

**Number:** ODHS-25-052

**Date:** 10/07/2025

**To:** Assisted Living and Residential Care Facility Providers

**From:** Safety, Oversight and Quality Unit

**Subject:** Door and Locking Devices in Assisted Living and Residential Care Facilities

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The Oregon Department of Human Services (ODHS) Office of Aging and People with Disabilities (APD) Safety, Oversight and Quality (SOQ) would like to provide clarification and guidance on the requirements for doors and locking devices in resident apartments within Community Base Care (CBC) assisted living and residential care facilities. These requirements apply to all CBC assisted living and residential care facilities effective **11/01/2025**.

- **All shared bathrooms must be equipped with locks that provide residents with privacy.**
- **All apartment entrance doors must include a locking mechanism with a single-action release and levered handle (OAR 441-054-0200(5)(a) and OAR 411-054-0300(5)).**

## Single-Occupancy, Private Bathrooms

In single-occupancy apartments with private bathrooms, locks on the bathroom doors are not required due to apartment entrance locking mechanism.

## Shared Bathrooms

All shared bathrooms must have bathroom doors that are equipped with resident accessible locks.

## Jack and Jill Bathrooms

For bathrooms that are shared between two apartments, residents must be able to lock both bathroom doors when the bathroom is in use. The doors must include locks and resident accessible handles and there must be a way for staff to access the bathroom from either side if needed

## Pocket Doors

Pocket doors for bathrooms that are shared between two apartments must include a resident accessible locking mechanism. For existing bathroom pocket doors, facilities may submit an Application for Exception prior to their next survey if the required lever handle cannot be installed. Any alternative pocket door handle, door pull, or similar hardware option must ensure accessibility, safety and resident privacy.

## Barn Doors

Barn doors for bathrooms that are shared between two apartments must include a resident accessible locking mechanism. For existing barn doors, facilities may submit an Application for Exception prior to the next survey if the required lever handle cannot be installed. Any alternative barn door handle, pull, or similar hardware option must ensure accessibility, safety and resident privacy.

## New Building Plans

Beginning 11/01/2025, building plans with pocket doors or barn doors will no longer be permitted. Building plans submitted on or after **11/01/2025** may not include pocket doors or barn doors and must comply with applicable building codes in effect at the time of the submission.

## Change of Ownership

Change of ownership of an existing facility, the facility and owner must comply with the above requirements.

## Previously Closed/Unlicensed Facility

Owners that purchase or seek to operate a previously closed or unlicensed facility (i.e., a facility is closed and no residents are in the facility) must bring the building up to current building codes in accordance with OAR 411-054-0200(2) for Residential Care Facilities and OAR 411-054-0300(2) for Assisted Living Facilities. Even if these facilities have pocket or barn doors, no exceptions will be approved or granted. Each such facility must meet the standards in effect at the time of licensure, as well as the applicable building codes in effect at that time.

## Exception

For facilities that may qualify for an exception, please contact your policy analyst to discuss the application process.

For questions or to request an Application for Exception, please contact the CBC Team at [CBC.TEAM@odhsoha.oregon.gov](mailto:CBC.TEAM@odhsoha.oregon.gov).

## References:

**411-054-0200(4)(d) Residential Care Facility Building Requirements INTERIOR DOORS** Lever-type door handles must be provided on all doors used by residents.

**411-054-0300(5)(d)(A) Assisted Living Facility Building Requirements RESIDENT UNITS** A locking device must be included that is released with action of the inside lever. Locks for the entry door must be individually keyed, master keyed, and a key supplied to the resident.