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A collaborative program between the
ADA National Network and the
U.S. Access Board



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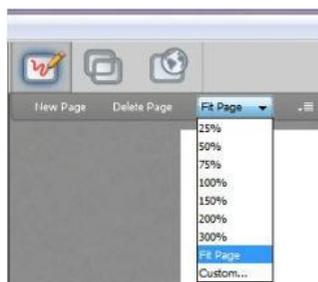
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Transient Lodging Q & A

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Presenters



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2010 ADA Standards for Transient Lodging



Based on the Board's ADA
Accessibility Guidelines (2004)
with additional DOJ requirements

In Partnership with the
American Hotel & Lodging Association



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What is ADA Covered Transient Lodging?

A facility with short-term sleeping accommodations with no right to return e.g., hotels, motels, inns, or similar with:

- 1) On- or off-site management and reservations service;
- 2) Rooms available on a walk-up or call-in basis;
- 3) Availability of housekeeping or linen service; and
- 4) Acceptance of reservations for a guest room type without guaranteeing a particular unit or room until check-in, and without a prior lease or security deposit.

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What is ADA Covered Transient Lodging?

Excluding:

- Owner-occupied facilities with 5 or fewer units
- Units exclusively for residential (long-term) use e.g., condo portions of hotels
- Social service center establishments

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ADA Covered Transient Lodging Additional DOJ Requirements

28 CFR 35.151 (f) and 36.406 (e)

Housing at a place of education (college and university dormitories) is covered as transient lodging with some additional requirements taken from §§ 233 and 809 (residential dwelling units).

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ADA Covered Transient Lodging Additional DOJ Requirements

28 CFR 35.151 (f) and 36.406 (e)

- **“Guest room” = “sleeping room”**
- **Turning space and accessible work surface must be provided in kitchens**
- **Provide an accessible route throughout the unit**
- **Apartments and townhouses leased year-round by faculty or grad students comply with §§ 233 and 809 Residential Dwelling Units**

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Potential Duplication in Coverage

- **The Fair Housing Amendments Act of 1988**
- **Section 504 of the Rehabilitation Act of 1973, as amended**
- **The Architectural Barriers Act of 1968**

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Fair Housing Act

Covered multi-family dwelling units may include:

- **Timeshares**
- **Dormitories**
- **SROs**

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Section 504 and ABA

§ 504 covered facilities include those constructed by, for the use of, or on behalf of entities receiving federal assistance

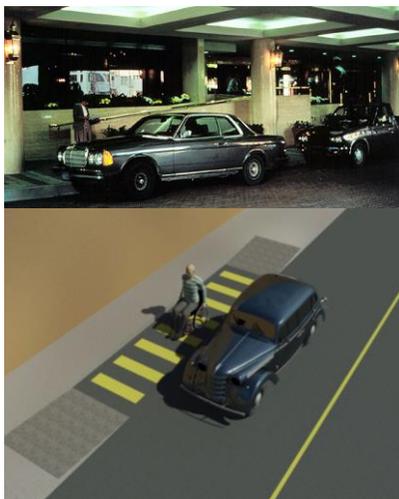
ABA covered facilities include Federal facilities and those constructed with federal dollars

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Outside Guest Rooms

Passenger Loading Zone



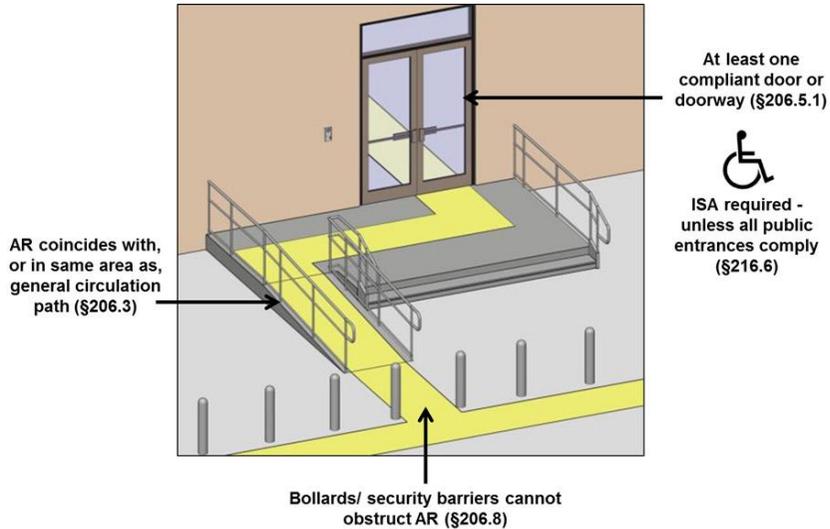
§ 209.2 comply
“where provided”

