Common Sources of Confusion in the ADA and ABA Standards

Presenters

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### Agenda

- Building Blocks
- Accessible Routes
- Doors
- Parking
- Toilet and Bathing
- Signs
- Dining and Work Surfaces
- Recreation Facilities
- Miscellaneous
- Public Rights of Way
- Your Questions

### Building Blocks
Can synthetic sports turfs be used as a compliant floor surface on an accessible route?

• Carpet - §302.2, including pile height, must be met.
• Blades of artificial grass cannot be more than ½”.
• Use of infill products to meet pile height not recognized by the standards.
• Must meet other applicable requirements for floor and ground surface.
• If part of accessible route within a play area, must also comply with ASTM referenced standards.

What are the requirements for rollout carpets and door mats?

• Moveable elements, like furniture, are not covered by the standards.
• Recommend that they meet the requirements for carpet as much as possible.
• Want to avoid a wheelchair getting stuck if the trim doesn’t meet requirements for change in level.
Can the entire ½” allowable change in level be beveled?

• The entire ½” change in level can be beveled.
• The bottom ¼” is permitted to be vertical, but not required to be vertical.

Are limited changes in level permitted in required turning space and clear floor space?

• Generally, prohibit changes in level other than slopes 1:48 max.
• However, compliant changes in level up to ½” are allowed (per Advisory 304.2) to accommodate changes in flooring and similar conditions.
• Such changes in level should be avoided.
At what depth does an element become an obstruction for a high side reach?

- Anything that prevents the clear floor space from abutting the element is an obstruction.
- Its height is limited to 34”.
- Molding on walls can be disregarded.

Accessible Routes
When can a curb ramp be used instead of a standard ramp?

- Curb ramp: short ramp cutting through a curb or built up to it.
- Can only be used at curbs.
- Curb generally defined as a raised edge along the side of a street or vehicular way, often forming part of a pedestrian circulation path or part of a gutter.

What is the maximum length and height for a curb ramp?

- Not specified by standards.
- Curb ramp height limited to the height of the curb.
- Per PROWAG length of curb ramp does not need to exceed 15’.
Can the running slope of a ramp vary along a run, or must it be consistent?

- Running slope of a ramp run should be consistent along the full length within construction tolerances, especially in new construction.
- Significant changes in slope can impact accessibility.
- May impact handrails, which must be at a consistent height above ramp surfaces.
- A landing should be used to separate ramp runs with different running slopes.
- However, consistent running slope along ramp runs is not specified in the standards.
Which automatic doors are not required to have door maneuvering clearance?

- Low energy or fully automatic doors that are not part of an accessible means of egress.

- Low energy or fully automatic doors that are part of an accessible means of egress and have standby power.

- Low energy or fully automatic doors that are part of an accessible means of egress and remain open in the power-off condition. Remaining open in the power-off condition means the door opens and stays open when the power goes out.

Can a ramp run or sloped walkway extend to the sill of an automatic door not requiring maneuvering clearance?

- Not prohibited by standards but should be avoided.
- Ramp runs require landings 60” min. long and as wide as the run (min. 36”).
- Door must be 36” wide min. to accommodate ramp and landing.
- Ramp runs with more than 6” rise require handrails, including 12” extension over landing.
Are door keypad locks required to comply as door hardware?

• They must comply as operable parts.

• Must be located 34”-48” AFF.

• Other requirements do not apply.

• Standard phone keypad arrangement with a dot on the 5 is recommended.

Door Pulls

• Door hardware
Parking

Is restriping of parking spaces an alteration triggering compliance?

• If parking spaces are fully restriped, compliance of the parking facility is triggered, per DOJ.
• Work to refresh limited sections of existing markings is maintenance.
Is a parking lot or garage required to be as close as possible to the building it serves?

- Parking facilities are not required to be located as close as possible to the facilities they serve.
- Accessible parking spaces must be on the shortest accessible route relative to other spaces in the parking facility.
- Advisable for parking lots and garages to be located near the facility they serve.

