



**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

Date: June 2014 Revised

Toilet Facilities and Bathing Facilities – Clear floor space requirements Section 213 of the 2010 ADA Standards for Accessible Design

Question: Is it allowable for the door swing to penetrate the required turning radius in a toilet room?

Answer: Yes, doors can swing into the turning space per Section 603.2.3.

Question: Is it allowable for the door swing to penetrate the required clear floor space of the toilet fixtures?

Answer: No, with the following "exceptions": Toilet and Bathing Facilities must be compliant with Section 603, however, 602.2.3 Exception 1 provides an exception for private use restrooms off of offices or a "single" occupant (not common use or public use) and 602.2.3 Exception 2 permits the door swing to penetrate the clear floor space at toilet fixtures as long as there is a clear floor space area in compliance with 305.3 (30"x48") outside the swing arc of the door. In that instance the door can penetrate the clear floor space of any toilet fixture.

Question: Where does it allow for "adaptability" in private single use restrooms and what does that mean?

Answer: What constitutes adaptability is no longer specifically described in those terms. In the new 2010 ADA Standards, unlike the 1992 ADA Accessibility Guidelines (ADAAG) where nothing was expected to have to be accessible unless specifically enumerated or specified, everything is expected to be made accessible unless specifically "excepted", hence the use of "Exceptions". So in the case of a single use private restroom, it is assumed that it will have the clear floor space required for the restroom, turning radius and fixture clearances as there are no "exceptions" for that. However, looking under the door section (603.2.3), the toilet section (604.4), sink section (606.2), grab bar section (604.5) there are specific exceptions allowing for door to swing into clear floor spaces that

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would be required if the door swing can be reversed in the future. Likewise for the other fixtures there is an exception in each area of the standards that allows for the installation of an *inaccessible* model or not installing a grab bar at all as long as there is blocking in the wall for its future installation. Therefore these exceptions are found in different locations in the Standards for individual elements and are no longer in one place.

TEB
State ADA Coordinator's Office