§ 209.4 provide a
passenger loading
zone at “valet
parking”

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Entrances § 206.4



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Entrances § 206.4

Accessible door and operable parts, including card readers, where provided



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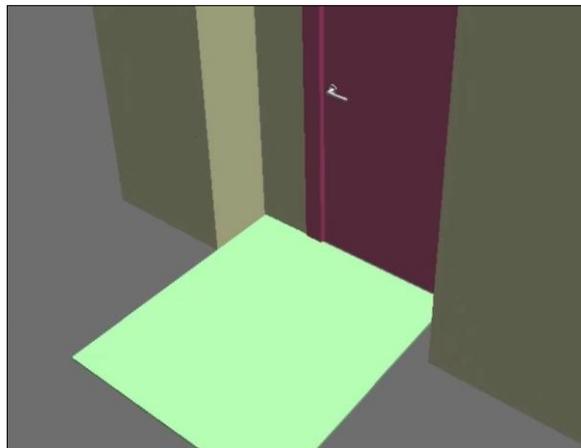
Doors and Gates



Recess: 8" max

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Doors and Gates



Recess: greater than 8"

(forward approach clearance flush with plane of door)

Service Counters

- Provide a forward or side approach
- No more automatic equivalent facilitation



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Business Center Workstations

§ 226

“... where work surfaces are provided for use by other than employees, at least 5 percent shall comply with 902”



Image courtesy of capl@washjeff.edu

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Guest Laundry Facilities



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Destination Dispatch Elevators

