



# **ADA Standards**

## **Part 1**

# Agenda

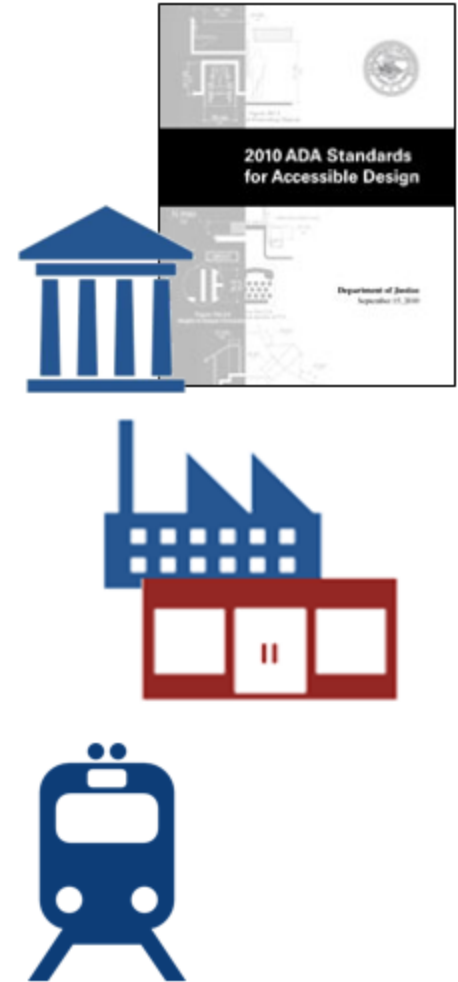
- **Access onto Sites**
- **Entrances & Doors**
- **Spaces Covered**
- **Operable Parts & Elements**

**(Chapters 1 – 5)**

# ADA Standards (2010)

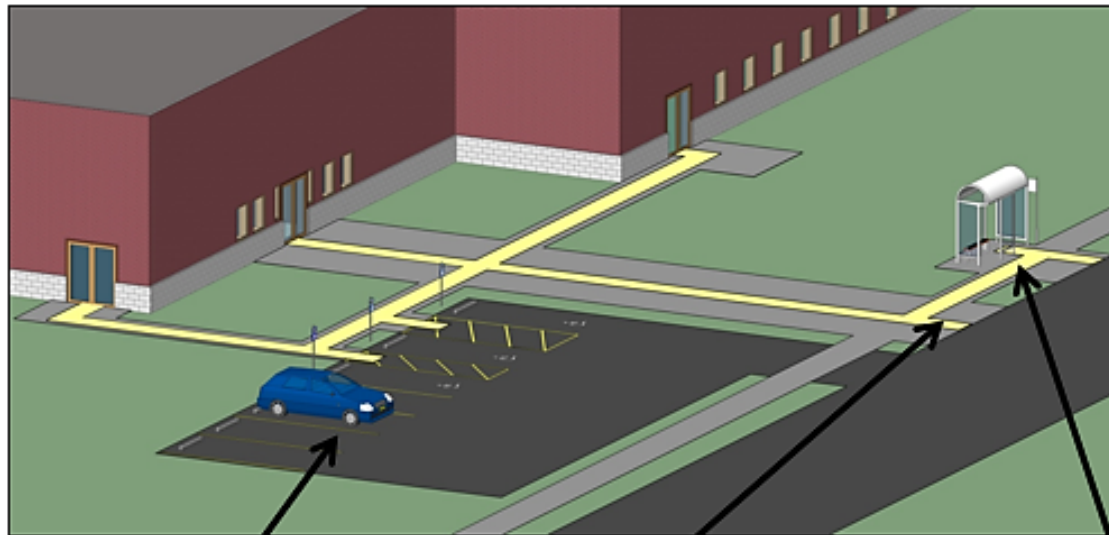
Apply to:

- State/ local gov't facilities
- Places of public accommodation
- Commercial facilities
- Transportation facilities (DOT's 2006 Standards)



