



Indian Health Service
Office of Environmental Health & Engineering
Division of Engineering Services

Date: March 6, 2020
From: Director, Division of Engineering Services
Authority Having Jurisdiction
Subject: Alcohol-Based Hand-Rub Dispensers in IHS Owned Health Care Facilities
AHJ Clarification
To: Acting Director, Office of Environmental Health and Engineering

Background:

Alcohol-Based Hand-Rub dispensers (ABHRs) were first specifically permitted in rooms, corridors, and suites in health care and ambulatory health care occupancies by the 2006 edition of NFPA 101 Life Safety Code. Based on fire-modeling, specific criteria for compliance was included to address individual capacity, separation, aggregate volume, proximity to ignition sources, and flooring materials. Similar provisions were developed and authorized in the 2015 edition of NFPA 101 permitting ABHRs in nearly all occupancies, including business occupancies.

The IHS OEHE Technical Handbook Chapter 24-2, Applicability of Life Safety Codes, requires new IHS facilities to be designed and constructed in accordance with the most current edition of NFPA 101, and to remain in compliance with that edition throughout their life. This chapter also requires existing facilities to be reassessed every five years against the relevant existing occupancy codes, including the most current edition of NFPA 101. In effect, an existing IHS facility determined to be in compliance with the existing occupancy codes of the most current edition of the NFPA 101 Life Safety Code is considered to be in compliance with IHS Life Safety requirements. The responsibility for conducting these assessments is assigned to personnel from each Area Office as described in IHS OEHE Technical Handbook Chapter 73-1, Facilities Condition Assessment Program.

AHJ Clarification:

IHS owned health care facilities are permitted to provide Alcohol-Based Hand-Rubs in corridors in business occupancies under either of the following conditions:

1. The facility has been designed, constructed, and maintained in full compliance with the 2015 or later edition of NFPA 101 Life Safety Code.
2. The facility has been reassessed and determined to be fully compliant with existing occupancy provisions of the most current edition of the NFPA 101 Life Safety Code.

Michael R. Weaver, P.E., BCEE
AHJ for the Indian Health Service

cc: HFAC Members
All Area OEHE Directors
All Area OEHE Facility Directors