



Long-Term Care Regulation Technical Memorandum

Number: TM 2024-01
Title: Single-action Latches, Locks or Other Fastening Devices on a Door
Provider Types: Assisted Living Facility (ALF)
TAC Reference: See Endnote ¹
Date Issued: December 18, 2024

1.0 Subject and Purpose

This technical memorandum (TM) provides guidance on the interpretation of, and compliance with, the requirements for a latch, lock, or other fastening device on a door, in a means of escape or means of egress in ALFs, as established in Texas Administrative Code, Title 26 (26 TAC), Chapter 553, Licensing Standards for Assisted Living Facilities.²

A door using special locking arrangements has additional requirements for the release of latches or other fastening devices. Special locking arrangements include delayed-egress locks and locking arrangements for doors and gates in certified Alzheimer’s ALFs.

Read [Section 4.0, Resources](#) of this TM for additional guidance on a door using special locking arrangements.

The guidance provided in this TM cannot address every unique requirement of every ALF. Compliance can only be evaluated based upon the on-site conditions in each situation. This TM applies only to the provisions of 26 TAC Chapter 553, Subchapter D³ specifically addressed herein. It does not constitute a substantive change to any provision of those sections, nor does it address or modify any other rule in Chapter 553 or other legal requirement to which an ALF is subject, including requirements for approval by a local authority having jurisdiction (AHJ) for enforcement of its own standards.

2.0 Policy Details & Provider Responsibilities

Latches, locks, and other fastening devices are primarily used to keep a door closed or prevent access to a space on the other side of the door. In most instances, a door in an ALF must be able to be freely opened from inside the room or space, and must not be latched, locked, or fastened in a way that prevents a person in the room from getting out of the room or space.⁴

A door with more than one latch, lock, or fastening device could require “special knowledge or effort” to operate and would not be considered to meet life safety code requirements. If a door has two latching, locking, or fastening devices, it is common for the two devices to need to be released or unlocked in a specific order. When more than one latching, locking, or fastening device is present on a door, occupants might be confused about whether a lock is in the locked or unlocked position.

The operation of latches, locks, and other fastening devices on a door that does not meet the applicable requirements could cause evacuation out of the space to be delayed. A latch, lock, or other fastening device on a door in a means of escape⁵ or a means of egress⁶ must have a releasing device that meets certain requirements.⁷

- The releasing device must have an obvious method of operation.
- The releasing device must be readily operated under all lighting conditions.
- The releasing device must unlatch or unlock the door with one releasing motion.⁸

It is not always apparent that a latch, lock, or other fastening device can release with a single motion. A latch, lock, or other fastening device that has a button or turning thumbpiece in the doorknob or door lever might be unlatched or unlocked using a single motion, but this is not always the case. Some door latches, locks, or fastening devices require a separate motion to turn the thumbpiece before turning the doorknob or lever. This means that the type of latch, lock, or fastening device requires two motions, rather than a single motion. A latch, lock, or fastening device that must be turned is only considered to be single-action if the device is released when the doorknob or lever is turned.

Some latches, locks, or fastening devices can operate with a single motion but can also be set to require more than one motion (not single-action). The only way to determine whether a latch, lock, or fastening device will unlatch or unlock with a single motion is to physically operate the device in every way it can be used. A device that can operate in a way that requires more than one motion does not meet life safety code requirements even if an ALF only intends to use it in the “single-action” mode.

HHSC only permits a deadbolt lock on a door if the deadbolt lock can be unlocked, and the door can be opened, with a single action. A single-action locking device that includes a deadbolt lock is most commonly used in hotel settings. A door with a deadbolt lock does not usually meet ALF requirements because the deadbolt usually must be unlocked independently from the latching devices (a doorknob or door lever), requiring more than one opening action. This does not mean that deadbolt locks are prohibited altogether. HHSC considers a door with a deadbolt lock that is the only means of latching the door—that is, the door is only latched when the deadbolt projects into the door frame—to be single-action if it unlatches and unlocks with a single motion.⁹

3.0 Background/History

[Health and Safety Code §247.0263](#) requires HHSC to provide “guidance on the interpretation of minimum life safety code standards” prescribed under Health and Safety Code, Chapter 247, Assisted Living Facilities, and ALF rules, in 26 TAC Chapter 553. The statute requires a TM to be published at least twice a year. The statute requires surveyors to use the interpretation in a TM to assess an ALF’s compliance with the requirements referenced in the TM.

