Postsecondary Educational Institution
Fire Drill Report

(Pursuant to Public Act 481 of 2014)

February 3, 2023

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INTRODUCTION

Michigan's Fire Prevention Code was amended in 2014. MCL 29.1 et al. The amendments to the Michigan Fire Prevention Code added requirements for fire drills at postsecondary educational institutions and took effect March 31, 2015. MCL 29.19a. Each postsecondary educational institution dormitory is mandated to hold three (3) fire drills each year. MCL 29.19a(2). The fire drill requirements are as follows:

- One (1) fire drill in the fall semester within 21 days after the start of classes. MCL 29.19a(2)(a);
- One (1) fire drill in the spring semester. MCL 29.19a(2)(b);
- At least one (1) of the fall or spring drills shall be held when school is in session between sunset and sunrise. MCL 29.19a(3); and
- One (1) fire drill in the summer semester if the dormitory is occupied by students during that semester. MCL 29.19a(2)(c).

No other postsecondary educational institution building is mandated to have fire drills.

DEFINITIONS

- Fall semester means the semester in which the majority of scheduled classes are between September 1 and December 31. MCL 29.19a(8)(a).
- Postsecondary educational institution means a degree or certificate-granting public, or private college or university, junior college, or community college located in this state. The term includes the governing body of the postsecondary educational institution. MCL 29.19a(8)(b).
- Postsecondary educational institution dormitory means a building located on the campus of a postsecondary educational institution; is owned, leased, or managed by, or under the direct control of, the postsecondary educational institution; is used to provide housing for more than 16 individuals who are not members of the same family; and does not provide individual cooking facilities for its residents, whether or not meals are provided to any of those residents. MCL 29.19a(8)(c).
- Spring semester means the semester in which the majority of scheduled classes are between January 1 and May 3. MCL 29.19a(8)(d).
- Summer semester means the semester in which the majority of scheduled classes are between June 1 and August 31. MCL 29.19a(8)(e).

INSTRUCTIONAL STAFF TRAINING

All instructional staff are required to be trained in fire drill procedures before the beginning of each academic year. MCL 29.19a(1). This training would include staff in dormitory buildings and instructional staff regardless of the requirement for conducting drills in the building. The training may be separate or part of the institution's training in their overall emergency response plans.

REPORTING REQUIREMENTS

Beginning in 2016, the College/Dormitory Fire Safety Drill Requirement Forms are due on or before January 10th of each year. Postsecondary educational institutions are required to submit a statement on a Bureau of Fire Services (BFS) form certifying the institution complied with all the requirements in the preceding calendar year. MCL 29.19a(5). The College/Dormitory Fire Safety Drill Requirement Form (BFS-48) is available on the BFS website at **www.michigan.gov/bfs**. The report is required to include the following items:

- Submitter information;
- Certification of compliance;
- Instructional staff training information; and
- A record of each drill.

Note: Other drill records, including a record of all emergency procedures and training completed by staff, shall be retained, and made available to the BFS upon request per MCL 29.19a(4).

Penalties for violations of the section for conducting drills, conducting training, or submitting required reports are set forth in MCL 29.19a(6) and include:

- The institution is responsible for a civil fine of $500.00 for a first violation of this section and a civil fine of $1,000.00 for a second or subsequent violation. A civil fine collected under this subsection shall be paid to the general fund and credited to the bureau for the enforcement of this Act.
- For a second or subsequent violation of this section, the bureau may require a mandatory inspection of the institution's facilities and the preparation of a plan of action report by the bureau or its designee. The institution is responsible for payment of the bureau's costs associated with an inspection and plan of action report, or $1,000.00, whichever is less.

The Act requires the BFS submit a report to the Speaker of the House of Representatives, the Senate Majority Leader, the House and Senate Appropriations Committees, the House and Senate Appropriations Subcommittees on Higher Education and Joint Capital Outlay, and the Department of Licensing and Regulatory Affairs describing each violation of this section by a postsecondary educational institution in the preceding state fiscal year. MCL 29.19a(7).

SUMMARY

After the 2014 amendment of the Act, the BFS took the following measures to ensure all postsecondary educational institutions were fully educated on the new reporting requirements:

- Established a comprehensive database which identified those postsecondary educational institutions required to comply with the amendments.
- Developed and distributed the necessary reporting forms, procedures, and other helpful information (Frequently Asked Questions) to postsecondary educational institutions.
- Provided follow-up to those postsecondary educational institutions requiring additional support and guidance; and
- Developed a comprehensive tracking mechanism to record compliance of the postsecondary educational institution reporting requirements of the Act.

In 2022, there were 107 identified postsecondary educational institutions required to comply with Public Act 481. There were 7 institutions (6.5%) failing to submit the required form prescribed by the BFS with their 2022 information. A total of 100 institutions (93.4%) were in full compliance with the requirements of the Act.