Are signs required for each accessible parking space?

- Accessible parking must be identified by the ISA.
- Not specifically required to have one sign at each individual space.
- Multiple spaces can be identified with one sign, but it must be clear which spaces are accessible.
Are motorcycle spaces counted when determining minimum number of accessible parking spaces?

- Motorcycle spaces not required to be counted.
- Including them in the count maximizes accessibility.

Toilet and Bathing Rooms
213.2.1: Unisex toilet rooms shall contain not more than one lavatory, and two water closets without urinals or one water closet and one urinal. ... Doors to unisex toilet rooms and unisex bathing rooms shall have privacy latches.

How many water closets must a unisex toilet room have?

• A unisex toilet room may have:
  • One water closet;
  • Two water closets; or
  • One water closet and one urinal.
• This is not a multi-user toilet room, so no more toileting fixtures permitted.
Can unisex toilet rooms have more than one lavatory?

• Per the ADA, unisex toilet rooms can have a second lavatory, provided that the room has the required privacy latch.

• Language “not more than one lavatory” derived from building code language, part of ensuring that the unisex toilet room is for private/individual use.

Is there a cluster exception for single user bathing rooms?

• For a cluster of single-user toilet rooms, no more than 50% of the toilet rooms for each use must comply (213.2 ex. 4).

• This only applies to toilet rooms!

• If rooms with toilets also have bathtubs or showers in them, they are not toilet rooms and not eligible for the exception.

• In addition to the accessible bathing fixture, water closets and lavatories in single-user bathing rooms must comply.
Can paper towel, soap, and other types of dispensers overlap the water closet clearance?

- Any type of dispenser can overlap the water closet clearance.
- Recommended that only dispensers used for toileting (toilet paper, seat cover dispensers) overlap the clearance.
- Hand dryers cannot overlap the water closet clearance.

Must dispensers in toilet and bathing rooms comply as protruding objects?

- Dispensers in toilet and bathing rooms must comply as protruding objects.
- Toilet compartments and shower compartments are not considered to be part of a circulation path, so protruding object requirements do not apply in these.
How many paper towel dispensers and hand dryers must be accessible?

• Operable parts must comply; scoping not limited to one of each type.
• If dispensers are associated with specific elements, only those associated with accessible elements must comply. (e.g., soap dispensers at each lavatory)
• All dispensers not associated with specific elements that are in accessible rooms or spaces or on accessible routes must comply.

What is the maximum slope for the floor in a roll-in shower?

• Maximum slope not defined.
• Recommend slope as close to 1:48 as possible, even around the drain.
Is a compliant bench required in bathing rooms?

- Compliant benches only required in locker rooms, dressing/fitting rooms, and saunas or steam rooms with seating.
- A bench is required in a bathing room only if it contains lockers or a dressing room or compartment.
- Recommended in other bathing rooms, but not required.
- Individual compartments provided for changing clothes/privacy in front of showers are covered as dressing rooms.

What requirements apply to ablution stations used for ritual body cleansing for religious purposes?

- Not covered by standards.
- Recommend providing access, especially in non-religious facilities.
- Provide access to 5%.
- Products with movable or folding seats provide better access.
- Clear floor space for transfer at fixed seats.
- Controls comply as operable parts.
Non-Compliant Shower Benches

Signs
Redundant Signs

Redundant signs provided in addition to compliant signs not required to comply.

Signs in Other Languages

• If a sign is written in more than one language, only the content in one language (English) must comply.

• If a sign is written only in a language other than English, it must comply to the fullest extent possible.

• Standards do not address character sets or braille for languages other than English.
Are instructions for two-way communication systems required to be brailed?

• Not required.
• This is recommended.

Dining and Work Surfaces
Must access be provided at all bars and dining counters?

