



# **Applying the ADA Standards**

## **Sources of Confusion and Errors**

# Agenda

- **Civil Rights Law**
- **New Construction**
- **Alterations and Additions**
- **Common Sources of Confusion**
- **Common Errors in Georgia**

# Civil Rights Law

**Applies to discrimination:**

- **Started with focus on racial discrimination**
- **1964 - In public places and employment**
- **Moved to focus on persons with disabilities**
  - **first with federal government**
    - **1968 - Facilities - ABA and UFAS (1984)**
    - **1973 - Funding - Rehabilitation Act**
  - **then within non-federal situations**

# Civil Rights Law

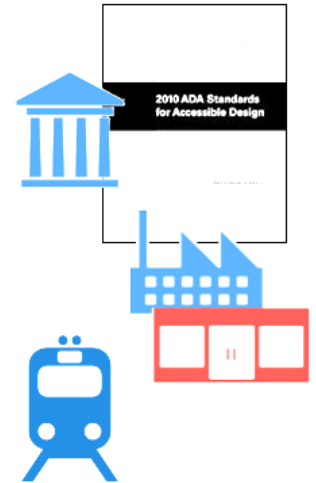
**Applies to discrimination:**

- **1988 - In housing - FHA**
- **1990 - non federal operations - ADA**
  - **Title I - employment**
  - **Title II - state and local government services**
  - **Title III - public accommodations and commercial facilities**
- **1995 - Georgia O.C.G.A. 30-3**

# 2010 ADA Standards

**Applies to new construction and alterations:**

- **State and Local government facilities**
- **Places of public accommodation**
- **Commercial facilities**
- **Transportation facilities**
  - **DOT's 2006 Standards**



**Federal facilities covered by ABA Standards**

# ADA vs FHA

- **FHA applies to housing services and facilities**
- **Accessible routing requirements similar**
- **FHA technical dwelling unit accessibility is modest compared to ADA requirements**
- **ADA, by regulation only covers housing if:**
  - **Social Service Centers**
  - **Place of Education**
  - **Public Entity offers units for sale to individual owners**

# ADA vs FHA

- **FHA applies to single family housing if *“covered”- four or more units in one building***
- **Scoping requirements for ADA and FHA dwelling units are the same with:**
  - **5% of “covered” for mobility**
  - **2% of “covered” for communication**
- **FHA requires adaptable in all “covered” units**
- **ADA has no requirement for adaptable**

# ADA vs GA

per Georgia Law

O.C.G.A. 30-3

- Only applies to permitted construction
- 2% of privately funded apartment complex units with 20 or more dwelling units to be accessible or adaptable for mobility
- 5% of total temporary lodging units
  - ADA Scoping from Table 224.2 ranges from 2.6% to 8% depending on total provided



# **ADA vs GA**

**per Georgia SFM Rule 120-3-20**

- **Sets minimum standard as 2010 ADA and**
- **“covered” unit standard as ANSI A117.1-2003**

**per Georgia Law O.C.G.A. 40-6-221**

- **Applies to parking signage**
- **Far more detailed than ADA requirements**

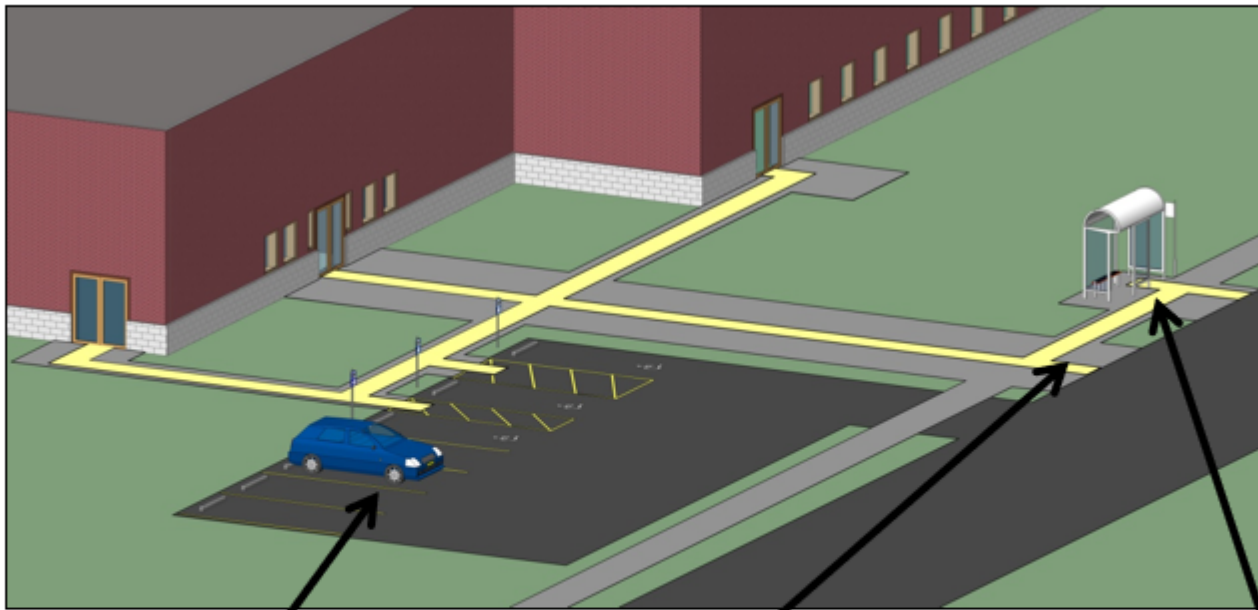
**per Georgia AG opinion - 95-20**

- **Religious facilities considered public**

# Questions?

# Accessible Routes (§206)

At least one accessible route to building entrances from *site arrival points* provided



parking & passenger loading zones



streets & sidewalks

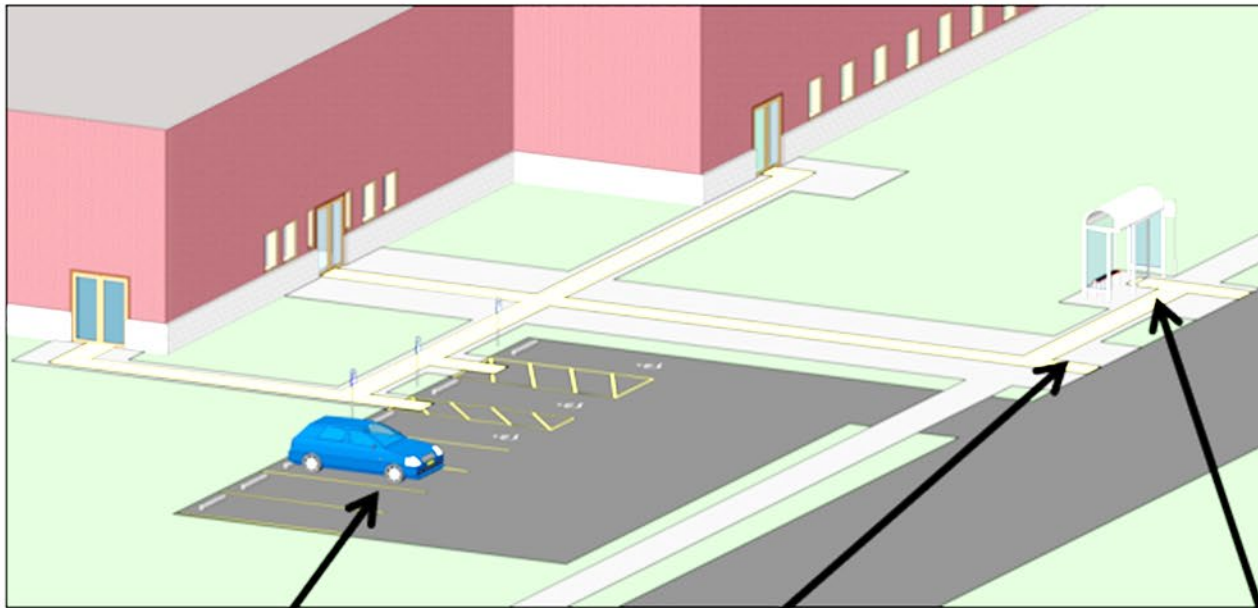


transportation stops

# Accessible Routes (§206)

At least one accessible route to building entrances  
from *site arrival points* provided

- Pedestrian focused



parking & passenger  
loading zones



streets &  
sidewalks



transportation  
stops 12

**Which rooms and spaces must comply in new construction?**



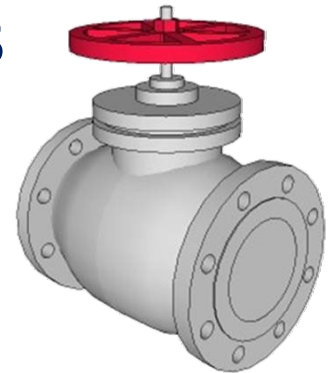
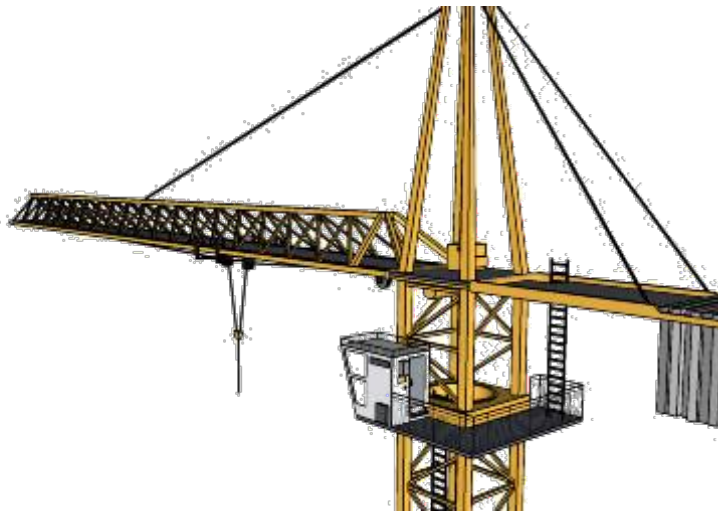
# **New Construction (§201)**

**All areas must comply except:**

- **Exempted structures and spaces**
- **Employee Work areas**
- **as scoped by Chapter 2 for specific elements and spaces**

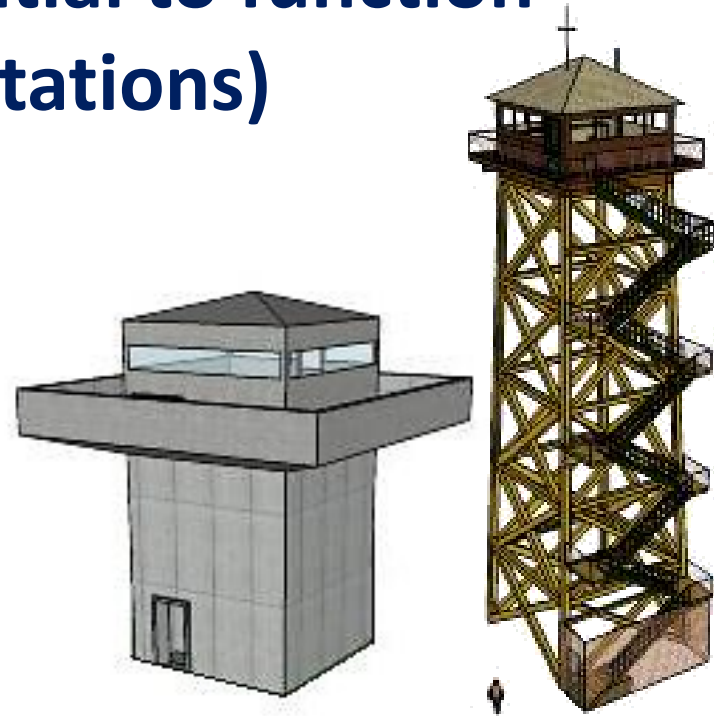
# General Exceptions (§203)

- construction sites
- machinery spaces used only for occasional monitoring, maintenance and repair
- spaces accessed by ladders, catwalks, crawl spaces, very narrow passageways



# General Exceptions

- areas raised for security, life or fire safety
- employee work areas < 300 SF that must be elevated 7" min - essential to function (excluding courtroom stations)





