



Date: February 24, 2017

DQA Memo 17-005  
Replaces Memo 11-027

To: [Community-Based Residential Facilities](#)

From: David Soens, Life Safety Fire Authority  
Bureau of Education Services and Technology

Via: Otis Woods, Administrator  
Division of Quality Assurance

Alfred Johnson, Director  
Bureau of Assisted Living

## Construction Requirements for New 'Class-C' CBRF Structures

This memorandum replaces memorandum 11-027 with updated regulatory references and contacts. The position of the Department of Health Services remains unchanged and the purpose of this memorandum is to provide information regarding the physical plant requirements for new Community-Based Residential Facility (CBRF) licensure, as these requirements relate to the application of the Wisconsin Commercial Building Code (WCBC). CBRFs are licensed according to Wis. Admin. Code ch. DHS 83. Commercial structures are designed to the requirements in the WCBC.

### Background

The WCBC adopts and modifies the International Building Code (IBC). Chapter 3 of the IBC classifies commercial buildings in relation to use and occupancy. Depending on the number of people being cared for, and the extent of their physical condition, CBRFs will typically be classified I-2, I-1, R-4, or R-3. In addition, a small CBRF serving five to eight persons can be constructed to the Uniform Dwelling Code standards in Wis. Admin. Code chs. SPS 320 to 325. According to Wis. Admin. Code § DHS 83.04(2)(d), (e), and (f):

(d) *Class C ambulatory (CA)*. A class C ambulatory CBRF serves only residents who are ambulatory but one or more of whom are not mentally capable of responding to a fire alarm by exiting the CBRF without any help or verbal or physical prompting.

(e) *Class C semi-ambulatory (CS)*. A class C semi-ambulatory CBRF serves only residents who are ambulatory or semi-ambulatory, but one or more of whom are not physically or mentally capable of responding to a fire alarm by exiting the CBRF without help or verbal or physical prompting.

(f) *Class C non-ambulatory (CNA)*. A class C non-ambulatory CBRF serves residents who are ambulatory, semi-ambulatory or non-ambulatory, but one or more of whom are not physically or mentally capable of responding to a fire alarm by exiting the CBRF without help or verbal or physical prompting.

IBC Group I-2 occupancies serve buildings and structures with persons who are not capable of self-preservation.

**Guidance**

Class-C CBRFs of nine or more beds, i.e., commercial size, seeking licensure in a new structure, must be approved as an **IBC Group I-2 Condition 1**.

**Questions**

Please direct any questions about the content of this memo to the DQA Life Safety Consultant at 608-266-8016.