# Application

Standards fully apply within boundary of the site starting with site arrival points (at least one accessible route to accessible entrance)



parking & passenger loading zones



streets & sidewalks



transportation stops

# Parking Spaces

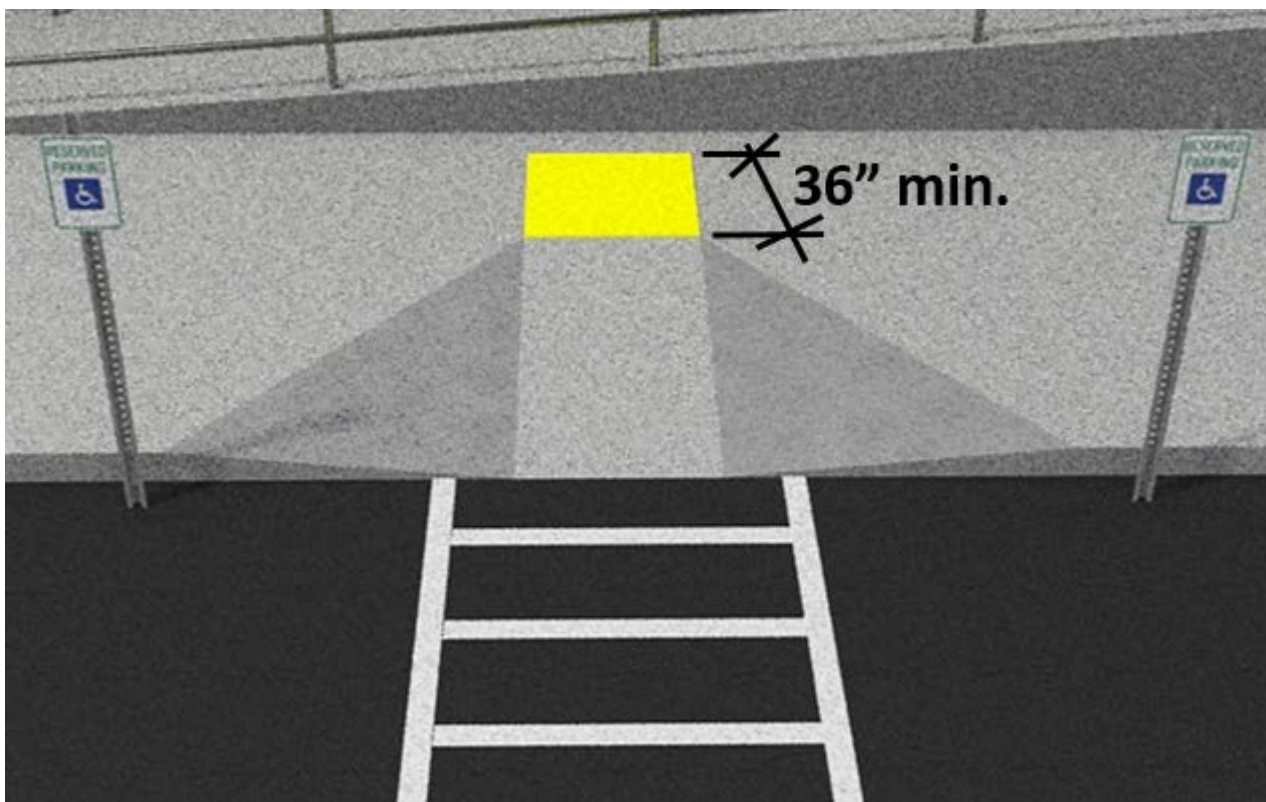
**AR must connect to access aisles at accessible parking spaces**