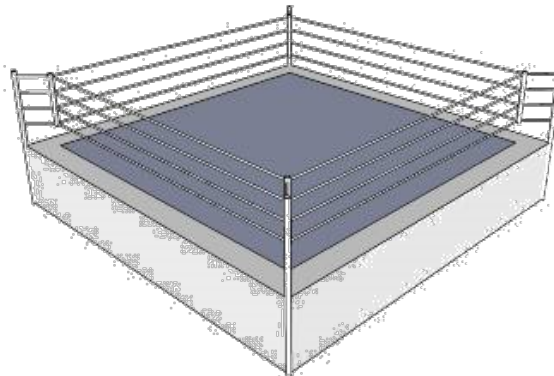
# General Exceptions (§203)

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

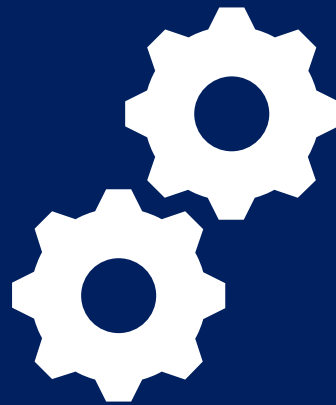


# General Exceptions

- **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)

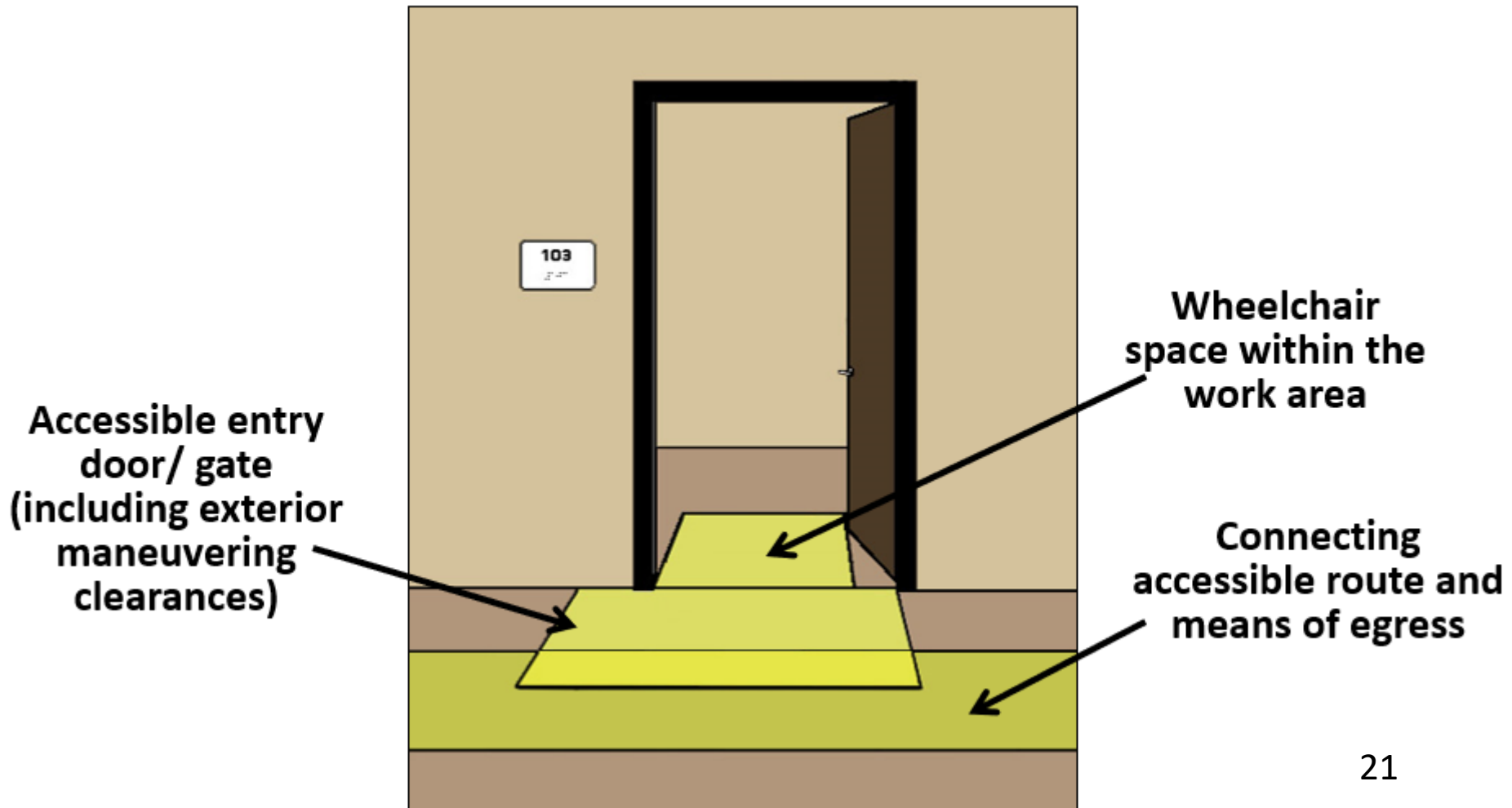
## Minimum requirements:

- “approach, entry, & exit”
- circulation paths (in areas  $\geq 1000$  sq ft)
- means of egress
- visual alarm connection



# Employee Work Areas

Access for “approach, entry, & exit”

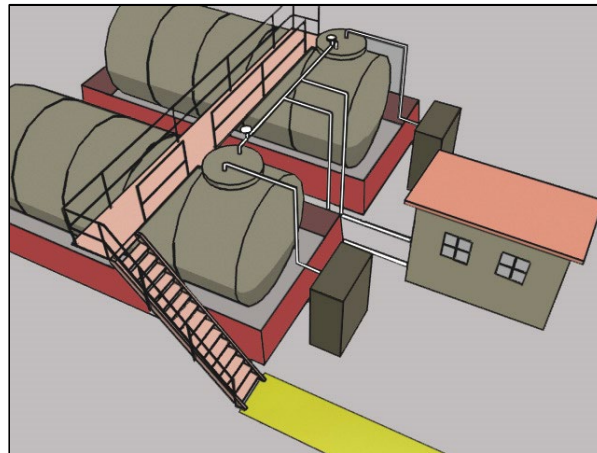


# Employee Work Areas (§206.2.8)

Common use circulation paths must comply in work areas 1,000 SF or more in size

**Exempt:**

- exterior areas fully exposed to weather
- portions of paths integral to equipment

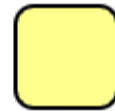


# Example: Medical Care Suite

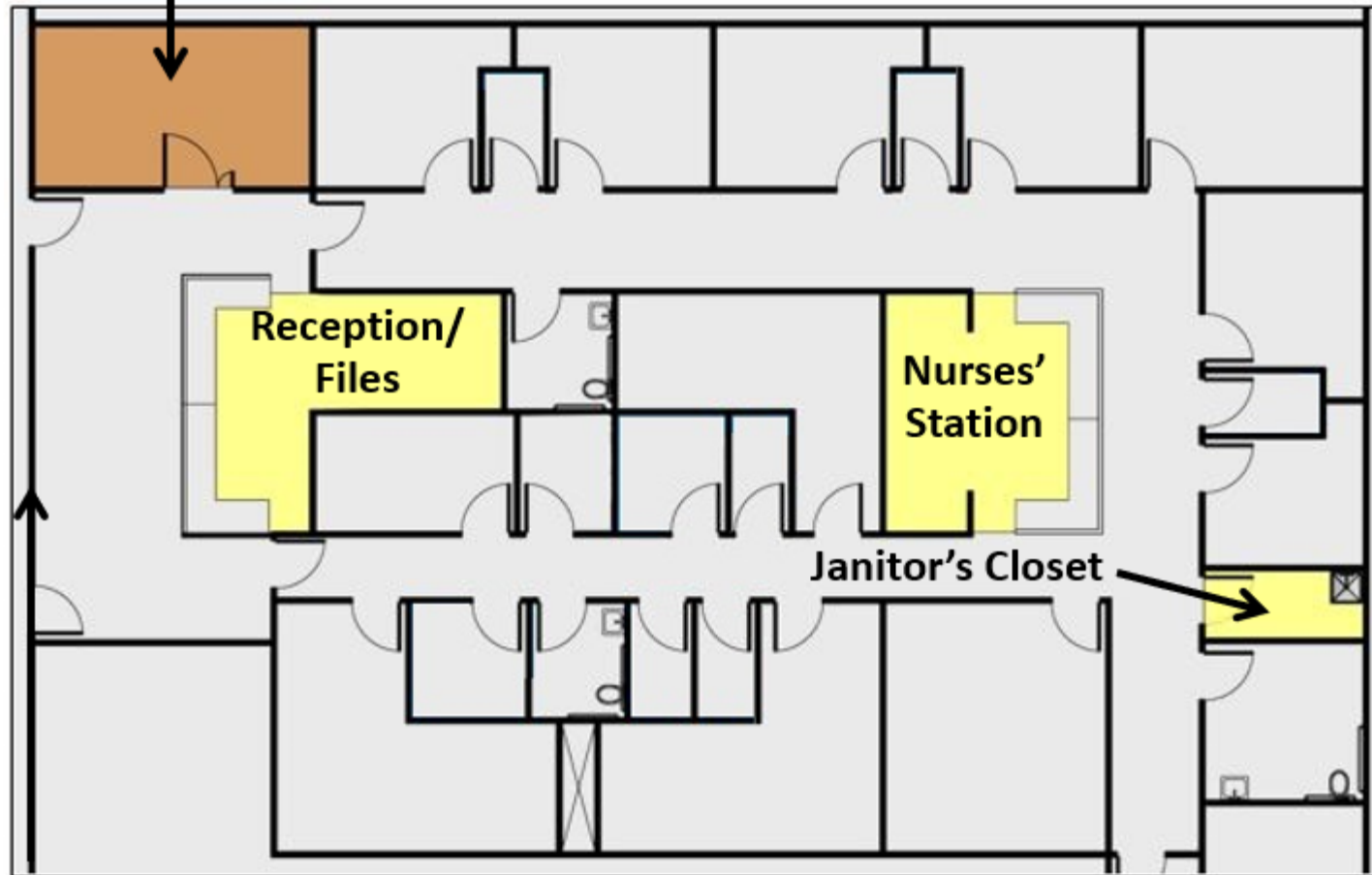


## Employee Work Areas & Exempt Spaces

Mechanical (exempt)



Employee Only Work Areas



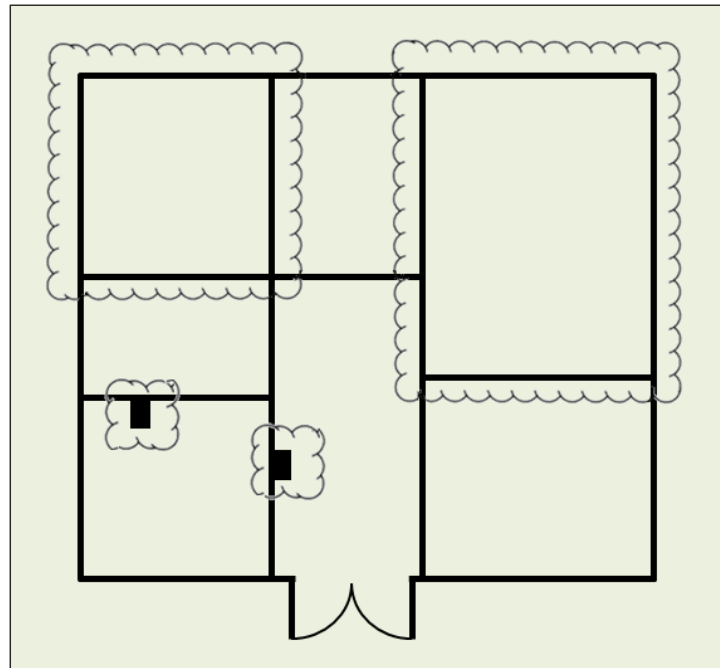
# What is required in alterations?





