



Oregon

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Oregon Department of Human Services
Office of Developmental Disabilities Services (ODDS)
in collaboration with Aging and People with Disabilities,
Child Welfare Programs, and Oregon Youth Authority
Senate Bill 1548 Legislative Report
2022 Regular Session



October 1, 2022

Relating to Sprinkler System Requirements for Residential Settings

In accordance with Senate Bill 1548, enacted March 23, 2022, the Oregon Department of Human Services (ODHS) respectfully submits the following report, which contains projections on impacts to capacity of residential service settings supporting individuals served by the ODHS, the Oregon Health Authority (OHA), and the Oregon Youth Authority (OYA), as well as recommendations for implementing modern standards for fire suppression in a manner that minimizes disruption of services. This report represents collaboration across state agencies and consultation with community members and partners in the intellectual and/or developmental disabilities and aging and people with disabilities communities, including services providers who would be most impacted by fire safety requirements. Participants in that collaborative effort represented a variety of roles, including services providers, case management entities, Residential Facilities Ombudsmen, and advocates.

Senate Bill 1548 (“SB 1548”) relates to adopted updates to the Oregon Structural Specialty Code. The updates to the code mandate fire suppression sprinkler systems in community residential homes licensed by ODHS. ODDS and other programs have since engaged with DCBS/Building Code Division about the sprinkler requirements and look forward to working with them on the issues raised in this report. SB 1548 paused the Building Code Division’s requirements for residential sprinkler systems and requires the completion of this report.

This report is formatted to align with the layout of section four of SB 1548. Listed below the bill language is the summary of information as required by the bill, including projection on capacity impact and recommendations for fire safety and suppression standards, and feedback of the community member discussions related to the report topics.

In addition to the community feedback provided, Oregon Resource Association (ORA), an organization of providers, conducted a survey related to the impact of sprinkler requirements. Please see Appendix D.

Licensed and certified homes, also referred to as residential settings in this report include ODDS-licensed 24-hour residential group homes, APD and ODDS-licensed adult foster homes, Child Welfare and ODDS-certified child foster homes, host homes, and OYA foster, proctor, and BRS settings.

SECTION 4. No later than October 1, 2022, the Department of Human Services and the Oregon Health Authority shall provide to the interim committees of the Legislative Assembly related to human services and to health a report, in the manner provided in ORS 192.245, regarding the impact of residential sprinkler system requirements on programs and facilities regulated by the department and the authority. The report shall include, but not be limited to:

(1) The potential impact on capacity to serve individuals discharged from the Oregon State Hospital into community-based settings;

ODHS does not have a specific data source to identify the exact number of service recipients discharged from the Oregon State Hospital into licensed residential service settings such as foster homes and 24-hour residential settings. Using the projections of potential impact on capacity as identified in subsections (2) and (3) of this report, it can be deduced that there is a potential negative impact on capacity to serve individuals discharging from the state hospital into a licensed home setting, similar to other populations entering licensed home settings.

(2) The potential impact on capacity to serve individuals with physical, intellectual or developmental disabilities in community-based settings;

(3) The potential impact on capacity to serve seniors and aging Oregonians in community-based settings;

Subsections (2) & (3) of this report have been combined due to similarities between the licensed settings and impact to providers and service recipient populations.
Summary:

Most ODHS-licensed homes serve five or fewer individuals and as neighborhood single-family homes, and very few of these homes have a residential sprinkler system

installed and active. There are no current building code requirements to install sprinkler systems in Oregon for single-family homes. Licensed homes such as foster care settings and 24-hour residential group homes serving five or fewer individuals are generally located in single family residential homes. It is unlikely that homes applying for a residential setting license will have a residential sprinkler system installed or operational.

Based on projections of costs to install sprinkler systems into homes and vendor shortages described in in subsection (5) of this report, there is an indication imposition of these requirements would create a significant barrier to capacity growth of residential settings available to support individuals with intellectual or developmental disabilities, physical disabilities, and aging and senior populations.

Additionally, many licensed community home settings are not owned by the operator, meaning that a third-party landlord would have to be willing to permit the installation of sprinklers in a home. Approximately 30% of APD AFH operator respondents to a recent survey reported renting or leasing the foster home location. There are no funding resources currently available that could alleviate the cost burden imposed on providers and some landlords should residential sprinkler requirements be implemented.

The impacts range from reduction of capacity as providers find it cost-prohibitive to absorb the cost of installation, fees, permits, maintenance, etc., to displacement in finding alternate housing where a sprinkler system may be installed, to disruption of home settings and temporary relocation needs while sprinkler systems are installed.

Findings:

Settings Serving Individuals with Intellectual and Developmental Disabilities:

From 2014 through 2021, the Office of Developmental Disabilities Services (“ODDS”) issued 556 licenses for new 24-hour residential setting homes all of which would be impacted by the sprinkler requirements. Additionally, ODDS has received approximately 60 new home license applications in 2022. These homes average capacity of approximately 3-4 individuals. With these numbers, it can be speculated that nearly 2,000 individuals would be impacted by the sprinkler requirements immediately.

	Number of Homes Licensed Since 2014	Average Capacity	Total Number of Individuals Potentially Impacted
24-Hour Residential Homes/ Group Homes Serving 5 or Fewer Individuals	556	3.5	1946

An average of 80 new home licenses per year may be projected to impact approximately 280 individuals each year.

For adult foster homes, ODDS issues an average of 75 new home licenses each year (excluding Multnomah County adult foster homes which are independently licensed per statute). If assuming an average capacity of 3 individuals served, this results in approximately 225 individuals impacted per year.

ODDS-Licensed Setting Type	Average Number of New Home Licenses per Year	Average Capacity	Number of Individuals Potentially Impacted per Year
24-Hour Residential Homes/ Group Homes Serving 5 or Fewer Individuals	80	3.5	280
Adult Foster Homes licensed by ODDS	75	3	225
DD Adult Foster Homes Licensed by Multnomah County	25	3	73
Total Individuals Impacted Per Year:			580

Settings Serving Individuals with Physical Disabilities and Aging and Senior Populations:

The ODHS Aging and People with Disabilities program (“APD”) licenses an average of 109 new Adult Foster Homes per year (excluding those homes licensed by Multnomah County). The average home capacity to serve individuals is approximately 4 persons. This leads to a projection of up to 436 or more individual service recipients potentially impacted each year.

APD-Licensed Setting Type	Average Number of New Home Licenses per Year	Average Capacity	Number of Individuals Potentially Impacted per Year
APD Licensed Adult Foster Homes	109	4	436
APD Adult Foster Homes Licensed by Multnomah County	90	3	270
Total Individuals Impacted Per Year:			706

The impact to capacity for APD services is amplified due to APD currently experiencing a reduction in the number of license applications for adult foster homes as well as a notable volume of providers migrating to other service systems that offer higher service rates for home and community based services or closing homes.

Community Feedback and Recommendations for Subsections 2 and 3:

ODDS and APD met jointly with community members on July 27, 2022. Participants raised concerns residential sprinkler requirements would have a significant negative impact on the capacity to serve individuals with disabilities and aging populations in Oregon. Overwhelmingly, participants shared that the sprinkler requirement would present an additional insurmountable barrier for access to affordable community housing as many, if not most, providers rent the properties used for licensed settings. Providers would be reliant on landlord permission to install sprinkler systems which are costly and often can result in a negative impact to the property value.