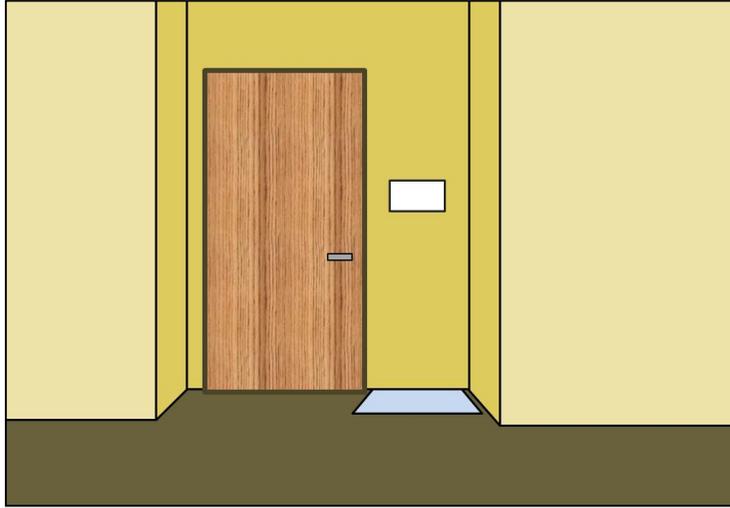


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Tactile Signs: Location

No space on latch side: on nearest adjacent wall



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Tactile Signs: Location

No space on latch side: on nearest adjacent wall



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Tactile Signs: Location

At double doors: right side (2 active leaves) or on inactive leaf

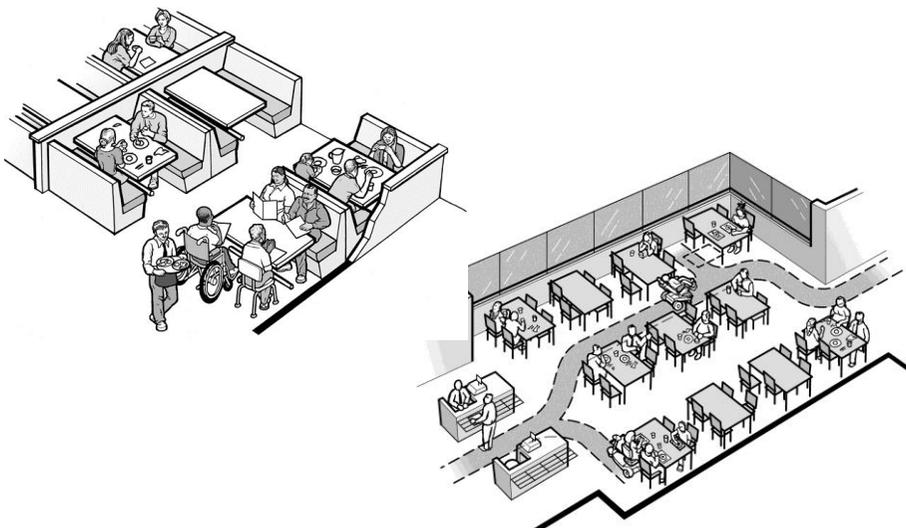


Tactile Signs: Location

Signs can be mounted on the push side of doors with closers and without hold-open devices



Restaurants & Dining Areas



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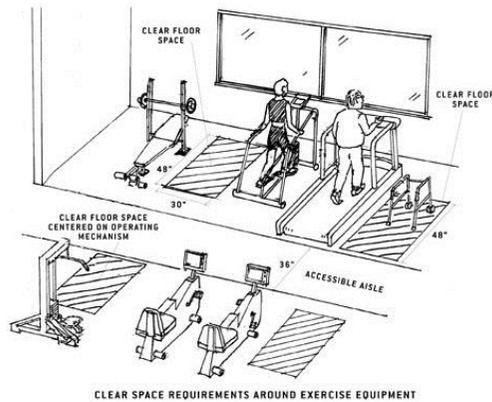
Bar Areas



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Exercise Equipment

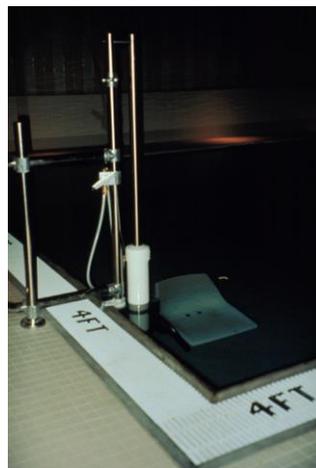


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Swimming Pools and Spas

- Pool lifts
- Sloped entries
- Transfer systems
- Transfer walls
- Pool stairs



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Swimming Pools and Spas DOJ Guidance



Addresses:

- Fixed vs movable
- Shared between pools
- Barrier removal (title III)
- Program access (title II)
- New construction versus alterations

http://www.ada.gov/pools_2010.pdf

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Access Board Guidance

<https://www.access-board.gov/guidelines-and-standards/recreation-facilities/guides>



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Transient Lodging Scoping

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Guest Room Scoping § 224.2

**New construction is based on the number
of rooms provided**

**Alterations and additions are based on the
total number altered or added**

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ADA Covered Transient Lodging Additional DOJ Requirements

*28 CFR 36.406 (c)

Sites with multiple buildings under one permit:

- Units in buildings with 50 or fewer guest rooms may be added and calculated together
- Buildings with 50 or more guest rooms are calculated separately

*Not included in title II regulations

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Mobility Features Scoping

Total Number of Guest Rooms Provided	Minimum Number of Required Rooms without Roll-In Showers	Minimum Number of Required Rooms with Roll-In Showers	Total Number of Required Rooms
1 to 25	1	0	1
26 to 50	2	0	2
51 to 75	3	1	4
76 to 100	4	1	5
101 to 150	5	2	7
151 to 200	6	2	8
201 to 300	7	3	10
301 to 400	8	4	12
401 to 500	9	4	13
501 to 1000	2 percent of total	1 percent of total	3 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000	10, plus 1 for each 100, or fraction thereof, over 1000	30, plus 2 for each 100, or fraction thereof, over 1000

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Communication Features Scoping

224.4 Guest Rooms with Communication Features	
Total Number of Guest Rooms Provided	Minimum Number of Required Guest Rooms with Communication Features
2 to 25	2
26 to 50	4
51 to 75	7
76 to 100	9
101 to 150	12
151 to 200	14
201 to 300	17
301 to 400	20
401 to 500	22
501 to 1000	5 percent of total
1001 and over	50, plus 3 for each 100 over 1000

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Room Scoping Example

Under the 2010 ADA Standard, the number of accessible guest rooms required in a hotel with **250** rooms:

Table 224.2 Guest Rooms with Mobility Features

Total Number of Guest Rooms Provided	Minimum Number of Required Rooms Without Roll-in Showers	Minimum Number of Required Rooms With Roll-in Showers	Total Number of Required Rooms
1 to 25	0	0	0
26 to 50	2	0	2
51 to 75	3	1	4
76 to 100	4	1	5
101 to 150	5	2	7
151 to 200	6	2	8
201 to 300	7	2	9
301 to 400	8	4	12
401 to 500	9	4	13
501 to 1000	2 percent of total	1 percent of total	3 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000	10, plus 1 for each 100, or fraction thereof, over 1000	30, plus 2 for each 100, or fraction thereof, over 1000



7 rooms with mobility features (only one must have communication features (any bathing fixture type))



3 rooms with mobility features with roll-in showers



17 rooms with communication features (one provided in a room with mobility features)

Table 224.4 Guest Rooms with Communication Features

Total Number of Guest Rooms Provided	Minimum Number of Required Guest Rooms With Communication Features
151 to 200	14
201 to 300	17
301 to 400	20
401 to 500	22
501 to 1000	5 percent of total
1001 and over	50, plus 3 for each 100 over 1000

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Guest Room Dispersion

Disperse among the classes of guest rooms to allow choices comparable to those provided to other guests.

More types than required number?

- Prioritize by guest room type, number of beds, and amenities.

Overlap of mobility with communications rooms

- At least one, and
- No more than 10%

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Inside Guest Rooms

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Doors and Doorways

Non-Accessible Guest Rooms § 224.1.2

All user passage doors and doorways in rooms without mobility features includes: entrances, bathroom, sleeping room, doors within suites, doors to connecting rooms (from accessible unit side)

- 32 inch minimum clear opening width
- Exception for shower and sauna doors

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Non-Accessible Guest Room Doors

- All passage doors must provide 32" clear opening in all guestrooms



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Doors and Doorways

Guest Rooms with Mobility Features

- Maneuvering Clearance at Clear Width at all Doors for User Passage



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Multi-Story Guest Rooms with Mobility Features

§ 206.2.3 Exception 5

Vertical access to a second story within a unit is not required *if* all spaces required to be accessible are on an accessible route

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Guest Rooms with Mobility Features: Spaces Required to be Accessible

§ 806.2

- Living and dining areas
- Exterior spaces serving the unit
- At least one sleeping area
- At least one bathroom

§ 225 & 811

- Storage (except kitchens)

§ 212 & 811 Kitchens and Kitchenettes

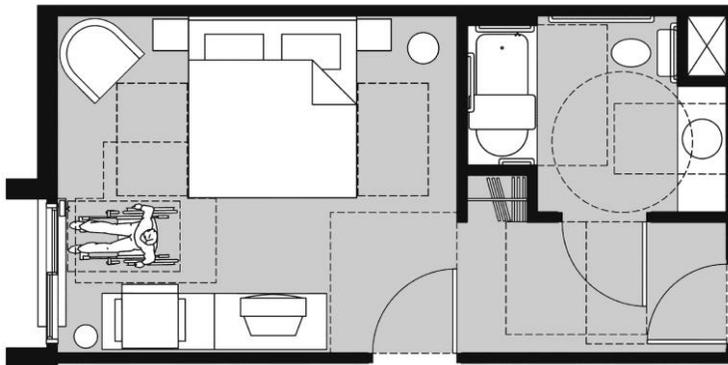
§ 205, 229, & 309

- Operable parts, including windows

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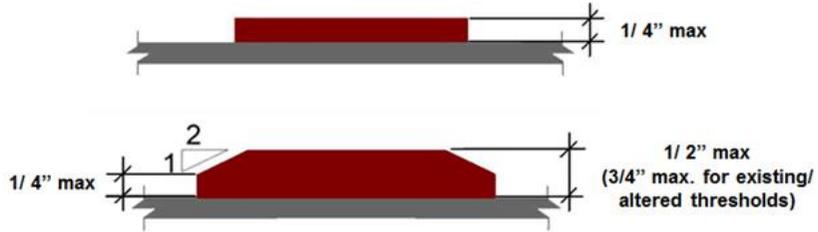
Transient Lodging Unit



