



MENTAL RETARDATION BULLETIN

COMMONWEALTH OF PENNSYLVANIA - DEPARTMENT OF PUBLIC WELFARE

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SUBJECT:
**Regulation Interpretation
Unobstructed Egress**

BY:

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SCOPE:

County Mental Health/Mental Retardation Administrators
Community Home Directors
Family Living Home Directors
Adult Training Facility Directors
Vocational Facility Directors

PURPOSE:

The purpose of this bulletin is to establish new interpretive guidelines for mental retardation licensing regulations related to unobstructed means of egress from licensed mental retardation facilities.

BACKGROUND:

During inspections recently conducted across the commonwealth, the Office of Mental Retardation discovered numerous homes with locks on exits which require a key to gain egress without permanently affixing the key nearby as required under the current interpretive guideline. Given the prevalence of this violation and the potential for serious injury or death which could result in the event of an emergency, it has become necessary to revise the interpretive guideline to further ensure the safety of individuals receiving services.

REGULATIONS:

Chapter 6400.101 - Stairways, halls, doorways, passageways and exits from rooms and from the building shall be unobstructed.

Chapter 6500.101 - Stairways, halls, doorways and exits from rooms and from the home shall be unobstructed.

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:

Appropriate Regional Licensing Administrator

Chapter 2380.82 - Stairways, halls, doorways, aisles, passageways and exits from rooms and from the building shall be unobstructed.

Chapter 2390.81 - Stairways, hallways and exits from rooms and from the facility shall be unobstructed.

REGULATION INTERPRETATION:

Are stairways, halls, doorways, aisles, passageways and exits from rooms and from the building unobstructed?

Explanation: This does not apply to exits from a community home or family living home if all of the following conditions are met:

- The exit is never used:
- The exit is not accessible and does not have the appearance of being an exit; and
- There are at least two other usable exits from that floor.

Doors may not be equipped with operable locks which require a key or combination entry to gain egress. Locks may remain in place if rendered permanently inoperable by means of removing the bolt and filling the hole with a hardening filler (such as putty or plastic wood), or by filling the keyhole with filler.

Adult training facilities and vocational facilities may use removable keyed locks (such as a padlock and chain) on facility doors when no individuals are in the building.

Magnetic door release systems and delayed buzzer panic bar systems are acceptable in adult training facilities which are dually licensed by the Department of Aging as older adult daily living centers serving people with dementia-related diseases when a written variance approving such systems has been issued by the Pennsylvania Industrial Board of the Department of Labor and Industry.

OBSOLETE BULLETINS:

This bulletin replaces current licensing inspection Instrument guidelines for community homes (CH. 6400.101), family living homes (CH. 6500.101), and adult training facilities (CH. 2380.82) and is added to the LII for vocational facilities (CH. 2390.81).