Additionally, the providers would likely be responsible for removing the system at the end of a rental or lease period.

Community members raised concerns about the ability to adapt services to meet individual needs. It is not uncommon for providers to change locations to find a structure, layout, and location to better meet an individual's needs. With the concern for costs related to the sprinkler system as well as the need for permission from a landlord, this could be difficult to achieve.

Individuals with disabilities and providers serving these persons have often faced barriers to access to community-based housing, including affordability and discrimination. The sprinkler system requirement strengthens these barriers with added costs and provides potential landlord with a reason not to rent to persons with disabilities or their services providers.

Many providers expressed concern about their ability to operate with additional costs associated with the sprinkler requirements. The difficulty in accessing contractors willing to complete the work make the installation of a system in a reasonable manner a near impossible expectation. Many providers are small business operators who identify as a member of priority populations including racial and ethnic minorities, LGBTQIA+, and women business owners. The imposition of costs to comply with sprinkler requirement would serve as an additional barrier or dissuade some potential providers who would bring diversity to Oregon..

A more detailed summary of community member feedback can be found in Appendix B of this report, and a letter from the Oregon Developmental Disabilities Coalition is attached as Appendix E.

Subsection (4) The potential impact on capacity to serve children and youth in the child welfare and juvenile justice systems in family homes

Should residential sprinkler requirements be applied to homes providing residential or foster care to children, it can be projected that the impact would be devastating to the service system capacity to support children in community homes. The sprinkler requirements would be a deterrent to the recruitment of new foster homes as well as potentially impact the ability of family caregivers who would otherwise be a home resource for children, but are unable to afford the significant costs of a home modification and maintenance of a sprinkler system.

Licensed or Certified Setting Type	Average Number of New Home Licenses per Year	Average Capacity	Number of Individuals Potentially Impacted per Year
ODHS Child Welfare Foster Homes	1690	1.5	2535
OYA Youth Foster and Proctor Homes	< 10 homes per year	1.5	at least 15
OYA BRS Programs	12	1.5	18+
Total Individuals Impacted Per Year:			2568

It could be presumed that very few homes that are currently licensed or certified to serve children have sprinkler systems in place due to these homes being community family homes with no requirement for residential sprinkler systems in community single- or dual-family homes. With costs, lack of available vendors, and likely resistance to embarking on home renovations to install sprinklers, it can be anticipated that this would have a detrimental effect on providers willing to continue to operate children’s homes or have interest in becoming a children’s provider. There are no identified funding resources currently available that could alleviate the cost burden imposed on providers should residential sprinkler requirements be implemented.

Subsection (5) The estimated cost of retrofitting existing residential facilities to comply with sprinkler system mandates

It is difficult to quantify the cost of retrofitting existing residential homes to install sprinkler systems. Cost estimates range from \$2 to \$7 per square footage with there being limited vendors located in Oregon to complete such renovation work.

Many factors impacting costs include the following considerations:

- Type of system- stand alone, multi-purpose, etc., and system features
- Water meter- will existing meter(s) be adequate?
- House size- architecture, size, number of floors, water supply, age of home
- Design, permit, plan review, inspection fees and labor costs
- Location of the home and availability/travel costs for contractor

In researching estimated costs of sprinkler installation, it was found there was great variation amongst cost considerations including contractor pricing and local municipality fees. In the most ideal, low cost situations, the estimated cost would be thousands of dollars for equipment, installation, finish, work, fees, and inspections. Appendix C of this report includes a table of examples of local costs related to fees.

An additional cost factor for installation of residential sprinkler systems is a large volume of licensed or certified residential setting homes in Oregon are not owned by the service provider and would be dependent on a landlord willing to permit the renovations necessary for a sprinkler system to be installed. When a rented or leased property is vacated, the tenants may be financially responsible to remove the sprinkler system.

Many cost projections also do not include costs related to finish work and aesthetic components of the installation as well as removal costs.

Sprinkler systems also include maintenance costs with limited shelf-life for specific parts requiring replacement over time. Questions related to costs also include the necessity for back up systems such as generators and manual pumps when there are electric outages.

Other cost considerations are related to inspection of the systems, such as which entity is responsible for oversight of compliance with the requirements and addressing consistency between multiple levels and locales of governmental authorities involved.

Lastly, there are cost impacts related to potential malfunction of a sprinkler system, including property damage and displacement of individuals. There is potential for residential sprinkler systems to have a negative impact property value due to malfunction risks and maintenance requirements.

Community Feedback and Recommendations for Subsection 5:

Community members were among a general consensus that retrofitting properties to meet the sprinkler system requirements would be cost prohibitive. One provider reported his independent findings from his attempt to install a sprinkler system. He struggled to find a contractor and was quoted approximately \$50,000 to install a system.

Community members also expressed concern about the costs with maintenance of the system, impact to insurance rates (often increased premiums due to level of risk of property damage due to malfunction or leakage), and depreciation of property value. One community member provider operated a licensed home site shared recent experience of a home with a sprinkler system that had a leak resulting in thousands of dollars of damage to the property as well as displacement of the home residents for several weeks while the extensive damage is repaired. The malfunction took place within six months of having the system inspected.

Other community members expressed the concern that the sprinkler requirement is not a one time cost due to fluctuation in housing, requiring the installation in nearly all new home license situations. The costs also do not factor depreciation of property which can occur with indoor sprinkler systems.

Other community members pointed out that the costs of compliance with a sprinkler requirement are not just fiscal but also impact quality of life and choice for individuals. Providers make efforts to offer housing to cohorts of individuals, often selecting a home to meet the needs of multiple of individuals while also supporting relationships between persons supported. Additional examples of housing situations which will be impacted are family homes where a provider is selected to operate a licensed home maintaining an individual in their familial home with peers. The costs associated with retrofitting, maintenance, and impact to value of the home may limit this opportunity. Barriers added will limit options, choice, and opportunity for individuals to self-direct their living situation.

Several community members also expressed the concern that the sprinkler requirements feel very institution-like in nature which is counter to community-based living experiences of which all Oregonians are entitled.

Community member also expressed the sentiment that the volume of resources required to implement sprinkler systems in residential home could be better used to serve individuals living in the community in other effective ways.

Other community members presented the concept that those choosing to operate with sprinkler system requirements may limit their housing to smaller square footage to reduce costs, resulting in only offering shared bedrooms and smaller living space.

Subsection (6) Proposals for how to implement modern standards for fire suppression efforts in a way that minimizes disruption of services for Oregonians in need of residential care, supports or services

Both ODDS and APD Oregon Administrative Rules include provisions for addressing fire safety standards for licensed settings (see Appendix A for rule language citation). These standards include requirements for fire safety equipment such as detectors, alarms, fire extinguishers, physical structure, and egress.

The Department completed a review of serious incidents, injuries, and death reports for the past 10 years. Not one serious injury or death was identified related to licensed residential home fire in Oregon.