# Alterations (§202.3)

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



# Alterations

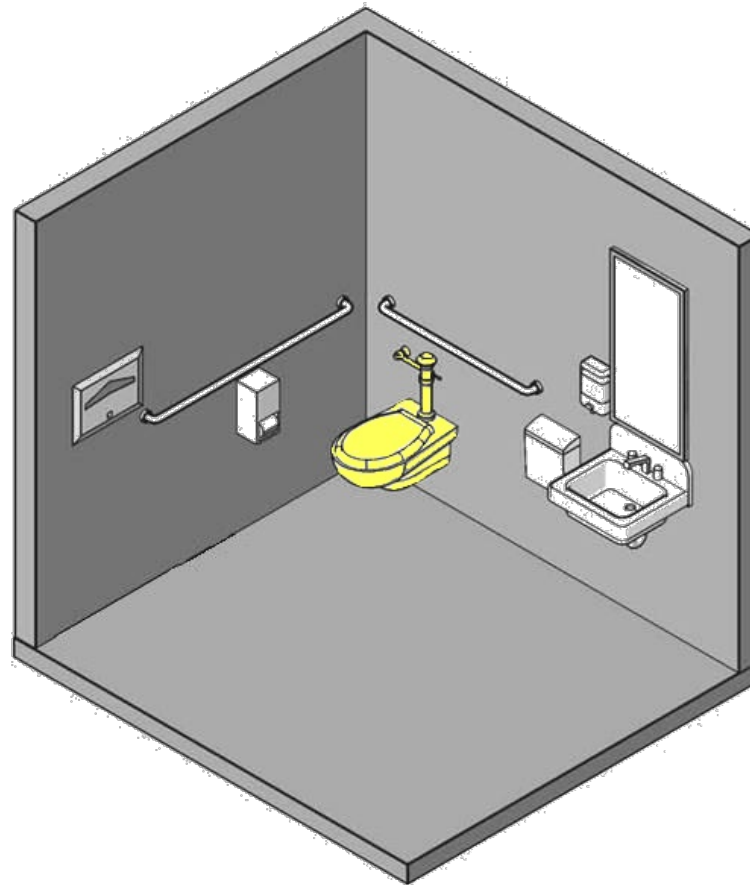
**Within an altered space, standards apply to those elements that are altered**



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

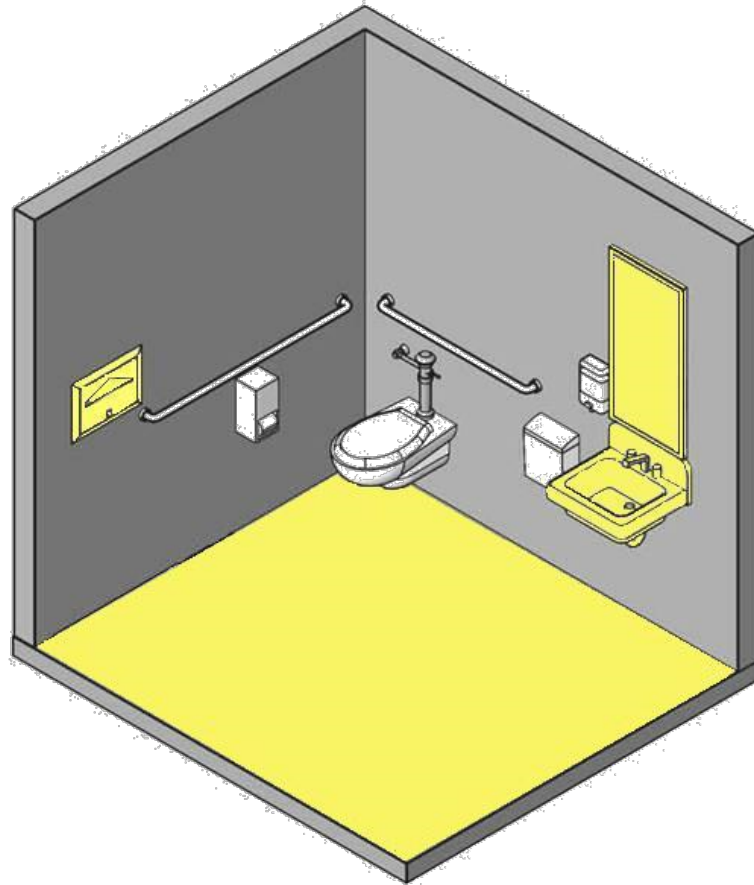
# Alterations

*Example: Toilet room – single element  
(toilet altered/replaced)*



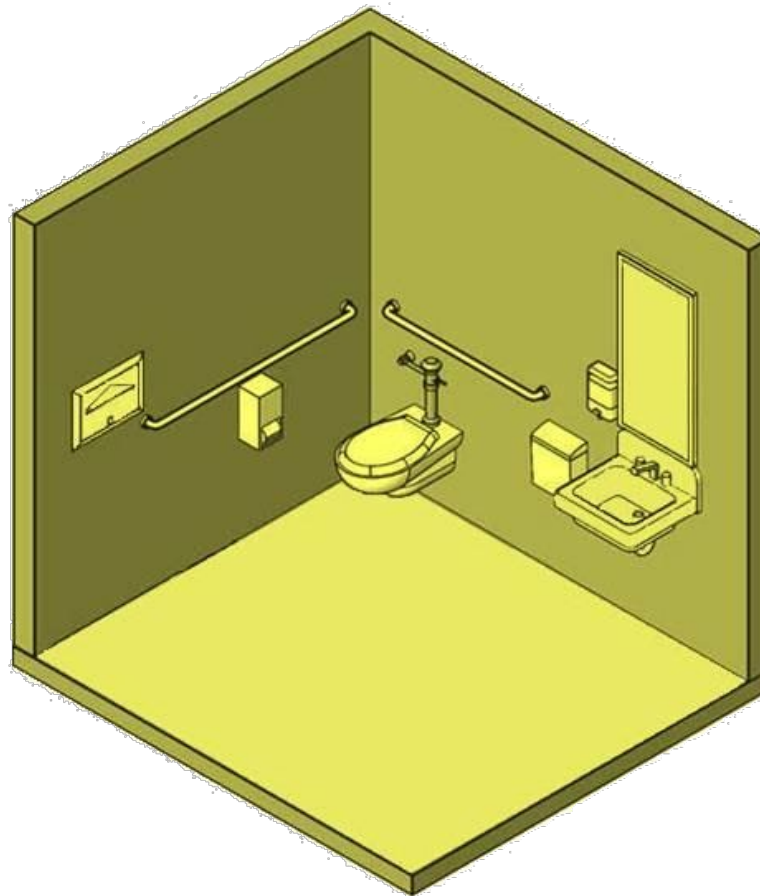
# Alterations

*Example: Toilet room – multiple elements altered  
(lavatory, mirror, floor, dispenser)*



# Alterations

*Example: Toilet room – fully altered or built new*



# Alterations

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



# Alterations

**Consider that:**

- **Some access is better than none**
- **Fuller access (path of travel) required for primary function areas**
- **Other mandates apply to existing facilities**

# Existing Facilities

**Other mandates may require retrofits**  
*(whether or not alterations planned):*

**Title III**

***Readily Achievable Barrier Removal***

*at places of public accommodation*

*or*

**Title II**

***Program Access***

*for all State and Local governments*



# Alterations

## *Recommendation:*

**Maximize opportunities for access in alterations beyond minimum required (often more cost-effective when work is already underway).**

# Alterations

Specific provisions for alterations located throughout standards (refer to “alterations” or “existing facilities”)



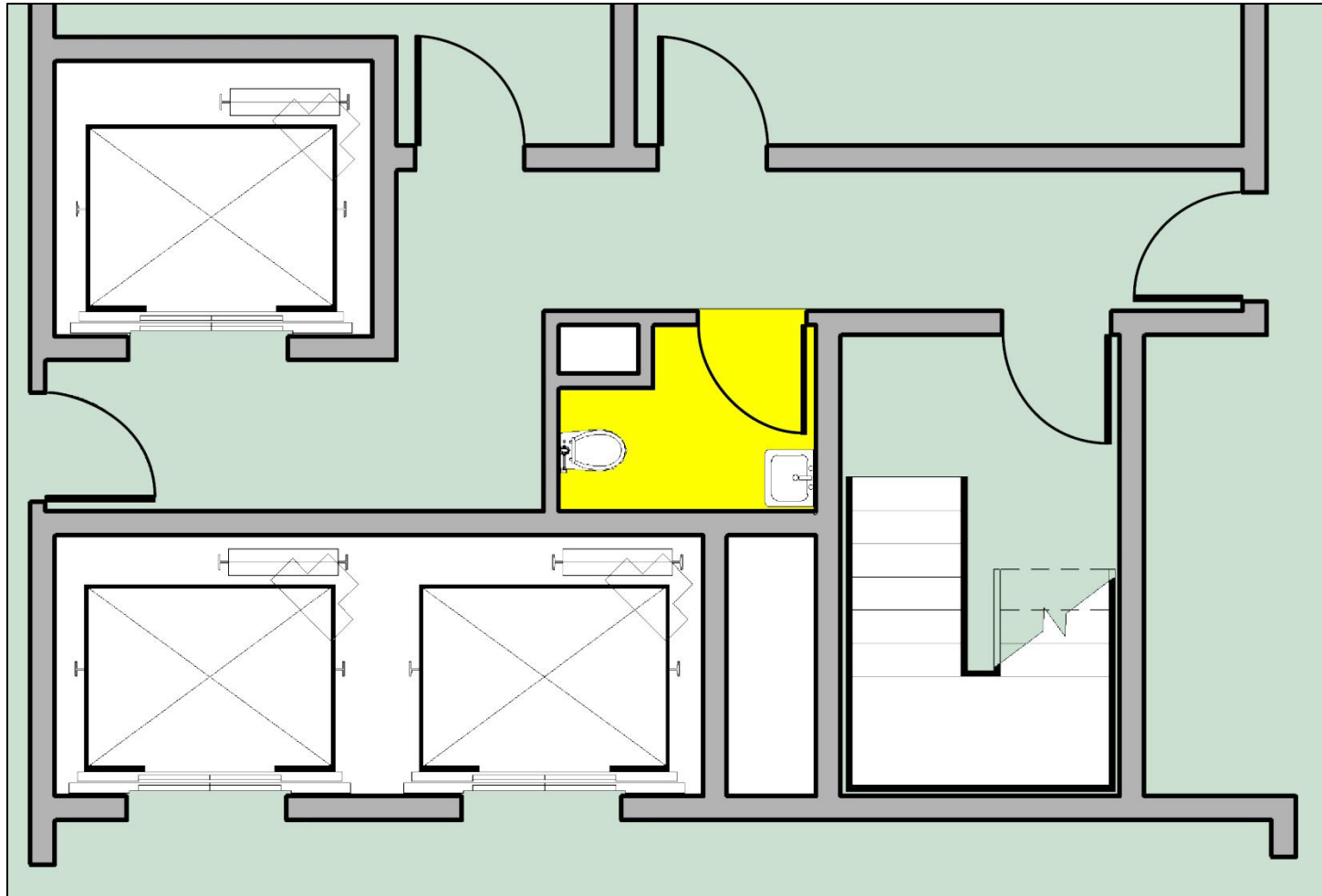
# Technical Infeasibility

*“Little likelihood of being accomplished because:*

- *existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame*
- *or because other existing physical or site constraints prohibit ... compliance.”*

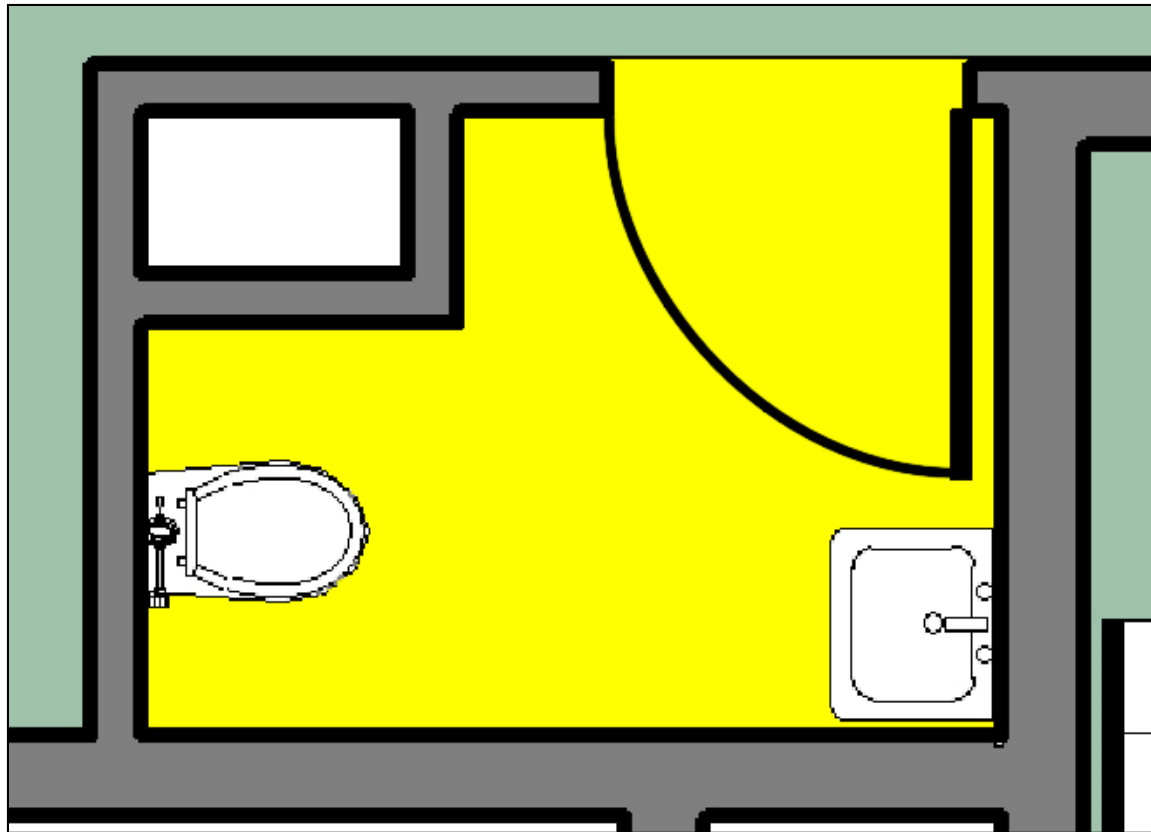
# Technical Infeasibility

Space limitations and technical infeasibility



# Technical Infeasibility

Compliance required to the  
“maximum extent feasible”



