

Guidance for complying with Door Inspection Requirement

Summary: While required door inspections may be performed by a third-party contractor, door inspections can also be performed by qualified in-house personnel. Specifically, door inspections may be performed by any individual who can demonstrate knowledge and understanding of doors and their components as well as an understanding of codes and standards related to this topic. This standard can be met by qualified in-house personnel or a qualified third-party contractor.

Background information: In light of recent feedback and potential confusion from regulated parties that the Office of the State Fire Marshal (OSFM) was made aware of, OSFM is providing the following information to all stakeholders, businesses, and interested parties regarding requirements for the inspection of doors as prescribed in the Part 100 (41 Ill. Adm. Code 100) adoption of NFPA 101, *Life Safety Code* (2015 edition) which became effective on January 1, 2020.

The 2015 edition of NFPA 101 requires inspection of door assemblies to ensure proper function and operability of these egress and fire protection components during an emergency as an integral part of life safety and egress for the structure.

There are four different sections of NFPA 101, *Life Safety Code* (2015) that have requirements for door inspections, and which business owner may see violations noted on inspection reports:

- Section 7.2.1.15: Applies to means of egress doors.
- Section 8.2.2.4: Applies to doors that are required to be smoke leakage-rated in accordance with NFPA 105, *Standard for Smoke Door Assemblies and Other Opening Protectives*.
- 8.3.3.13: Applies to fire-rated door assemblies that are required to be inspected and tested in accordance with NFPA 80, *Standard for Fire Doors and Other Opening Protectives*.
- Section 8.8: Applies to self-closing or automatically closing doors.

NFPA 80, 101, and 105 (as identified above) require acceptance and functional testing and inspection of existing door assemblies be performed by individuals who can demonstrate knowledge and understanding of doors and their components as well as an understanding of codes and standards related to this topic.

While a third-party contractor or inspection company can be hired to conduct the required testing and inspection of door assemblies, these standards can alternatively be met by qualified in-house personnel who can demonstrate knowledge and understanding of doors and their components as well as an understanding of codes and standards related to this topic. The choice between utilizing an inspection conducted by qualified in-house personnel or the hiring of an independent third-party contractor is entirely up to the business. The Office of the State Fire Marshal takes no position on how a business chooses to conduct the required door inspections so long as the inspections satisfy the standards set forth in the applicable codes.

Should a business choose to have qualified in-house personnel conduct the required testing and inspection of existing door assemblies, someone familiar with all the functions of doors and their components can prepare the required inspection program in accordance with the Life Safety Code sections identified above to ensure all inspection and testing requirements are identified and followed. Also, it is important for documentation of all inspections, maintenance, and any repairs conducted, be readily available to OSFM inspectors when conducting Life Safety Code inspections.

OSFM is available to answer questions related to this topic, however, OSFM will not participate in the development of testing programs or checklists, nor review checklists for compliance with NFPA 101, Life Safety Code (2015).