In 2021, there were 107 identified postsecondary educational institutions required to comply with Public Act 481. There were 3 institutions (2.8%) failing to submit the required form prescribed by the BFS with their 2021 information. A total 104 institutions (97.2%) were in full compliance with the requirements of the Act.

In 2020, there were 108 identified postsecondary educational institutions required to comply with Public Act 481. There were 26 institutions (24%) failing to submit the required form prescribed by the BFS with their 2020 information. A total of 19 institutions (18%) were in partial compliance with various individual requirements of the Act and 63 institutions (58%) were in full compliance with the requirements of the Act.

In 2019, there were 109 identified postsecondary educational institutions required to comply with Public Act 481. Up 15 from the year prior, the increase in identified postsecondary education institutions was due to two new postsecondary educational institutions and the capture of multi-campus postsecondary educational intuitions. There were two institutions (1.8%) failing to submit the required form prescribed by the BFS with their 2019 information. A total of 13 institutions (12%) were in partial compliance with various individual requirements of the Act and 94 institutions (86.2%) were in full compliance with the requirements of the Act.

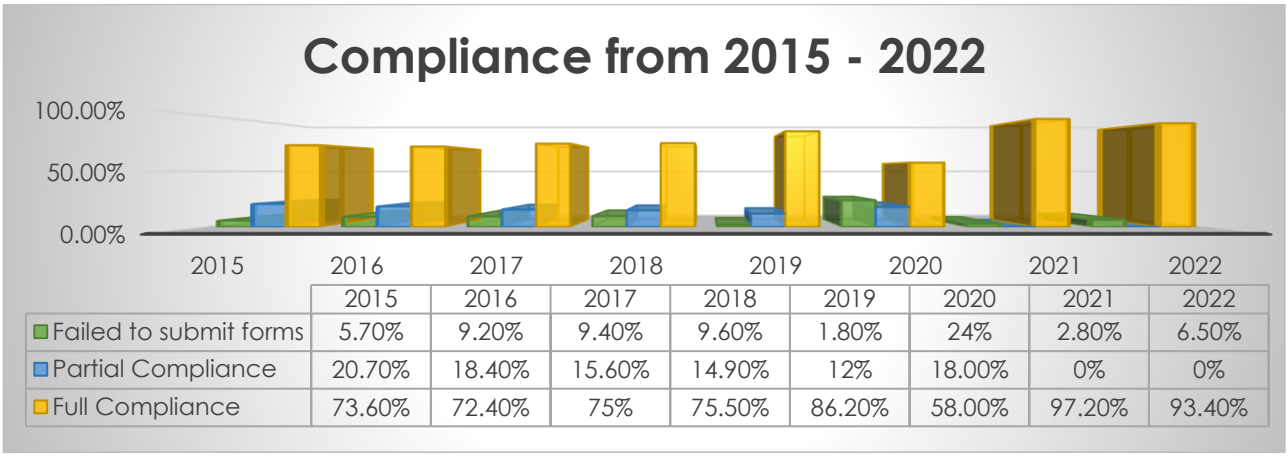
In 2018, there were 94 identified postsecondary educational institutions required to comply with Public Act 481. There were nine institutions (9.6%) failing to submit the required form prescribed by the BFS with their 2018 information. A total of 14 institutions (14.9%) were in partial compliance with various individual requirements of

the Act and 71 institutions (75.5%) were in full compliance with the requirements of the Act.

In 2017, there were 96 identified postsecondary educational institutions required to comply with Public Act 481. There were nine institutions (9.4%) that failed to submit the required form prescribed by the BFS with their 2017 information. A total of 15 institutions (15.6%) were in partial compliance with various individual requirements of the Act and 72 institutions (75%) were in full compliance with the requirements of the Act.

