

**OFFICE OF THE STATE FIRE MARSHAL  
STATE OF ILLINOIS**

Statute, Rule or Standard Policy Interpretation:     **Application of the Fire Sprinkler  
Dormitory Act**

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Title:	Fire Sprinkler Dormitory Act
Part:	110 ILCS 47
Section Number:	47/5 And 47/10
Section Title:	N/A
Policy Number:	11-TS-001

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**Purpose:**                     This instruction provides for current policy and guidance to ensure uniform enforcement of the Fire Sprinkler Dormitory Act [110 ILCS 47]. Specifically, the policy identifies a definition for the term “dormitory” which is not offered in the Act and also clarifies the deadline date for installation of fire sprinkler systems in dormitories of post-secondary educational institutions in Illinois. This policy also offers guidance on the installation of sprinklers in dormitory occupancies that may be required to be protected by automatic sprinklers by rules or codes with compliance dates that differ from the Fire Sprinkler Dormitory Act.

**Scope:**                     Statewide

**Current Code:**            The Fire Sprinkler Dormitory Act requires that all dormitories of post-secondary educational institutions be protected by automatic fire sprinkler systems by 2013. However, the Office of the State Fire Marshal (OSFM) receives questions relative to the following issues related to the Act:

- 1) With the term “dormitory” not being defined in the Act, what post-secondary educational institution buildings are to be considered dormitories, and thus need to be protected by automatic sprinkler systems? and
- 2) With the Act indicating that “*fire sprinkler systems are required in the dormitories of all post-secondary educational institutions by 2013*” does this mean by the beginning of 2013 (January 1, 2013) or the end of 2013 (December 31, 2013)?
- 3) If a dormitory is required to be protected by automatic fire sprinklers in accordance with other rules applied by the OSFM (e.g., the adopted NFPA Life Safety Code) must the sprinklers be put in immediately or are all dormitory occupancies allowed to wait until the 2013 compliance date of the Fire Sprinkler Dormitory Act?
- 4) The OSFM-adopted Life Safety Code classifies some specific dormitory arrangements as apartment building occupancies. Do the LSC allowed reclassifications apply to dormitories at post-secondary educational facilities?

**Enforcement Policy:**    Finding no definition of “dormitory” in the Fire Sprinkler Dormitory Act, the OSFM applies the definition of “dormitory” found in the State-adopted NFPA Life Safety Code (adopted via administrative rule at 41 Ill. Adm. Code 100) as the applicable criteria. Specifically, the Life Safety Code defines “dormitory” in Section 3.3.46:

### *3.3.46 Dormitory.*

*A building or a space in a building in which group sleeping accommodations are provided for more than 16 persons who are not members of the same family in one room or a series of closely associated rooms under joint occupancy and single management, with or without meals, but without individual cooking facilities.*

According to the NFPA Life Safety Code, some dormitory room arrangements may be classified as “apartment building occupancies” rather than dormitories. In light of the “dormitory” definition adopted above, the OSFM defers to the Life Safety Code definition to determine what is and what is not a dormitory, the following language from the LSC is applicable: “Any dormitory divided into suites of rooms, with one or more bedrooms opening into a living room or study that has a door opening into a common corridor serving a number of suites, shall be classified as an apartment building”.

If the classification of a building is determined to be an “apartment building” rather than a dormitory, the Fire Sprinkler Dormitory Act would not apply to the building. In such cases, the requirements of the Life Safety Code would apply regarding the necessity for fire sprinkler system installation and the allowance for compliance until 2013 offered in the Act would not be applicable. In accordance with OSFM-adopted 2000 edition of the Life Safety code, “New Apartment Buildings” (those constructed or converted to an apartment building on or after January 1, 2002) are required to be protected by fire sprinkler systems unless every unit in the building has an exit door opening directly to the street or yard at ground level or has direct access to an outside stair that serves not more than two units, both of which are located on the same floor or where every dwelling unit has direct access to an interior stair serving only that unit, and such stair is separated from all other portions of the building by fire barriers having a 1-hour fire resistance rating. Thus, most new apartment buildings will likely require sprinkler protection. For “Existing Apartment Buildings” (those constructed or converted to apartment building use prior to January 1, 2002), the Life Safety Code offers multiple options for compliance. Some of those options include partial or total sprinkler protection. Therefore, sprinkler systems may be required in existing apartment buildings.

Regarding the date of required compliance, the OSFM interprets the Act’s language “by 2013” to mean as of January 1, 2013. Therefore, all post-secondary educational institution dormitories are required to be protected by automatic fire sprinkler systems as of January 1, 2013.

Regarding the applicability of other codes (including the OSFM-adopted NFPA Life Safety Code) that may require the installation of sprinklers in dormitory occupancies: In consideration of the Fire Sprinkler Dormitory Act specifically addressing requirements for sprinkler system installation in post-secondary educational institution dormitories, it is the policy of the OSFM to allow such occupancies until 2013 to complete the installation of required automatic sprinkler systems in dormitory buildings. However, all buildings are expected to be in compliance with the other requirements of the Life Safety Code at all times. Also, it should be noted that, if a dormitory is taking advantage of any of the less stringent requirements (design options or “trade offs”) allowed by the Life Safety Code, such sprinkler systems must be currently installed, functional and Life Safety Code-compliant. Such systems cannot take, and will not be afforded, any

installation extensions. Furthermore, dormitory occupancies that are currently protected by an automatic sprinkler system are required to inspect, test and maintain that sprinkler system in accordance with applicable codes and are not allowed to ignore these duties until 2013.

Reason: To provide guidance and ensure the uniform enforcement of the Fire Sprinkler Dormitory Act in Illinois post-secondary educational institutions.

Effective Date: February 2011 (with inclusion of information supplied to post-secondary educational institutions in a letter from the OSFM in March 2006).