ODDS and APD propose that fire standards may be improved by aligning requirements across residential settings serving five or fewer individuals for consistency of protective standards and determining when requirements for integrated alarm systems may be appropriate. The Department is committed to further investigation of options according to its rulemaking authority.

Community member Feedback and Recommendations for Subsection 6:

During the community member engagement that occurred on July 27, 2022, participants were generally in agreement that current rule standards are effective in addressing fire safety efforts. Suggestions for improving fire suppression included exploration of smart home or alert technologies that could communicate directly with fire safety services as well as more portable units that may use water suppression targeting a specific area.

Community members recommended cross-program and setting requirement collaboration to set clear, consistent fire safety standards for all smaller licensed homes serving five or fewer individuals. ODHS agrees with these recommendations.

Appendix A: Oregon Administrative Rule Fire Safety Standards

Setting	OAR Language
<p>ODDS 24-Hour Residential (Group Homes)</p>	<p>0150- (6) Bedrooms.</p> <p>(a) Bedrooms on the ground level must have at least one window that opens from the inside without special tools that provides a clear opening of not less than 821 square inches, with the least dimension not less than 22 inches in height or 20 inches in width. Sill height may not be more than 44 inches from the floor level. Exterior sill heights may not be greater than 72 inches from the ground, platform, deck, or landing. There must be stairs or a ramp to ground level. Those homes previously licensed having a minimum window opening of not less than 720 square inches are acceptable unless through inspection it is deemed that the window opening dimensions present a life safety hazard.</p>
<p>OAR 411-325</p>	<p>0240- Assessment of Fire Evacuation Assistance</p> <p>(1) The service provider must assess, within 24 hours of an individual’s entry to the home, the individual’s ability to evacuate the home in response to an alarm or simulated emergency.</p> <p>(2) The service provider must document the level of assistance needed by each individual to safely evacuate the home and the documentation must be maintained in the individual’s entry records.</p> <p>0250- Fire Drill Requirements and Fire Safety</p> <p>(1) The service provider must conduct unannounced evacuation drills when individuals are present, one per quarter each year with at least one drill per year occurring during the hours of sleep. Drills must occur at different times during day, evening, and night shifts with exit routes being variance based on the location of a simulated fire.</p> <p>(2) Written documentation must be made at the time of the fire drill and kept by the service provider for at least two years following the drill. Fire drill documentation must include:</p> <p>(a) The date and time of the drill or simulated drill;</p> <p>(b) The location of the simulated fire and exit route;</p> <p>(c) The last names of all individuals and staff present on the premises at the time of the drill;</p> <p>(d) The type of evacuation assistance provided by staff to individuals as specified in each individual’s safety plan;</p> <p>(e) The amount of time required by each individual to evacuate or staff simulating the evacuation; and</p> <p>(f) The signature of the staff conducting the drill.</p> <p>(3) Smoke alarms or detectors and protection equipment must be inspected and documentation of inspections maintained as recommended by the local fire authority or State Fire Marshal.</p> <p>(4) The service provider must provide necessary adaptations to ensure fire safety for sensory and physically impaired individuals.</p> <p>0260- Individual Fire Evacuation Safety Plans</p> <p>(1) For individuals who are unable to evacuate the residence within the required evacuation time or who with concurrence of the ISP team request not to participate in fire drills, the service provider must develop a written fire safety and evacuation plan that includes the following:</p> <p>(a) Documentation of the risk to the individual’s medical, physical condition, and behavioral status;</p> <p>(b) Identification of how the individual evacuates his or her residence, including level of support needed;</p> <p>(c) The routes to be used to evacuate the residence to a point of safety;</p> <p>(d) Identification of assistive devices required for evacuation;</p> <p>(e) The frequency the plan is to be practiced and reviewed by the individual and staff;</p> <p>(f) The alternative practices;</p> <p>(g) Approval of the plan by the individual’s legal or designated representative (as applicable), case manager, and the services provider executive director; and</p>

	<p>(h) A plan to encourage future participation.</p> <p>(2) The service provider must maintain documentation of the practice and review of the safety plan by the individual and the staff.</p> <p>0280- Fire Safety Requirements for Homes or Duplexes Serving Five or Fewer Individuals</p> <p>(1) Each home or duplex unit must be made fire safe.</p> <p>(a) Each home or duplex must have a minimum of two exterior doorway exits allowing for egress.</p> <p>(b) Sleeping and living quarters must have a minimum of two unobstructed exits.</p> <p>(c) A class 2A10BC fire extinguisher that is easily accessible must be provided on each floor in each home or duplex unit.</p> <p>(d) Permanent wired smoke alarms from a commercial source with batter back-up must be provided and maintained in each bedroom and at a point centrally located on each floor in the corridor or area giving access to each separate sleeping area.</p> <p>(e) A 13D residential sprinkler system in accordance with the Nation Fire Protection Association Code must be provided and maintained. Homes or duplexes are granted an exception from the residential sprinkler system requirement according to section (2) of this rule.</p> <p>(f) Hardware for all exit doors and interior doors must be simple hardware that may not be locked against exit and must have an obvious method of operation. Hasp, sliding bolts, hooks and eyes, double key deadbolts, and childproof doorknobs are not permitted. A deadbolt must be single action release to allow a door to open in a single operation.</p> <p>(2) A home or duplex is granted an exception to the requirements in section (1)(d) and (e) of this rule under the following circumstances:</p> <p>(a) All individuals residing in the home or duplex have demonstrated the ability to respond to an emergency alarm with or without physical assistance from staff to the exterior and away from the home or duplex in three minutes or less, as evidenced by three or more consecutive documented fire drills.</p> <p>(b) Battery operated smoke with a 10-year battery life and hush feature have been installed in accordance with the manufacturer’s listing, in each bedroom, adjacent hallway, common living areas, basements, and in two-story homes or duplexes at the top of each stairway. Ceiling placement of smoke alarms is recommended. If wall mounted, smoke alarms must be mounted as per the manufacturer’s instructions. Alarms must be equipped with a device that warns of low battery condition when battery operated. All smoke alarms must be maintained in functional condition.</p> <p>(c) A written fire safety evacuation plan is implemented that assures that staff assist all individuals in evacuating the premises safely during an emergency or dire as documented by fire drill records.</p> <p>0290- Fire Safety Requirements for Apartments Serving Five or Fewer Individuals</p> <p>(1) Each apartment must be made fire safe by:</p> <p>(a) Providing and maintaining in each apartment, battery-operated smoke alarms with a 10-year life in each bedroom and in a central location on each floor;</p> <p>(b) Providing first floor occupancy apartments. Individuals who are able to exit in three minutes or less without assistance may be granted a variance from the first floor occupancy requirement;</p> <p>(c) Providing a class 2A10BC fire extinguisher easily accessible in each floor in each unit.</p> <p>(d) Providing access to telephone equipment or intercom in each apartment usable by the individual receiving services; and</p> <p>(e) Providing constantly usable unblocked exits from the apartment and apartment building.</p>
<p>Setting</p> <p>ODDS- Licensed Adult</p>	<p>0060- Capacity</p> <p>(2) The number of individuals permitted to reside in an AFH-DD is determined by the ability of the caregiver to meet the care, service, and support needs of the individuals, fire safety standards, physical structure standards, and standards of these rules.</p>