# Technical Infeasibility



**Is relative to scope of work; where renovation is more extensive, technical infeasibility is less likely**

# Technical Infeasibility

## *Example: Code Conflict*

**Compliance conflicts with applicable building, plumbing, life safety or other codes (e.g., combining 2 toilet stalls to create an accessible stall could violate plumbing code's required fixture count)**



# Technical Infeasibility

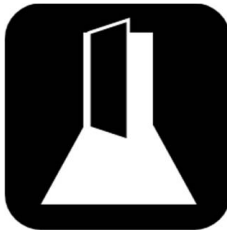
- **case-by-case determination**
- **based on existing constraints, conditions, scope of work**
- **compliance required to the maximum extent feasible**



# Primary Function Areas (§202.4)

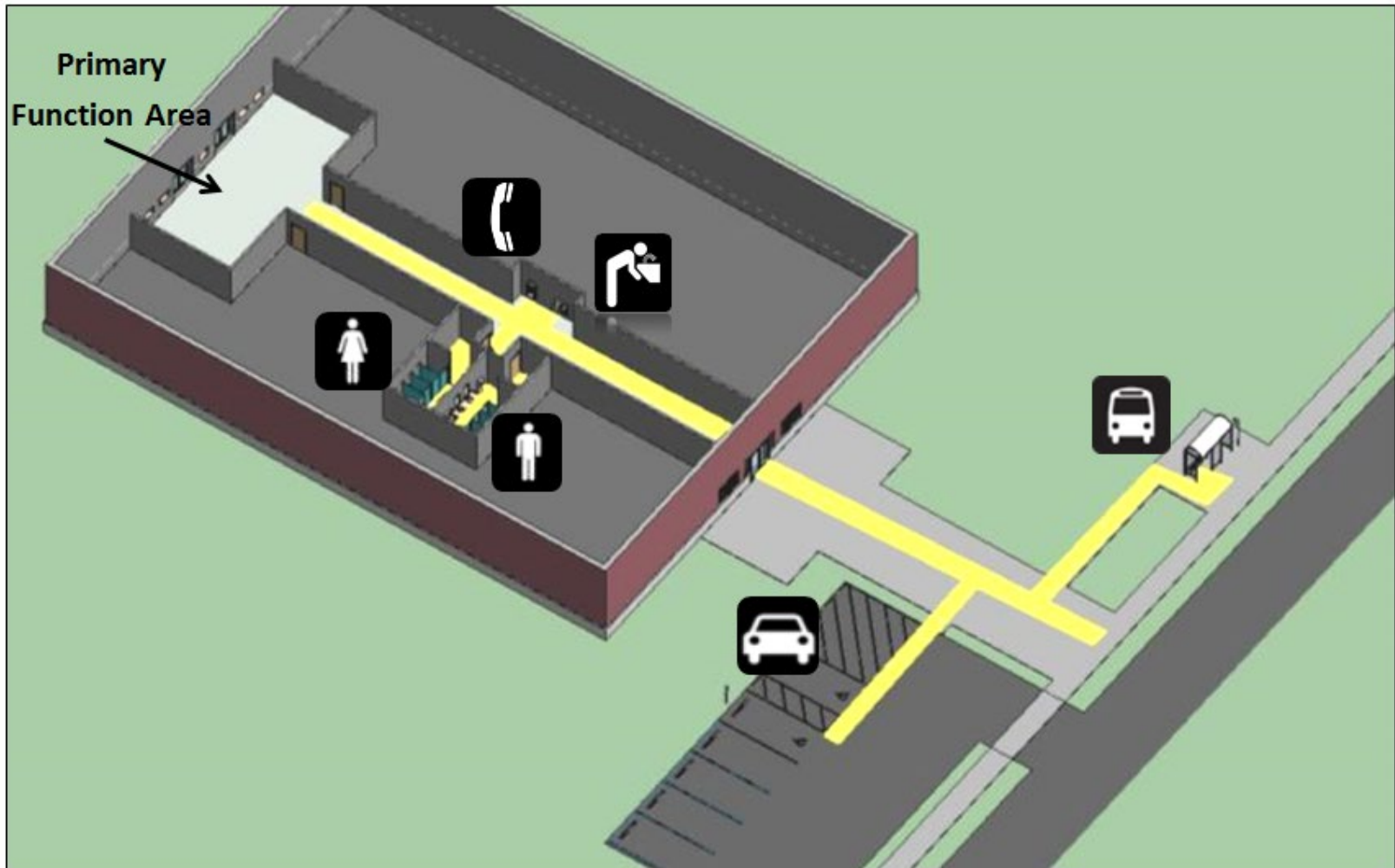
Required: Accessible “Path of Travel”:

- **accessible route**
  - from site arrival points and accessible facility entrance to altered Primary Function areas, including
- **restrooms** (*for each sex unless only unisex provided*)
- **public phones**
- **drinking fountains**



# Path of Travel

## Example path of travel

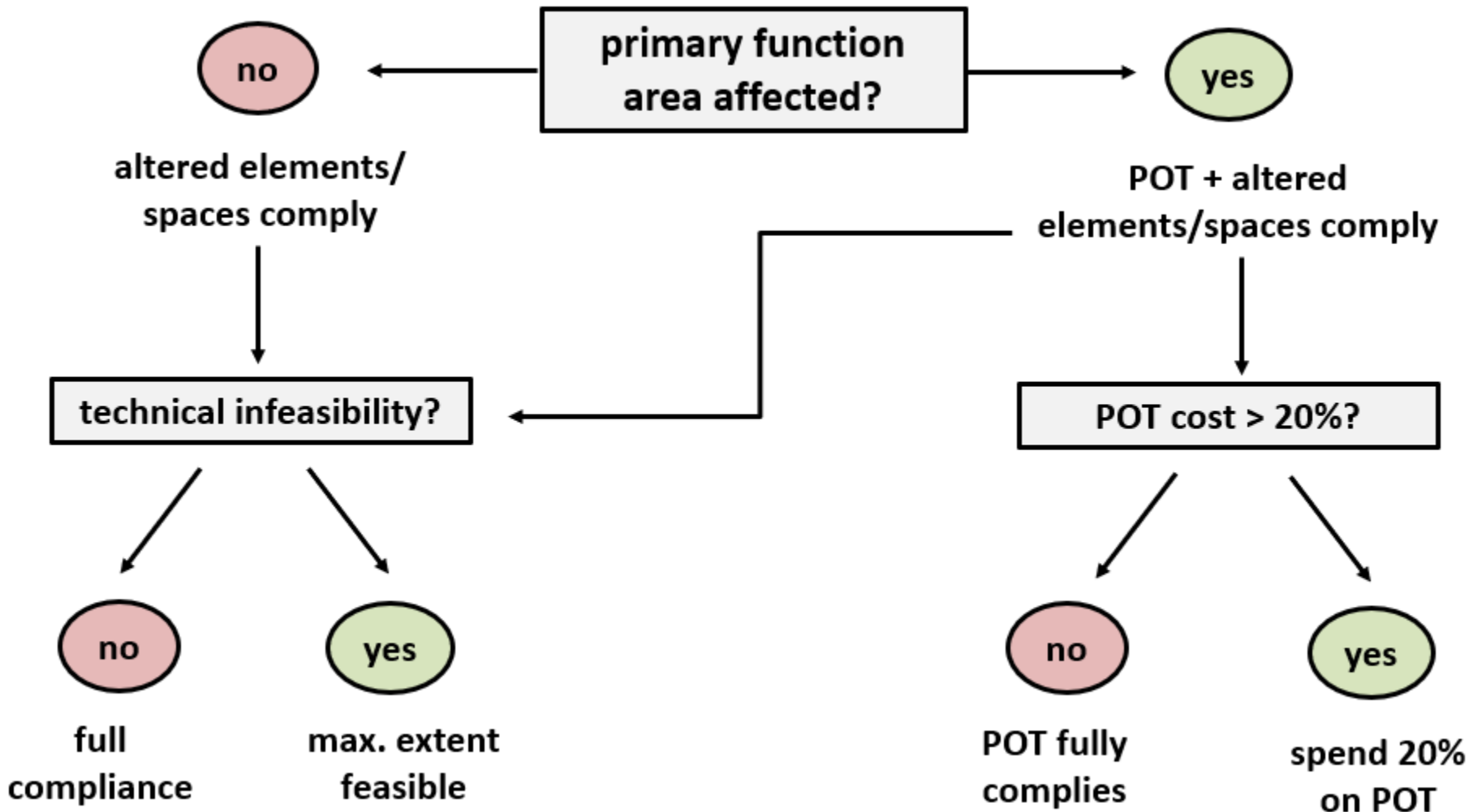


# Path of Travel

Path of travel is required to the extent that it is not “disproportionate” to the project cost (more than 20%)

Compliance required up to the 20% limit

# Alterations - Summary

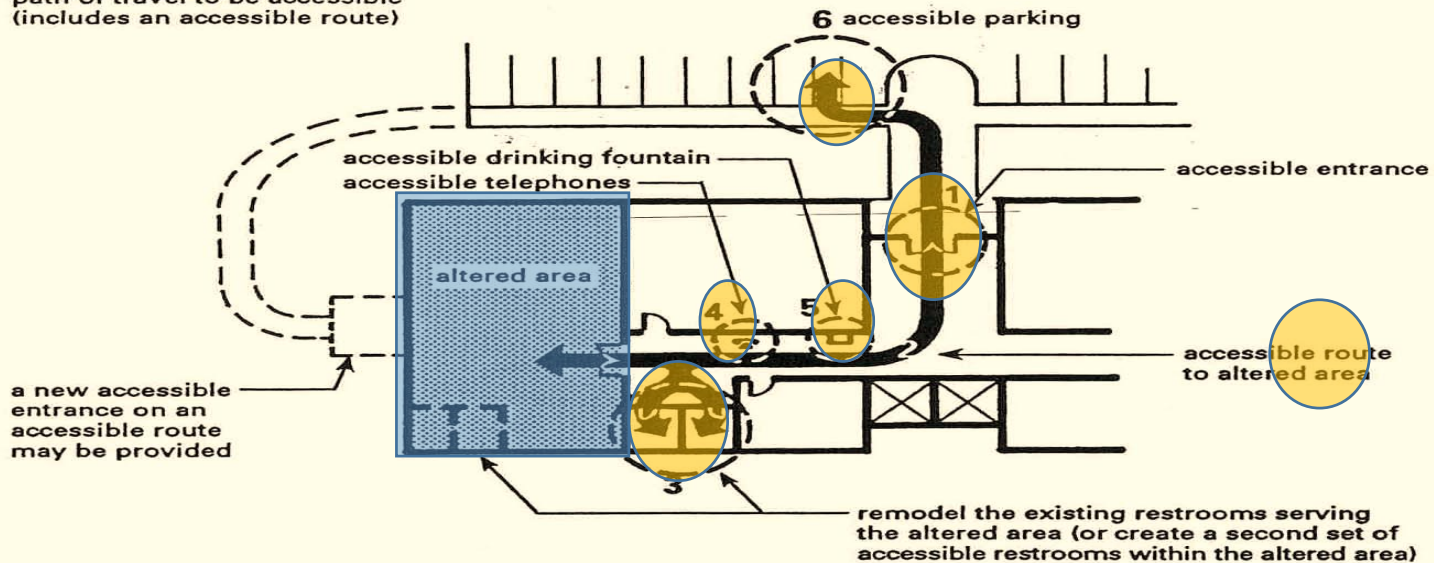


# Alteration – Path of Travel - Priorities

## Priorities for Providing Accessible Path of Travel and Accessible Elements When Disproportionate Costs Exist:

1. an accessible entrance,
2. an accessible route to the altered area,
3. at least one accessible restroom for each sex, or an accessible unisex restroom
4. accessible telephones,
5. accessible drinking fountains, and
6. additional accessible elements such as parking, storage, and alarms.

