Fire Alarm Systems: the GAR and "exemptions from design release requirement"

→ **GIVEN: this is the current text found in the GAR**

- The starting point is 675 IAC 12 - 6 - 4 (b) (3) (G):

  Design releases are necessary for the remodeling or altering of all Class 1 structures, except work limited to one (1) or more of the following:

  (3) Electrical work as follows:

  (G) Except for fire detection or fire alarm systems, electrical wiring, devices, appliances, apparatus, or equipment:

  (i) operating at less than twenty-five (25) volts; and

  (ii) not capable of supplying more than fifty (50) watts of energy.

- The key portion of this rule is found at the beginning of (G) where it says, "Except for fire detection or fire alarm systems,". This means any and all remodeling or altering of a fire detection or fire alarm system requires a design release.

- Further support of the decision in the bullet above is found in the text of 675 IAC 12 - 6 - 4 (b) (3) (E) where it says, "Low-energy power, control, and signal circuits of Classes II and III as defined in the Indiana Electrical Code except circuits for fire detection or fire alarm systems. This means any and all electrical work on circuits for fire detection or fire alarm systems requires a design release.

→ **CONCLUSION: Any and all electrical work pertaining to a fire detection or fire alarm system requires a design release. This includes electrical work on the circuits, electrical wiring, devices,**

appliances, apparatus or equipment.

The General Administrative Rules (GAR), 675 IAC 12, list the rules and guidelines for the Fire Prevention and Building Safety Commission (FPBSC) and the Division of Fire and Building Safety (DFBS). There are fee schedules described, the administrative procedures for the FPBSC are established, variances and all of the administrative procedures pertaining to variances are shown and exemptions from design releases are described to name a few of the topics found in the rules.

The focus of this policy specifically pertains to the section titled "Exemptions from design release requirements", 675 IAC 12 - 6 - 4. When discussing fire detection or fire alarm systems, there are two parts in this specific section which apply; 675 IAC 12 - 6 - 4 (b) (3) (G) and 675 IAC 12 - 6 - 4 (b) (3) (E). Both of these sections require a design release for any and all electrical work pertaining to a fire detection or fire alarm system. This includes electrical work on the circuits, electrical wiring, devices, appliances, apparatus or equipment. This requirement is not realistic and doesn't take into account the normal day to day activities that involve the maintenance of fire alarm systems throughout the state.

In support of this position is the language of 675 IAC 12 – 4 – 9 (a) – (c). These sections require that all structures, including "emergency detection, emergency communication, or fire or explosion systems, and all parts thereof," shall be maintained.

The purpose of this policy is to better describe when fire detection or fire alarm systems and the electrical work associated with these systems are exempt from acquiring a design release.

The following situations are examples of remodeling or altering a fire detection or fire alarm system and a design release is not required:

1) **replacement in the same location of devices of a similar type and rating (smoke detectors, heat detectors, HVAC duct detectors, manual pull stations, notification devices, etc.) when the functionality of the devices is the same and the UL listing of the device(s) has not been compromised. (this is the like - for - like philosophy)**

   Ex. 1 – replacement in the same location of a defective strobe, horn, or horn/strobe assembly with another of the same type of device.

   Ex. 2 – replacement in the same location of a single action manual pull station with a double action manual pull station.

   Ex. 3 – replacement in the same location of a glass rod manual pull station with a single action manual pull station.

   Ex. 4 – replacement in the same location of a photoelectric smoke detector with an ionization smoke detector.

   Ex. 5 – replacement in the same location of a smoke detector with a heat detector where permitted by 675 IAC 13.

2) **replacement in the same location of equipment of a similar type and rating (fire alarm control panels) when the functionality of the equipment is the same and the**

UL listing of the equipment has not been compromised. (this is the like - for - like philosophy)

Ex. 1 – replacement in the same location of an out-dated conventional fire alarm control panel with an up-to-date conventional fire alarm control panel.

Ex. 2 – replacement in the same location of an out-dated or defective conventional fire alarm panel with a smart panel where no addition/replacement of wiring or devices occurs.

Ex. 3 – replacement in the same location of a defective annunciator panel with a new annunciator panel.

Ex. 4 – replacement in the same location of a defective NAC panel with a new NAC panel.