Foster Homes	0130- AFH General Standards (3) General Conditions.
OAR	(a) Up-to-date documentation must be maintained verifying an AFH-DD meets the following:
411-360	<p>(B) State and local fire and safety regulations for a single-family residence.</p> <p>(b) General buildings must be of sound construction and meet all applicable state and local fire and safety regulations in effect at the time of construction. It is the duty of the licensee to check with local government to be sure all applicable local codes have been met. A current floor plan of the AFH-DD must be on file with the local CDDP.</p> <p>(5) Bedrooms.</p> <p>(i) Bedrooms must be on ground level for individuals who are non-ambulatory or have impaired mobility.</p> <p>(j) Individual bedrooms must be in close enough proximity to the provider to alert the provider to nighttime needs or emergencies or be equipped with an intercom or audio monitoring as approved by the ISP team.</p> <p>(k) Each individual’s bedroom must have at least one window or exterior door that readily opens from the inside without special tools and provides a clear opening of not less than 821 square inches, with the least dimensions not less than 22 inches in height or 20 inches in width. If sill height is more than 44 inches from the floor level, approved steps or other aids for window egress must be provided. A grade floor window with a clear opening of not less than 720 square inches with a sill height of 48 inches may be accepted when approved by the State Fire Marshal or the authority having jurisdiction designee of the State Fire Marshal.</p> <p>(8) Safety.</p> <p>(a) Buildings must meet all applicable state and local building, mechanical, and housing codes for fire and life safety. The AFH-DD may be inspected for fire safety by the Office of the State Fire Marshal at the request of the Department using the standards in these rules as appropriate.</p> <p>(b) Only ambulatory individuals capable of self-preservation may be housed on a second floor or in a basement.</p> <p>(c) Split level homes must be evaluated according to accessibility, emergency egress, and evacuation capabilities of the individuals.</p> <p>(d) Ladders, rope, chain ladders, and other devices may not be used as a secondary means of egress.</p> <p>(e) Heating in accordance with the specifications of the manufacturer and electrical equipment, including wood stoves, must be installed in accordance with all applicable fire and safety codes, used and maintained properly, and be in good repair.</p> <p>(D) Un-vented portable oil, gas, or kerosene heaters are prohibited. Sealed electric transfer heaters or electric space heaters with tip-over shut-off capability may be used when approved by the authority having jurisdiction.</p> <p>(f) Extension cord wiring and multi-plug adaptors must not be used in place of permanent wiring.</p> <p>(g) Each exit door and interior door used for exit purposes must have simple hardware that cannot be locked against exit and must have an obvious method of single action operation.</p> <p>(A) Hasps, sliding bolts, hooks and eyes, and double key deadbolts are not permitted.</p> <p>(h) Carbon Monoxide Alarms. Carbon monoxide alarms must be listed as complying with ANSI/UL 2034 and must be installed and maintained in accordance with the instructions of the manufacturer. A carbon monoxide alarm must be installed within 15 feet of each bedroom at the height recommended by the manufacturer.</p> <p>(A) Carbon monoxide alarms may be hard wired, plug-in, or battery operated. Hard wired and plug-in alarms must be equipped with a battery backup. Battery operated alarms must be equipped with a device that warns of a low battery.</p> <p>(B) Bedrooms used by hearing-impaired occupants who may not hear the sound of a regular carbon monoxide alarm must be equipped with an additional carbon monoxide alarm that has visual or vibrating capacity.</p> <p>(i) Smoke alarms. A smoke alarm must be installed in accordance with the instructions of the manufacturer in each bedroom, hallway or access area adjoining bedrooms, family room or main living area where occupants congregate, laundry room, office, and basement. In addition, a smoke alarm must</p>

be installed at the top of each stairway in a multi-level home.

(A) Ceiling placement of smoke alarms is recommended. If wall mounted, smoke alarms must be between 6 inches and 12 inches from the ceiling and not within 12 inches of a corner.

(B) Smoke alarms must be equipped with a device that warns of low battery when battery operated or with a battery backup if hard wired.

(C) When activated, smoke alarms must be audible in all bedrooms.

(D) Bedrooms used by hearing-impaired occupants who may not hear the sound of a regular smoke alarm must be equipped with an additional smoke alarm that has visual or vibrating capacity.

(j) Each carbon monoxide alarm and smoke alarm must contain a sounding device or be interconnected to other alarms to provide, when activated, an audible alarm in each bedroom. The alarm must be loud enough to wake occupants when all bedroom doors are closed.

(k) A licensee must test each carbon monoxide alarm and smoke alarm in accordance with instructions of the manufacturer at least monthly (per NFPA 72). Testing must be documented in the AFH-DD records.

(l) Fire extinguishers. At least one 2A-10BC rate fire extinguisher must be in a visible and readily accessible location on each floor, including the basement. Fire extinguishers must be inspected at least once a year by a person qualified in fire extinguisher maintenance. All recharging and hydrostatic testing must be completed by a qualified agency properly trained and equipped for this purpose. Maintenance must be documented in the AFH-DD records.

(m) A licensee must maintain carbon monoxide alarms, smoke alarms, and fire extinguishers in functional condition. If there are more than two violations in maintaining battery operated alarms in working condition, the Department may require the license to hard wire the alarms into the electrical system.

(9) Emergency Procedures and Planning.

(a) Evacuation.

(A) A provider may have a fully operating and maintained interior sprinkler system approved by appropriate regulatory authorities allowing for evacuation of all individuals meeting applicable fire, life, and safety requirements; or

(B) A provider must demonstrate the ability to evacuate all occupants from the AFH-DD within three minutes. If the provider is not able to demonstrate the three-minute evacuation time, the Department may apply conditions to the license including, but not limited to, reducing the number of individuals receiving services, requiring additional staffing, increasing fire protection, or revoking the license.

(b) Evacuation Drills.

(A) A provider must conduct unannounced evacuation drills when individuals are present, once every quarter, with at least one drill per year occurring during the hours of sleep. The availability of a fully operating sprinkler system does not substitute for the requirements of evacuation drills.

(i) Evacuation drills must occur at different times of the day, evening and night, with exit routes being varied based on the location of a simulated fire.

(ii) All occupants must participate in the evacuation drills.

(B) Written documentation must be made at the time of each drill and kept by the provider for at least two years following the drill...

(c) A new individual must receive an orientation to basic safety and shown how to respond to a fire and carbon monoxide alarm and how to exit from the AFH-DD in an emergency within 24 hours of arriving. Documentation of orientation must be maintained in the individual's record.

(d) Floor plans. A provider must provide, post, and keep up to date, a floor plan on each floor.

(A) The floor plan must contain the following:

(v) Each exit on each level of the home, including emergency exit such as windows;

(vii) each fire extinguisher, smoke alarm, carbon monoxide alarm, and sprinkler, if the home has an interior sprinkler system; and

(viii) Exit routes.

