

**Division of Child Care Services**

**POLICY STATEMENT**

**ID NUMBER: 10-1**

**TOPIC: Combustible Materials and Wall Coverage**

**TYPES OF CHILD DAY CARE IMPACTED: Day Care Centers and School-Age  
Child Care Programs**

**APPLICABLE REGULATIONS: Title 18 of the New York State Codes of Rules  
and Regulations § 414.3, 414.4, 414.5 & 418-1.3,  
418-1.4, 418-1.5**

**CONTACT: <http://www.ocfs.state.ny.us/main/beccs/regionaloffices.asp>**

**EFFECTIVE: Immediately- 6/14/10**

*This policy statement is effective immediately and cancels all previous memos or statements on the topic.*

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The purpose of this policy statement is to establish a uniform standard regarding the type of materials that can be used for decorative purposes, as well as the amount of wall space that can be covered by combustible materials in Day Care Centers, Small Day Care Centers or School Age Child Care programs located in places other than public school buildings.

**Overview:**

Studies of fires indicate that type of interior finish, and type and amount of decorative materials are often contributing factors to rapid fire spread and subsequent loss of life or serious injury. In order to better understand the concerns and the dangers related to the presence of excessive combustible material in child care settings, it is important to be familiar with the following definitions:

According to the National Fire Protection Association (NFPA) Standard 101:3.3.29, a **combustible material** is one that will ignite and burn. Some examples of common combustible materials are items made of fabric, paper, plastics or wood.

Appropriate materials used in construction and commercial settings are generally described as either “flame resistant,” a term used for decorative materials; or as “fire retardant,” a term used for construction materials. The term “flame spread rating” is used to describe the degree of flammability of an interior finish. The term “fire resistant rating” refers to fire-rated walls, barriers, and enclosures.

A material labeled as “**flame resistant**” refers to a material that inherently has the properties to resist ignition or inhibit the propagation of flames, as well as those materials to which a chemical treatment, process, paints, or coatings, has been added to enhance these properties. The term “flame resistant” is often used interchangeably with the term “**flame retardant**” which generally refers to treatments for decorative materials which, once applied, make those materials “flame resistant.” The term “**fire retardant**” refers to treatments used on construction materials such as chemical, paints, or coatings used to make combustible building materials resistant to burning. One example of a fire-retardant product would be Fire Retardant Treated (FRT) lumber.

### Issues:

**Hanging Decorations in Corridors:** Fire Code in New York State dictates specific requirements regarding items hanging from ceilings. It references that curtains, draperies, hangings and other decorative materials suspended from walls or ceilings shall be flame resistant. This would require that fabric wall hangings, sheets, or tapestries on display in child care settings have to be either a flame-resistant material, or treated with a flame-retardant chemical or treatment. One concern regarding flame-resistant materials and flame-retardant treatments is the longevity of the resistance or retardant properties as they can be affected by laundering, sunlight and other environmental factors.

It is not the role of the Fire Safety Representative to determine compliance of these materials with the applicable standards. Rather, it is the responsibility of the Fire Safety representative to inform the program that any items hanging from ceilings must meet these standards and allow the program to make that determination regarding status of the materials. However, when it is obvious that the materials could not meet the requirements of code; for example, when hanging materials are obviously combustible, such as those made of untreated paper or plastics, then it must be considered a violation and appropriately documented and corrected by the provider.

**Wall Coverage:** Fire Code also addresses the amount of wall space that may be covered in corridors. Per the existing code, not more than 20% of corridors may be covered with combustible materials or decorations. In addition, it is prohibited to post combustible material within ten (10) feet of exit doors which lead from the common corridor to the exterior of the building. An exception will be made for required postings such as exit diagrams and other emergency information.

This standard, while appropriate for corridors, is considered excessively restrictive to apply to classrooms in consideration of developmentally appropriate practice for early childhood settings. As such, the Office recommends that the maximum allowable amount of wall space to be covered with combustible materials or decorations be set at one-third of the total wall space within a classroom. In addition, the posting of any combustible materials on exit doors leading to corridors or directly to the exterior of the building shall be prohibited. The calculation of one-third takes into account the need to balance life safety with the ability to provide a colorful, intellectually stimulating environment for young children. This can be achieved by concentrating decorations in program areas

away from exits, and in those areas in which children are most likely to spend time within the classroom space. Permanent finishes, such as paint, are not considered combustible decorations and are an option for programs that seek additional color and decoration beyond the one-third limit for combustible decorations and materials. Wall paintings must not incorporate doors in any manner that would hide or obscure the door. Consideration should also be given to keeping combustible materials a safe distance away from electrical outlets and light switches. Combustible materials should be kept a minimum distance of six (6) inches from the cover plate. By limiting the amount and placement of combustible materials, the goal is to provide for increased safety of children and child care workers.

Furthermore, combustible materials may not be posted on or within one (1) foot in any direction of exit doors from classrooms. An exception will be made for required postings such as exit diagrams and other emergency information. Placement of these items behind Plexiglas or within securely mounted frames is highly recommended.

**Items Suspended from or Stored Near the Ceiling within Classrooms:** Decorations hung from ceilings must be included as part of the combustible material calculation for the total amount of wall coverage. This requirement includes items suspended from wires strung across the classroom, as well as items attached directly to the ceiling. Items suspended from the ceiling may not be attached directly to any light fixture, fire alarm, sensor, detector, or alert mechanism which is an integral part of the fire protection system within the building, nor any sprinkler head or overhead pipe run.

In reference to both the storage of items as well as the practice of decorations suspended from the ceiling, items must be a minimum of 18 inches below the level of the ceiling in a sprinklered building, and a minimum of 24 inches below the level of the ceiling in a non-sprinklered building. Items suspended from, or stored near, the ceiling, cannot obstruct or obscure the view of any exit door, rescue window, exit sign or emergency lighting, and must not pose a hazard to adults or children. This would include items such as clotheslines or cables strung across a room to allow artwork to dry.

**Combustible Materials on Doors:** The posting of combustible materials on interior doors of classrooms or other child care spaces is prohibited. Furthermore, it is prohibited that any combustible material including furnishings, decorations or other objects be placed so as to obstruct or conceal an exit from the building. This includes doors leading directly from child care spaces to the outside as well as those to a common exiting corridor within a larger building, and those leading from a central corridor within the child care space to the outside. Exit doors must not be hidden or obscured through the use of paint and should be clearly recognizable.

The posting of information regarding classroom name, number, teacher name or other identifying information will be allowed on or next to doors leading from the main corridor into classrooms. The size of such posting should not exceed 12 inches in any direction and placement of these items behind Plexiglas or within securely mounted frames is highly recommended.

Questions regarding this policy statement should be directed to the Division of Child Care Services Regional Office Fire Safety Representatives or the New York City Department of Health and Mental Hygiene staff assigned responsibilities for fire and safety matters.

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Approved  Date: 6/14/10



Janice M. Molnar, Ph.D.  
Deputy Commissioner  
Division of Child Care Services