

Michigan Department of Licensing and Regulatory Affairs  
**Office of Regulatory Reinvention**  
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**REGULATORY IMPACT STATEMENT  
and  
COST-BENEFIT ANALYSIS**

**PART 1: INTRODUCTION**

In accordance with the Administrative Procedures Act (APA) [1969 PA 306], the department/agency responsible for promulgating the administrative rules must complete and submit this form electronically to the Office of Regulatory Reinvention (ORR) no less than (28) days before the public hearing [MCL 24.245(3)-(4)]. Submissions should be made by the departmental Regulatory Affairs Officer (RAO) to **orr@michigan.gov**. The ORR will review the form and send its response to the RAO (see last page). Upon review by the ORR, the agency shall make copies available to the public at the public hearing [MCL 24.245(4)].

Please place your cursor in each box, and answer the question completely.

**ORR-assigned rule set number:**

2011-003 LR

**ORR rule set title:**

Dormitory Fire Safety for Schools, Colleges and Universities

**Department:**

LARA

**Agency or Bureau/Division**

Bureau of Fire Services

**Name and title of person completing this form; telephone number:**

Brian Williams (517-241-9371)

**Reviewed by Department Regulatory Affairs Officer:**

Liz Arasim  
Department of Licensing and Regulatory Affairs

## **PART 2: APPLICABLE SECTIONS OF THE APA**

### **MCL 24.207a “Small business” defined.**

Sec. 7a.

“Small business” means a business concern incorporated or doing business in this state, including the affiliates of the business concern, which is independently owned and operated and which employs fewer than 250 full-time employees or which has gross annual sales of less than \$6,000,000.00.”

### **MCL 24.240 Reducing disproportionate economic impact of rule on small business; applicability of section and MCL 24.245(3).**

Sec. 40.

(1) When an agency proposes to adopt a rule that will apply to a small business and the rule will have a disproportionate impact on small businesses because of the size of those businesses, the agency shall consider exempting small businesses and, if not exempted, the agency proposing to adopt the rule shall reduce the economic impact of the rule on small businesses by doing all of the following when it is lawful and feasible in meeting the objectives of the act authorizing the promulgation of the rule:

(a) Identify and estimate the number of small businesses affected by the proposed rule and its probable effect on small businesses.

(b) Establish differing compliance or reporting requirements or timetables for small businesses under the rule after projecting the required reporting, record-keeping, and other administrative costs.

(c) Consolidate, simplify, or eliminate the compliance and reporting requirements for small businesses under the rule and identify the skills necessary to comply with the reporting requirements.

(d) Establish performance standards to replace design or operational standards required in the proposed rule.

(2) The factors described in subsection (1)(a) to (d) shall be specifically addressed in the small business impact statement required under section 45.

(3) In reducing the disproportionate economic impact on small business of a rule as provided in subsection (1), an agency shall use the following classifications of small business:

(a) 0-9 full-time employees.

(b) 10-49 full-time employees.

(c) 50-249 full-time employees.

(4) For purposes of subsection (3), an agency may include a small business with a greater number of full-time employees in a classification that applies to a business with fewer full-time employees.

(5) This section and section 45(3) do not apply to a rule that is required by federal law and that an agency promulgates without imposing standards more stringent than those required by the federal law.

**MCL 24.245 (3)** “Except for a rule promulgated under sections 33, 44, and 48, the agency shall prepare and include with the notice of transmittal a **regulatory impact statement** containing...” (information requested on the following pages).

[**Note:** Additional questions have been added to these statutorily-required questions to satisfy the **cost-benefit analysis** requirements of Executive Order 2011-5.]

**MCL 24.245b Information to be posted on office of regulatory reinvention website.**

Sec. 45b. (1) The office of regulatory reinvention shall post the following on its website within 2 business days after transmittal pursuant to section 45:

- (a) The regulatory impact statement required under section 45(3).
  - (b) Instructions on any existing administrative remedies or appeals available to the public.
  - (c) Instructions regarding the method of complying with the rules, if available.
  - (d) Any rules filed with the secretary of state and the effective date of those rules.
- (2) The office of regulatory reinvention shall facilitate linking the information posted under subsection (1) to the department or agency website.