4.0 Resources

[PL 18-25, Delayed-Egress Locks](#)

[TM 2018-01, Exit Door Locking Arrangements for Certified Alzheimer’s Assisted Living Facilities](#)

[TM 2018-02, Control Door Locking Arrangements for Certified Alzheimer’s Assisted Living Facilities](#)

[TM 2018-03, Fence Requirements and Gate Locking Arrangements for Certified Alzheimer’s Assisted Living Facilities](#)

[TM 2020-01, Bedroom Door Lock](#)

5.0 Contact Information

If you have any questions about this letter, please contact the Policy and Rules Section by email at LTCRPolicy@hhs.texas.gov or call (512) 438-3161.

Endnote References

¹ All references to Texas Administrative Code, Title 26, Part 1, Chapter 553, Licensing Standards for Assisted Living Facilities, can be viewed at the [Texas Office of the Secretary of State website](#).

- Existing small Type A ALF – [26 TAC §553.113\(c\)](#)
- Existing small Type B ALF – [26 TAC §553.123\(c\)](#)
- Existing large Type A ALF – [26 TAC §553.133\(c\)](#)
- Existing large Type B ALF – [26 TAC §553.143\(b\)](#)
- New small Type A ALF – [26 TAC §553.213\(c\)](#)
- New small Type B ALF – [26 TAC §553.223\(c\)](#)
- New large Type A ALF – [26 TAC §553.233\(c\)](#)
- New large Type B ALF – [26 TAC §553.243\(b\)](#)

² See [endnote 1](#).

³ See [endnote 1](#).

⁴ There are exceptions to the requirement that a door be easily opened from inside the room in a Type B ALF that is a certified Alzheimer’s assisted living facility and in a certified Alzheimer assisted living unit in a Type B

⁵ Means of escape, rather than means of egress, is a way out of a building that does not meet the strict definition of means of egress (see [endnote 6](#)) but provides an alternate way out. Means of escape applies to small residential board and care occupancies including small Type A and small Type B ALFs. A means of escape only has to provide a way out of a building but does not have to provide a continuous and unobstructed path to a public way.

⁶ A means of egress is a continuous and unobstructed way of travel from any point in a building to a public way such as a sidewalk. Means of egress applies to large residential board and care occupancies such as large Type A ALFs and to healthcare occupancies such as large Type B ALFs.

⁷ NFPA 101, *Life Safety Code*, 2012 edition, is referenced by the ALF rules listed in [endnote 1](#). NFPA 101 requires door leaves to meet the

requirements of NFPA 101, 7.2.1.5, Locks, Latches, and Alarm Devices.

NFPA 101, 7.2.1.5.1, requires a door to be arranged for easy opening from the egress side—usually the inside of the space served by the door.

NFPA 101, 7.2.1.5.3, prohibits locks on door leaves from using a key, tool, or special knowledge or effort for operating the lock from the egress side. A door leaf is the main panel of a door that swings open and closed. It is the primary part of the door that allows building occupants to pass through. A door leaf is attached to the door frame by hinges and is a key part of the door assembly, which also includes the gram, latch, handle, and other hardware.

NFPA 101, 7.2.1.5.10, requires a latch or other fastening device on a door to have an obvious method of operation and be easily opened under all lighting conditions.

NFPA 101, 7.2.5.10.2, requires the releasing mechanism for a latch or other fastening device to open the door with a single releasing operation. Exceptions to this requirement for residential occupancies in NFPA 101 do not apply to ALFs.

NFPA 101 and other National Fire Protection Association (NFPA) codes and standards may be viewed online at no cost.

To review NFPA codes and standards online:

[View the list of NFPA's codes and standards.](#)

Select the document you want to review.

Click the "Free Access" link (red outlined button under the document title)

Select the edition of the document you want to review.

Click "View."

You may be asked to "sign in" or create a free profile to access the document in read-only format.

⁸ A latch, lock, or other device, that unlatches or unlocks a door is also called "single-action" hardware. "Single-action" is not a technical term, although it accurately describes the way some door hardware operates. In most cases you will not be able to order or specify "single-action" hardware. When purchasing door latching or locking devices you should request a device that releases with a single operation.

⁹ A door that is only latched or locked using a deadbolt lock usually has a

device that keeps the door closed without latching, such as a door closer or spring hinge.