Appendix B: Community member Feedback

ODDS and APD met with jointly with Community members on July 27, 2022. Participation was open to anyone. Below is a list of participants as well as a summary of the comments, concerns and suggestions provided by participants:

Participants:

David Schill	Corrine Walker
Rose Herrera	Monika Affeld
Don Prentice	Lia O'Hara
Isaac Elting McGuire	Matt Bullis
Elayna McNurlin	Ken Ralph
Amy Taber	Natasha Atkinson
Ginger Kocurek	Daniela Lucescu
Malinda Malone	Amanda Dalton
Kim Kerby-Mellow	Teresa Bees
Desi Rodriguez	Karensa Schill
Adriana Sandu	Jeff Waldpole
Sefika Alijaj	Regena Valentine
Kathy Nelson	Katie Mamic
Angie Templeton	Biftu Gameda
LaDonna Jones	Jared Weekly
Jolynn Best	Loralei Lavoie
Eleni Gialoyrakes	Carrie Brickey
Tiffani Olsen	Jared Weekly
Ann Dahl	Leyenda Lloyd
Petronella Donovan	Paul Partridge
Jessica Denison	Nancy Robertson
Bekalu Abebe	Kidist Stusser
Jennifer Pruden-Gay	Caitlin Shockley
Tad Larez	
Debbie Drake	
Lois Gibson	
Erin Fleming	
Kimberly Mintrone	
Audra Ramirez	
Charito Moncogong	
Patrick Rosario	
Tracy Applegate Hassan	
Yanin R-M	
Joanna Fuhrman	
Teresa Rees	
Ali Brown	
Tammorra Barnes	

Comments:

Sections 2 & 3 - Impact to Capacity to Serve Individuals with Intellectual, Developmental and Physical Disabilities and Seniors and Aging Oregonians

- Cost impacts would leave providers with no choice but to close homes unless there were grants or other cost assistance sources available
- Concern on impact to choice for people receiving services. There are housing shortages and providers are using rentals. There can be frequent moving due to needs of individuals, choice, fit of home and location, etc. and the requirements present a major barrier to flexibility or individuals having a choice in moving.
- Providers shared the implementation of the requirement would also have a negative impact on mission and values. Often homes are selected because they are the right fit for the individual including factors like location, physical accessibility and adaptations, size, and other features. This requirement would significantly limit prospective property options (due to reluctance from landlords to allow for sprinkler installation as well as costs impacts depending on property size and feature) in an existing housing shortage.
- With many properties rented, people will be reliant on permission from landlords and considering expense, impact to the property, and potential for decrease in property value, many landlords will be reluctant to give permission.
- Providers cannot afford to continue to operate and this requirement makes this more challenging. Providers will leave or be discouraged from becoming a provider resulting a significant loss to capacity.
- While there are some providers who could request and be granted an alternative, many would see this as just too cost prohibitive or too intrusive to the home and give notice. One case management program posed the situation to their provider community and the response from many providers is they would choose to give up their license if sprinklers were required.
- In many communities in Oregon, there is a shortage of available providers without the sprinkler system requirement in place, adding this would increase the problem.
- One provider who primarily operates homes with sprinkler systems expressed concern about persons who may want to be supported in their family homes and the costs and barriers to implementing a sprinkler system may result in pushing people from their childhood homes.
- There are concerns about how this will be a barrier or deterrent for minority and female business owners as a large portion of residential providers are small, independent businesses operated from personal funds of a proprietor.
- Other Community members mentioned the effect of providers choosing smaller properties and having shared bedrooms to limit the costs of installing sprinkler systems which are impacted by construction and square footage. This leads to a decrease in private living options for individuals.
- Other providers also expressed safety concerns of individuals who may require specialized physical environments due to risks or behaviors of self-harm. Adding a sprinkler system and components may introduce additional harmful surfaces and objects. Additionally, there may be an added challenge of negative sensory reaction to the system by individuals.
- With variation amongst local municipalities allowing for alternatives, differences in fees, and costs being greater in rural or older communities, this would impact the ability of people in these areas to remain in their home communities when their care needs and life situation make a residential placement necessary.
- The impact to people with disabilities by having a requirement that diminishes capacity of placement options is that people are being left in less desirable situations such as homelessness, undesirable or unhealthy family structures, being stuck in jails, hospitals, and detention.

Section 5 – The Estimated Cost of Retrofitting to Install Residential Sprinkler Systems

- Sprinkler systems could impact the value of a home, decreasing the value due to risks and potential damage associated with interior sprinkler system.
- Providers expressed that they cannot afford this. APD homes have closed this past year because they cannot afford to operate and cannot afford staff. This additional requirement exacerbates the issue.
- It's not just about cost- there is widely varying estimates of costs but also other additional barriers such as water systems and installing pressurizing systems in rural areas. There are so many different building code jurisdictions that have different directives. Well water systems make need to make significant updates and even add a tank to supplement water pressure.
- Concerns related to unexpected and ongoing costs. A provider shared a recent experience with a maintained and routinely inspected system that leaked, resulting in extensive damage and displacing a household of five individuals for 4-6 weeks while repairs are completed.
- Concerns about costs secondary to installation of a system, including finish work to complete the job, aesthetic elements to make the system not look institutional, and costs to remove the system and restore the property for rented or leased settings.
- There is a significant lack of contractors and contractors with sufficient specialty and availability who will install sprinkler systems.
- A provider shared their experience of looking at sprinkler system installation about three years ago. They could only identify two contractors in Oregon willing to do the work and cost estimates where over \$50,000.
- Another APD provider explored sprinklers and found the costs for a home to be between \$15,000 and \$20,000.
- A provider with experience as a contractor explained there is such significant variability that costs could range from \$8,000 to as much as \$120,000 depending on all factors including construction of the home and water source.
- A community member shared a recent experience with a landlord that was able to install a residential sprinkler system that was not very noticeable in the home, required a "sprinkler closet" in the garage for water holding tanks, and cost approximately \$10,000.
- Community members were concerned about a mandate and the resulting home experience being institution-like where individuals are supposed to be supported in living in the community like everyone else.
- Another provider expressed concern that the mandate would require significant allocation of resources which could be more effectively used in other ways. Already there is a significant shortage of workforce and funding to pay a living wage and retain a workforce.
- Some community member engagement with local municipalities is that many residential municipal water systems cannot support the capacity/pressure necessary for a sprinkler system and some home designs are not of a construction type to be reasonably modified to accommodate the piping/plumbing necessary for a sprinkler system.
- Some multi-level homes may be very difficult to retrofit due to challenge of installing piping between floor levels.

Section 6 – Proposals for Modern Standards for Fire Safety and Suppression

- There are questions and concerns raised about authority and oversight for fire protection and suppression requirements. When sprinkler systems were initially being implemented, it was directed that local building code authorities would be approving or granting exceptions to sprinkler systems. The result was significant variance in standards and expectations with some programs being lenient and liberal in granting exceptions and others not entertaining any form of exception. There is concern that this discretionary authority and variability could result in discriminatory practices that limit individual access to ADA compliant and community-based housing.