### PART 3: DEPARTMENT/AGENCY RESPONSE

Please place your cursor in each box, and provide the required information, using complete sentences. Please do not answer the question with “N/A” or “none.”

#### Comparison of Rule(s) to Federal/State/Association Standards:

(1) Compare the proposed rule(s) to parallel federal rules or standards set by a state or national licensing agency or accreditation association, if any exist. Are these rule(s) required by state law or federal mandate? If these rule(s) exceed a federal standard, please identify the federal standard or citation, and describe why it is necessary that the proposed rule(s) exceed the federal standard or law, and specify the costs and benefits arising out of the deviation.

These updated dormitory fire safety rules for schools, colleges and universities are required by the Michigan Fire Prevention Code, 1941 PA 207, section 29.3c (1).

The proposed rules do not have any parallel federal rules or standards. The only federal rules related to dormitory fire safety for schools, colleges or universities are associated with the Disclosure of Fire Safety Standards and Measures as listed below for higher education. The federal rule requires record keeping for colleges and universities that have on-campus housing and participate in Title IV of the Higher Education Act of 1965. See below for further details:

**Disclosure of Fire Safety Standards and Measures** (Section 485 of the [Higher Education Opportunity Act of 2008](#)) 20 USC 1092(i); [34 CFR 668.49](#)

Any institution participating in a Title IV federal student financial aid program that maintains on-campus housing facilities must track fire safety statistics as follows:

#### Annual Fire Safety Report

The school must, on an annual basis, publish a fire safety report with the following information:

A) Statistics concerning the following in each on-campus student housing facility during the most recent calendar years for which data are available:

- (i) the number of fires and the cause of each fire;
- (ii) the number of injuries related to a fire that result in treatment at a medical facility;
- (iii) the number of deaths related to a fire; and
- (iv) the value of property damage caused by a fire.

B) A description of each on-campus student housing facility fire safety system, including the sprinkler fire system;

C) The number of regular, mandatory, supervised fire drills;

D) Policies or rules on portable electrical appliances, smoking, open flames (such as candles), procedures for evacuation, policies regarding fire safety education and training programs provided to students, faculty, and staff; and

E) Plans for future improvements in fire safety, if determined necessary by such institution.

In addition, the Higher Education Opportunity Act, passed by Congress in 2008, now requires universities and colleges to publish an annual fire safety report and maintain a fire reporting log. As part of this law, institutions must provide a description of each on-campus housing fire safety policy and sprinkler system as well as rules regarding fire safety education, training, and evacuation procedures in

each residence.

(2) Compare the proposed rule(s) to standards in similarly situated states, based on geographic location, topography, natural resources, commonalities, or economic similarities. If the rule(s) exceed standards in those states, please explain why, and specify the costs and benefits arising out of the deviation.

The Dormitory Fire Safety for Schools, Colleges and Universities' rules in Michigan adopt a nationally recognized code for fire safety. The new rule set will adopt the 2012 Life Safety Code, published by the National Fire Protection Association (NFPA). The state of Ohio has the Ohio Fire Code which adopts a nationally recognized code, the International Fire Code (IFC) 2009 edition. Wisconsin has adopted NFPA 1, 2012 edition as its Fire Code and adopts the International Building Code (IBC) 2009 edition for its building code. The State of Illinois, Office of the Illinois State Fire Marshal has adopted the 2000 edition of NFPA 101, Life Safety Code (LSC). These nationally recognized codes are very similar in the fire safety requirements such as the requirements for fire alarm systems and automatic sprinkler systems. These rules have many similarities to the proposed updated dormitory fire safety rules for Michigan.

These fire safety rules apply to dormitories which are defined as 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 the control of the school authority, with or without meals, but without individual cooking facilities. If the rooms have individual cooking facilities then the building is classified as an apartment and is not subject to these rules.

