



**GEORGIA STATE FINANCING AND INVESTMENT COMMISSION  
CONSTRUCTION DIVISION**

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**INTER-OFFICE MEMORANDUM**

**To:** State Fire Marshal

**From:** GSFIC/State ADA Coordinator's Office

**Subject:** Technical Assistance for Georgia Accessibility Code/2010 ADA Standards for Accessible Design

**Date:** April 2015 Revised

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**203 General Exceptions - 203.9 Employee Work Areas (Please review all General Exceptions 203.1 – 203.12 for other specific areas not required to comply with the requirements or be on an accessible route)**

**Question:** What is an employee work area?

**Answer:** An employee work area is an employee's specific space that is utilized for a specific job – related task. e.g., individual cubicles, personal offices or a specific work area for a specified employee or restricted staffing area.

**Question:** Are employee spaces used for purposes other than job-related tasks (e.g., break rooms, employee lounges, cafeterias, restrooms, parking, shower and locker rooms, exercise facilities, etc.) included as *work areas*?

**Answer:** No. These spaces are considered *common use* and must be fully accessible to the same extent as a public area. The *work area* exception is limited to those areas used exclusively by employees as *work areas*.

Likewise, employee work areas that also function as a *public use* space, such as patient exam rooms, must be *fully accessible* for public access. However, fixtures, cabinetry and controls within those public access areas *used only by employees* (e.g., employee-only use scrub sinks in operating rooms, specialized equipment hook-up locations within patient and operating rooms, etc.) are not required to comply.

**Question:** What are the accessibility requirements for areas used only by employees as work areas?

**Answer:** The requirements for Employee work areas can be found under Exception 203.9, which require Employee Work Areas to comply with 206.2.8 Employee Work Areas, 207.1 General which refer to means of egress, and 215.3 which refer to Fire Alarm Systems.

The requirement for work areas is that they be designed so that individuals with disabilities can *approach, enter, and exit* the areas. Full accessibility *within* the work area is not required. However, common use and circulation paths within employee work areas are required to comply with Section 402 with 3 Exceptions that apply. Please read this section fully and the related sections.

**Note:** Under the Americans with Disabilities Act (ADA), a covered employer may be required to make structural modifications to a work area as a “reasonable accommodation” to an employee with an ADA-covered disability if necessary to ensure an equal employment opportunity. However, any such requirement is triggered under the ADA only when a specific need arises. (Please see Advisory 206.2.8 for additional information).

**Question:** What is approach, enter, and exit?

**Answer:** The work-only area must be located on an accessible route so that wheelchair users can enter and back out of the space. This includes accessible entry doors and gates. The 2010 ADA Standards now require compliance for circulation paths (section 402) within the Employee Work Area, with 3 exceptions to consider.

**Question:** Are mechanical rooms considered employee *work areas*?

**Answer:** Yes. Exception 203.5 describes these as “machinery spaces” and they are not required to comply with the regulations or be on an accessible route. There are other spaces specifically excepted in 203 from 203.1 thru 203.12.

**Note:** Accessibility *is also not required* for non-occupiable spaces accessed only by ladders, crawl spaces, very narrow passageways, or freight (non-passenger) elevators, and frequented only by service personnel for repair purposes. These spaces are not required to follow any accessibility requirements. (See Sections 203.1 – 203.12)

**Question:** Are sinks in Doctor Office exam rooms, Dentist office exam rooms and hospital patient rooms that are required to be accessible, required to be accessible?

**Answer:** Yes, with the adoption of the new 2010 ADA Standards public or common use sinks are now scoped for accessibility in these areas.

State ADA Coordinator’s Office