parameters inspected, tested and maintained or all removed if they are not required by the LSC, and
2. Structures will not be maintained simultaneously in partial compliance with LSC and a building code. Facility Managers must maintain parameters or remove all parameters not required by LSC.

Reference:

These guidelines will be included in Chapter 4-1, Application of Fire Protection /Life Safety Codes, Health Facilities Advisory Committee, Part 4, Volume I of the Technical Handbook for Environmental Health and Engineering.

Adopted by HFAC on September 2, 1998.

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