**Illinois** – Illinois currently has adopted and enforces the 2000 edition of the LSC. The website for the Office of the Illinois State Fire Marshall indicates that Illinois is in the process of updating to the 2012 edition of the LSC. Illinois also has enacted the Fire Sprinkler Dormitory Act which required all existing college and university dormitories to be protected by an automatic sprinkler system by September 2014.

**Ohio** – Ohio Fire Code, IFC 2009

**Wisconsin** – In the city of Madison, dormitories have to be in compliance with the IBC 2009 edition and also in compliance with the requirements for 'student housing'. Student housing is defined as a privately owned residential building that has a capacity of at least 100 occupants, that is occupied by persons at least 80 percent of whom are enrolled in an institution of higher education. Existing student housing dormitories greater than 60 feet in height were required to have automatic sprinkler protection installed by January 1, 2014.

(3) Identify any laws, rules, and other legal requirements that may duplicate, overlap, or conflict with the proposed rule(s). Explain how the rule has been coordinated, to the extent practicable, with other federal, state, and local laws applicable to the same activity or subject matter. This section should include a discussion of the efforts undertaken by the agency to avoid or minimize duplication.

There are no federal or local rules that may overlap or conflict with the proposed rules. The Bureau of Construction Codes (BCC) promulgates the Michigan Building Code (MBC) per the Stille-Derossett-Hale Single State Construction Code Act, Act 230 of 1972. At the state level, the MBC does have some overlap with the Dormitory Fire Safety for Schools, Colleges and Universities (DFSR). The Bureau of Fire Services (BFS) has coordinated, to the extent practicable, with the BCC to avoid and minimize

conflicts between the two codes. The BCC was represented on the ad-hoc committee and provided recommendations where the two codes had conflicting requirements. Amendments have been provided in the DFSR to address these conflicts. As an example R 29.2009, section 8.6.10.2.1 was amended to match the language and requirements set forth in the MBC.

**Purpose and Objectives of the Rule(s):**

(4) Identify the behavior and frequency of behavior that the proposed rule(s) are designed to alter. Estimate the change in the frequency of the targeted behavior expected from the proposed rule(s). Describe the difference between current behavior/practice and desired behavior/practice. What is the desired outcome?

The proposed rules only update to a much newer edition of the Life Safety Code. No current behaviors/practices have been identified as deficient that require the change to the rules. The adoption of these rules will require dormitories at schools, colleges and universities to be built meeting the latest nationally recognized safety features. There are many similarities between the current rules and the proposed rules. The desired outcome of the proposed rules is to continue to provide safe buildings for existing dormitory buildings as well as providing the latest safety requirements for new dormitory buildings.

(5) Identify the harm resulting from the behavior that the proposed rule(s) are designed to alter and the likelihood that the harm will occur in the absence of the rule. What is the rationale for changing the rule(s) and not leaving them as currently written?

The harm that these rules are designed to prevent is the injury, due to fire or similar emergency, to students in school or college dormitory buildings. These rules are applicable to new and existing dormitory buildings. The likelihood that more fires and injuries would occur in these buildings is very high in the absence of these rules. The reason the rules are changing is to update the nationally recognized Life Safety Code standard to the 2012 edition from the 1997 edition.

(6) Describe how the proposed rule(s) protect the health, safety, and welfare of Michigan citizens while promoting a regulatory environment in Michigan that is the least burdensome alternative for those required to comply.

The proposed rules adopt the 2012 edition of the Life Safety Code. The Life Safety Code is a nationally recognized code standard used for the protection of health and safety of occupants in buildings. By adopting a national standard and amending it in certain sections to be compatible with the Michigan Building Code this rule set is the least burdensome alternative for those required to comply.

(7) Describe any rules in the affected rule set that are obsolete, unnecessary, and can be rescinded.

No portions of the existing rules are identified as obsolete or unnecessary.

**Fiscal Impact on the Agency:**

Fiscal impact is an increase or decrease in expenditures from the current level of expenditures, i.e. hiring additional staff, an increase in the cost of a contract, programming costs, changes in reimbursement rates, etc. over and above what is currently expended for that function. It would not include more intangible costs or benefits, such as opportunity costs, the value of time saved or lost, etc., unless those issues result in a measurable impact on expenditures.