- One community member expressed concern about equitability of applying a building code mandate when in their county area there are six separate building code authorities. This can lead to great variance in expectations even at a micro community level.
- Suggestion to have direct link set up with local emergency responders and/or local fire station and/or explore integrated alert systems. There is technology that exists that may be used to improve fire safety and response.
- Many of the setting rules require evacuation times of three minutes or less for residents- could this expectation be standardized across residential settings?
This led to a consensus suggestion that fire safety requirements for licensed settings could be standardized across settings.
- Homes are currently located primarily in single-family residential dwellings. All licensed and certified settings are required to comply with building code. Oregon does not mandate residential sprinkler systems in single-family residential dwellings so applying this mandate to community homes serving individuals with disabilities would result in a discriminatory practice.
- Many providers suggested grants or funding to help with sprinkler system costs, but many people were concerned that this would not be adequate to overcome all barriers associated with sprinkler systems as there would likely still be reluctant landlords, ongoing maintenance costs, costs associated with malfunctions or leaks, decreased property value, and likely increased insurance premiums.
With the discussion of financial assistance options, there was expressed concern about equitability of access to resources as a consideration.
- One provider suggested exploration into a fire suppression system that is a pressurized unit mounted to the ceiling of the center of a room which sprays retardant into the room to suppress flames. This system does not use water, is less costly than a sprinkler system, is fairly simple to install, and would be a more affordable alternative to a piped sprinkler system.
- Another community member reached out to local authorities for suggestions for alternatives and was given the recommendations of upgrading fire alarm systems to be professionally designed with features of ionization, photo electric, and heat detectors strategically placed throughout a home and garage. The suggestion included augmentation of detection coverage through out the home and garage with the upgrades costing approximately \$500-\$600 rather than \$10,000+ for installation of a sprinkler system.

Appendix C: County Fees Related to Sprinkler System Installation

County	Fee Type*	Cost
Clackamas	Fire Permit/Plan Review	Based on square feet- average \$200-\$250
	Water System Development Fees (SDC)**	5/8 to 1" = \$32,258 with credit for existing 5/8 meter of \$13,193
Clatsop	Fire Permit/Plan Review	Based on square feet- up to 2000 sq. ft= \$400 + Kitchen and bathrooms add \$400-\$500 + Garage Space- average home of 2000 sq ft + garage is approx. \$3878
	SDC	No SDC at this time, but construction cost to replace meter from 5/8 to 1"= \$6472.06 plus \$60.00 application fee
Coos	Fire Permit/Plan Review	Based on system cost- 15k system= \$254.26 20k system= \$570.00
	SDC	5/8 to 1" = \$6700+ for upgrade, new fee + construction costs
Deschutes	Fire Permit/Plan Review	Based on square feet- \$1.90/ft up to 2000 \$2.6/ft for 2001-3600
	SDC	5/8 to 1" = \$10,803.50
Harney	Fire Permit/Plan Review	Based on system value- 15k system= \$450.00 20k system= \$570.00
	SDC	5/8 to 1" = \$150-\$200
Josephine	SDC	5/8 to 1" = \$7158.68
Klamath	Fire Permit/Plan Review	Based on square feet- 0-2000/ft= \$86.00 2100-3600= \$129.00 + 12% state tax + Plan review fee= to 25% of permit fee before tax
	SDC	5/8 to 1" = \$4956.00, includes credit for old meter
Lane	Fire Permit/Plan Review	Based on square feet- 0-2000/ft= \$230.00 2100-3000= \$287.00
	SDC	5/8 to 1" = \$3225.00
Linn	Fire Permit/Plan Review	Based on square feet- 0-2000/ft= \$200.00 2100-3600= \$250.00 + 12% state tax + Plumbing permit costs based on bathrooms and kitchens \$313- \$500
	SDC	5/8 to 1" = \$6697.00 plus new meter cost, to appeal fee is \$100
Marion	Fire Permit/Plan Review	Based on square feet- 0-2000/ft= \$98.00

		2100-3600= \$129.00 + 12% state tax, must submit 2 sets of plans
	SDC- Salem	5/8 to 1" = \$600 for plumbing and other fees, meter upgrades specific to residential home sprinklers are exempted from SDC
	SDC- Woodburn	5/8 to 1" = \$6573.00
Multnomah-Gresham	Fire Permit/Plan Review	Plan fees may apply + based on square ft- 1500-2000/ft= \$224.00 2001-3000/ft= \$280
	SDC	5/8 to 1" = \$3535-\$4699, discount available for certain districts
Multnomah-Troutdale	Fire Permit/Plan Review	Troutdale- Fire protection permit fee= \$321.25 + Plan review fee= \$208.81+ Safety plan review fee= \$128.50 + state surcharge of \$38.55= total \$697.11
Multnomah County-Portland	SDC	5/8 to 1" = \$11,407.00 when the Water Bureau permanently removes an existing meter and a new meter is installed at same site, credit for old meter applied
Sherman	Fire Permit/Plan Review	Based on system value- 15k system= \$322.49 20k system= \$405.68
Umatilla	Fire Permit/Plan Review	Based on system value- 15k system= \$254.26 20k system= \$323.29
	SDC	5/8 to 1" = \$2453.25-\$5006.25, most homes already have 1" meters
Washington	Fire Permit/Plan Review	Based on square feet- 0-2000/ft= \$130.00 2100-3600= \$194.00 + 12% state tax
	SDC	5/8 to 1" = \$31,457.00
Wheeler	Fire Permit/Plan Review	Based on system value- 15k system= \$322.49 20k system= \$405.68
	SDC	No SDC at this time but construction cost to replace meter would be case by case.
Yamhill	Fire Permit/Plan Review	Based on square feet- 1500/ft= \$57.51 2000/ft= \$63.67 3000/ft= \$86.27

*Some municipalities may have additional permit and planning fees not captured in table.

**Water System Development Fee (SDC) addresses meter upgrade and reflect increase in piping diameter

***On July 1, 2022, ----Water SDCs increased approximately 7%, based the Engineering News Record Construction Cost Index (ENR-CCI), an inflation index. The new Water SDC is in effect July 1, 2022 to June 30, 2023.

Appendix D: ORA Survey and Data Analysis



Data Analysis: SPRINKLER REQUIREMENT IMPACT ON PEOPLE WITH DISABILITIES

Survey: The Oregon Resource Association collected data from their members from September 1, 2022 to October 1, 2022 to inform the ODDS stakeholder solicitation of feedback for their report to the Oregon Legislature on Sprinkler and Other Fire Safety and Suppression Measures for Residential Settings. The data was collected electronically via a survey tool and reflects 33% of 24-Hour Residential Services in Oregon.

About: The Oregon Resource Association (ORA) is the statewide network that represents, supports and advocates for its members as they provide services for individuals with intellectual, developmental or other disabilities to lead full and inclusive lives. ORA envisions communities where people with disabilities live rich, fulfilling and inclusive lives. ORA represents over 80 organizations. These service providers make up about 54% of the 24-hour Residential Services provided to people with intellectual and developmental disabilities (IDD) in Oregon.

