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**FIRE PREVENTION AND BUILDING SAFETY COMMISSION**  
**Department of Homeland Security**

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2019-28-2014 IBC-302.1

**Building or Fire Safety Law Interpreted**

[675 IAC 13-2.6](#) 2014 Indiana Building Code Section 302.1

**Issue**

What is the appropriate occupancy classification for toilet rooms and hallways?

**Interpretation of the State Building Commissioner**

Toilet rooms, and the circulation spaces that provide access to them, share the occupancy classification of the structure, or portion of the structure, they serve.

**Rationale**

Unless a toilet facility is free standing, neither toilet rooms nor their circulation pathways enjoy an occupancy group of their own. They share the occupancy classification of the structure, or portion of the structure, that they serve. In practice, this means if the toilet room or circulation space is intended to serve the occupants that are in the building for business purposes, the occupancy group is considered B. If they are intended to serve the occupants that are in the building for assembly purposes, the occupancy group is considered A. If the space is intended to be shared by multiple groups, then the space "shall comply with all of the requirements that are applicable to each of the purposes for which the room or space will be occupied" [emphasis added]. See Section 302.1 of the Indiana Building Code.

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