

- D. For design features that are addressed by both the IBC as well as by NFPA 101 or a document referenced by NFPA 101, the requirements of NFPA 101 or the document referenced by NFPA 101 must be used exclusively (this applies even if the IBC requirements are different).

Note: VA buildings must meet the requirements of NFPA 101, and documents referenced by NFPA 101 in order to comply with the accreditation requirements of the Joint Commission. It is intended that life safety and fire protection features will be designed in accordance with the requirements of NFPA 101 and documents referenced by NFPA 101. Other building features (including, but not limited to, structural strength, stability, sanitation, adequate light and ventilation, and energy conservation) will be designed in accordance with the IBC and documents referenced by the IBC or as identified in VA Program Guide [PG-18-3](#), Topic 1 – Codes, Standards, and Executive Orders.

- E. Strict compliance to codes and standards is mandatory for new construction.

1.4 Fire Protection During Construction:

- A. Coordinate with the facility prior to and concurrent with design.
- B. Fire protection during construction must comply with VA Master Construction Specifications. (Note: Specification Section 01 35 26 , Safety Requirements, addresses NFPA 241, Joint Commission Interim Life Safety Measures, Hot Work Permits, etc..)
- C. Separate all occupied areas from demolition, rehabilitation, or construction activities by temporary smoke-tight construction partitions of gypsum board or other approved non-combustible or limited-combustible material. Partitions must be full height, extending through suspended ceilings to the floor slab or roof deck above and must be one-hour fire rated, unless sprinklers are installed and are operational on both sides of the temporary partition whereupon the partition may be permitted to terminate at the ceiling in accordance with NFPA 241. Where the ceiling on one side of the temporary construction barrier has been removed, the temporary partition must extend to the deck above.

Note: This requirement is due to the inherently greater potential for fire or hazardous materials incidents associated with the combustibles and operations of demolition/construction. This risk is made worse by the likelihood of compromised fire protection systems and fire or smoke resistant construction. This does not obviate the need to provide other protective measures to contain dust and debris as specified by VA Master Specification Section 01 35 26 1.14 (D). Sprinklers are considered to be operational when they are installed in accordance with NFPA 13 (spacing, protection, distance from the ceiling, etc.) and there is a sufficient automatic water supply. If the ceiling was removed and the sprinklers remain at the original ceiling level, they would likely not be considered operational. A change to the 2021 edition of NFPA 101 (18/19.7.9.3) addresses separation requirements for short duration nonhazardous construction activities. The change permits the use of fire-retardant plastic as a temporary barrier.

- D. Phase construction as necessary to ensure that obstruction of exits is minimized or avoided. If exits are obstructed during construction, provide alternate exit routes during each phase of construction and identify the alternate routes on the construction drawings.
- E. Minimize or avoid disruptions to fire alarm and sprinkler systems. Delineate phasing of construction to ensure that installations of new systems are expedited, and where possible, maintain existing systems in service until the replacement system is operational. If fire protection systems are to be disrupted, ensure procedures are incorporated to maintain



equivalent levels of fire protection and provide formal notification to the facility while systems are down.

1.5 Americans with Disabilities Act (ADA): Fire Protection requirements of ADA do not apply to federal agencies. VA is required to comply with the Architectural Barriers Act Accessibility Standard (ABAAS) for Federal Facilities. In addition, VA uses the Barrier Free Design Standard to meet the needs of the Department of Veterans Affairs in its health care facilities.