Key Findings:

- Extensive steps are currently being taken to ensure the safety of the individuals these residential homes serve. Current requirements already add significant fire safety standards for these homes.
- Almost half, or 46.5% of respondents, currently lease or rent their homes. This leasing structure provides further complications for residential sprinkler mandates.
- Of those that lease, over 43.8% of landlords shared the provider-tenant would not be able to install sprinklers. For landlords that would allow sprinkler systems to be installed, every landlord responded that they would require the provider-tenant to pay for the installation and 37.5% would require the provider-tenant to remove the system when they move out.

The Sprinkler mandate would increase costs by about \$19,684 per leased/owned home (weighted average using mid-point of ranges reported), to install the system. There are additional costs if the system must be removed upon vacating the property, as well as annual maintenance costs.

Current Fire Response

100% of providers that responded currently take the following steps to ensure that the people they support live in safe, healthy environments of their choice. This includes a number of safety precautions for fire prevention required by current state law including:

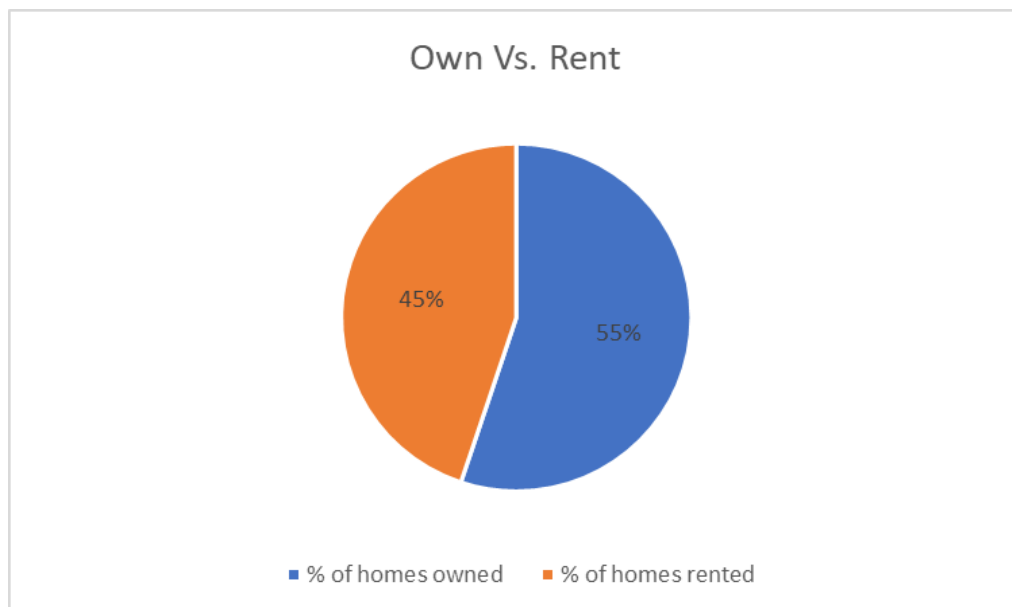
- Assessing the level of assistance each person needs to evacuate
- Extensive staff training including monthly evacuation drills and fire suppression training
- Safe storage and use of flammable and combustible materials Smoke alarms or detectors and protection equipment are inspected and maintained as recommended by the local fire authority or State Fire Marshal
- Any necessary adaptations to ensure fire safety for sensory and physically impaired individuals are installed

Additionally, respondents shared that because their homes are staffed 24-hours per day with awake staff being the norm, staff are able to provide an immediate response to a fire. Many also noted that a specific fire safety plan is developed for any person who cannot evacuate within three minutes.

Types of Homes

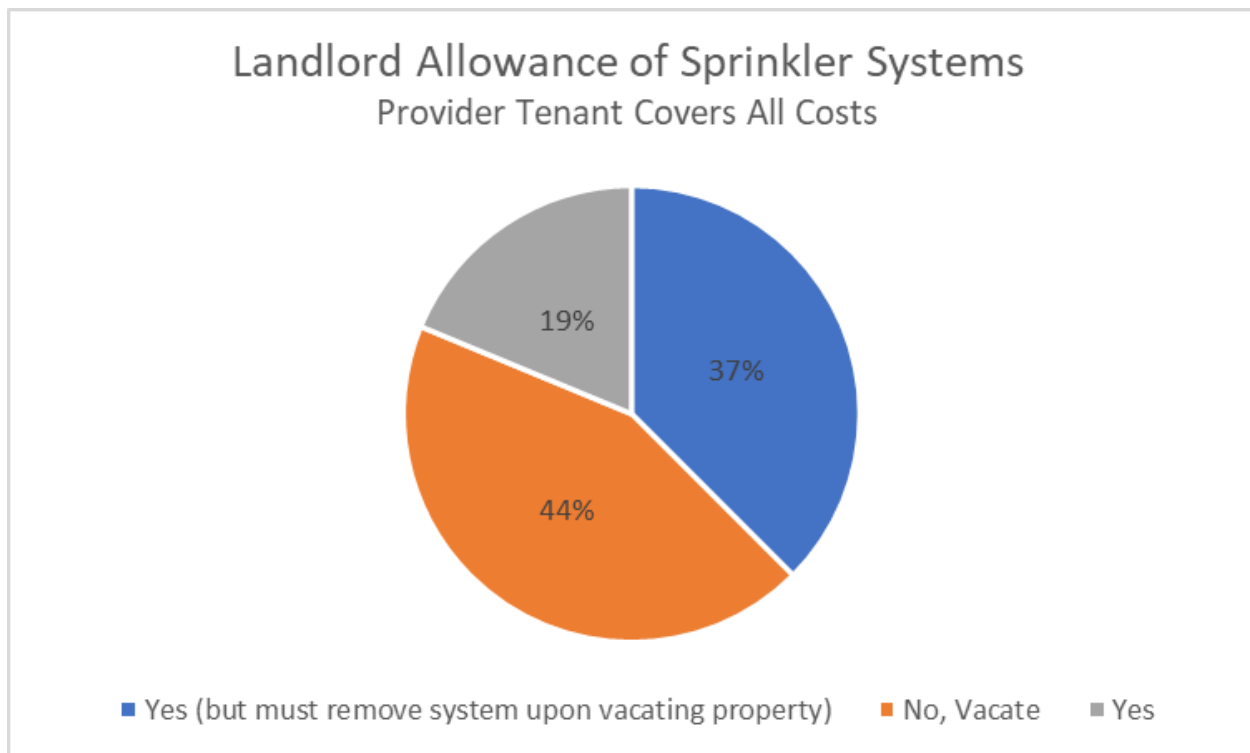
The homes where 24-hour Residential Services operate are just like any other home in the community. In most homes, two to three people with IDD live together as roommates. The largest homes support up to five people. Oregon does allow homes for people with IDD that are larger and serve over five people, but there are very few of these left in the state and sprinkler systems are already required for these larger homes.

Service Providers may own or rent/lease homes. This mix should influence future policy and budgets for a residential sprinkler mandate as data shows that almost half, or 46.5% of respondents currently lease or rent their homes.



Of those homes providers own, respondents shared that about half (48%) of these homes currently have a sprinkler system.

