ADA Checklist for Existing Facilities

ADA Reference Checklists

The New England ADA Center is a resource for extremely helpful checklists based on the 2010 ADA Standards requirements. Since the 2012 NCBC requirements and the referenced 2009 ANSI A117.1 provisions are close to identical, if you are unaware of the website and its checklists, now seems an appropriate time to make that discovery, especially since the summer recreational season is upon us. Don’t forget the few NC Code differences!

Here is what is available: (both WORD fillable + non-fillable forms)

- ADA Checklist for Existing Facilities
- Recreational Checklists (below) are all on the same webpage as the one above (look at the bottom of the page).
  - Amusement Rides
  - Fishing Facilities
  - Golf Facilities Miniature Golf Facilities
  - Play Areas
  - Recreational Boating Facilities
  - Swimming Pools, Wading Pools & Spas
  - Miscellaneous – Areas of Sports Activities, Team or Player Seating, Exercise Machines & Equipment, Bowling Lanes, Saunas & Steam Rooms, and Shooting Ranges

NCBC Table 1107.6.1.1 - Hotel Showers

Designers have been doing research on hotel guestroom accessibility requirements to address a recurring conversation with clients, contracts and designers regarding the installation of showers in transient lodging. The trend is to greatly eliminate most, or in some cases, all tubs for new hotel construction. Feedback on the matter was requested, along with a response to the questions below.

Q1: Where we have some hotel brands transitioning to all-shower guestrooms (no tubs), some brands are recommending that we go to ALL roll-in showers in our accessible guestrooms and eliminate the tub options entirely. Is the tub distribution (101+ guestrooms = 5 + 2 roll-in) merely a suggestion as long as the minimum number of roll-ins are provided or are we allowed to provide all showers and no tubs, where no tubs are present in the standard guestroom types?

A1: The designated shower numbers and sizes identified in NCBC Table 1107.6.1.1 are requirements, not recommendations or suggestions. Under the first column in the table labeled MINIMUM REQUIRED NUMBER OF ACCESSIBLE UNITS WITHOUT ROLL-IN SHOWERS, there are two options available: 1) accessible bathtubs per ANSI 607, or 2) transfer showers per ANSI 608.2.1. Both the NCBC and the 2010 ADA Standards provisions are identical on this issue. It is certainly possible to provide all showers, if that is what the hotel brand prefers. The MINIMUM REQUIRED NUMBER OF ACCESSIBLE UNITS WITHOUT ROLL-IN SHOWERS will be then provided with transfer showers.

Q2: Would it be acceptable to substitute a roll-in shower for either a tub or a transfer shower for the MINIMUM REQUIRED NUMBER OF ACCESSIBLE UNITS WITHOUT ROLL-IN SHOWERS?

A2: No, it is not acceptable because not everyone with a mobility impairment may have a shower chair to use in a roll-in shower when s/he travels. This is why the initial requirement specifically states MINIMUM REQUIRED NUMBER … WITHOUT ROLL-IN SHOWERS.
NCBC 1109.8 - R-2 Apt. Storage

Q: Can you please clarify what percentage of storage units need to be accessible on a new apartment project? Typically, the storage units are located at the end of a garage. The storage units are not assigned and can be rented for an additional fee to any resident. There are no shelves. Most of the time the units are approx. 4’ wide x 5’ deep. Sometimes a few will be 5’ wide or larger. I am seeing different interpretations by various Architects.

A: Since the storage units are exterior to each dwelling, they are not assigned to a specific dwelling unit but are available for rent, and these range in size from 4’ – 5’ wide x 5’ deep, the storage units are addressed under the Common Use Area requirements. Here are the specifics:

1. An apartment complex typically contains both Type A and Type B dwelling units.
   a. Type A – ANSI 1003.14 Storage Facilities. Where storage facilities are provided, at least one of each type shall comply with Section 905.
      i. This section is intended for storage within the dwelling unit.
      ii. The storage shown in the photo (below) is Common Area Storage, so ANSI 1003.14 would not be applicable.
   b. Type B – ANSI A117.1 has no requirements addressing storage within Type B dwelling units. [See boxes on left for Fair Housing Act Design Manual comments.]

2. The storage areas in the photo are located in Common Use areas. [My underlining below.]
   a. NCBC 1107.1 states In addition to the other requirements of this chapter, occupancies having dwelling units or sleeping units shall be provided with accessible features in accordance with this section.
   b. NCBC 1104.2 states At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements and accessible spaces that are on the same site.
   c. NCBC 1109.8 Storage. Where fixed or built-in storage elements such as cabinets, shelves, medicine cabinets, closets and drawers are provided in required accessible spaces, at least one of each type shall contain storage space complying with ICC A117.1. [NOTE: the definition of ACCESSIBLE is A site, building, facility or portion thereof that complies with this chapter.]
      i. The 2009 IBC Commentary for this section states The code does not require storage facilities, but when such facilities are provided, this section requires at least one of each type to contain storage space in accordance with ICC A117.1. Storage elements within Accessible, Type A and Type B units are specifically addressed under ICC A117.1 Chapter 10.

Specifically, since the storage is exterior to dwelling unit and located within the common area, the following is required:

- NCBC 1104.2 requires an accessible route to each and every storage unit.
- Each storage unit door is required to comply with ANSI 404 (maneuvering clearances, door hardware, thresholds).
- NCBC 1109.8 requires at least one of each type to contain accessible storage space.
  o For self-storage units, the storage unit types are differentiated by sizes, e.g., 5’ x 10’, 10’ x 10’, etc.
  o For residential rental storage units, each unit cluster, or group of storage units, will be considered as a type requiring a minimum of one accessible storage space per cluster. Where the sizes of the storage units in each cluster vary,
    • The accessible storage unit in the cluster will have
      o An accessible route into the storage unit per ANSI 305.7.2 for a forward approach (36” x 48”).