alteration to primary function area triggers the requirement for the path of travel to be accessible (includes an accessible route)

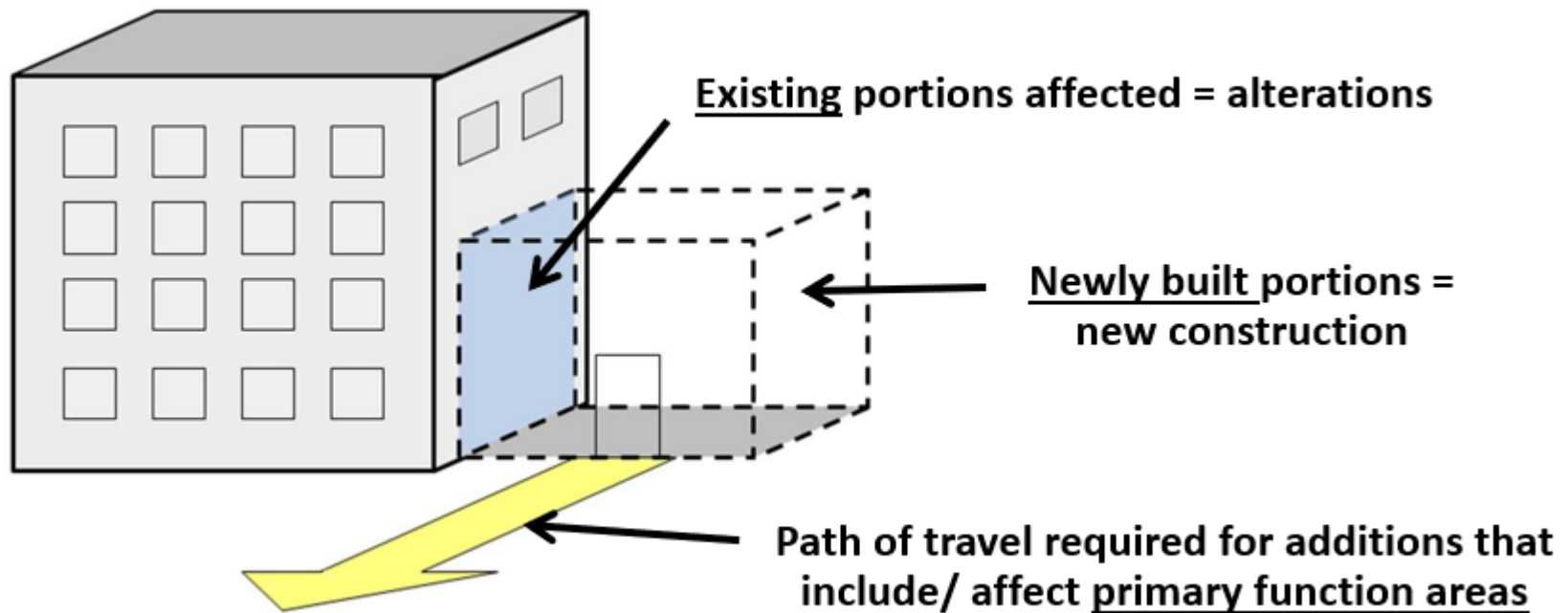


Accessible Path of Travel To Altered Area

# Questions?

# Additions (§202.2)

expansion, extension, or increase in a facility's gross floor area or height



**Where are detectable  
warnings required?**





# Detectable Warnings

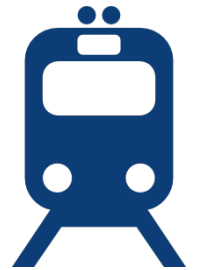
Required on curb ramps at:

- Transit facilities (DOT standards – 406.8)
- FHwy funded projects – GA DoT
- Public sidewalks



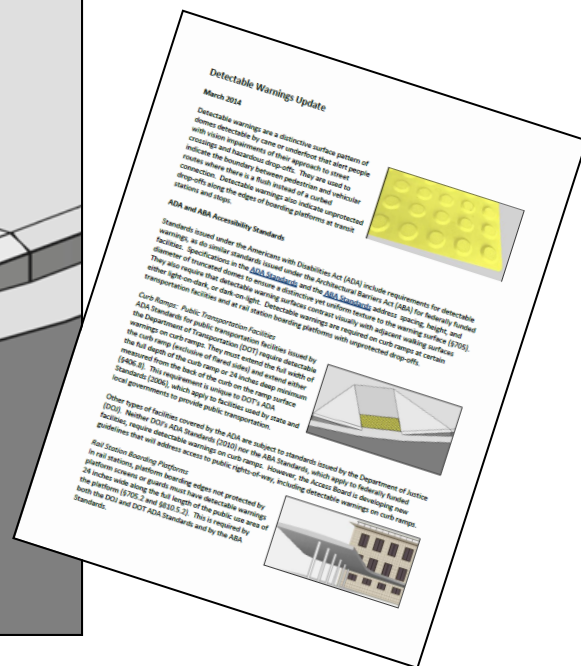
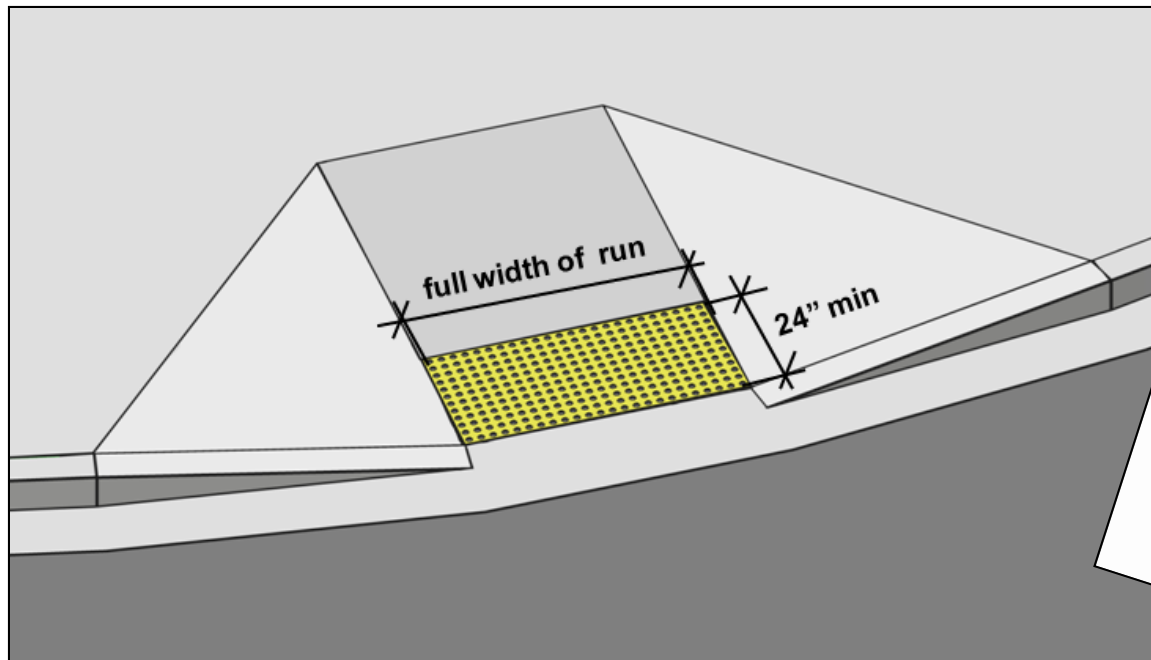
Not required on curb ramps at other facilities or hazardous vehicular areas

Required on rail station boarding platforms



# Detectable Warnings

## Revised specifications for location at curb ramps



## Proposed ROW guidelines provide further guidance Update on Board's website

<https://www.access-board.gov/guidelines-and-standards/streets-sidewalks/public-rights-of-way/guidance-and-research>

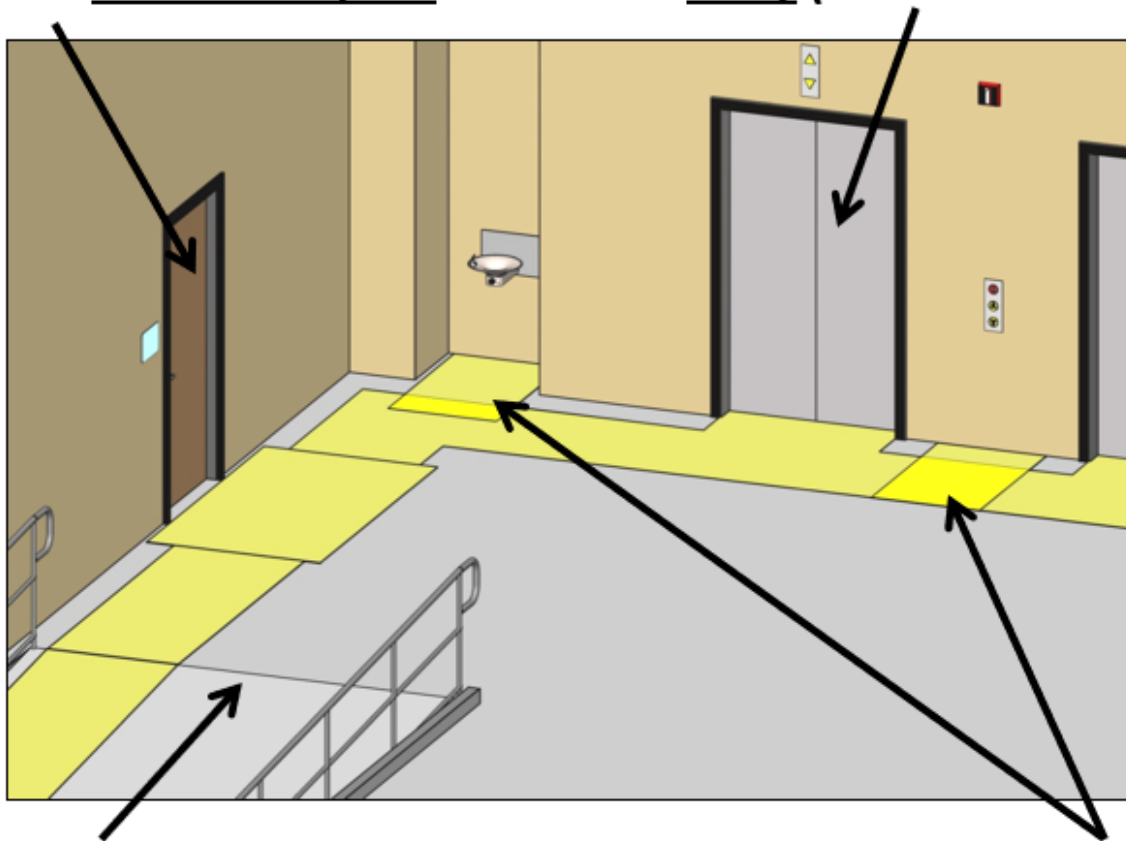
# Questions?

