Common Sources of Confusion in the ADA Standards

Session Agenda

• Application in New Construction
• Alterations
• Entrances & Doors
• Vertical Access
• Toilet Rooms
• Signs
• Interactive Transaction Machines
• Dining Areas and Bars
Which rooms and spaces must comply in new construction?

New Construction (§201)

All areas must comply except:

• Exempted structures/ spaces
• Employee Work areas
• Partially scoped spaces
General Exceptions (§203)

- construction sites
- machinery spaces
- spaces accessed by ladders, catwalks, crawl spaces, very narrow passageways

General Exceptions

- areas raised for security, life/fire safety
- employee work areas < 300 SF that must be elevated 7” min - essential to function (excluding courtroom stations)
General Exceptions (§203)

- single occupant structures accessed only by passageways below grade or elevated above standard curb height (e.g., some toll booths)

General Exceptions

- Raised structures for refereeing, judging, scoring sports
- Raised boxing/wrestling rings
- Raised diving boards & platforms
- Water slides
- Animal containment areas not open to public
What level of access is required for work areas?

Employee Work Areas (§203.9)

Minimum requirements:

- “approach, entry, & exit”
- circulation paths (in areas ≥ 1000 sq ft)
- means of egress
- visual alarm connection
Employee Work Areas
Access for “approach, entry, & exit”

Accessible entry door/gate (including exterior maneuvering clearances)

Wheelchair space within the work area

Connecting accessible route and means of egress

Employee Work Areas
Less than 1,000 SF

Common use circulation paths not required to comply

Access for approach, entry, and exit to work area required
Employee Work Areas

1,000 SF or more in size

size defined by permanent partitions, counters, casework

common use circulation path

What is required in alterations?

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Alterations (§202.3)

“Where existing elements or spaces are altered, each altered element or space shall comply with the applicable requirements...”

Alterations

Within an altered space, standards apply to those elements that are altered

(acceptable route not required unless circulation paths altered or path of travel required)
**Alterations**

"If full access isn’t guaranteed in an alteration, what’s the use?"

Consider that:

- Some access = better than none
- Other mandates apply to existing facilities
- Fuller access (path of travel) required for primary function areas
Alterations: Path of Travel

Alterations to **primary function areas** require **accessible path of travel** to the extent it is does not cost more than 20%.

Compliance required up to the 20% limit
Alterations

- altered elements/spaces comply
  - technical infeasibility?
    - no
      - full compliance
    - yes
      - max. extent feasible

- POT + altered elements/spaces comply
  - POT cost > 20%?
    - no
      - POT fully complies
    - yes
      - spend 20% on POT
**Entrances (§206.4)**

- At least one compliant door or doorway
- AR coincides with, or in same area as, general circulation path
- Bollards/security barriers cannot obstruct AR

**International Symbol of Accessibility**

ADA Standards don’t recognize alternatives to ISA – departures must be based on “equivalent facilitation”

- Original ISA (1968)
  - Referenced in ADA Standards (§703.7.2.1)
- Current ISA (2007)
**Entrances**

**Exterior Doors: Automation Recommended**

- Required at GSA buildings (Public Building Service Standards)

**Doors, Doorways, Gates (§404)**

- Clear Width (32” min.)
- Closing Speed
- Opening Force (5 lbf max)
- Vision/ Side Lights
- Compliant Hardware
- Smooth Surface (bottom, push side)
- Thresholds (1/2” max)
- Maneuvering Clearance (both sides unless usable in 1 direction only)
Maneuvering Clearances
Minimum space for positioning/maneuvering at doors

Maneuvering Clearances
Forward Approach

48” min. 60” min.

12” min.* 18” min.

* If door has closer and latch (otherwise 0”)

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Maneuvering Clearances

Maneuvering clearance must be 8” max. from the face of the door

Besides thick walls and recessed doors, the 8” max. offset can accommodate other elements, such as handrails/guardrails, thick base moulding, etc.
When is vertical access required between stories?