(8) Please provide the fiscal impact on the agency (an estimate of the cost of rule imposition or potential savings on the agency promulgating the rule).

There is no additional fiscal impact to the agency beyond the current operational cost.

(9) Describe whether or not an agency appropriation has been made or a funding source provided for any expenditures associated with the proposed rule(s).

Funding for the enforcement of the Dormitory Fire Safety for Schools, Colleges and Universities' rules comes from the school plan review fees. These fees are established in the bureau's annual appropriations bill. The authority for the fees comes from PA 207 of 1941, as amended, Section 29.2c being MCL 29.2c. The proposed rules will not result in additional fiscal impact on the agency so the current year's appropriations bill will not be altered.

(10) Describe how the proposed rule(s) is necessary and suitable to accomplish its purpose, in relationship to the burden(s) it places on individuals. Burdens may include fiscal or administrative burdens, or duplicative acts. So despite the identified burden(s), identify how the requirements in the rule(s) are still needed and reasonable compared to the burdens.

The purpose of the rules is to provide life safety for occupants in new or existing dormitory school, college or university buildings. The rules adopt a nationally recognized standard that sets minimum code standards for life safety. The adoption of the Life Safety Code (LSC) provides a reasonable set of requirements necessary to accomplish the life safety in these buildings. For the most part the rules have amended several code requirements in order to lessen the burden on schools, colleges and universities. For example, Section 29.3.7.5 which states, "A cross-corridor door in a smoke partition shall be permitted to swing in either direction when the existing corridor width is 7 feet or less" was added to help lessen the construction requirements for opposite swinging doors in narrow corridors.

Another section of the code was amended to provide a time schedule for raising or setting aside funds to provide automatic sprinkler systems in existing high-rise dormitories. High-rise dormitories are buildings that have floors higher than 75 feet from the ground. The LSC requires that all existing high-rise dorms be equipped with an automatic sprinkler system. The proposed rules amend this section to allow a 10 year time frame from the date that the rules take effect, for compliance with the sprinkler requirement.

#### **Impact on Other State or Local Governmental Units:**

(11) Estimate any increase or decrease in revenues to other state or local governmental units (i.e. cities, counties, school districts) as a result of the rule. Estimate the cost increases or reductions on other state or local governmental units (i.e. cities, counties, school districts) as a result of the rule. Please include the cost of equipment, supplies, labor, and increased administrative costs, in both the initial imposition of the rule and any ongoing monitoring.

No other agency or governmental units are impacted by these rules.

(12) Discuss any program, service, duty or responsibility imposed upon any city, county, town, village, or school district by the rule(s). Describe any actions that governmental units must take to be in compliance with the rule(s). This section should include items such as record keeping and reporting requirements or changing operational practices.

Inspections, testing and maintenance of required life safety systems, such as fire alarm systems and automatic sprinkler systems, will continue as required by the current rules and, therefore, would not have any effect on State or local governmental units.

(13) Describe whether or not an appropriation to state or local governmental units has been made or a funding source provided for any additional expenditures associated with the proposed rule(s).

There is no appropriation to state or local governmental units.

#### **Rural Impact:**

(14) In general, what impact will the rules have on rural areas? Describe the types of public or private interests in rural areas that will be affected by the rule(s).

The proposed rules affect the State of Michigan as a whole. The proposed rules will have no impacts either positive or negative for rural areas.

**Environmental Impact:**

(15) Do the proposed rule(s) have any impact on the environment? If yes, please explain.

The proposed rules do not have any impact on the environment

**Small Business Impact Statement:**

*[Please refer to the discussion of “small business” on page 2 of this form.]*

(16) Describe whether and how the agency considered exempting small businesses from the proposed rules.

These fire safety rules are directly related to buildings that are occupied as dormitories at schools, colleges or universities. The proposed rules will affect all in Michigan whether large or small.

