



Long-Term Care Regulation Technical Memorandum

Number: TM 2024-02
Title: Resident Room 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 door between a resident room and a hallway or corridor in ALFs as established in Texas Administrative Code, Title 26 (26 TAC), Chapter 553, Licensing Standards for Assisted Living Facilities.²

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

A door between a resident room, which can be a bedroom or sleeping room or an apartment-style living unit, and a hallway or corridor is a critical component in protecting a resident from exposure to smoke or fire. A door between a resident room and a corridor or hallway must meet specific smoke resistance requirements and, in some cases, fire resistance requirements.

2.1 Terminology

The following terms are used in this TM as they are described in the following sections.

2.1.1 Existing ALF or New ALF

An ALF is considered an existing ALF if it was initially licensed before August 31, 2021, and has remained licensed without interruption since then.⁴

An ALF is considered a new ALF if it was initially licensed on or after August 31, 2021.⁵

Parts of an existing ALF that were constructed after August 31, 2021, might need to meet the requirements for a new ALF based on the building rehabilitation requirements in ALF rule⁶ and NFPA 101, *Life Safety Code*, 2012 edition.⁷

2.1.2 Resident Room

The ALF rules use the term “resident room” to mean two different things depending on the context in which the term appears.

Depending on the specific rule in which the term “resident room” is used, the term means:

- A bedroom; or
- A living unit.

2.1.3 Bedroom

A bedroom is a room where a resident sleeps. In some ALFs, the only space designated for the exclusive use of a resident is their bedroom. In ALFs where a resident has only a bedroom for their exclusive use, that room opens directly onto a hallway or corridor that is accessible to other residents, facility staff, and visitors.

For the purposes of this TM, a resident bedroom as described in this section is a resident room. The door between the resident room and a hallway or corridor that is accessible to other residents, facility staff, and visitors is a resident room door.

2.1.4 Living Unit⁸

A living unit is a portion of an ALF exclusively for the use of residents who occupy sleeping rooms in the living unit. A living unit is arranged as a separate unit providing one or more sleeping rooms, toilet and bathing facilities, and living and dining spaces. A living unit might or might not have facilities for cooking.

For the purposes of this TM, an entire living unit is a resident room. The door between the living unit and a hallway or corridor that is accessible to other residents, facility staff, and visitors is a resident room door.

2.1.5 Door That Resists the Passage of Smoke

A door resists the passage of smoke if the door closes the door opening leaving only the minimum clearances around the door that are necessary for the door to work properly. A door that is smoke resisting does not have louvers or grilles⁹ in the door surface. A door that is smoke resisting does not have to be smoke tight but is still effective at restricting the spread of smoke and reducing drafts.

The projecting molding around the perimeter of a door frame, against which the door closes, is known as a stop. Stops at the top and sides of a door that are part of the door frame help the door resist the passage of smoke. Gasketing of a door is not required for the door to resist the passage of smoke if the door is relatively tight-fitting in its frame.

Doors that resist the passage of smoke are not smoke door assemblies and do not have to be rated for air leakage. Resident room doors do not have to meet the requirements of NFPA 105, *Standard for Smoke Door Assemblies and Other Opening Protective*, or UL 1784, *Standard for Air Leakage Tests of Door Assemblies*.

2.1.6 Self-Closing or Automatic-Closing

A self-closing door is a door that is expected to be kept closed. A self-closing door is equipped with hardware so the door will close and latch into the door frame on its own unless held open by some means. A self-closing door can only be held open by a

hold-open device that automatically releases the self-closing door when the fire alarm system is activated.

An automatic-closing door is a self-closing door that is held open by a hold-open device that automatically releases the self-closing door when the fire alarm system is activated. An automatic-closing door is equipped with both self-closing hardware and a hold-open device connected to the fire alarm.

2.1.7 Fire Resistance or Opening Protection Rating of a Door

Where the ALF rules or NFPA 101 require a resident room door to have a fire resistance or opening protection rating, the door does not have to be a fire door assembly that meets the requirements of NFPA 80, *Standard for Fire Doors and Other Opening Protectives*.

Resident room doors are not fire doors, but in certain ALFs a resident room door is required to have a fire resistance or an opening protection rating. Where a resident room door is required to have a fire resistance or an opening protection rating, the fire resistance or opening protection rating only applies to the door itself and not to the other components of the door assembly, such as the door frame and door hardware (including the door latching device, hinges, and door closing devices).

Where the ALF rules or NFPA 101 require a resident room door to have a fire resistance or an opening protection rating, the rules and NFPA 101 recognize doors with solid wood cores that are at least 1-3/4 inches thick perform as well as doors that have been tested, listed, and labeled as having a 20-minute fire resistance.¹⁰

2.2 Existing Small Type A ALF

2.2.1 Existing small Type A ALF without fire sprinklers

An existing small Type A ALF that was initially licensed before January 5, 2014, and has remained continuously licensed since then, was not required to have a fire sprinkler system when it was initially licensed. Unless the facility makes substantial modifications, such as building an addition to the facility, HHSC will not require the facility to have a fire sprinkler system.

