

2026 Indiana Fire Prevention Code

Emergency communication and response planning

Packet detail	Information
Submitted by	Hunter Cullen
Submitted to	Indiana Fire Prevention and Building Safety Commission
Rule target	Proposed 675 IAC 22-2.6; 2024 IFC with Indiana amendments
Revised	September 13, 2026

Requested action

I ask the Commission to adopt the following emergency communication amendments, including a limited risk analysis requirement before qualifying RHS or SGL services first begin at a site.

I am a self-advocate. An emergency signal may alert an occupant without explaining what to do. Occupants may need clear instructions or staff assistance to evacuate, relocate, shelter in place, or take another protective action. These amendments connect notification technology with the action occupants need to take.

Draft baseline and scope

This comment targets the June 1, 2026 draft, not an effective 2026 rule. Retain the model code provisions in Sections 917.1 and 917.2. The proposed additions below supplement that baseline. [1, 5]

Both June drafts remove voice system language from Section 907.2.3 for Group E educational occupancies. The quality provisions below apply where a voice system is required; they do not restore that deleted requirement or require voice in every building. [1, 2]

Proposed definitions

Add these definitions in Chapter 2 through 675 IAC 22-2.6-3. These are proposed code definitions. All text identified as an addition in this packet is new text. [9, 10]

PROTECTIVE ACTION. An action taken to avoid or reduce exposure to a hazard, including evacuation, relocation, shelter in place, lockdown, or another action identified in an approved emergency plan.

RESIDENTIAL HABILITATION AND SUPPORT (RHS). An Indiana Medicaid home- and community-based waiver service that provides supervision, training, or other support to help an individual acquire, improve, or retain skills for living in the individual's own home.

SUPERVISED GROUP LIVING (SGL). A community residential facility licensed under 460 IAC 9 that provides residential support to persons with developmental disabilities.

Proposed system requirements

Add the following subsections through 675 IAC 22-2.6-7. Use the edition of NFPA 72 referenced by the adopted code and its Indiana amendments.

Coordination of emergency voice systems

Add Section 907.5.2.2.6.

907.5.2.2.6 Coordination. Emergency voice/alarm communication systems required by this code shall be coordinated with the fire safety and evacuation plans required by Section 404. The approved sequence of operation shall identify initiating events, paging zones, message priorities, system interfaces, emergency control functions and manual override. The sequence of operation shall be included in the fire alarm shop drawings required by Section 907.1.2. Manual override and alternative uses shall comply with Sections 907.5.2.2.1 and 907.5.2.2.3.

Message content and intelligibility

Add Section 907.5.2.2.7.

907.5.2.2.7 Message content and intelligibility. Voice messages shall be clear and concise and shall provide instructions for the protective action to be taken. Message content shall be consistent with the fire safety, evacuation and lockdown plans, where required. Voice intelligibility shall be in accordance with NFPA 72. Construction documents shall identify the acoustically distinguishable spaces in which intelligibility is required and the method of verification. Intelligibility shall be verified and documented as part of the acceptance testing required by Section 907.7.

Emergency communication and assistance plans

Through 675 IAC 22-2.6-5, amend Section 404.2 by replacing the reference to Section 404.2.3.2 with Section 404.2.4. Add Section 404.2.4 to read as follows:

404.2.4 Emergency communication and assistance. Fire safety, evacuation and lockdown plans required by this code shall include the following:

1. The means of notifying occupants of each protective action addressed by the plan.
2. Procedures for communicating instructions to occupants who require assistance to recognize or understand emergency notification or to initiate or complete a protective action.
3. Identification and assignment of personnel responsible for providing prompting, cueing, redirection, instruction or physical assistance.

Technical basis

Section 907.5.2.2 establishes system operation and the NFPA 72 installation reference. Its existing subsections address manual override, live voice messages, alternative uses, captions and standby power. The additions document coordination and intelligibility without replacing those requirements or the audible and visible notification provisions. [5, 6]

Section 404.2.4 supplements the existing plan contents in Sections 404.2.1, 404.2.2 and 404.2.3.1. Retain the distinct lockdown notification requirement in Section 404.2.3.1, Item 4.1, and the training and drill provisions in Sections 405 and 406. [13]

Proposed risk analysis requirement

Retain Sections 917.1 and 917.2 and add the following subsection through 675 IAC 22-2.6-7.