(17) If small businesses are not exempt, describe (a) the manner in which the agency reduced the economic impact of the proposed rule(s) on small businesses, including a detailed recitation of the efforts of the agency to comply with the mandate to reduce the disproportionate impact of the rule(s) upon small businesses as described below (in accordance with MCL 24.240(1)(A-D)), or (b) the reasons such a reduction was not lawful or feasible.

The proposed rules will provide the same minimum level of life safety to all occupants in a dormitory independent of whether it is small or large.

(A) Identify and estimate the number of small businesses affected by the proposed rule(s) and the probable effect on small business.

**K-12 Schools with dormitories**

Cranbrook houses about 250 students in dormitories.

Leelanau School houses about 42 students in dormitories.

**Colleges and Universities with dormitories**

Public Universities – 15

Private Colleges/Universities – 68\*

Community Colleges - 30

\* Approximate figures based on the data provided in the 2014 Michigan Education Directory.

The number of facilities that would qualify as a small business cannot be directly determined. There are approximately 265 dormitories located on the various public and private campuses and it is unknown how many meet the definition as small business. It is believed that out of the 68 private colleges/universities that only a few of them meet the definition as a small business. It is possible that some of these are owned and/or operated by a larger corporation.

(B) Describe how the agency established differing compliance or reporting requirements or timetables for small businesses under the rule after projecting the required reporting, record-keeping, and other administrative costs.

No different reporting requirements or administrative costs are established by these rules.

(C) Describe how the agency consolidated or simplified the compliance and reporting requirements and identify the skills necessary to comply with the reporting requirements.

The proposed rules have simplified the reporting requirements by eliminating the requirement to always send in a copy of the classification of hazards content and the emergency plan. These documents are only required upon request from the Bureau of Fire Services. Basic administrative skills are necessary to comply with the reporting requirements.

(D) Describe how the agency established performance standards to replace design or operation standards required by the proposed rules.

The 2012 Life Safety Code (LSC) allows the use of performance based options. Instead of requiring strict compliance with the code requirements, this option allows alternatives for life safety compliance. The LSC also has special provisions for renovations of existing buildings in Chapter 43 – Building Rehabilitation. This chapter addresses rehabilitation in existing buildings and also allows latitude when projects deal with repair, renovation, modification and reconstruction.

(18) Identify any disproportionate impact the proposed rule(s) may have on small businesses because of their size or geographic location.

No impacts are expected

(19) Identify the nature of any report and the estimated cost of its preparation by small business required to comply with the proposed rule(s).

There is one additional reporting requirement established by these proposed rules. There is a requirement for each school and college/university to prepare an emergency plan. The emergency plan shall include procedures for reporting emergencies, occupant and staff response to emergencies, evacuation procedures, appropriate use of elevators, type of building fire protection systems and other similar items. This plan only needs to be developed once and many colleges and universities currently have one in place. The estimated cost for developing this plan is unknown due to many variables for each school, college and university such as size, location, number of students and staffing levels.

The additional reporting requirements for door inspections and hazard classification have been eliminated or amended. Refer to the discussion under Item #26.

(20) Analyze the costs of compliance for all small businesses affected by the proposed rule(s), including costs of equipment, supplies, labor, and increased administrative costs.

Since all facilities are held to the same standard a cost break-down for small business was not evaluated.

(21) Identify the nature and estimated cost of any legal, consulting, or accounting services that small businesses would incur in complying with the proposed rule(s).

No additional costs are associated with these rules.

(22) Estimate the ability of small businesses to absorb the costs without suffering economic harm and without adversely affecting competition in the marketplace.

All facilities are held to the same standard so no economic harm or advantage is present.

(23) Estimate the cost, if any, to the agency of administering or enforcing a rule that exempts or sets lesser standards for compliance by small businesses.

No additional costs for the agency would be incurred by the lesser standard.

(24) Identify the impact on the public interest of exempting or setting lesser standards of compliance for small businesses.

There could be a large negative impact from the public if smaller businesses were exempt or held to a lesser standard of public safety than larger businesses. The small businesses would also have a higher risk if they did not adhere to the same safety standards as for large businesses.

