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**FIRE PREVENTION AND BUILDING SAFETY COMMISSION**  
**Department of Homeland Security****Written Interpretation of the State Building Commissioner****Interpretation #:** CEB-2022-17-2014 IBC-1014.2**Building or Fire Safety Law Interpreted****675 IAC 13-2.6 2014 Indiana Building Code, Section 1014.2 Egress through intervening spaces.** Egress through intervening spaces shall comply with this section.

1. Egress from a room or space shall not pass through adjoining or intervening rooms or areas, except where such adjoining rooms or areas and the area served are accessory to one or the other, are not a Group H occupancy and provide a discernible path of egress travel to an *exit*.

**Exception:** *Means of egress* are not prohibited through adjoining or intervening rooms or spaces in a Group H, S, or F occupancy when the adjoining or intervening rooms or spaces are the same or a lesser hazard occupancy group.

2. An *exit access* shall not pass through a room that can be locked to prevent egress.

3. *Means of egress* from dwelling units or sleeping areas shall not lead through other sleeping rooms, toilet rooms, closets, or spaces used for similar purposes.

**Exceptions:**

1. *Means of egress* are not prohibited through a kitchen area serving adjoining rooms constituting part of the same *dwelling unit* or *sleeping unit*.

2. Means of egress are not prohibited through stockrooms in Group M occupancies when all of the following are met:

2.1 The stock is of the same hazard classification as that found in the main retail area;

2.2 Not more than 50 percent of the *exit access* is through the stockroom;

2.3 The stockroom is not subject to locking from the egress side; and

2.4 There is a demarcated, minimum 44-inch-wide (1118 mm) *aisle* defined by full- or partial-height fixed walls or similar construction that will maintain the required width and lead directly from the retail area to the *exit* without obstructions.

**Issue**

Whether Section 1014.2 of the 2014 *Indiana Building Code* (IBC) prohibits egress through intervening spaces in a B occupancy structure.

**Interpretation of the State Building Commissioner**

Section 1014.2 of the 2014 *IBC* does not prohibit egress through intervening spaces in a B occupancy structure, provided the qualifying criteria in the section are met.

**Rationale**

The code does not provide a blanket prohibition on egress through intervening spaces, though as seen in the text of the section, its acceptance is limited and regulated. In occupancy groups other than H, S, and F, the design requirements are these:

- The intervening space and the space that it serves as part of the egress path must be accessory to one or the other.
- A discernible path to the exit must be provided through the intervening space.
- Any doors in the path must not be lockable from the egress side.

There are additional intervening space requirements for H, S, and F occupancies, for structures containing sleeping units or dwelling units, and for M occupancies in which egress is routed through a stock area. However, since the request at hand was specific to a B occupancy office/training structure, there is no qualifying dispute regarding other occupancy groups and uses. Consequently, those requirements will not be addressed here.

In discussing "accessory" in the context of this regulation, the code does not concern itself with the percentage square footage limits of Chapter 5, but instead uses the term to recognize a functional relationship between the spaces in question. Since the code does not define the term "accessory", we must apply the ordinary and customary meaning of the word. Merriam-Webster's online dictionary defines "accessory" as "an object. . .that is not essential in itself but adds to the. . .convenience or effectiveness of something else", and as "aiding or contributing in a secondary way".<sup>1</sup> If the spaces assist one another in allowing specific functions to take place in them, or their individual activities are part of a larger common use or purpose, they can be considered accessory

to one another. The intent in requiring this working or functional relationship between spaces is to reduce the potential for communicating doors to be locked or blocked. It is also worth noting that in using the phrase "accessory to one or the other", the code stipulates that if a hierarchical relationship exists between the spaces, it is irrelevant to the direction of the allowed egress path. Space "A" may be accessory to space "B" or vice versa.

The second requirement is simply that a discernable path must be provided through the intervening space to the exit. In M occupancies where egress is through a stock area, there are specific requirements for how to demarcate and maintain this path. In B occupancies, however, there are no such design requirements. Under the 2014 IBC the path in a B occupancy must simply be discernable. The occupant must be able to readily identify the route to the exit and, presumably, move along it unimpeded.

The third requirement is that no intervening space may be subject to locking from the egress side. The need for unimpeded egress overrides any possible concerns for privacy or limitation of access. As with any other egress door, here the lock(s) or latchset(s) must be operable from the egress side without key or specialized knowledge or effort.

If a proposed egress path meets these requirements, routing through intervening spaces is allowed. It is also important to note that the code does not set a limit on the number of qualifying intervening spaces that may be traversed in an egress path. If each space meets the listed requirements, and all other code requirements are met (such as the total exit access travel distance limits), they are allowed.

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<sup>1</sup> See entry at <https://www.merriam-webster.com/>, last accessed April 7, 2022.

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