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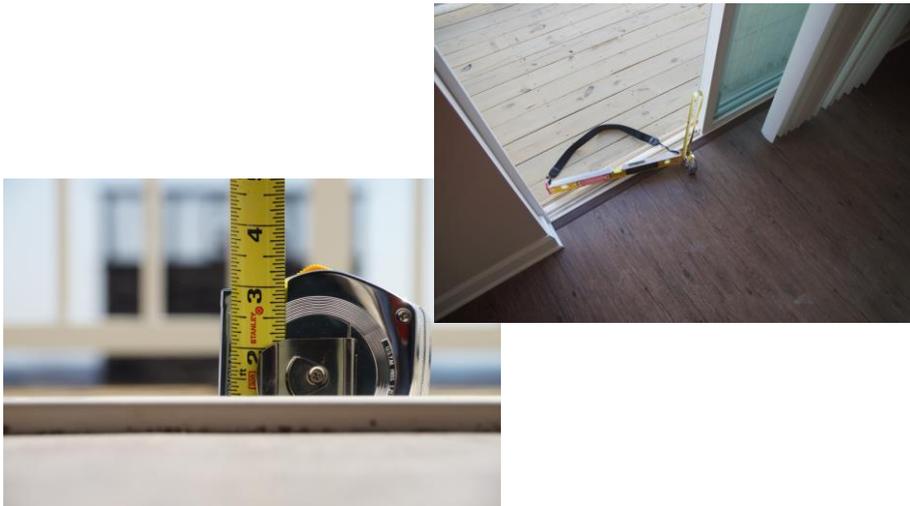
Exterior Spaces



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Exterior Spaces



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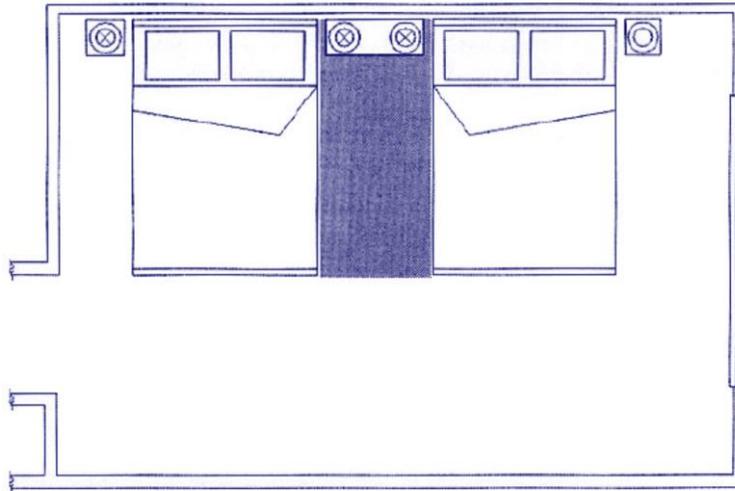
Guest Room Beds

- 36" Accessible Route to 30"x48" clear floor space



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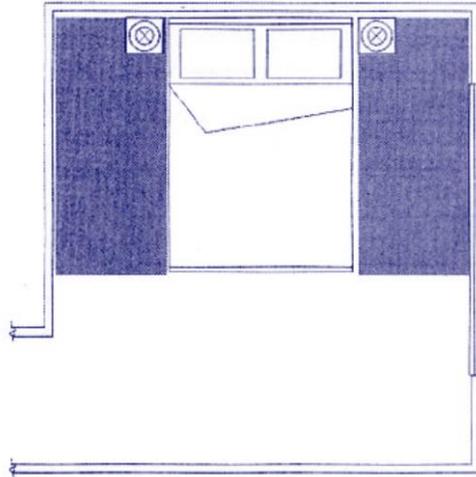
Clear Floor Space Location



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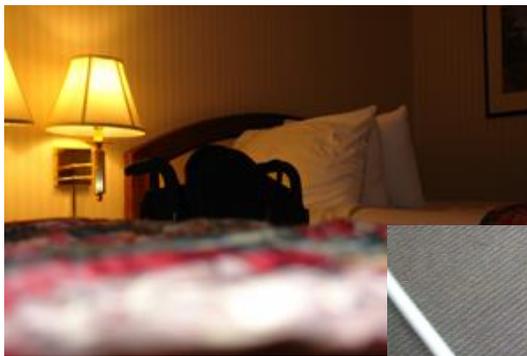
Clear Floor Space Location