The proposed rules, along with other regulatory agency requirements at the state establish minimum requirements that are considered essential for life safety. Reduction of those requirements for small business would not be in the public interest.

(25) Describe whether and how the agency has involved small businesses in the development of the proposed rule(s). If small business was involved in the development of the rule(s), please identify the business(es).

The ad-hoc committee had a representative from the following organization that represent a variety of small business operators throughout the state:

- American Institute of Architects, Michigan – representing architects that design construction plans for the building and renovation of school/college projects.

### **Cost-Benefit Analysis of Rules (independent of statutory impact):**

(26) Estimate the actual statewide compliance costs of the rule amendments on businesses or groups. Identify the businesses or groups who will be directly affected by, bear the cost of, or directly benefit from the proposed rule(s). What additional costs will be imposed on businesses and other groups as a result of these proposed rules (i.e. new equipment, supplies, labor, accounting, or recordkeeping)? Please identify the types and number of businesses and groups. Be sure to quantify how each entity will be affected.

Dormitory buildings will be directly affected by these rules. Universities, colleges, administrative boards, administrators, architects and engineers will be indirectly affected by these rules. The majority of the revisions from the newer edition of the Life Safety Code (LSC) either clarifies existing requirements or relaxes current requirements.

Rule amendments to lower costs:

**Door Inspections** – Some dormitories are considered mixed use buildings. Dormitories with lounges, multi-purpose rooms or cafeterias with more than 50 occupants are considered mixed use buildings. They are considered a dormitory occupancy and assembly occupancy. These Dormitory Fire Safety Rules adopt the chapters for assembly and dormitory. The new edition of the LSC requires door inspections in assembly occupancies. Doors with panic hardware and doors in exit enclosures shall be inspected annually and provide a written report created for each door. This item was discussed by the ad-hoc committee and determined that the costs associated with this requirement would pose an unnecessary hardship. The rules have amended the assembly occupancy requirements to delete this requirement.

Rule amendments to reduce recordkeeping:

**Hazards classification** – The new edition of the LSC requires that the architect or engineer submit a hazard of contents classification to the Bureau, however this section has been modified. As amended the hazard of contents classification report is only required upon request from the Bureau. This will reduce the need of recordkeeping for dormitories and for the Bureau.

**Door Inspections** – As noted above this requirement has been deleted from the new LSC in order to cut down on costs and on recordkeeping.

Updated Code Revisions:

**Allowable building height and area** – The current rules have an outdated table that lists the allowable stories for dormitory buildings. The newer rules will reference the Michigan Building Code so that architects and engineers only have to comply with the most current building limitations.

Rule amendments to help existing dorms to be in compliance:

**Sprinkler protection** – The 2012 edition of the LSC requires that all existing high-rise dormitories shall be protected by an automatic sprinkler system. A high-rise building has floors greater than 75 feet above the lowest level of fire department access. The ad-hoc committee believes that this requirement is a good requirement but they are concerned about the financial impact on several colleges and

universities that have existing high-rise dormitories that are not protected by a sprinkler system. The proposed rules amend this requirement and allow up to 10 years to bring existing high-rise dormitories into compliance. It is believed that there are 5 existing high-rise dormitories in Michigan that do not currently have a complete sprinkler system. They are located at the University of Detroit Mercy, Central Michigan University, Eastern University, Ferris State University and Oakland University. Each of these campuses would be required to upgrade the high-rise dormitory with a complete automatic sprinkler system within 10 years. The estimated cost for the installation of sprinklers in existing high rise buildings is between \$2.00 to \$4.00 per square foot.

(27) Estimate the actual statewide compliance costs of the proposed rule(s) on individuals (regulated individuals or the public). Please include the costs of education, training, application fees, examination fees, license fees, new equipment, supplies, labor, accounting, or recordkeeping). How many and what category of individuals will be affected by the rules? What qualitative and quantitative impact does the proposed change in rule(s) have on these individuals?

These rules do not have any effects at the individual level.

(28) Quantify any cost reductions to businesses, individuals, groups of individuals, or governmental units as a result of the proposed rule(s).

No cost reductions are expected.