917.3 Residential habilitation and support and supervised group living. Prior to the first provision of RHS or SGL services at a Class 1 or Class 2 structure, a mass notification risk analysis shall be conducted in accordance with NFPA 72 where an approved plan required by Section 404 or a site-specific plan or assessment identifies one or more occupants who ordinarily require staff prompting, cueing, redirection, instruction or physical assistance to recognize or understand emergency notification or to initiate or complete a protective action. Where the risk analysis determines a need for mass notification, an approved mass notification system shall be provided in accordance with the findings of the risk analysis.

Exceptions:

1. Dwelling units and sleeping units used solely as private residences where RHS or SGL services are not provided.
2. This section shall not apply solely because intermittent, episodic, incidental or visiting services are provided.

Conforming amendment for existing buildings

Through 675 IAC 22-2.6-2, add the following at the end of Section 102.3.1.

Section 917.3 shall apply to existing structures where RHS or SGL services are first provided on or after the effective date of this code, whether or not a change of occupancy classification occurs.

Reason

The proposed Section 917.3 follows the risk analysis and conditional system requirement used in the 2024 model code. Sections 917.1 and 917.2 remain unchanged. The added category addresses documented assistance needs at RHS and SGL premises. Receipt of services or a diagnosis alone does not satisfy the stated assistance condition. [5]

The analysis should consider the hazards, occupant needs, staffing and existing notification capabilities. Existing adequate systems and an analysis prepared for the companion code should inform the review. The proposal does not replace other required fire alarm or occupant notification provisions.

Scope and accessibility basis

The service start trigger may require assessment and physical work in an existing building before services first begin. The conforming amendment addresses existing structures prospectively. A qualifying RHS site may also be someone's home; the private residence exception does not exempt an RHS residence that meets the trigger. Construction remains subject to Building Code Section 113 and Chapter 34. [2]

Effective communication obligations depend on the covered entity and circumstances. Sections 35.160 and 36.303 of 28 CFR support attention to accessible emergency communication; they do not independently mandate a particular mass notification system at every residence. Coordinate these amendments with existing FSSA and facility requirements, and use functional summaries for code review without unnecessary disclosure of personal records. [7–11]

Regulatory and fiscal review

I assert no statewide dollar estimate or cost neutrality. I ask the agency to evaluate incremental costs and benefits under IC 4-22-2-22.8 and distinguish existing duties. The analysis should avoid counting the same system under both codes. Whole code estimates do not establish this proposal's cost. [3, 4]

Proposed change	Potential added cost	Evidence to obtain
Coordination and intelligibility	Design documentation, programming, verification, and corrections.	Current practice, professional hours, testing and retesting costs.
Plan procedures	Plan updates, staff preparation, and integration into required drills.	Affected sites, update hours, existing provider obligations.
Risk analysis and any required system	Analysis, review, installation if indicated, ongoing testing, maintenance, and training.	Qualifying sites or projects, current systems, no system findings, and lifecycle costs.

The intended benefit is that occupants receive usable instructions and needed assistance. Assess effects on small providers, residents, housing availability, and review capacity. I ask the Commission to adopt the text or refer it for technical and jurisdictional review with self-advocates, disability providers, and qualified design professionals. Coordinate final numbering and the effective date provisions before adoption.

Authorities and source materials

Indiana draft materials reviewed September 12–13, 2026. Model code provisions checked September 13, 2026. Text identified for addition is proposed Indiana amendment language.

1. [IDHS, June 1, 2026 Fire Code draft. 675 IAC 22-2.6-2, -3, -5, and -7.](#)
2. [IDHS, June 1, 2026 Building Code draft. Companion rule coordination.](#)
3. [IDHS, 2026 Fire Code regulatory analysis. Baseline rule analysis, not an estimate for these additions.](#)
4. [Indiana OMB, Regulatory Analysis Template under IC 4-22-2-22.8.](#)
5. [ICC, 2024 IFC, first printing, October 2023. Chapter 9, Sections 907.1.2, 907.5.2.2, 907.7 and 917.](#)
6. [NFPA 72, National Fire Alarm and Signaling Code. Use the edition incorporated by the applicable Indiana code.](#)
7. [28 CFR 35.160, effective communication by public entities.](#)
8. [28 CFR 36.303, auxiliary aids and services in public accommodations.](#)
9. [Indiana FSSA, Medicaid HCBS Waivers. CIH waiver and SGL program materials.](#)
10. [460 IAC 9, Community Residential Facilities for Persons with Developmental Disabilities.](#)
11. [FSSA, Provider Emergency Plan Policy announcement, July 18, 2022. Related provider obligations.](#)
12. [IDHS, Fire Prevention and Building Safety Commission meeting materials.](#)
13. [ICC, 2024 IFC, first printing. Chapter 4, Sections 404, 405 and 406.](#)