
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2020-11-2009 IEC-210.8

Building or Fire Safety Law Interpreted

[675 IAC 17-1.8](#) 2009 Indiana Electrical Code, Article 210.8 Ground-Fault Circuit-Interrupter Protection for Personnel

Issue

Whether, under Article 210.8 of the 2009 Indiana Electrical Code, electrical receptacles located in a dwelling unit walk-in closet are required to have ground-fault circuit-interrupter (GFCI) protection when the closet is adjacent to and accessed through a bathroom.

Interpretation of the State Building Commissioner

The Indiana Electrical Code does not require GFCI protection for receptacles located in a walk-in closet adjacent to and accessed through a bathroom.

Rationale

Article 210.8 of the 2009 Indiana Electrical Code discusses GFCI protection for receptacles. Sub-article 210.8(A) lists all required locations for such devices in dwelling units. That list of required locations does not include closets.

Because, however, the building official's violation notice in the case at the center of this interpretation request is based not on the name assigned to the room ("closet"), but rather on its location (stated on the notice as "in the bathroom"), it is important to note that other considerations can be relevant, and they must be considered as well.

Room types are not driven merely by the name assigned to them by the owner. Names can be intentionally or unintentionally misleading. Room types are determined by applying to the space either:

- (1) The code definition for the proposed room type; or
- (2) If there is no code definition for the proposed room type, the common and ordinary meaning of the room type.

In instances where it is not clear whether the room type falls within any of the specifically listed room types in Article 210.8(A), the proper classification shall be determined by classifying the room as the type of room that most nearly resembles the room type, taking into account the hazards the requirement is intended to address and the reasons for which this specific list of rooms was created. In instances where a room is intended to be used for different purposes, the room must comply with the requirements of this provision, if one of the purposes of the room falls within the listed room types.

For example, if a room is labeled "closet," but it also contains a lavatory or shower, then the room is being used for different purposes, one of which is a bathroom and it therefore must be provided with GFCI protection.

However, in the subject case the floor plan indicates the closet in question is a completely separate room from the bathroom, albeit one that adjoins it. The fact that the only means of accessing the closet is through the bathroom is irrelevant to what would be considered the "location" of the space. If means of access were relevant, then a bedroom accessed only via a corridor would be said to be located "within" the corridor.

The more relevant criterion in this case is that the closet itself shares no apparent use in common with that bathroom (it contains no plumbing fixtures) nor with any common characteristics of the other required locations listed in 210.8(A). The facts that the rooms adjoin and that access to the closet can only be made through the bathroom are not sufficient reasons to consider the closet to be either 1) a part of the bathroom, 2) located within the bathroom, or 3) subject to the hazards addressed by the GFCI requirement, any more than those could be said to apply to a bedroom or corridor that adjoin a bath.

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