**Recommended: connect AR to front of aisle to prevent travel behind parked cars**

# Curb Ramps (§406)

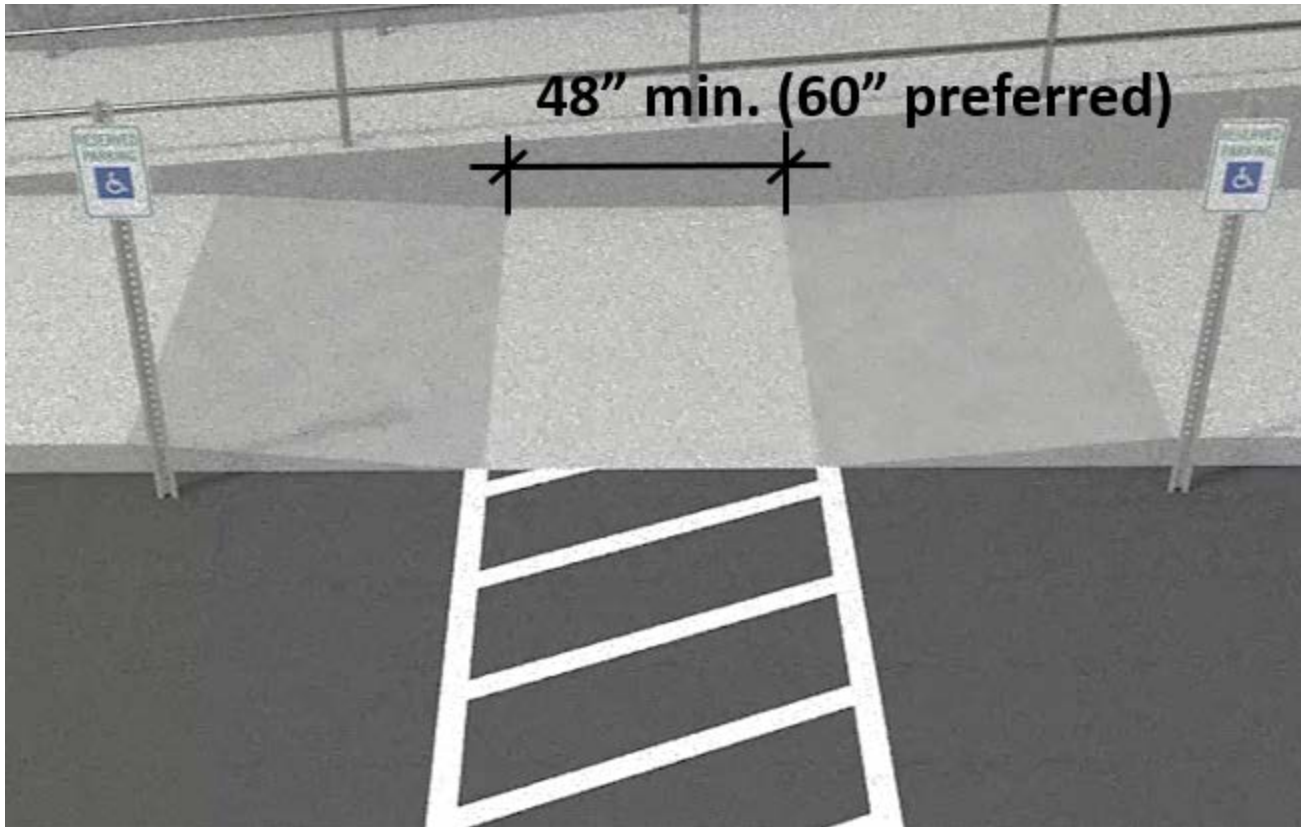
Landing 36" deep min. required at top of curb ramps in new construction



Curb ramps cannot protrude into access aisle

# Curb Ramps

Parallel curb ramps can be used where top landing space is unavailable



# Detectable Warnings



Required on curb ramps at:

- Transit facilities (DOT standards – 406.8)
- FHwy funded projects
- Public sidewalks (recommended – new ROW guidelines will address)

