Frequently Asked Questions
Postsecondary Fire Safety Drill Requirements

1. **Question: The act states that beginning in 2016, on or before January 10 of each year the postsecondary educational institutes must submit a statement of compliance. Since reporting is based on subsequent year activities - drills and training - does this mean the drills and training of instructional staff will need to be accomplished prior to the start of this academic year?**

   Answer: Yes, as defined in the Fire Prevention Code, PA 207 of 1941, as amended, MCL 29.19a, Section 19a(5):

   (5) Beginning in 2016, on or before January 10 of each year, a postsecondary educational institution shall submit to the bureau, on a form prescribed by the bureau, a statement certifying that the institution complied with all of the requirements of this section and this act in the preceding calendar year.

2. **Question: The act states all instructional staff are to be trained in fire drill procedures before the beginning of each academic year. Does this as mean annual training for all instructional staff, not just new hires?**

   Answer: Yes, all instructional staff are required to be trained, not just new hires.

3. **Can the training be based on our emergency response procedure protocols for fires or is there going to be training components mandated by Bureau of Fire Services (BFS)?**

   Answer: The annual training should be based on the postsecondary education institutes emergency response procedure protocols for fires. The State Fire Marshal Bulletin 14 is a guideline for the annual training component for the postsecondary educational institutions instructional staff. The basic annual training should include ensuring evacuation during drills or real emergencies, identification of primary and secondary egress routes.

4. **Question: Is it the responsibility of the institution to document and maintain the records for who participated in a training; whether a direct delivery or online session or the record of who was provided materials (i.e. a copy of the institution's fire drill procedures)?**

Answer: The BFS will not mandate the actual mode of delivery for the training. The mode of delivery for training should be determined by each postsecondary educational institution based on specific needs. All documentation and maintenance of records are the responsibility of the institution and those records must be available to BFS on request. The BFS does requires a statement certifying the institution is statutorily compliant and the training was performed according to institutional requirements.

As defined in the Fire Prevention Code, PA 207 of 1941, as amended, MCL 29.19a, Section 19a (4, 5):

> *(4) A postsecondary educational institution shall prepare a record of each drill described in this section, on a form prescribed by the bureau.* ***The institution shall retain these records and a record of all emergency procedures training completed by its staff and make those records available to the bureau on request.***
>
> *(5) Beginning in 2016, on or before January 10 of each year, a postsecondary educational institution shall submit to the bureau,* ***on a form prescribed by the bureau, a statement certifying that the institution complied with all of the requirements of this section and this act in the preceding calendar year.***

5. **Question: If the fire drills are only required for dormitory buildings, why do all instructional staff need to be trained?**

   Answer: Campus buildings other than dormitories often have constantly changing occupants. While this makes conducting drills difficult, it does not diminish the danger from fire in all campus buildings. Instructional staff play a critical function to ensure fire safety processes and practices are being met during drills and actual fires. Instructional staff need to be familiar with the building layouts, fire exits and provide guidance to occupants in the event of a fire.

6. **Question: Do fire drill requirements apply only to the residential halls (dormitories) and not university apartments or administrative and classroom buildings?**

   Answer: Yes. The Fire Prevention Code, PA 207 of 1941, as amended, MCL 29.19a; Section 19a (2) requires drills be conducted in all postsecondary educational institution dormitories in accordance with the requirements of the section.

   As defined in the Fire Prevention Code, PA 207 of 1941, as amended, MCL 29.19a; Section 19a (8)(c);

(8) As used in this section:

(a) "Fall semester" means the semester in which most scheduled classes are between September 1 and December 31.

(b) "Postsecondary educational institution" means a degree- or certificate-granting public or private college or university, junior college, or community college in this state. The term includes the governing body of the postsecondary educational institution.

(c) "Postsecondary educational institution dormitory" means a building that is 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.

7. Question: When is the postsecondary educational institution supposed to perform the fire drills?

Answer: According to the Fire Prevention Code, PA 207 of 1941, as amended, MCL 29.19a; Section 19a (2)(a-c) and (3):

(2) A postsecondary educational institution shall ensure unrestricted emergency egress from each postsecondary educational institution dormitory while students occupy the building and shall ensure that each postsecondary educational institution dormitory holds all of the following fire drills each year and keeps a record of those drills:

*(a) One fire drill in the fall semester, held **within** 21 days **after** the start of classes in that semester.*
(b) One fire drill in the spring semester.
(c) One fire drill in the summer semester if the dormitory is occupied by students during that semester.

(3) A postsecondary educational institution shall hold at least 1 of the fire drills described in subsection (2)(a) or (b) while school is in session and between sunset and sunrise (for example, between 9:00pm and 5:00am).

NOTE: Note one fire drill must be conducted in the dark, between the sun setting and the sun rising.

8. **Question: How do I report my fire drill information to the Bureau of Fire Services?**

   Answer: According to the Fire Prevention Code, PA 207 of 1941, as amended, MCL 29.19a; Section 19a(5), a postsecondary educational institution shall submit to the bureau, on a form prescribed by the bureau the drill record, instructional staff training record and the statement certifying the institution has complied with all the requirements on the Postsecondary Fire Safety Drill – Training Requirements form, BFS-48 and emailed to LARA-postsecondary@michigan.gov.

9. **Question: I failed to complete the required documentation for my fire drills by January 10th of the following calendar year, what will happen?**

   Answer: According to the Fire Prevention Code, PA 207 of 1941, as amended, MCL 29.19a; Section 19a(6)(a-b):

   (6) In addition to any other applicable penalties or remedies under this act, all the following apply if a postsecondary educational institution violates this section:

   (a) 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.

   (b) 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.

10. **Question: What do I do if the contact person changes at my postsecondary educational institution?**

    Answer: Email contact information that has changed to the following email address: LARA-postsecondary@michigan.gov.

11. **Question: Are postsecondary educational institutions still required to conduct fire drills due to COVID-19?**

    Answer: Yes. Students living in dorms must conduct the fire drills while practicing social distancing and wearing masks. Practicing evacuation procedures is crucial to establishing muscle memory of what to do when the fire alarm sounds especially to students new to living away from home. Fire Drills demonstrates to students the importance of situational awareness and how to evacuate safely. Additionally, it provides feedback of evacuation efficiency to assess the current procedures for campus staff.

12. Question: How should postsecondary educational institutions adjust fire drills due to COVID-19 or another pandemic?

Answer: Training of staff and residents in dorms should include best practices and Center for Disease Control and Prevention guidance. Postsecondary educational institutions will need to review and discuss options for accomplishing social distancing during an emergency evacuation, assessing travel routes for egress and space assessment to properly social distance at assembly points outside the buildings. Masks must be worn when social distancing is not possible. Participants should utilize hand washing and hand sanitizing after each drill. Hand sanitizing stations should be provided, but not in the path of egress (stairwells and hallways).