# Accessible Routes

Must connect to:

each accessible room and space

each story (unless an exception applies)



each level on a floor required to be accessible

each accessible element

**When is vertical access  
required between stories?**



# Multi-Story Facilities (§206.2.3)

**At least one accessible route must connect each story & mezzanine (unless an exception applies)**



# Exceptions

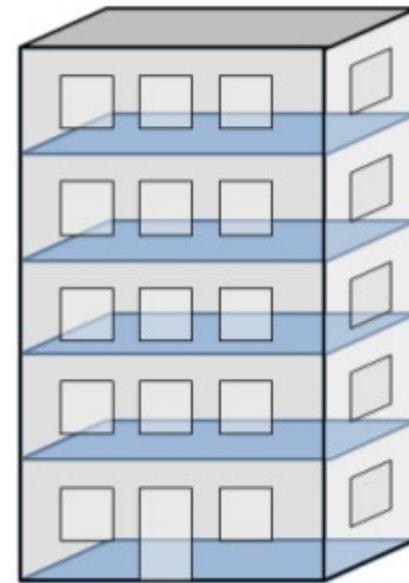
AR between floors (“elevator exception”)

Private sector facilities only:



less than 3 stories

OR



less than 3,000 sf/ flr)

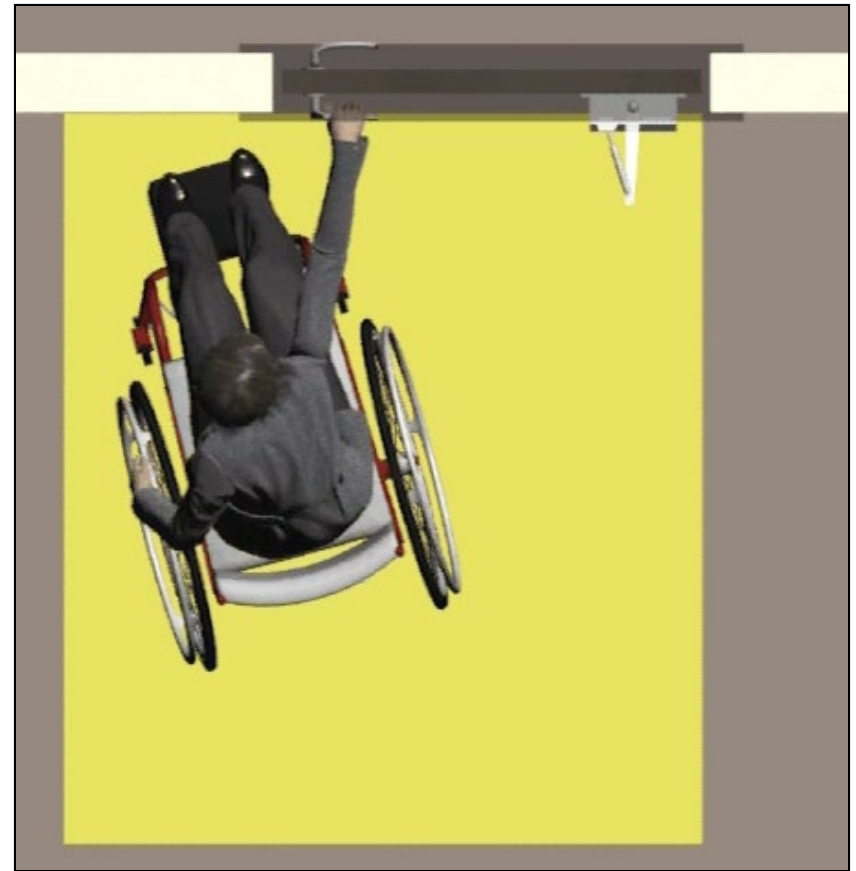
**How is maneuvering  
clearance provided at  
recessed doors?**