An accessible route is required to the storage area. This does mean that a curb cut is required from the route outside the garage driveway up to the sidewalk providing access to the storage areas. It is possible in the adjacent photo, that the curb cut is just outside the range of the photographer.
ANSI 606.2 Counters + ANSI 308

Q: I have a client that is planning on installing a farm sink like the one pictured below (red dashed box) in their break room. The area where we will have this sink allows for a parallel side approach and a 60” turnaround. Per ANSI 606.3, the front of sinks shall be 34” max above the floor to the rim of the sink. If we set the top of this sink at 34” and undermount it on the countertop, and there will be no countertop at the front of the sink. Can we let the bottom of the counter sit at the top of the sink so that we can keep the counter at a continuous height? Do you see any issues of concern if all the above is met?

A: The answer to your question has everything to do with what is in the break room.
   1. The farm sink is fine so long as there is no cooktop or stove in the break room (a microwave on the counter is fine). [ANSI 606.2 Exc. 1]
   2. The top of the sink is still required to be at 34” measured to the rim. [ANSI 606.3]

The counter, however, is another thing. That has everything to do with what is on the counter, what is over the counter, or what is on the backsplash behind the counter.
   1. Controls, operating mechanisms and hardware. [NCBC 1109.12 – check out the list of exceptions.]
   2. ANSI Fig. 308.3.2(a) and (b) – (left below) both address counter heights when there are reach ranges over an obstruction, where the obstruction is the counter in question.

   a. So, what does that mean? It means a person in a wheelchair is required to be able to reach over the counter to reach an electrical outlet or a switch on the back wall, or to reach the same on a side wall. If this is the case in the break room, then the counter is required to be maximum 34” high also, along with the rim of the sink.
   b. Think about what is located on the counter as well, not just what outlets or switches are on the walls. Is there a Keurig or other coffee maker? Reaching over the counter to insert a K-cup into the machine means that 1) the counter height will be 34”, and 2) the permitted vertical reach will be limited, depending on the depth of the counter. Remember, cups and other coffee/tea paraphernalia are often located adjacent to the coffee maker as well.
   c. A 36” counter works where there are no electrical outlets, no switches and nothing on the counter to reach. In some cases, an unobstructed approach per ANSI 308.3.1 (right below) may work for a side reach. According to the ANSI Commentary, a Side reach is considered unobstructed when something below an operable part is less than 10 inches (255 mm) deep. This allowance would permit side approaches to be considered unobstructed when a person would need to reach over projections. If a microwave (MW) has controls at the front edge of the device, ANSI 308.3.1 will permit reaching into the MW to insert/remove the food. This assumes the MW is not pushed back on a deep countertop. Consider the reach range requirements for all items on the same counter with the MW before making a final decision!

Global Accessibility Awareness Day – 17 May 2018

This is a reprint from a link on the SouthEast Americans with Disabilities Act Network newsletter issued on behalf of the Southeast ADA Center. Their News Archives are here. Click on the graphic below to get additional information: how it started, events, and other activities, etc.
Q: **ANSI 603.2.2** states that doors cannot overlap the clear floor space or clearance at any fixtures. Are toilet compartment doors considered ‘doors’ for the sake of this requirement?

A: The **ANSI 603.2.2** provision is applicable to any/all doors within the toilet room that may overlap the clear floor space or clearance at any fixture within the toilet room itself, not simply the fixtures required to be accessible. This includes toilet compartment doors. Please note there are some exceptions for individual toilet rooms. [See insert on left.]

The **ANSI Commentary** language for this section reads as follows: In a multiuser bathroom, the locations where a person in a wheelchair may be sitting to use a fixture must be out of the swing of the door. This is to prevent the wheelchair from being struck when others leave or enter the room. Although not the best design alternative, the door may swing over the turning space within the room. The turning space is part of the accessible route, not a clear floor or ground space for a fixture.

**ANSI 603.2.2 Exc. 2** – Where the room is for individual use and a clear floor space complying with Section 305.3 is provided within the room beyond the arc of the door swing, the door shall not be required to comply with **Section 603.2.2**.

**ANSI 1003.9 - Type A Garbage Disposal Location and GD Switch Location**

In a **Type A** dwelling unit, **ANSI 1003.12.4.2** requires the sink height to be maximum 34", measured to whichever is higher, either the sink rim or the counter surface.

The **ANSI Commentary** for this section notes that knee and toe clearances are required below the sink.

So, if a garbage disposal is provided, and the sink is a double sink, the knee clearance is required under only one of two sinks.

An alternate option - and what works best with a single sink - is to install the garbage disposal in the back corner of the sink. This allows the portion of the disposal below the sink in the cabinet to remain outside the required knee clearances, if it is carefully located.

Reaching the switch for a disposal in a **Type A** dwelling unit should be a simple enough procedure.

Operable parts are required to comply with the reach range requirements of **ANSI 309** and **ANSI 308**, while **ANSI 1003.9 Exc. 6** does permit a switch not to be accessible where redundant controls are provided.

Locating the switch on the back wall where reaching causes the user to have to bend over and hit his/her head against a 90-degree switchback counter is poor design.

This is where redundant controls on the front edge of the counter would have resolved the situation nicely.

Good thing to remember for **Type A** kitchens!