In an existing small Type A ALF that does not have an approved automatic fire sprinkler system that meets the fire protection systems requirements for an existing small Type A ALF, a resident room door must latch in its frame to resist the passage of smoke and must meet **one** of the following additional requirements:

- The door must be a solid core wood door at least 1-3/4 inches thick.
- The door must have a 20-minute opening protection rating.
- The door must be self-closing or automatic-closing.

2.2.2 Existing small Type A ALF with fire sprinklers

In an existing small Type A ALF that has an approved fire sprinkler system, the resident room door must latch in its frame to resist the passage of smoke but is not required to be made of any particular material or to be self-closing or automatic-closing.¹¹

2.3 Existing Small Type B ALF

A resident room door in an existing small Type B ALF must latch in its frame to resist the passage of smoke but is not required to be made of any particular material or to be self-closing or automatic-closing.

2.4 Existing Large Type A ALF

2.4.1 Existing Large Type A ALF without fire sprinklers

In an existing large Type A ALF that does not have an approved automatic fire sprinkler system that meets the fire protection systems requirements for an existing large Type A ALF, a resident room door must be self-closing or automatic-closing, must latch in its frame to resist the passage of smoke and must meet **one** the following additional requirements:

- The door must be a solid core wood door at least 1-3/4 inches thick.
- The door must have a 20-minute opening protection rating.

2.4.2 Existing Large Type A ALF with fire sprinklers

In an existing large Type A ALF that has an approved fire sprinkler system the resident room door must latch in its frame to resist the passage of smoke but is not required to be made of any particular material or to be self-closing or automatic-closing.

2.5 Existing Large Type B ALF

A resident room door in an existing large Type B ALF must latch in its frame to resist the passage of smoke. The resident room door is not required to be self-closing or automatic-closing.

The resident room door must be constructed of **one** of the following materials:

- The door must be a solid core wood door at least 1-3/4 inches thick.
- That door must be made of a material that resists fire for a minimum of 20 minutes.

2.6 New Small Type A ALF

A resident room door in a new small Type A ALF must latch in its frame to resist the passage of smoke but is not required to be made of any particular material or to be self-closing or automatic-closing.

2.7 New Small Type B ALF

A resident room door in a new small Type B ALF must latch in its frame to resist the passage of smoke but is not required to be made of any particular material or to be self-closing or automatic-closing.

2.8 New Large Type A ALF

A resident room door in a new large Type A ALF must latch in its frame to resist the passage of smoke but is not required to be made of any particular material or to be self-closing or automatic-closing.

2.9 New Large Type B ALF

A resident room door in a new Type B ALF must automatically latch against the door frame when closed and must remain closed until a deliberate unlatching action is initiated. The clearance between the

bottom of the door and the floor covering must not exceed 1 inch. A resident room door is not required to be made of any particular material or to be self-closing or automatic-closing.

2.10 Living Units with Independent Cooking

In an ALF containing living units with independent cooking equipment within the living unit, the resident room door to a living unit with independent cooking equipment must meet the requirements for a resident room door based on the age, size, and type of ALF.

A resident room door must also meet **all** the following requirements:

1. The door must be self-closing or automatic-closing.
2. The door must latch in its frame to resist the passage of smoke.

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

None.

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\(c\)](#); [§553.134\(a\)](#)
- Existing large Type B ALF – [26 TAC §553.143\(b\)](#); [§553.144\(a\)](#)
- 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\(c\)](#); [§553.234\(a\)](#)
- New large Type B ALF – [26 TAC §553.243\(b\)](#); [§553.244\(a\)](#)

² See [endnote 1](#).

³ See [endnote 1](#).

⁴ See [26 TAC §553.100\(e\)\(2\)](#).

⁵ See [26 TAC §553.100\(2\)\(3\)](#).

⁶ See [26 TAC §553.107](#).

⁷ NFPA 10, *Life Safety Code*, 2012 edition
National Fire Protection Association (NFPA)
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⁸ See [26 TAC §553.101\(13\)](#).

⁹ A louver is a set of angled slats or flat strips hung at regular intervals in a door to allow air or light to pass through.

A grille is a grating or screen of bars or wire placed in an opening to allow ventilation.

Resident room doors must resist the passage of smoke. A louver or grille might permit smoke to pass through a resident room door, which would mean the resident room door cannot resist the passage of smoke.

¹⁰ Fire tests of 1-3/4 inch thick solid-bonded wood-core doors show the doors will likely fail in a fire test in 22 minutes to 24 minutes.

¹¹ See [26 TAC §553.113\(c\)\(2\)](#).