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

Required on rail station boarding platforms



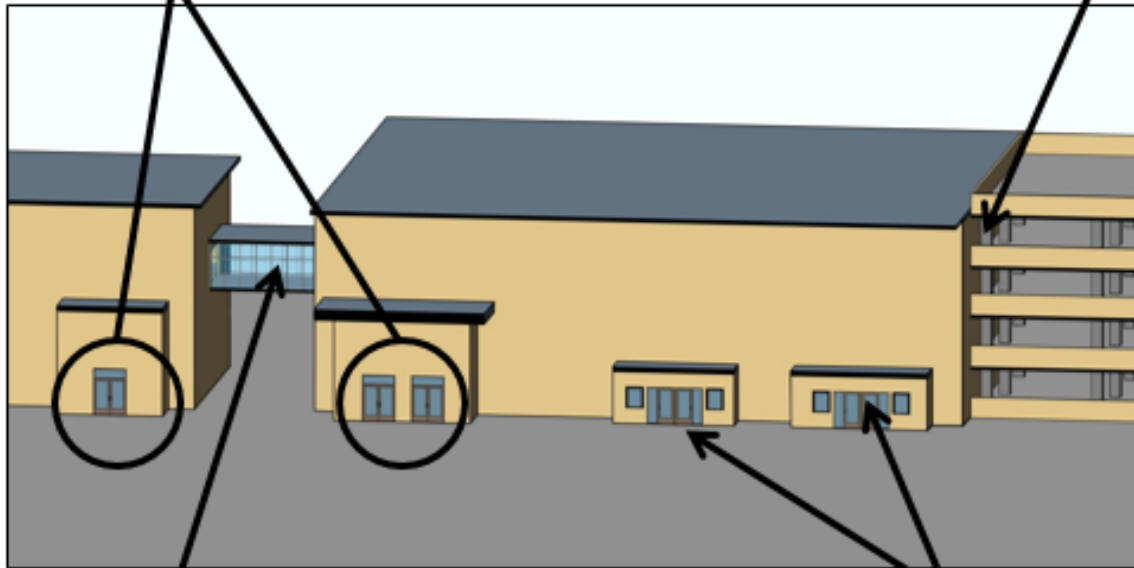


# Entrances (§206.4)

## Minimum Number

At least 60% of public entrances

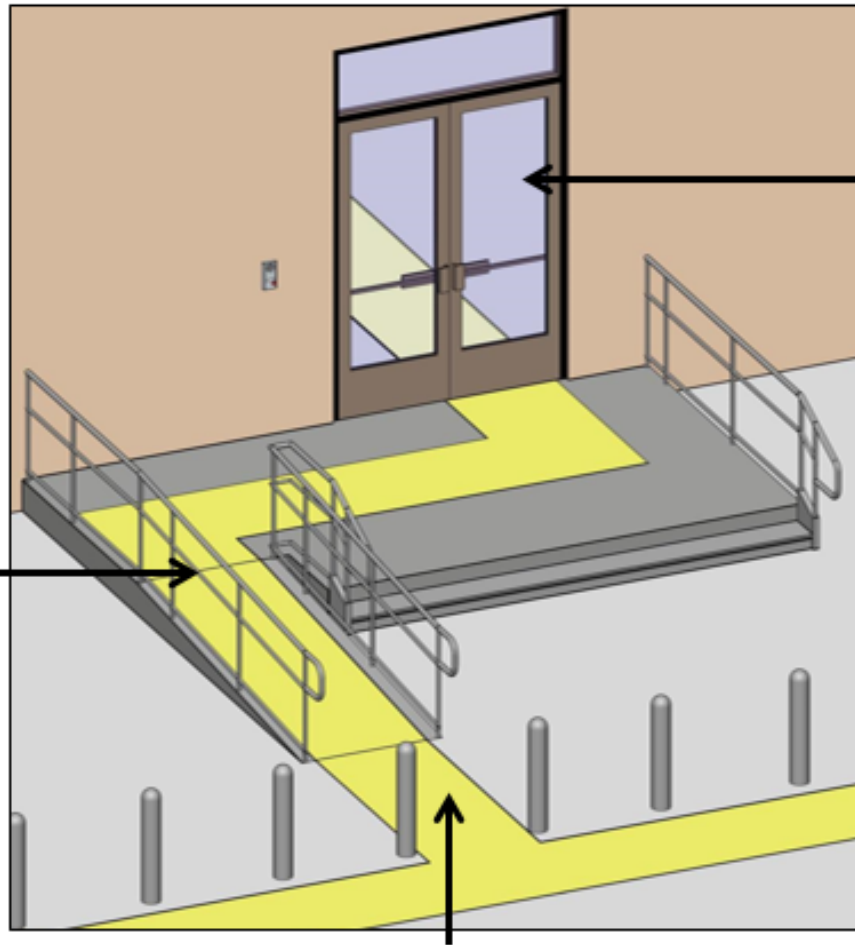
At least 1 entrance serving each direct access from parking structures