Multi-Story Facilities (§206.2.3)

At least one accessible route must connect each story and mezzanine unless an exception applies.
### Exceptions (§206.2.3)

**AR between floors (“elevator exception”)**

**Private sector facilities only:**

- less than 3 stories  **OR**  less than 3,000 sf/ flr

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### Exceptions

**Exception not allowed for:**

- Shopping centers/ malls with 5 or more sales or rental establishments
- Professional offices of health care providers
- Terminal, depots, or stations used for public transportation
- Government Facilities
Exceptions
If facility qualifies for exception:
• all other provisions still apply to stories & mezzanines not served by AR
• elevators provided anyway must fully comply (as standard or LULA)
• vertical access still may be required by state or local code

Exception: Gov’t Buildings
Exception for public (government) buildings:
• 2 story only AND
• 1 floor has: no public space AND max. occupancy of 5
Exceptions: Mezzanines

AR not required to mezzanines in buildings not required to have elevator (including 1 story buildings)

Restaurants & Cafeterias:
allowed only if < 25% of dining space on mezzanine and equal service/ décor provided on accessible level

What’s the size of an accessible toilet room (single user)?
Toilet Rooms

Water Closet Clearance

Lavatory cannot overlap toilet clearance (except in dwelling units)
**Toilet Rooms**

**Recessed Lavatory**

*(shorter rear grab bar allowed)*

- Keep swing outside fixture clearances or ...
- ... provide unobstructed clear floor space (30” x 48” min.) outside swing (location not specified)
**Toilet Rooms**

Door maneuvering clearance (interior)

- **Toilet Rooms**
  - **Turning Space:** 60" diameter circle or “T” shaped space

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**Toilet Rooms**

Turning Space: 60” diameter circle or “T” shaped space

Door can always swing into turning space
Toilet Rooms
Permitted overlap of turning space

Elements with knee and toe space can overlap a portion of the turning space

Toilet Rooms
Approximate Dimensions: Width

60” min
lavatory width
Toilet Rooms

Approximate Dimensions: Depth (in-swinging door)

Approximate Dimensions: Depth (out-swinging door)
Toilet Rooms
The requirements apply to all types of layouts

Clustered Single User Toilet Rooms
(50% scoping for each type)
Which signs must be tactile?

Signs (§216)

permanent room/space labels (tactile & visual)

- 304
- GRAND BALLROOM

directional & informational signs (visual)

- Elevators
- NOTICE EMPLOYEES ONLY
- Visitors must sign in

required access symbols (visual)

- Wheelchair
- Telephone
- Cochlear implant
Tactile Signs

Signs identifying “permanent” rooms & spaces:
• designations not likely to change over time (or without significant alteration of room/space)
• typically located at doorways

• room and floor numbers/letters
• room names
• labels for restrooms, locker rooms, cafeterias, libraries, conference rooms, mechanical rooms, and other permanent rooms/spaces
• doors at exit stairways, exit passageways, and exit discharge (label required) [§216.4]
• signs identifying rail stations/entrances [§810.6]
How is access addressed to Interactive Transaction Machines?

ATMs and Fare Machines (§220)

Access to 1 of each type at each location

- clear floor space
- operable parts & input controls
- speech output
- display screen
- Braille instructions (for speech mode)
Other Types of ITMs

- Must comply as operable parts where fixed
- Communication access is important (but not addressed by the standards)

What level of access is required at bars and dining counters?
Dining & Work Surfaces (§226)

- Access to at least 5% of seating & standing spaces
- Accessible route to all dining areas (§206.2.5)
- Dispersion within space/ facility required

Dining & Work Surfaces

- Scoping applies to both counter/bars (“standing spaces”) and table seating provided
- 5% does can be applied to combined total of both types (instead of separately for each)
- Dispersion
Dining & Work Surfaces

Providing access to tables instead of counters/bars may be possible if:

- Located in same room/area
- Equal level of service/experience provided
- Table seating is fixed (otherwise, must rely on equivalent facilitation)

Questions?
Technical Guides on the Standards
Available on the Board’s website

U.S. Access Board
(800) 872-2253 (voice)
(800) 993-2822 (TTY)
E-mail: ta@access-board.gov
www.access-board.gov

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