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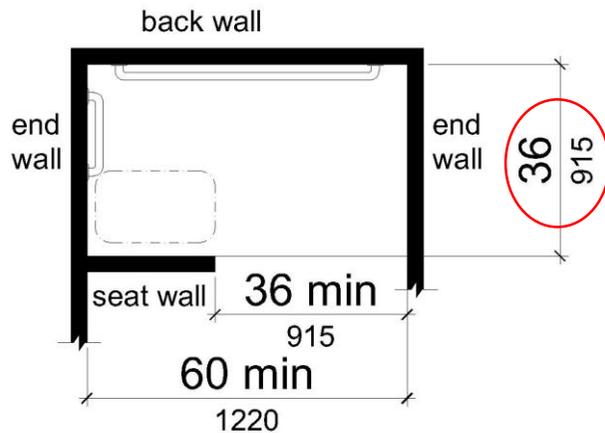
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Bed Height



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Alternate Roll-in Shower



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Alternate Roll-in Common Issues

- 60" min width
- 36" deep exact for alt

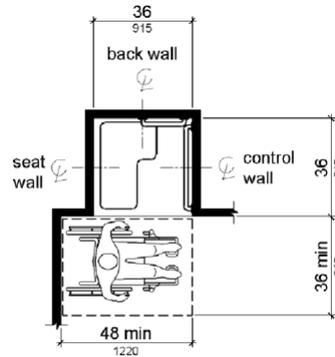


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Transfer Showers

§ 608.7 Exception permits a 2" max. threshold in alterations where ½ inch max. threshold would disturb the structural reinforcement of the floor slab



Note: inside finished dimensions measured at the center points of opposing sides

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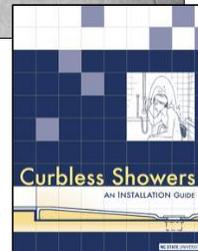
Roll-in Showers

½" max. beveled curb allowed (new)

Other ways to control water:

- 2% max. slope allowed
- consider trench drain
- Resource from the Center for Universal Design

<https://www.ncsu.edu/ncsu/design/cud/>



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Shower Spray Unit

Hand-held shower spray unit required:

- **non-positive shut-off**
- **temperature limited (120 degrees max.)**



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Bathtubs

§ 610

Removable in-tub seat provided

- **securely attached**
- **17" min. and 19" max. high AFF**



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Problem?



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Shower and Tub Seats: Common Errors

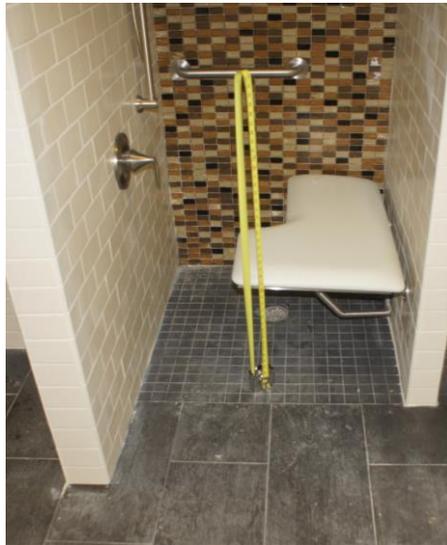
What's wrong?



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What's Wrong?



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Shower and Tub Seats: Common Errors

**Portable seat provided
when permanent seat is
required**



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Sufficient Backing for Seats and Grab bars

§ 609.8 Structural Strength [grab bars].
Allowable stresses shall not be exceeded for materials used when a vertical or horizontal force of 250 pounds (1112 N) is applied at any point on the grab bar, fastener, mounting device, or supporting structure.

See also § 610.4 Seats – very similar

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Adequate reinforcing must be provided

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Common Toilet Issues

- 16"-18" centerline



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Grab Bars

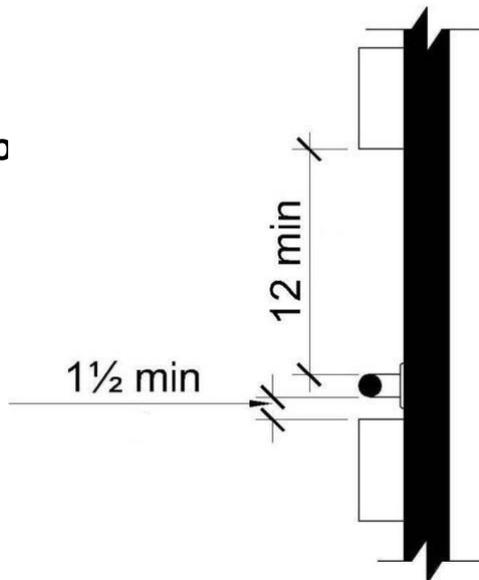
Clearances:

1 ½" behind (absc

1 ½" min. below

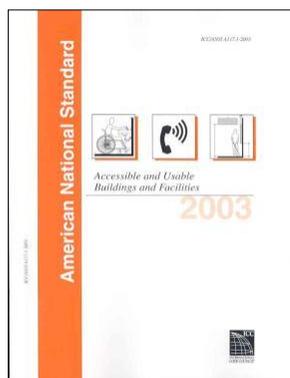
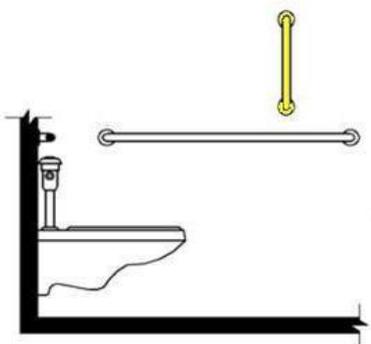
New:

12" min. above



Grab Bars

**ANSI A117.1 requires 18" min. vertical grab bar
(ADA and ABA guidelines do not)**



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Grab Bars



**Clearances at grab bars
help ensure usability**

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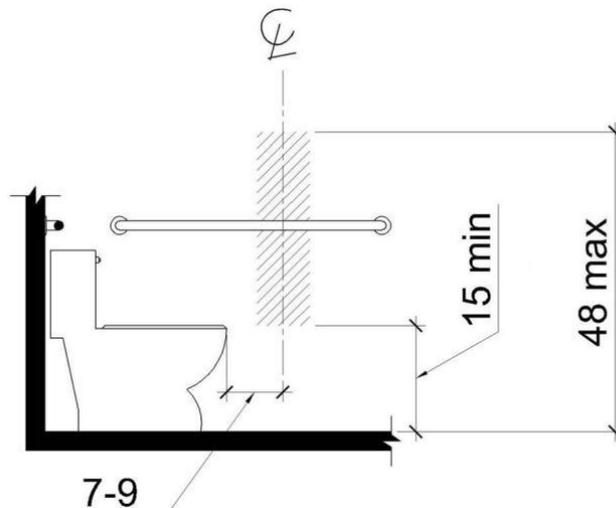
Common Grab Bar Installation Issues

- 54" min, 12" max side wall grab bar
- 24" and 12" on centerline rear grab bar



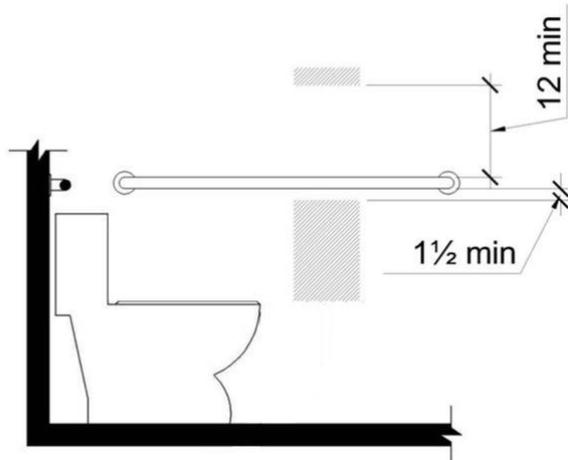
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TP Dispenser Dispenser location



TP Dispenser

grab bar height (33"-36") and clearances further limit location of non-recessed dispensers