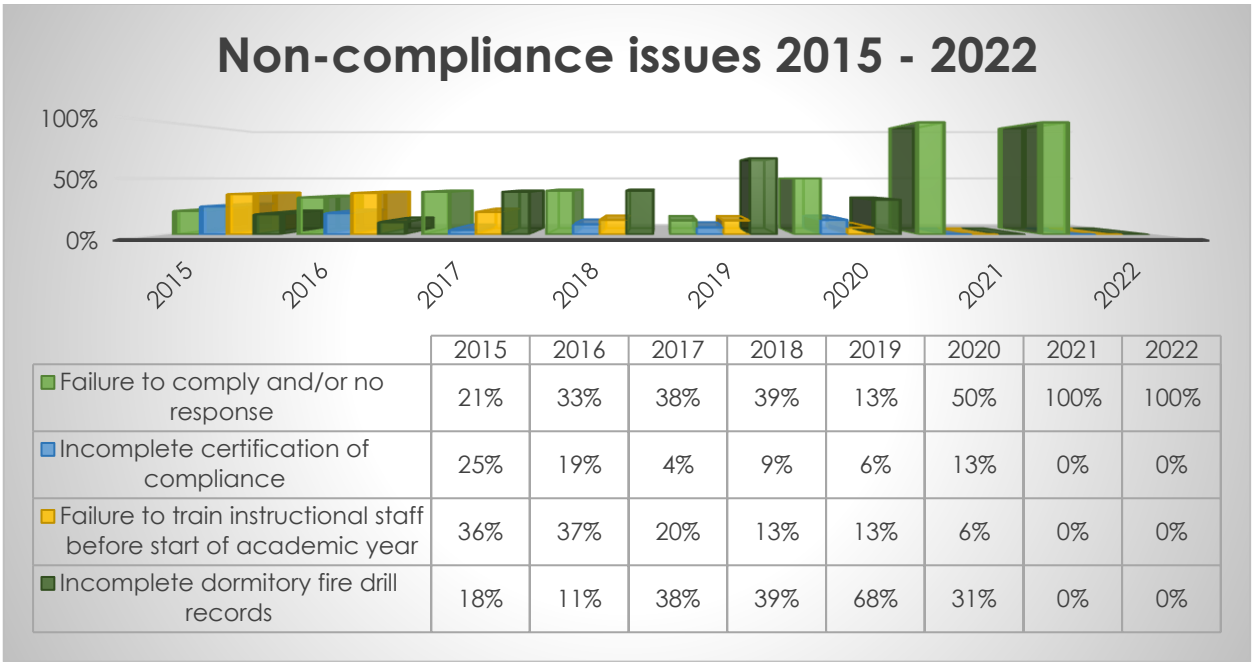
In 2016, there were 98 identified postsecondary educational institutions that were required to comply with Public Act 481. There were nine institutions (9.2%) failing to comply or submit the required form prescribed by the BFS with their 2016 information. A total of 18 institutions (18.4%) were in partial compliance with various individual requirements of the Act and 71 institutions (72.4%) were in full compliance with the requirements of the Act.

In comparison, in 2015 a total 106 postsecondary educational institutions were identified to comply with the amendments to the Act. There were 6 institutions (5.7%) that failed to comply or submit the required form prescribed by the BFS, 22 institutions (20.7%) were in partial compliance and 78 institutions (73.6%) in full compliance with the requirements of Public Act 481.



	2015	2016	2017	2018	2019	2020	2021	2022
Failed to submit forms	5.70%	9.20%	9.40%	9.60%	1.80%	24%	2.80%	6.50%
Partial Compliance	20.70%	18.40%	15.60%	14.90%	12%	18.00%	0%	0%
Full Compliance	73.60%	72.40%	75%	75.50%	86.20%	58.00%	97.20%	93.40%

Postsecondary institutions that are deemed not in compliance may include incomplete certificates of compliance, incomplete dormitory fire drill records, incomplete required instructional staff training before the start of the academic year and/or no response from the postsecondary educational institution.



	2015	2016	2017	2018	2019	2020	2021	2022
Failure to comply and/or no response	21%	33%	38%	39%	13%	50%	100%	100%
Incomplete certification of compliance	25%	19%	4%	9%	6%	13%	0%	0%
Failure to train instructional staff before start of academic year	36%	37%	20%	13%	13%	6%	0%	0%
Incomplete dormitory fire drill records	18%	11%	38%	39%	68%	31%	0%	0%

Refer to the attachment on page 9 of this document for a listing of schools that were found to be in partial compliance or did not comply with the requirements of Public Act 481.

CONCLUSION

This is the 8th year since the implementation of the statutorily mandated fire drills, instruction, and reporting through Public Act 481. In School Year (SY) 2020 due to the pandemic BFS did not collect fines due to the complexity of post-secondary institutions challenges faced during the pandemic. For SY 2021, BFS personnel held virtual training sessions to ensure current information was shared with the institutions. 87 institutions participated in the training. This allowed for open dialog throughout the year between BFS and the institutions to alleviate any impediments to compliance. Beginning in SY21, BFS once again began assessing fines where necessary. All funds collected under this subsection will be paid to the general fund and credited to the bureau for enforcement of this Act.

Please refer to Attachment A for a list of postsecondary education institutions with compliance issues.

ATTACHMENT A

As of February 3rd, 2023, the following postsecondary educational institutions were found to be non-compliant as they did not submit the required documentation:

- Glen Oaks University
- Great Lakes Christian College
- Moody Theological Seminary
- Ross College
- Trine University
- Washtenaw Community College
- Western Theological Seminary