



April 25, 2022

The Honorable Emanuel Cleaver  
Chair, Subcommittee on Housing,  
Community Development, and Insurance  
2129 Rayburn House Office Building  
Washington, DC 20515

**RE: Letter for the Record for the Hearing Entitled, “A Matter of Life and Death: Improving Fire Safety in Federally Assisted Housing”**

Dear Chairman Cleaver,

The Door and Hardware Institute (DHI) requests that this letter be included in the record for the Subcommittee’s April 20, 2022 hearing, “A Matter of Life and Death: Improving Fire Safety in Federally Assisted Housing.” As way of background, DHI is an association proudly serving door security and safety professionals, and the dynamic companies they represent, in the non-residential construction industry. Our Certified Fire + Egress Door Assembly Inspector Program (CFDAI) is widely recognized as the premier industry credential for fire door safety inspection professionals. On behalf of more than 5,000 door security and safety professionals represented by DHI across the United States, we thank the Committee for its attention to the important topic of fire safety in federally assisted housing.

We are writing to draw the Committee’s attention to the importance of fire door assemblies in fire prevention as it considers legislative solutions to prevent tragedies such as the Twin Parks North West apartment fire from occurring again in the future.

**The Importance of Fire Door Assemblies in Fire Protection and Prevention**

Life safety through proper fire and smoke containment is a critical issue for building owners and the authority having jurisdiction (AHJ), and doors and hardware are essential elements demanding their utmost attention. Door leaves are one of the few moving elements of a building that people routinely touch and as a result, they are susceptible to wear and tear over time and require ongoing maintenance to keep them working properly. When door leaves are working properly, we might never be consciously aware of them. On the other hand, we become painfully aware of them when they are difficult to open or close and as they become an obstacle we need to overcome in an emergency setting.

In addition to the fire protection properties of door assemblies, swinging door assemblies must provide occupants with access to a clear, unobstructed path of egress through the building, space, or structure to the public way (the street or other safe area outside the building) in panic-inducing situations. Occupants need to be able to evacuate a building, space, or structure safely and quickly at a moment's notice.

Perhaps the most common misconception regarding fire door assemblies is that they will maintain their appearance and be fully functional after being exposed to a fire. During the first few minutes of fire exposure, a metal fire door leaf expands very rapidly on the fire-side of the assembly. This expansion causes the door leaf to deform as it deflects, twists, and warps toward the heat of the fire. When the fire is on the pull-side of the assembly, enormous stress is exerted on the hinges and the latching hardware; but the door leaf must stay closed and latched. As the intensity of the fire increases, the door leaf deflects farther, exerting more stress on the hinges and latching hardware. Latching hardware and hinges are designed to bear an enormous amount of stress during a fire, but they also need to be able to handle additional stresses when the superheated assembly is exposed to the water temperature and pressure from fire hoses as firefighters extinguish the flames.

For these reasons, the National Fire Protection Association (NFPA) has developed robust door assembly inspection requirements in the **NFPA 80 and NFPA 101 standards**. NFPA 80, *Standard for Fire Doors and Other Opening Protectives*, contains specific requirements for the formal inspection of fire door assemblies to ensure that they are properly maintained throughout the life of their installation and will function properly under fire conditions. Under the provisions of NFPA 80, fire door assemblies are required to be inspected on an annual cycle, and written documentation of these safety inspections is required to be kept on site for review by the AHJ. Another important code that requires safety inspections of swinging door assemblies is NFPA 101, Life Safety Code™, which outlines requirements for both fire-rated and non-fire-rated egress door assemblies. **We strongly urge Congress to ensure that the Department of Housing incorporates NFPA 80 and NFPA 101 inspection requirements into its broader inspection criteria to improve life safety in federally assisted housing.**

### **Congress Should Take a Holistic View When Considering New Fire Mitigation Measures**

Committee members and other stakeholders have highlighted legislation that would require or fund fire protection measures such as sprinkler systems, temperature sensors, and self-closing doors. While these measures would undoubtedly help improve life safety, we urge Congress not to limit legislation to a single solution. **Fire protection features are most effective when working as part of a total system, not simply as a stand-alone element.** In a perfect world, fire door assemblies contain fires and provide time for sprinkler systems to extinguish the flames. However, sprinkler systems remain idle, waiting for that moment in time when they are called on to perform their function. Most times the sprinkler systems work well. However, sometimes they fail or are insufficient and cannot contain the flames or prevent the spread of smoke and gases; their success depends heavily on the containment of flames that is provided by fire-resistant construction in ceilings, floors, partitions, walls, and of course, the fire door

assemblies and other opening protectives that are installed within them. Unfortunately, many buildings lack these key protectives, including by failing to meet basic requirements for fire-rated or non-fire rated door assemblies.

As such, we would encourage the Committee to consider expanding legislation to allow more flexibility for building owners to make fire safety improvements that are best suited to improve the safety of their occupants, including by upgrading door assemblies to rated fire door assemblies where appropriate.

Once again, we appreciate the Committee's attention to this matter. DHI is proud to offer itself and its credentialed members as a resource as it considers any future fire safety legislation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cedric Calhoun', with a horizontal line extending to the right.

Cedric Calhoun, FASAE, CAE  
Chief Executive Officer  
Door and Hardware Institute

Cc:

Members of the House Financial Services Subcommittee on Housing, Community Development and Insurance