Common Errors at the WC

Controls not on the open side



Obstructed grab bars

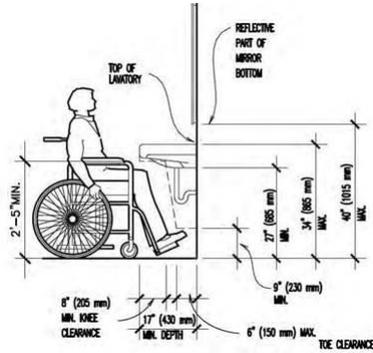


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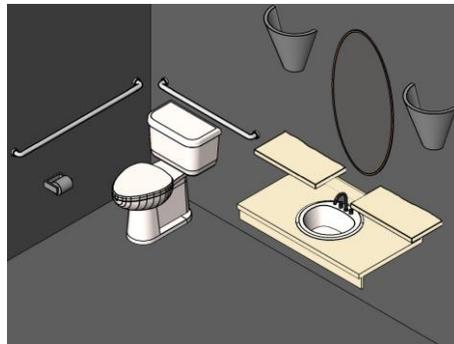
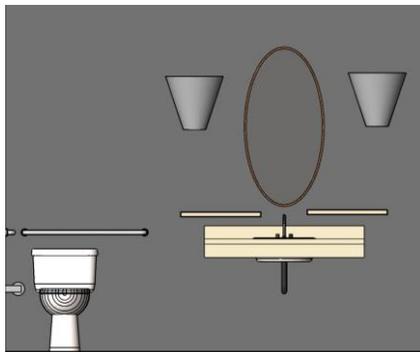
84

Knee and Toe Clearance

- 27" min. tall for 8" min. depth
- 9" min. tall for 11" min. depth
- 9" min. tall for 17" min. depth
- Controls cannot be farther than the toe space.



Equivalent Vanity Countertop Space



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Equivalent Vanity Countertop Space



Considered
"equivalent"



NOT
Considered
"equivalent"



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Towels and Sundries within Reach



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Kitchens and Kitchenettes Not in Educational Housing

- Accessible kitchen work surface not required
- Parallel approach permitted to sinks in wet bars and where no cooktop or range is provided



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Kitchens and Kitchenettes Housing at a Place of Education

- Accessible kitchen work surface (804.3) IS required
- Turning space (304) required



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Storage

- Clear floor space
- Reach range
- Operable parts

Common Error

- Forward approach provided where a side approach is needed



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Storage

Provide a forward or side approach

If doors are provided, ensure door can be opened without obstructing the clear floor space



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Storage

How long is your jacket?
- Good thing it isn't a ball gown.



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Operable Parts § 309

- Outlets, switches, thermostats, curtain controls, etc.
 - 15" to 48" high (measured to highest operable part)
 - clear floor space unobstructed by furniture
- Door hardware, including top lock 34" min. and 48"



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Common Guest Room Drapery Issues

- 48" max height or auto control



Loops recommended

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Common Guest Room Controls Issues

- 48" max to operable parts



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Operable Windows Complying with § 309

Where provided for operation by occupants, at least one window plus all of those required by an administrative authority e.g., for ventilation



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Guest Rooms with Communication Features

Visual Alarm § 702

- Building fire alarm system
- Smoke alarm
- Permanently installed



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Guest Rooms with Communication Features

Notification Devices § 806.3.2

- incoming telephone calls
- door knock or bell
- notification devices not connected to visual alarm
- telephone volume control
- outlet within 48" of telephone



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Auxiliary Aids

Visual alarms may not be effective at waking some sleeping deaf or hard-of-hearing people. An occupant may request a bed shaker or other assistive device to be better assured of being awakened in an emergency.

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Questions?

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Contact

American Hotel & Lodging Association

1250 I Street, N.W., Suite 1100

Washington, DC 20005

Tel: (202) 289-3100

Fax: (202) 289-3199

www.ahla.com



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ADA Title III Team Leader

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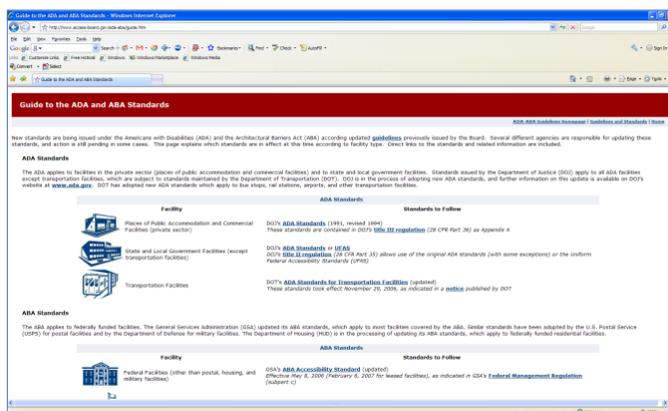
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Online Guidance

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Continuing Education



AIA Provider Number: I017

Course Title: Transient Lodging Q&A

AIA Course Number: GL20161201

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