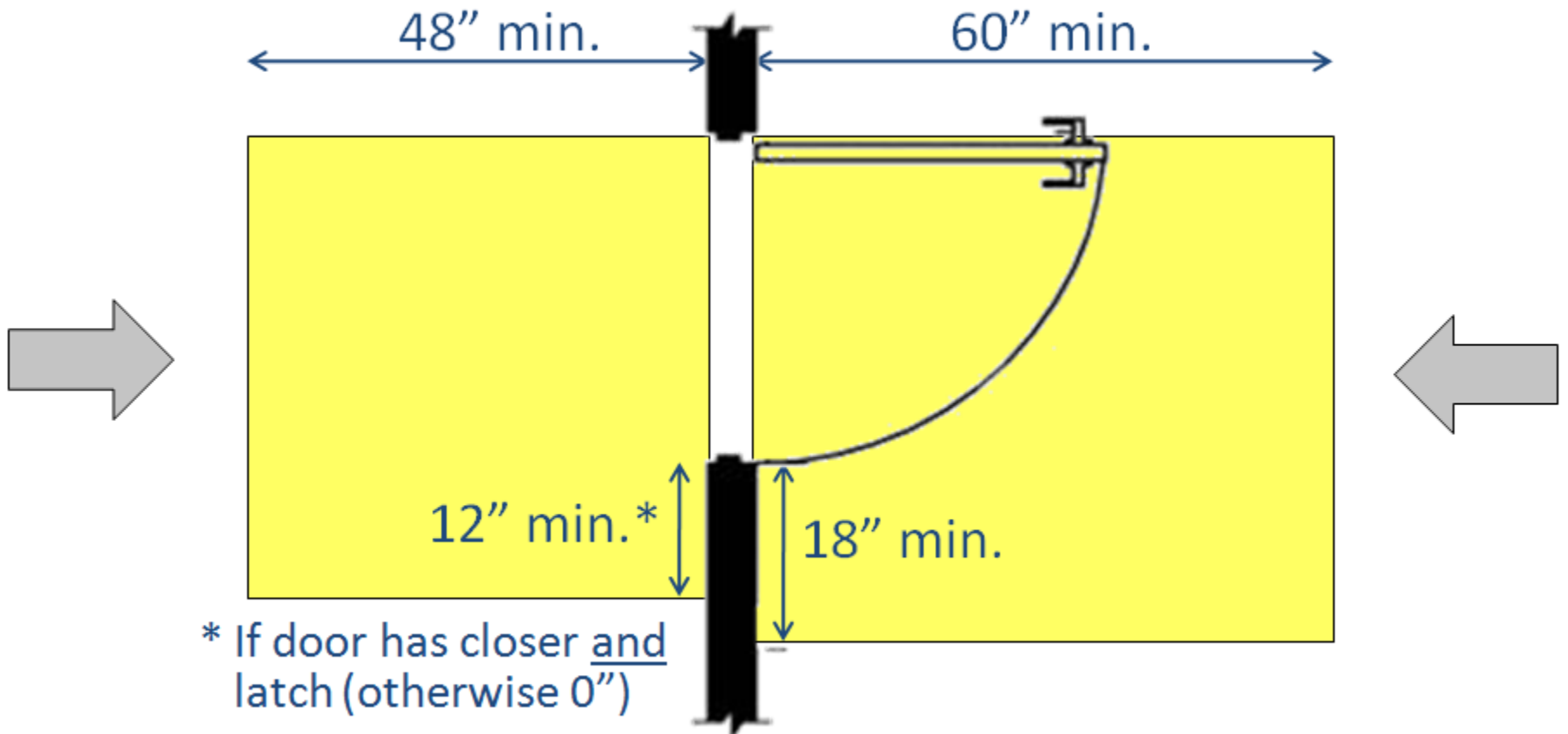
# Door Maneuvering Clearance

Minimum space for positioning/  
maneuvering at doors



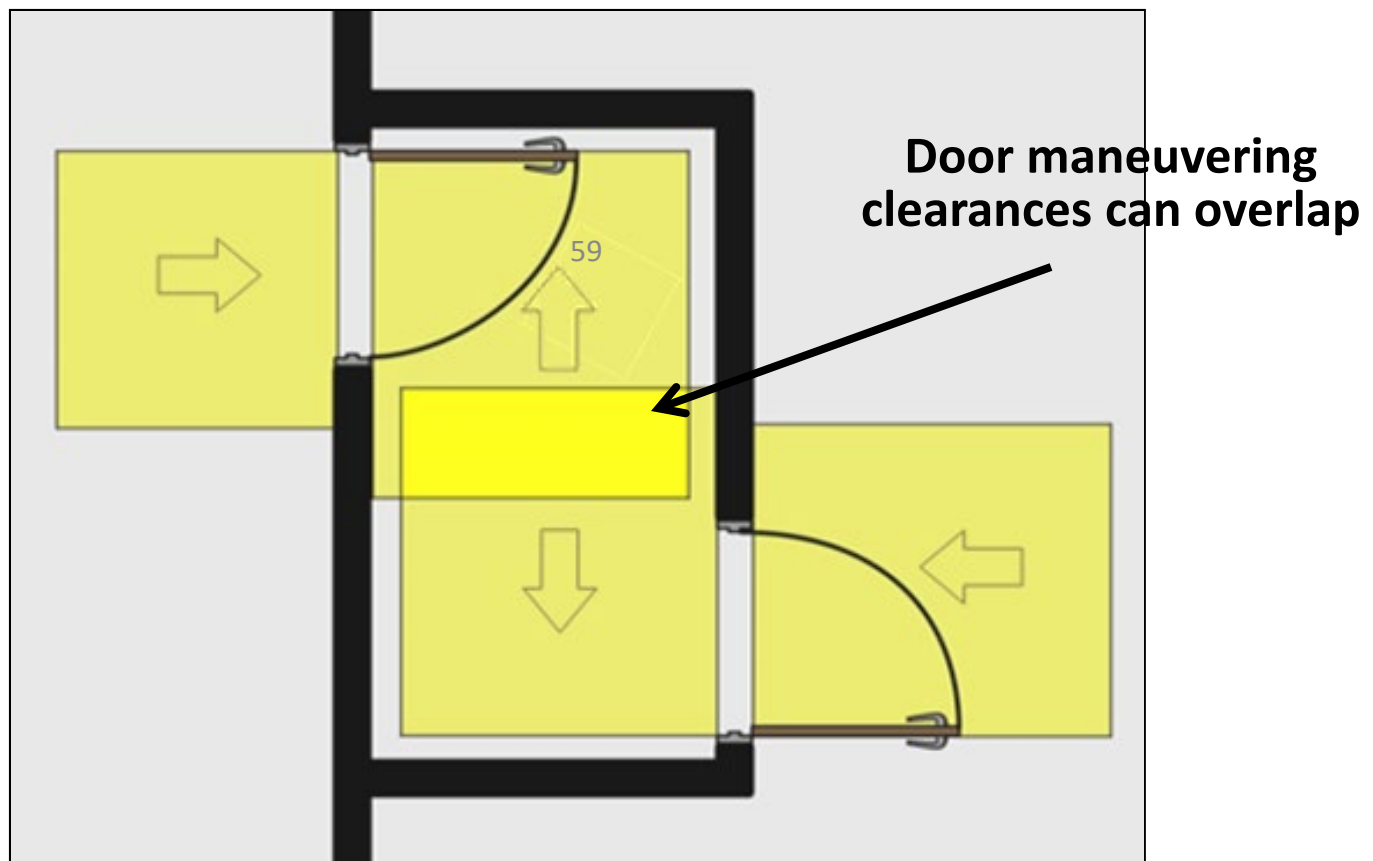
# Door Maneuvering Clearance

## Forward Approach



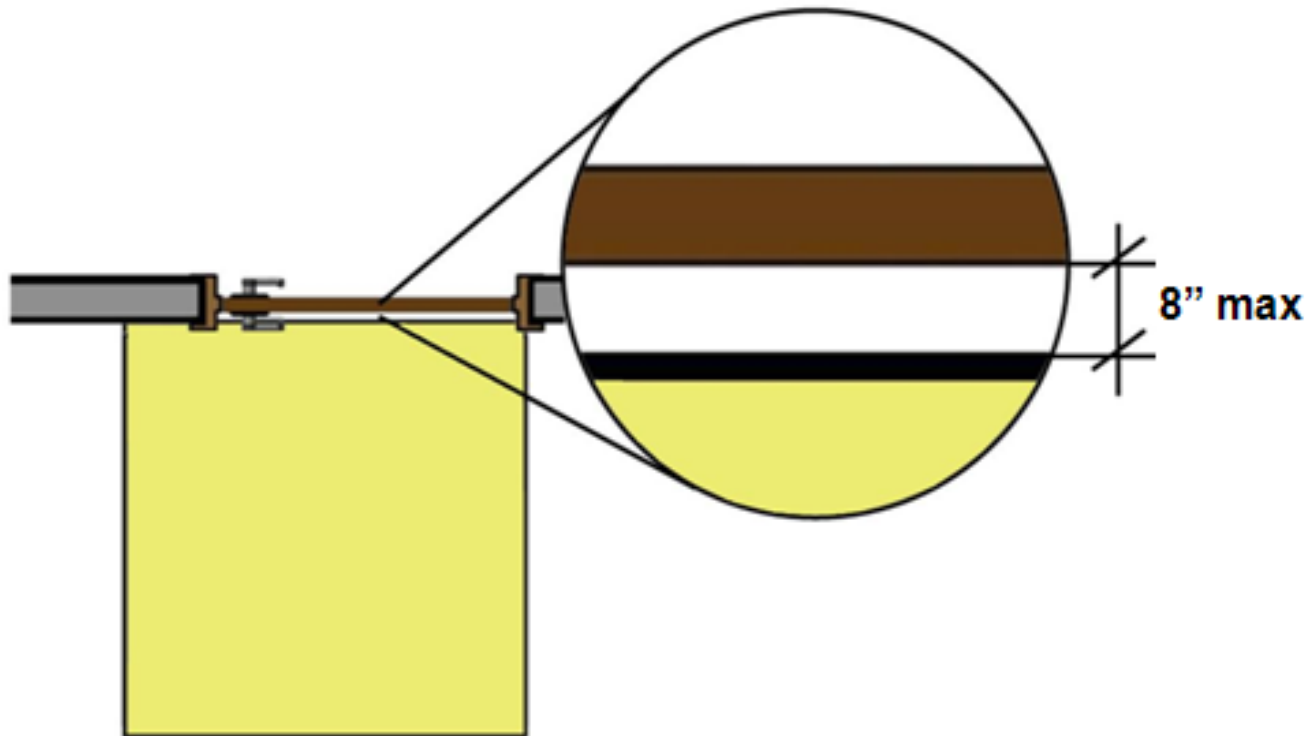
# Door Maneuvering Clearance

Required at each accessible door based  
on approach & swing

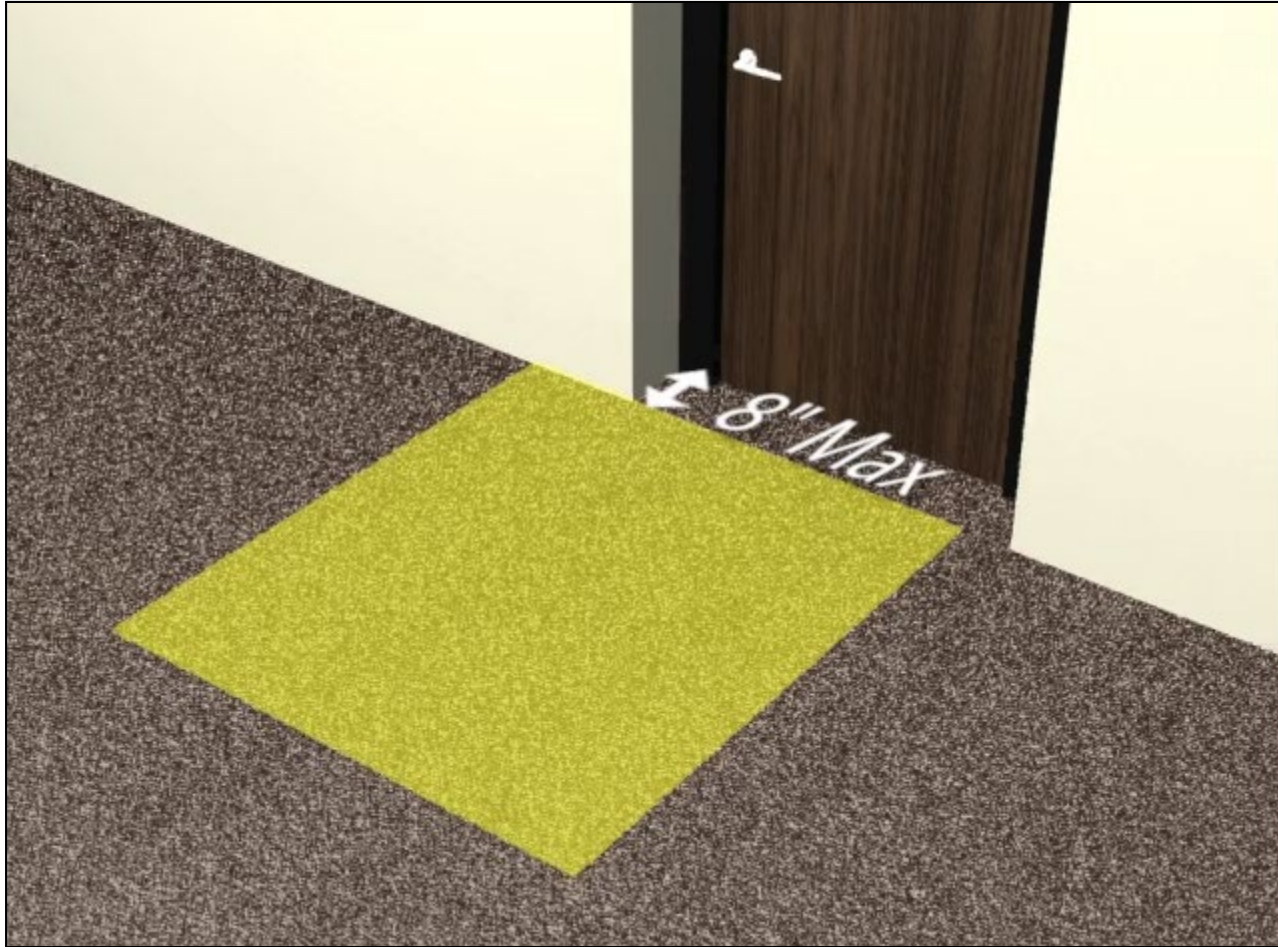


# Door Maneuvering Clearance

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

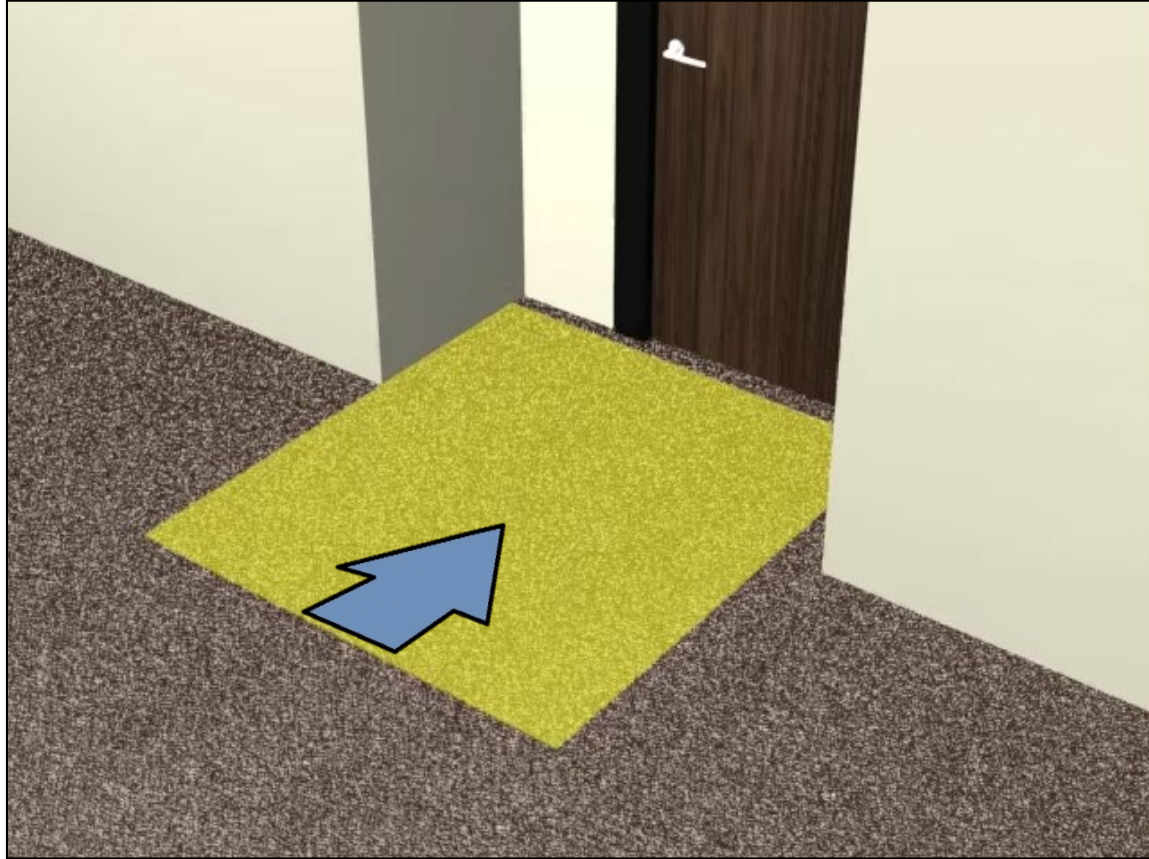


# Door Maneuvering Clearance



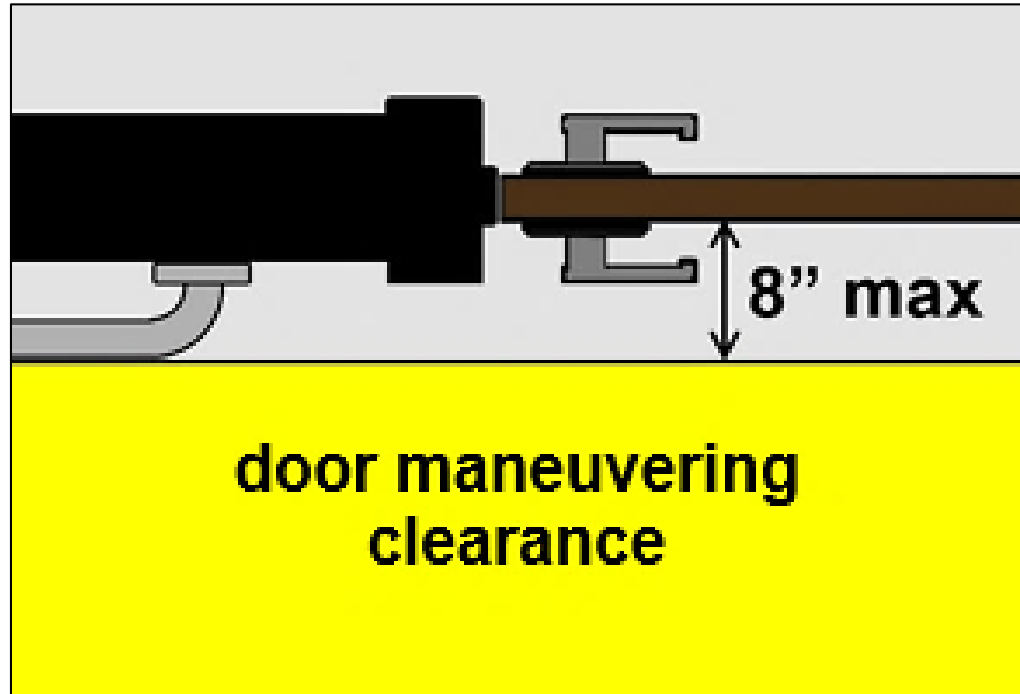
**8" max. offset from face of door**

# Door Maneuvering Clearance



**Recess > 8": maneuvering clearance for forward approach located 8" max. from face of door**

# Door Maneuvering Clearance



Besides thick walls and recessed doors, the 8" max. offset can accommodate other elements, such as handrails/ guardrails, thick base moulding, etc.

**What's the size of an accessible toilet room?**





# Toilet Rooms

**Size of toilet rooms determined by:**

- **Room layout**
- **Number and configuration of fixtures**
- **Number and configuration of accessories**
- **Swing of doors and hardware**
- **Other factors**

# 2010 ADA Standards Toilet Rooms

## Accessible Toilet Room Design Guide 8.06.2013 Version

*single user*

**type A**  
fixtures **A**cross from each other

**type B**  
fixtures **B**eside each other

**type C<sub>a</sub>**  
fixtures around a **C**orner & **a**cross from each other

**type C<sub>b</sub>**  
fixtures around a **C**orner & **b**eside each other

**type 90°**  
fixtures rotated **90°** to each other

*multi user*

**type T**  
fixtures arranged in a "**T**" shaped configuration with fixtures back to back

**type T<sub>v</sub>**  
fixtures arranged in a "**T**" shaped configuration with a shared entry **V**estibule option

**type T<sub>jv</sub>**  
fixtures arranged in a "**T**" shaped configuration with **J**anitor's closet and entry **V**estibule options

**type m<sub>u</sub>**  
fixtures arranged in an "**m**" shaped configuration with a family **U**nisex Toilet room option at the entry

**type =**  
fixtures arranged in an "**=**" configuration with **d**rinking **f**ountains in a shared vestibule



Accessible toilet rooms efficiently sized for the 2010 ADA (stricter state and/or local requirements may apply).

