



Florida Division of State Fire Marshal

The Florida Fire Marshals and Inspectors Association,
"Organization" (§633.026)

Informal Interpretation Request

Date: 8/23/23

NFPA Document Number: 101 2018 Florida Specific

Paragraph Reference: Chapter 18.3.4.3.1/19.3.4.3.1 and A18.3.4.3.1/A19.3.4.3.1

Explain how the Petitioner's substantial interests are being affected by the LFO's interpretation of the NFPA citation above:

Notification appliances within patient care areas are only intended to notify staff. The Florida Building Code provides a list of locations where staff are present and notification appliances are to be provided. This was coordinated with the FFPC in the 2020 edition in a collaboration between the FL State Fire Marshal's office and the Agency for Health Care Administration who is responsible for hospital construction and licensing. Requiring devices in excess of what the Building Code specifically allows for Healthcare (I-2) Occupancies, will cause a conflict with the building code. A more restrictive interpretation of the FFPC (additional devices) will actually result in a system that will not comply with the building code. Although the body of the text in the FFPC does not mirror the Building Code, the Annex material provides additional information that does align the two codes.

Enter a statement of the LFO's interpretation of the NFPA citation above and identify the manner in which the statement was rendered:

The LFO's interpretation of the section of the FFPC is that all corridors are required to have audible and visual notification appliances because staff may be in the corridor when the alarm is activated.

Enter a statement of the interpretation that the Petitioner contends should be given to the NFPA citation above and a statement supporting the Petitioner's interpretation:

The intent of the Private Mode Fire Alarm notification in patient care areas within hospitals is only intended to notify staff. Notification devices are provided where Staff are normally located (not only in the zone of alarm activation but in adjacent zones and at the constantly manned security center). This results in response from nursing staff as well as security staff. The Florida Fire Prevention Code was modified in the 2020 edition to avoid conflicts with the Florida Building Code which mandated specific locations where staff are normally located. Patient rooms and corridors were specifically omitted.

(See additional text form FFPC/FBC/NFPA 72 and NFPA 99 below)

Enter the Petitioner's question concerning an interpretation of the FFPC:

Is it the intent of the FFPC 18.3.4.3.1/19.3.4.3.1 to require audible and visual devices throughout the corridors of patient care areas in a Healthcare Occupancy?

Rulings herein expressed are not the formal position of the Florida State Fire Marshal's Office

Florida Fire Marshals and Inspectors Association | P. O. Box 325 Hobe Sound, FL 33475 | Tel 772-349-1507 | Fax 772-546-6675

Website: www.FFMIA.org | Email: info@ffmia.org | http://www.myfloridacfo.com/sfm/bfpr/bfpr_index.htm



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Committees' majority vote: No

Providing notification devices in corridors of patient care areas can cause risks to patient healthcare during procedures and distressing patients unnecessarily during alarm activations. The intent here is that staff is notified, and staff will respond. The code intent of providing staff notification and staff response does not require notification devices in corridors of patient care areas. The AHJ should ensure that proper hospital procedures are in place for staff to appropriately respond to an alarm signal.

Region 1 - Delegate: Byron Bennett, North Bay Fire Control District
Alternate: William (Michael) Hall, Marianna Fire Rescue

Region 2 - Delegate: Jason R. Greisl, Tallahassee Fire
Alternate: Vacant

Region 3 - Delegate: James Groff, Jacksonville F. R. (Committee Chair)
Alternate: Silver Chip Ware

Region 4 - Delegate:
Alternate: Karl Thompson

Region 5 - Delegate: Anthony Apfelbeck, Altamonte Springs Building Department
Alternate: Christina Diaz, Seminole County Fire Department

Region 6 - Delegate: Robert Salvaggio, Cape Coral Fire Rescue
Alternate:

Region 7 - Delegate: (Kenneth) Sean Brown, Broward Sheriff fire Rescue & emergency Services
Alternate: Rebecca Geimer Tamarac Fire Rescue

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