(29) Estimate the primary and direct benefits and any secondary or indirect benefits of the proposed rule(s). Please provide both quantitative and qualitative information, as well as your assumptions.

The proposed rules will have a direct benefit with architects and engineers who are involved with college or university dormitory construction or renovation. The newer edition of the Life Safety Code (LSC) will allow the design professional to utilize updated code standards. The proposed rules have deleted several old requirements that conflicted with the Michigan Building Code.

(30) Explain how the proposed rule(s) will impact business growth and job creation (or elimination) in Michigan.

No impacts on business growth or job creation are expected.

(31) Identify any individuals or businesses who will be disproportionately affected by the rules as a result of their industrial sector, segment of the public, business size, or geographic location.

None.

(32) Identify the sources the agency relied upon in compiling the regulatory impact statement, including the methodology utilized in determining the existence and extent of the impact of a proposed rule(s) and a cost-benefit analysis of the proposed rule(s). How were estimates made, and what were your assumptions? Include internal and external sources, published reports, information provided by associations or organizations, etc., which demonstrate a need for the proposed rule(s).

The bureau relied upon the ad-hoc committee in determining which sections of the rules would adversely impact schools, colleges and dormitories related to costs and recordkeeping.

Information in regards to the other states such as Indiana, Illinois, Ohio and Wisconsin were found by searching their governmental websites.

The sprinkler cost estimates come from the National Fire Sprinkler Association Frequently Asked Questions available at [http://www.nfsa.tv/info\\_items/FAQ\\_Fire\\_Sprinkler.pdf](http://www.nfsa.tv/info_items/FAQ_Fire_Sprinkler.pdf).

**Alternatives to Regulation:**

(33) Identify any reasonable alternatives to the proposed rule(s) that would achieve the same or similar goals. In enumerating your alternatives, please include any statutory amendments that may be necessary to achieve such alternatives.

There are no reasonable alternatives to the proposed rules that have been identified that would achieve the same or similar goals.

(34) Discuss the feasibility of establishing a regulatory program similar to that proposed in the rule(s) that would operate through private market-based mechanisms. Please include a discussion of private market-based systems utilized by other states.

The proposed rules are implemented through regulatory agencies at the state level. This bureau is unaware of any private market-based systems which may be utilized by other states. After further research the State of Indiana appears to require all schools and colleges to be reviewed by the Department of Homeland Security at the state level. The State of Illinois requires that dormitories comply with the 2000 edition of the Life Safety Code but does not require plans to be reviewed or dormitories to be inspected. Sometimes local building inspectors will also be involved with these projects but no mention of private market-based systems was mentioned by any of these states.

(35) Discuss all significant alternatives the agency considered during rule development and why they were not incorporated into the rule(s). This section should include ideas considered both during internal discussions and discussions with stakeholders, affected parties, or advisory groups.

The proposed rules update a current set of regulations and were developed with the assistance of an ad-hoc committee. The committee consisted of representatives from the Bureau of Fire Services, the Bureau of Construction Codes, fire service professionals, architects, builders and a number of representatives from the regulated industry. No significant alternatives were presented for the bureau and ad-hoc committee to consider.

**Additional Information**

(36) As required by MCL 24.245b(1)(c), please describe any instructions regarding the method of complying with the rules, if applicable.

The rules will be posted to the Bureau’s website upon final approval. The Bureau has a quarterly newsletter that will contain an announcement in regards to the adoption of the new rules. The Bureau also has an extensive list of email contacts for architects and engineers that do business in the State of Michigan. A mass email letter will be sent to those firms on record with the Bureau. The ad-hoc committee also has representatives from major organizations that will assist in distributing information regarding the new rules.

**PART 4: REVIEW BY THE ORR**

**Date Regulatory Impact Statement (RIS) received:**

11-17-2015

<b>Date RIS approved:</b>	<b>12-8-2015</b>
<b>ORR assigned rule set number:</b>	<b>2011-003 LR</b>

<b>Date of disapproval:</b>	Explain:
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<b>More information needed:</b>	Explain:
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(ORR-RIS March 2014)