- Access to 5% of fixed seating and standing spaces.
- Not necessary to disperse accessible spaces among all types if in same space.
- If a bar is the only fixed surface, accessible spaces must be provided at the bar.
- If there is a bar and fixed tables, accessible spaces can be provided only at the tables if same services are provided at both types.
- Using non-fixed surfaces to substitute for required accessible fixed surfaces must rely on equivalent facilitation.

Must drink rails comply with requirements for dining surfaces?

- Generally used as cupholders and not as dining surfaces.
- Treat as operable parts and locate between 15” and 48” AFF.
- Not required to meet depth and height requirements for dining surfaces.
- If drink rail is in front of a wheelchair space in an assembly area, make sure it doesn’t impede the line of sight.
Is a cell phone charging station a work surface?

• If not intended to be used as a work surface, does not have to comply as a work surface, but station, including outlets, must comply with requirements for operable parts.
• If station provides a surface for work use, for example, a surface for a laptop, it must comply as a work surface;
• Including the requirement that knee and toe clearance must extend at least 17” beyond the leading edge of the work surface.

Are lecterns or podiums work surfaces?

• If the lectern or podium is fixed;
• If it is not used by employees solely for work (in ADA facilities);
• It must comply as a work surface.
• Have lectern with adjustable heights or lectern with dual surface heights.
Can folding or pull-out shelves substitute for compliant section of a sales or service counter?

- Accessible surface must be integral to the counter and extend the full depth of the countertop for customer use.
- Folding or pull-out shelves not permitted as a substitute in new construction or alterations.

Recreation Facilities
Determining ground or elevated

Where transfer systems are used...

Elevated play components may connect other elevated play components

Care must be taken
Gate Hardware (404.2.7 EX. 2)

Access gates in barrier walls and fences protecting pools, spas, and hot tubs

Operable parts of the release of latch on self-latching devices at 54 inches maximum

Miscellaneous Issues
Which transient lodging guest rooms must be on an accessible route?

• Only guest rooms with mobility features required to be on an accessible route.

• Guest rooms with only communication features and guest rooms without accessibility features not required to be on an accessible route.

If an element is movable but plugs into an outlet, is it considered to be fixed?

• No. Elements that are readily movable are not considered to be fixed or built-in.

• Ex. Countertop microwaves, portable ATMs.
Are changes to lighting considered to be an alteration?

• Definition of alteration excludes changes to electrical and mechanical systems.
• This includes changes to lighting unless changes impact the usability of the building/facility, or an element covered by the standards.
• Ex. If a light switch is affected, triggers a light switch complying with operable parts.

Public Rights-of-Way
Current Status of Public Rights-of-Way Guidelines

- 2011 Proposed Rule
- 2013 Supplemental Notice to add Shared Use Paths (SUP)
- Currently working in the Final Rule.

- The following 5 slides are from the proposed rule on Public Rights-of-Way and are for guidance only.

Curb Ramp Running Slope

Maximum curb ramp slope 1:12
When ‘chasing grade’ length of the ramp can be limited to 15 feet with consistent slope that exceeds 1:12.
**Detectable Warning Location**

Place DW on curb ramp at grade break if space at bottom of ramp is less than 5’ deep

Place DW on bottom behind the back of the curb if space is more than 5’ deep at any point

**Detectable Warnings at Refuge Islands**

- Pedestrian refuge islands greater than 6 feet - DWs placed at front edge of island
Detectable Warnings at Rail Crossings

On-Street Parking

Where the width of the adjacent sidewalk or available right-of-way exceeds 14 ft. an access aisle is proposed to be required in new construction.
Questions?

You may type and submit questions in the Q&A Area

(questions submitted in the Chat will not be considered)

Technical Guides on the Standards

Available on the Board’s website
Continuing Education

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Questions will be addressed at the conclusion of this presentation.
Thank you for participating in today’s webinar

Next scheduled session:

Plumbed Elements: Lavatories and Sinks, Washers and Dryers, and Saunas and Steam Rooms
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