


BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, APEGBC, BOABC, POABC

File No: 12-0071

INTERPRETATION

Page 1 of 4

Interpretation Date:	April 19, 2016
Building Code Edition:	BC Building Code 2012
Subject:	Occupancy classification of memory care facilities
Keywords:	Occupancy classification, memory care, special care, alzheimers, dementia, security control, impeded egress, contained use, locking devices
Building Code Reference(s):	Div A 1.4.1.2.(1) definitions of "care", "care occupancy", "contained use area", "detention occupancy", "impeded egress zone", "treatment", "treatment occupancy", Div B Appendix A A-3.1.2.1.(1), 3.2.2.19, 3.3.1.13.(2), 3.3.3, Div B Appendix A A-3.3.3.1.(1), 3.3.3.7, 3.4.6.16.(1),
Question:	<ol style="list-style-type: none">1. What is the appropriate occupancy classification for special care facilities with occupants (more than 10 persons) needing memory care treatment such as for alzheimers or dementia?2. What is the appropriate occupancy classification for special care facilities with occupants (more than 10 persons) needing memory care treatment such as for alzheimers or dementia, and where in addition, special security control is also provided for the safety of such occupants?
Interpretation:	<ol style="list-style-type: none">1. Group B, Division 2 or 3. <p>Treatment or care facilities without correctional or detention intentions may include special memory care. Occupants in such facilities may not be expected to be readily moved or evacuated without some degree of assistance or additional protection features, such as for example, additional fire compartment zone separations in the floor areas to allow transfer into protected floor areas in an emergency.</p> <p>There is a wide range of levels of severity of alzheimers or dementia. Provincial community care regulation and licensing, and medical and care facilities operators and professionals, are typically involved in determining and deciding on, the level of care necessary and the appropriate type of facility needed, for the occupants needing memory care.</p> <p> R. J. Light, Committee Chair</p>
<small>The views expressed are the consensus of the joint committee with members representing AIBC, APEGBC, BOABC, and POABC, which form the BC Building Code Interpretation Committee. The purpose of the committee is to encourage uniform province wide interpretation of the BC Building Code. These views should not be considered as the official interpretation of legislated requirements based on the BC Building Code, as final responsibility for an interpretation rests with the local <i>Authority Having Jurisdiction</i>. The views of the joint committee should not be construed as legal advice.</small>	
<small>1107875 / 2016-04-14</small>	

BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, APEGBC, BOABC, POABC

File No: 12-0071

INTERPRETATION

Page 2 of 4

After such determination, these facilities can then be appropriately classified Group B, Division 2 or 3, depending on the level of care and service to be provided for the memory care occupants.

Therefore it is considered that treatment or care facilities not intended for correctional purposes, but including occupants needing special consideration due to dementia or alzheimers conditions, may be classified as Group B Division 2 or 3 major occupancies, as appropriate to the level of care and service to be provided.

2. Group B, Division 1, 2 or 3.

Occupants in treatment or care facilities who suffer from alzheimers disease, dementia or other such debilitating afflictions, often run the risk of harm, accident or serious injury by wandering away from supervised areas without the facilities staff being aware of their leaving. Often the memory care occupant may attempt to use a means of egress by which to leave unnoticed. Security control devices are therefore often implemented as part of the facility operations, to prevent such uncontrolled egress.

There are a range of levels of severity of alzheimers or dementia, as well as a range of levels of detention, treatment or care.

Appendix A A-3.1.2.1.(1) provides examples of various uses under Group B major occupancies. For Group B Division 1, the correctional aspect is common to all the specific examples listed. Occupants receiving memory care in a correctional type of facility are therefore classified as Group B Division 1. This is consistent with the Building Code definition of "detention occupancy" as "the occupancy by persons who are restrained from or are incapable of evacuating to a safe location without the assistance of another person because of security measures not under their control."

Treatment or care facilities without correctional or detention intent on the other hand, can also include special memory care. These are regulated and licensed by Provincial community care and can be classified Group B Division 2 or 3 depending on the level of service provided.

Sentences 3.3.1.13.(2) and 3.4.6.16.(1) permit the use of locking devices on means of egress doors in buildings having impeded egress zones or contained use areas.

As indicated in the NRC User's Guide – NBC 1995 Fire Protection, Occupant Safety and Accessibility (Part 3) "An impeded egress zonewill be found primarily in buildings associated with correctional facilities, in which the occupants are able to move with relative freedom throughout the zone but are unable to leave the zone unless a security person releases locking devices on doors at the perimeter. These buildings are used for work and recreational activities and are not permitted to include sleeping rooms or rooms in which persons could be


R. J. Light, Committee Chair

The views expressed are the consensus of the joint committee with members representing AIBC, APEGBC, BOABC, and POABC, which form the BC Building Code Interpretation Committee. The purpose of the committee is to encourage uniform province wide interpretation of the BC Building Code. These views should not be considered as the official interpretation of legislated requirements based on the BC Building Code, as final responsibility for an interpretation rests with the local *Authority Having Jurisdiction*. The views of the joint committee should not be construed as legal advice.

BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, APEGBC, BOABC, POABC

File No: 12-0071

INTERPRETATION

Page 3 of 4

detained.....

The contained use area.....applies to a wide range of buildings, many of which would not normally be classed as a care or detention occupancy." This commentary was written prior to the development of Group B Division 3 occupancy classifications.

An impeded egress zone or contained use area could also be less than 10% of a floor area, in which case Article 3.2.2.8. contains a waiver for considering these as major occupancies.

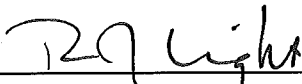
The Division B Appendix A A-3.3 commentary indicates: "Section 3.3 regulates safety within floor areas.....For example, a building may be classified by major occupancy as an office building: therefore, the provisions for structural fire protection and fire protection equipment for office buildings prescribed in Section 3.2. apply. However, within that building, a room or floor area may be used for mercantile, care, treatment, detention, business, residential, industrial or other occupancy." Conversely a correctional facility could besides the Group B Division 1 occupancies, also have other facilities such as recreational, assembly, care or treatment, work and other occupancies.

Therefore memory care facilities that are not classified as Group B Division 1 could still have security control provisions such as using contained use areas or with locking devices such as permitted in Sentence 3.4.6.16.(4) for all occupancies.

Special locking technologies to address wandering patients risks to danger from leaving the premises unnoticed, have been developed and used. Where locking devices on means of egress doors vary from the code restrictions, or are not addressed in the Building Code, the security control systems devised to safeguard the wandering patient risk may have be addressed as alternative solutions, recognizing the memory care occupant safety risks if adequate security control is not provided.

It is noted that The National Building Code of Canada 2015 now provides in Sentence 3.4.6.16.(5), an acceptable solution for locking devices specifically for such treatment or care occupancies.

The following matrix simplistically summarizes the various levels of security control and level of memory care or service and appropriate occupancy classification:



R. J. Light, Committee Chair

The views expressed are the consensus of the joint committee with members representing AIBC, APEGBC, BOABC, and POABC, which form the BC Building Code Interpretation Committee. The purpose of the committee is to encourage uniform province wide interpretation of the BC Building Code. These views should not be considered as the official interpretation of legislated requirements based on the BC Building Code, as final responsibility for an interpretation rests with the local *Authority Having Jurisdiction*. The views of the joint committee should not be construed as legal advice.

BC BUILDING CODE INTERPRETATION COMMITTEE

A joint committee with members representing
AIBC, APEGBC, BOABC, POABC

File No: 12-0071

INTERPRETATION

Page 4 of 4

	Detention or Correctional facilities	Treatment occupancies	Care occupancies
Unrestricted means of egress	n/a	Group B2	Group B3
15s delay electromagnetic locks to 3.4.6.16.(4)	n/a	Group B2	Group B3
Locking devices to 3.3.1.13.(6)-(9) used with contained use areas	Group B1	Group B2	Group B3
Locking devices to 3.3.1.13.(6)-(9) used with impeded egress zones	Group B1	Group B2 if constructed to 3.2.2.19 – however not applied to sleeping accommodation (otherwise Group B1)	Group B3 if constructed to 3.2.2.19 – however not applied to sleeping accommodation (otherwise Group B1)
Special locking devices for wandering patients (addressed as alternative solution)	Group B1	Group B2	Group B3

The provision of security control systems in treatment and care occupancies classified as Group B Division 2 or 3 is consistent with the recognition that occupants in such facilities are not expected to be readily moved or evacuated without some degree of assistance or additional protection features, such as for example, additional fire compartment zone separations in the floor area to allow transfer into protected floor areas.

It is noted that some provisions permitted in Group B Division 1 occupancies are not compatible with treatment or care occupancies, such as for example Sentence 3.2.8.2.(4) permitting interconnection of 2 adjacent floor levels, whereas Sentence 3.2.8.2.(6) excludes Group B2 and B3 occupancies from such interconnecting of floors; Sentence 3.4.3.2.(8) permits narrower exit stairs and doorways for Group B1 occupancies, but not for Group B2 occupancies; classification to Group B2 occupancy would be needed to apply the special emergency power requirements of Article 3.2.7.6., etc.

Therefore it is considered that treatment or care facilities not intended for correctional or detention purposes, but including occupants needing special consideration due to dementia or alzheimers conditions, and having some security controls, are more appropriately classified as Group B Division 2 or 3 major occupancies.

Where the occupants having dementia or alzheimers are in a correctional or detention facility or where impeded egress zones are applied, the appropriate classification would be Group B Division 1.

There may be specific project conditions that require case specific analysis and applications, and conflicts between the Building Code and other health care facilities regulations, which may have to be discussed and agreed upon with the local Authority having Jurisdiction.



R. J. Light, Committee Chair

The views expressed are the consensus of the joint committee with members representing AIBC, APEGBC, BOABC, and POABC, which form the BC Building Code Interpretation Committee. The purpose of the committee is to encourage uniform province wide interpretation of the BC Building Code. These views should not be considered as the official interpretation of legislated requirements based on the BC Building Code, as final responsibility for an interpretation rests with the local *Authority Having Jurisdiction*. The views of the joint committee should not be construed as legal advice.