**GENERAL SCOPE NOTES:**

Minimum number of required accessible Single User Toilet Rooms (scope):

Where single toilet rooms are provided, all toilet rooms must be accessible unless they are located in a "cluster". If toilet rooms are configured in a cluster, at least half are required to be accessible. See ADA Standards 213.2. Distribute accessible toilet rooms equally between genders if not unisex.

Cluster per ADA Advisory 213.2: A "cluster" is a group of toilet rooms proximate to one another. Generally, toilet rooms in a cluster are within sight of, or adjacent to, one another.

Basic Unisex Toilet room requirements (scope) -see ADA 213.2.1:

Unisex Toilets shall have a privacy latch on the door and can be configured with not more than one lavatory and either:

- two water closets without urinals or;
- one water closet and one urinal.

Basic Multi User Toilet Room requirements (scope) -see ADA 213.3.1:

At least one of the toilet compartments (if compartments provided) shall be accessible. In addition to the accessible toilet compartment, if there are a total of six or more water closets (or combination of water closets and urinals) at least one of those compartments is required to be an ambulatory compartment. Door must swing out in ambulatory compartments.

If lavatories are provided at least one must be accessible and the accessible lavatory is not permitted to be located inside a toilet compartment.

If there is more than one urinal, then at least one of those urinals is required be accessible.

Accessible toilet rooms efficiently sized for the 2010 ADA (stricter state and/or local requirements may apply).

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**Which signs must  
be tactile?**



# Signs (§216)

permanent room/space labels (tactile & visual)



directional & informational signs (visual)



required access symbols (visual)



# Tactile Signs

## Signs identifying “permanent” rooms & spaces:

- designations not likely to change over time  
(or without significant alteration of room or space)
- typically located at doorways



# Tactile Signs

- 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]

# Technical Guides on the Standards

## Available on the Board's website

<https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/guide-to-the-ada-standards>



# Touch Points for Accessibility

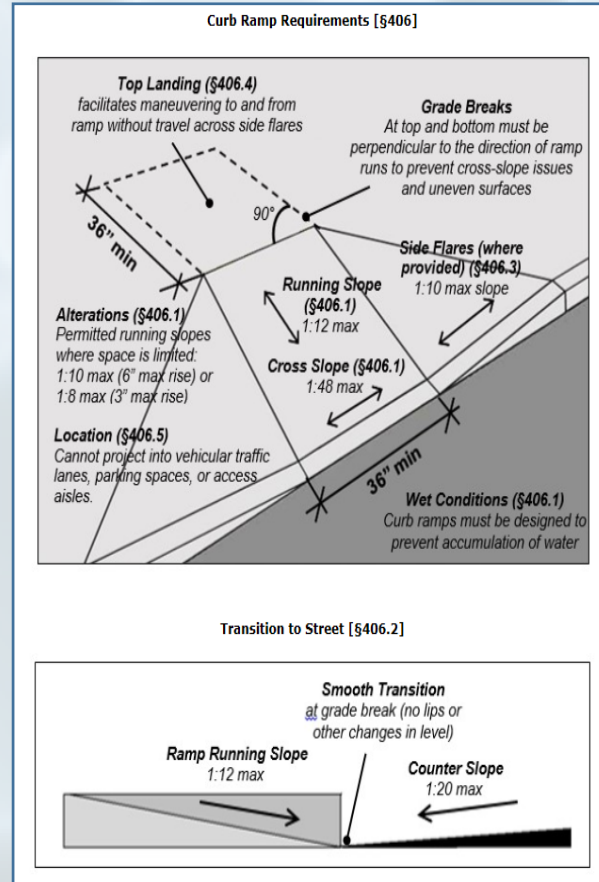
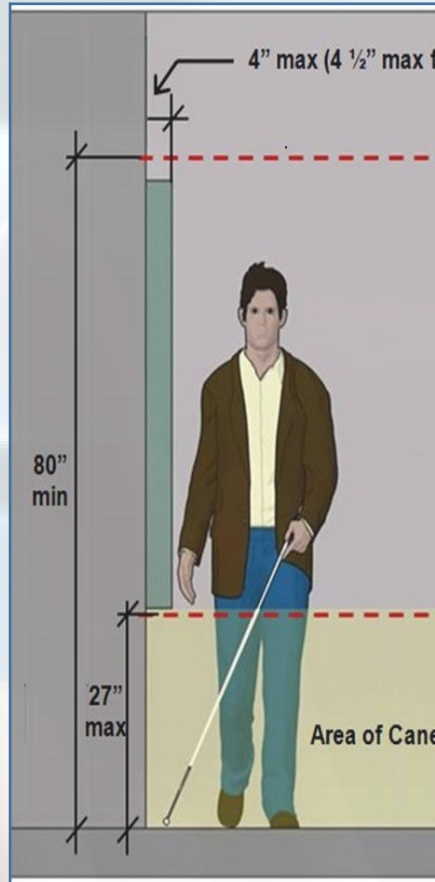
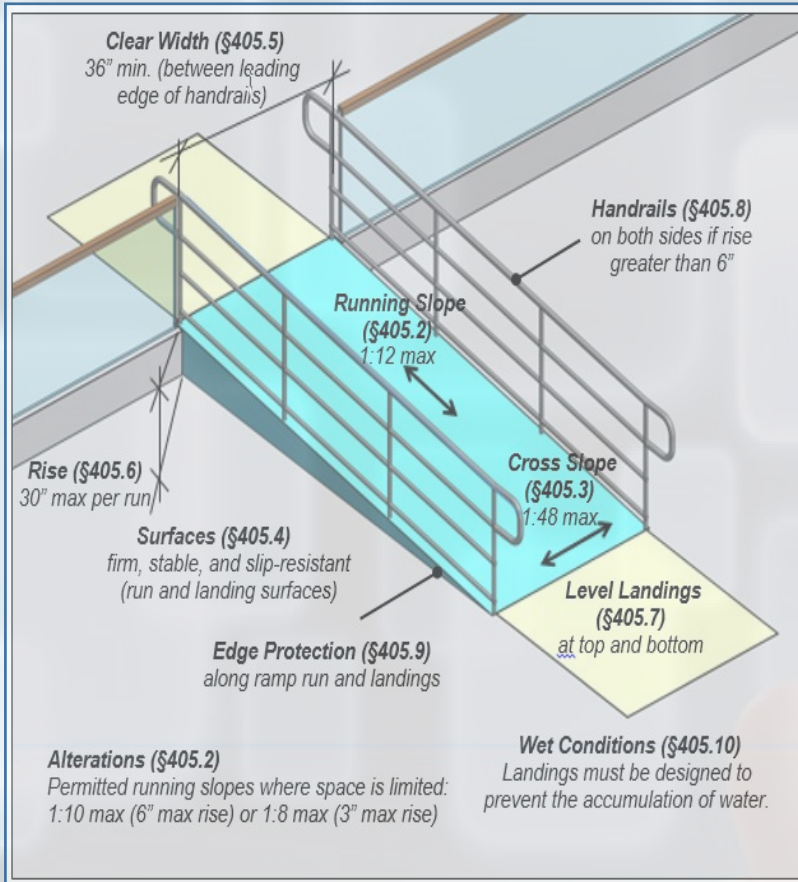


## *Document*

- Recommend to not document to limits of the regulations
  - Ramp Slope, Level Slope, Reach Ranges, Rise between landings
- Common Design & Construction Errors:
  - Georgia Accessible Parking Sign, Protruding Objects in Circulation, Level Parking Areas



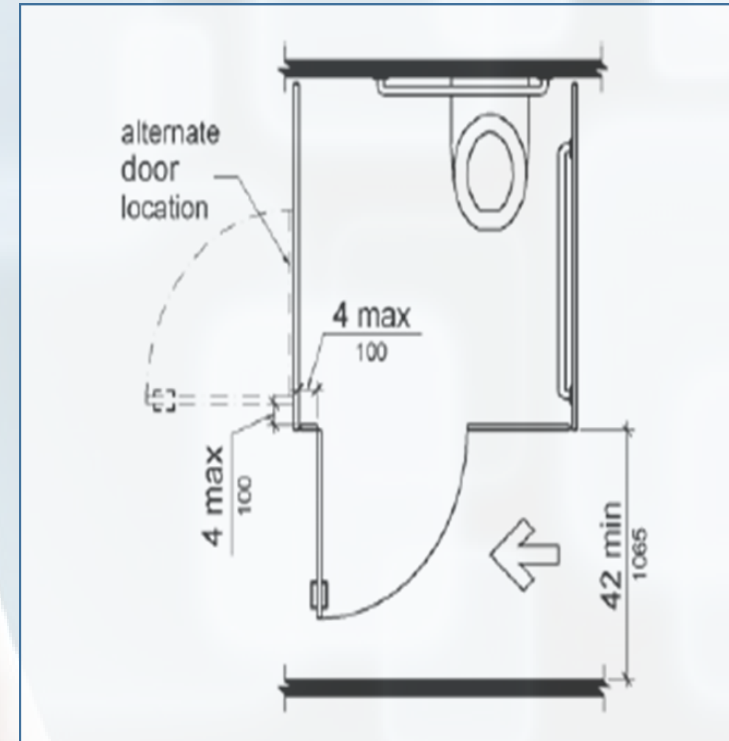
# Limits of Accessibility in Construction



# Common Errors of Accessibility in Georgia

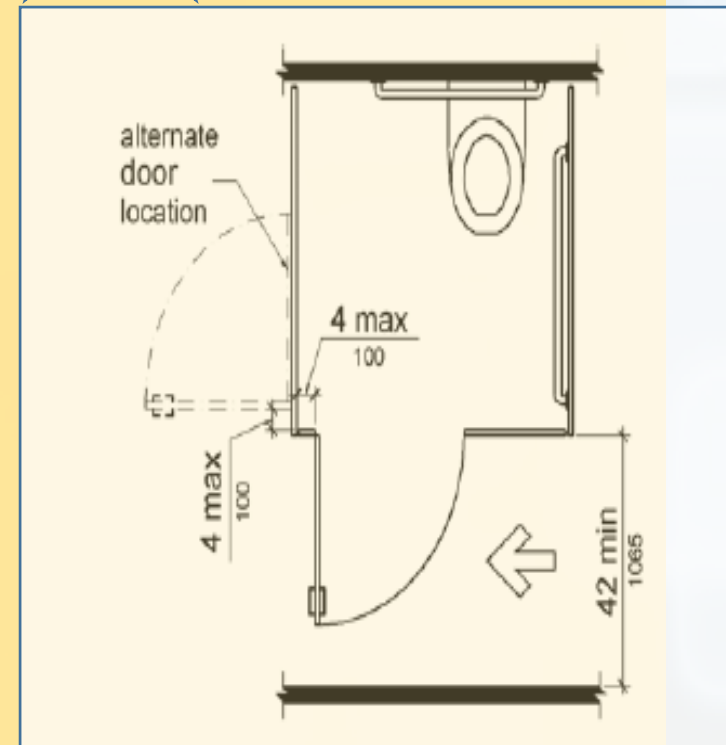


O.C.G.A. 40-6-221  
...a blue metal reflective sign which is at least 12 inches in width and 18 inches in length and is erected at a height of seven feet from the bottom of the sign to its ground surface and in such manner that it will not be obscured by a vehicle parked in the space and bearing the following words: "Permit Parking Only," "Tow-Away Zone," and the international symbol for accessibility. The warnings required in this subparagraph shall be centered on the sign, printed in white, and shall occupy not less than 75 percent of the surface area of the sign.



# Toilet Compartment Errors of Accessibility

**604.8.1.2 Doors.** Toilet compartment doors, including door hardware, shall comply with 404 except that if the approach is to the latch side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum. Doors shall be located in the front partition or in the side wall or partition farthest from the water closet. Where located in the front partition, the door opening shall be 4 inches (100 mm) maximum from the side wall or partition farthest from the water closet. Where located in the side wall or partition, the door opening shall be 4 inches (100 mm) maximum from the front partition. The door shall be self-closing. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the minimum required compartment area.



# Questions?



# **U.S. Access Board**

**(800) 872-2253 (voice)**

**(800) 993-2822 (TTY)**

**E-mail: [ta@access-board.gov](mailto:ta@access-board.gov)**

**[access-board.gov](http://access-board.gov)**

# Your Touch Point for Accessibility

*Thank You!*

*from*

ADA  
Coordinator's  
Office

[ada.georgia.gov](http://ada.georgia.gov)

404-657-7313



*Steven R. Jones*

Senior ADA Architect

404-463-5647

[steve.jones@gsfic.ga.gov](mailto:steve.jones@gsfic.ga.gov)

*Please complete your survey form and place at the back of the room in a stack. Thank You!*