At least 1 entrance from each elevated walkway or pedestrian tunnel

At least 1 entrance to each tenancy in a facility

# Entrances



AR coincides with, or in same area as, general circulation path

At least one compliant door or doorway

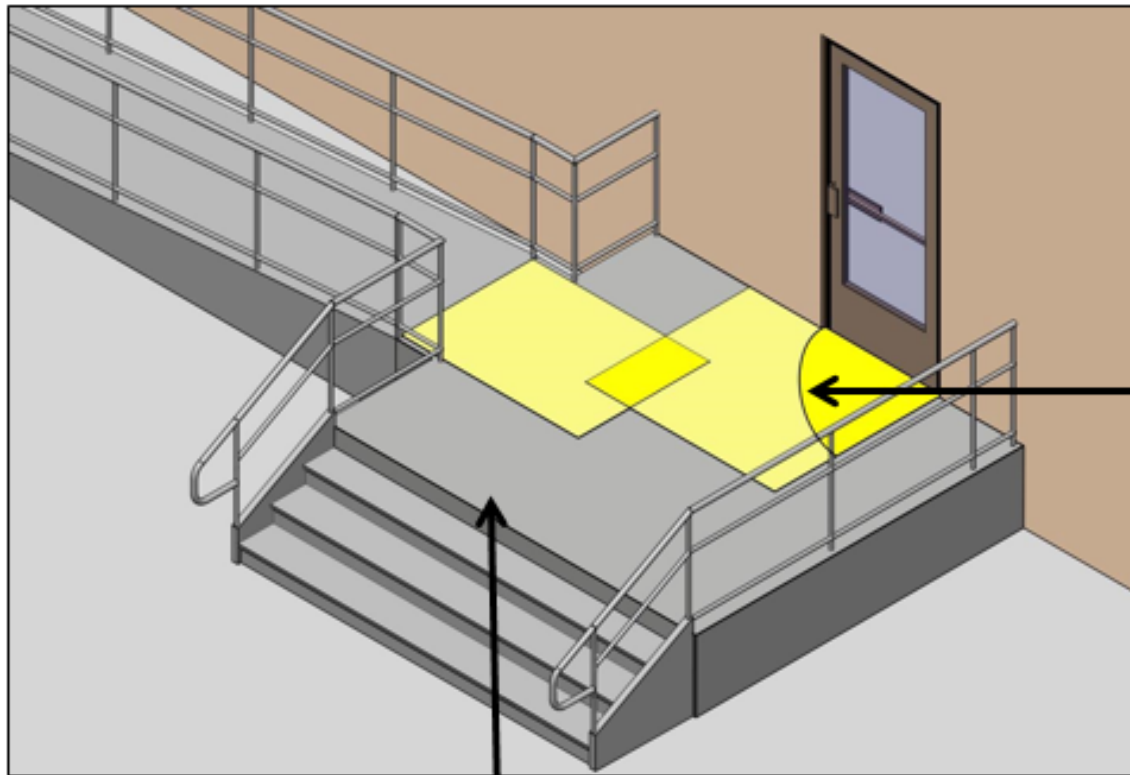


ISA required - unless all public entrances comply)