Affordable housing is in high demand in today's market and landlords are more apt to terminate leases and sell properties. In discussion with providers, they shared they have a significant concern that adding a sprinkler mandate would further limit people's choices for housing. 44% of respondents shared that their landlord would not allow sprinklers to be installed. In cases where the landlord agreed to the installation, providers would be required to cover the cost 100% of the time. In addition, only 19% of the landlords would allow the permanent installation of a sprinkler system. In 37% of the responses, providers would be required to restore the property to its original condition by removing the sprinkler system upon vacating the property and 44% of landlords would not allow the installation under any circumstances.



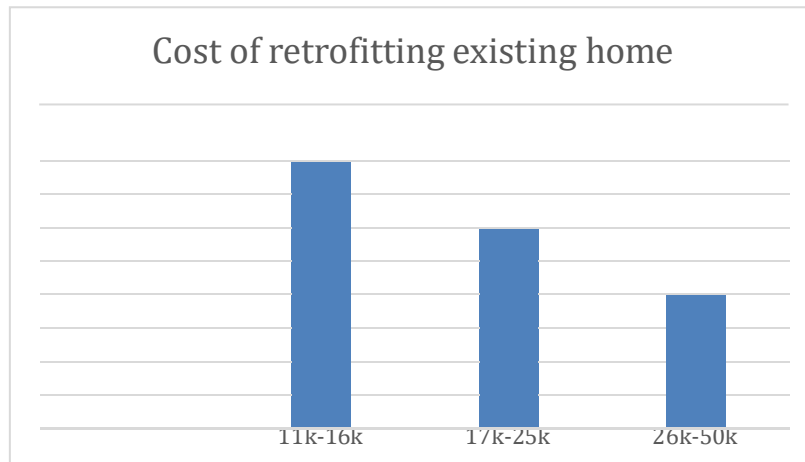
Impact on Capacity

Respondents also shared input on the impact a sprinkler mandate would have on their ability to add new homes, both owned and leased. Providers anticipate this would have a negative impact on their ability to grow this service.

Impact on Cost

The average cost estimate shared by providers per home was \$19,684. In addition for those

that lease/rent, the overwhelming majority of landlords will require the sprinklers be removed upon move out.



Other considerations and comments:

While not part of the survey data collected, respondents also shared that choice in housing is an important consideration in this conversation. If the need for a new home arises out of desire or necessity, it is common for the people who live there to be integral in the process of finding an alternative home. This allows people to live in the area and home of their choosing. If sprinkler systems were required, this freedom of movement would be greatly restricted. It is already difficult to find suitable, affordable homes and adding this requirement would shrink the available market even further. All providers might be forced to purchase homes or work out long-term leases just to reduce costs. This will shrink current capacity as many providers will not be able to make this leap. This will also move our system backward toward more institutional settings - something Oregonian's proudly moved beyond several decades ago.

Several Providers who have recently scheduled a sprinkler system for installation reported significant wait times for installation. They reported that it is difficult to find a company with availability and then once located the wait time for installation is six months to a year.



Appendix

Survey: The Oregon Resource Association collected data from their members from September 1, 2022 to October 1, 2022 to inform the ODDS stakeholder solicitation of feedback for their report to the Oregon Legislature on Sprinkler and Other Fire Safety and Suppression Measures for Residential Settings. The data was collected electronically via a survey tool and reflects 33% of 24-Hour Residential Services in Oregon.

Q1. Would your current landlords allow you to install sprinkler systems or would they require you to vacate?

	# of Providers	Percent
Yes, with restrictions	6	37.5%
No	7	43.8%
Yes, without restrictions	3	18.8%

Q2. For homes that you may lease or rent, if the landlord would allow the installation of sprinklers, would the cost of installation fall on you, the provider (rather than your landlord covering the cost)?

	# of Providers	Percent
Yes	15	100%
No	0	

Q3. If you have homes that are currently sprinkled, how much do maintenance and repairs cost annually, per home?

	# of Providers	Percent
\$200-\$300	5	23.8%
\$300-500	5	23.8%
\$500-\$1000	6	28.6%
\$1000-\$2000	3	14.3%
\$2000 +	2	9.5%

Q4. If you have researched cost or installed sprinkler systems, what was the cost of retrofitting?

	# of Providers	Percent
11k-16k	4	44.4%
17k-25k	3	33.3%
26k-50k	2	22.2%



Oregon

Kate Brown, Governor

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Q5. How many homes do you have sprinkled?

	Percent
Homes Sprinkled	52%
Homes Not Sprinkled	48%

Q6. How many homes do you lease? How many do you own?

	Percent
Homes Owned	55.5%
Homes Rented/Leased	46.5%



Appendix E: Letter from Chair of Oregon Developmental Disabilities Coalition



Oregon DD
Coalition

Advancing Opportunities

September 28, 2022

To: Lilia Teninty, Director, Oregon Developmental Disabilities Services

From: Emily Braman, Chair, Oregon Developmental Disabilities Coalition

RE: Sprinklers and other Fire Safety and Suppression Measure impact on housing for people with IDD.

Dear Lilia:

The Oregon Developmental Disabilities Coalition (DD Coalition) is a group of approximately 40 organizations across Oregon that come together to advocate for quality services, equality, and community integration for Oregonians with intellectual and developmental disabilities (IDD) and their families. We also have individual members who are self-advocates and family members of people with intellectual or developmental disabilities.

We believe that stable and consistent housing gives people the opportunity to build strong community lives. People with Intellectual and Developmental Disabilities (IDD) already face a scarcity of affordable housing options to live, work, and spend time in the communities they call home. Requiring them to install costly and involved sprinkler systems to their residence adds yet another barrier to meeting their housing needs. These requirements stand to destabilize housing for many people with IDD.

In the 2021 Oregon Legislative session, the legislature asked the Oregon Office of Developmental Disabilities Services for a report by October 2022 on the impacts and costs of Sprinklers and other Fire Safety and Suppression Measures in Residential and Foster homes settings. The Oregon DD Coalition Policy Committee has concerns about putting additional barriers into place that negatively impact people's access to housing. Affordable and accessible housing in Oregon is tremendously difficult to acquire. Both people with IDD and support providers share with us that the financial burden of adding sprinklers to rental or owned properties would be prohibitive. This change would impact people with disabilities looking at housing options because choices would be even more limited. Not all landlords currently leasing to people with IDD or their providers would allow the installation of sprinklers. Sprinklers also have the potential to damage possessions and ruin property in the home should they be triggered.



Oregon DD
Coalition

Advancing Opportunities

Most Oregon IDD residential homes are capped at serving no more than five total residents. However, there are some residential homes currently supporting more than five residents. In such cases, the DD Coalition supports the current additional Fire Safety and Suppression Measures in agreement with ODDS.

Fire safety is important. There are numerous safety steps in place in Oregon's IDD residential service settings for fire prevention, as required by licensing and state law. These include monthly evacuation drills, extensive staff training and assessment, and accommodations for everyone living in the home. In most of these homes, there are staff awake and available 24 hours a day and able to provide immediate emergency response according to written plans.

The Oregon DD Coalition urges the Oregon Legislature and ODDS to forego the Sprinkler requirements currently under consideration and continue to create housing options and remove barriers to access for Oregonians with IDD.