Bollards/ security barriers cannot obstruct AR

# Entrances

**Landings must accommodate door man. clearances**



**Recommended:  
locate door swing  
outside ramp landing**

**Recommended: locate clearances away  
from stair openings/ drop-offs**

# Entrances

## Exterior Doors: Automation Recommended



**Required at GSA buildings  
(Public Building Service Standards)**

**Which rooms and  
spaces must comply?**

# New Construction (§201)

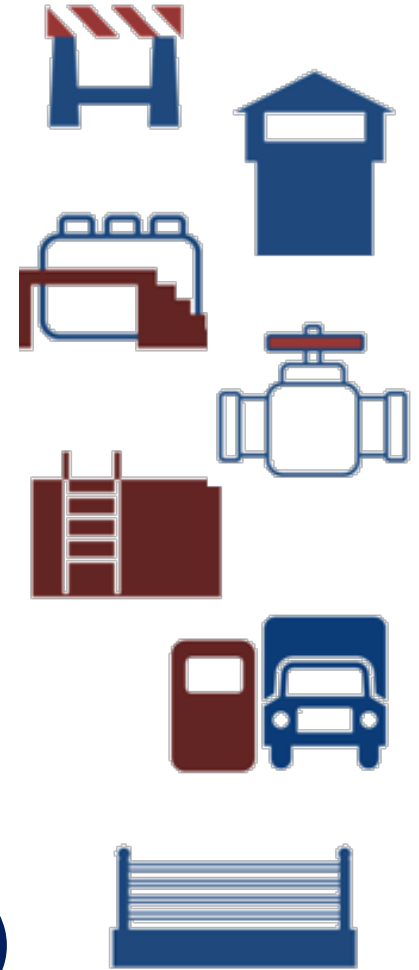
All areas must comply except:

- Exempted structures/ spaces
- Employee Work areas
- Partially scoped spaces



# General Exceptions (§203)

- construction sites
- areas raised for security, life/fire safety
- raised work areas
- machinery spaces
- spaces accessed by ladders, catwalks, crawl spaces, very narrow passageways
- certain single occupant structures (e.g., toll booths)
- certain sports structures (e.g., referee standards, boxing rings, diving platforms)



# Example: Retail Facility



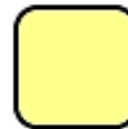
Sales Counter (at least 1 of each type accessible on public side)



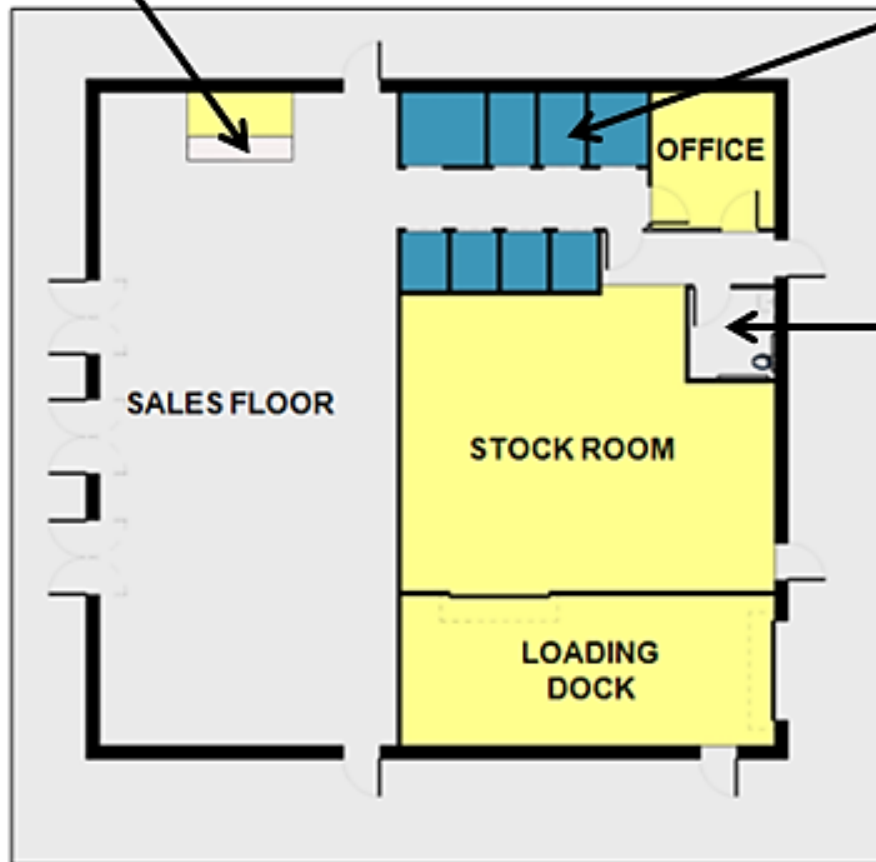
Fitting Rooms (at least 5% of each type)



Toilet rooms, including employee restrooms, must comply



Employee Work Areas - Partial access if used *only* by employees *for work*







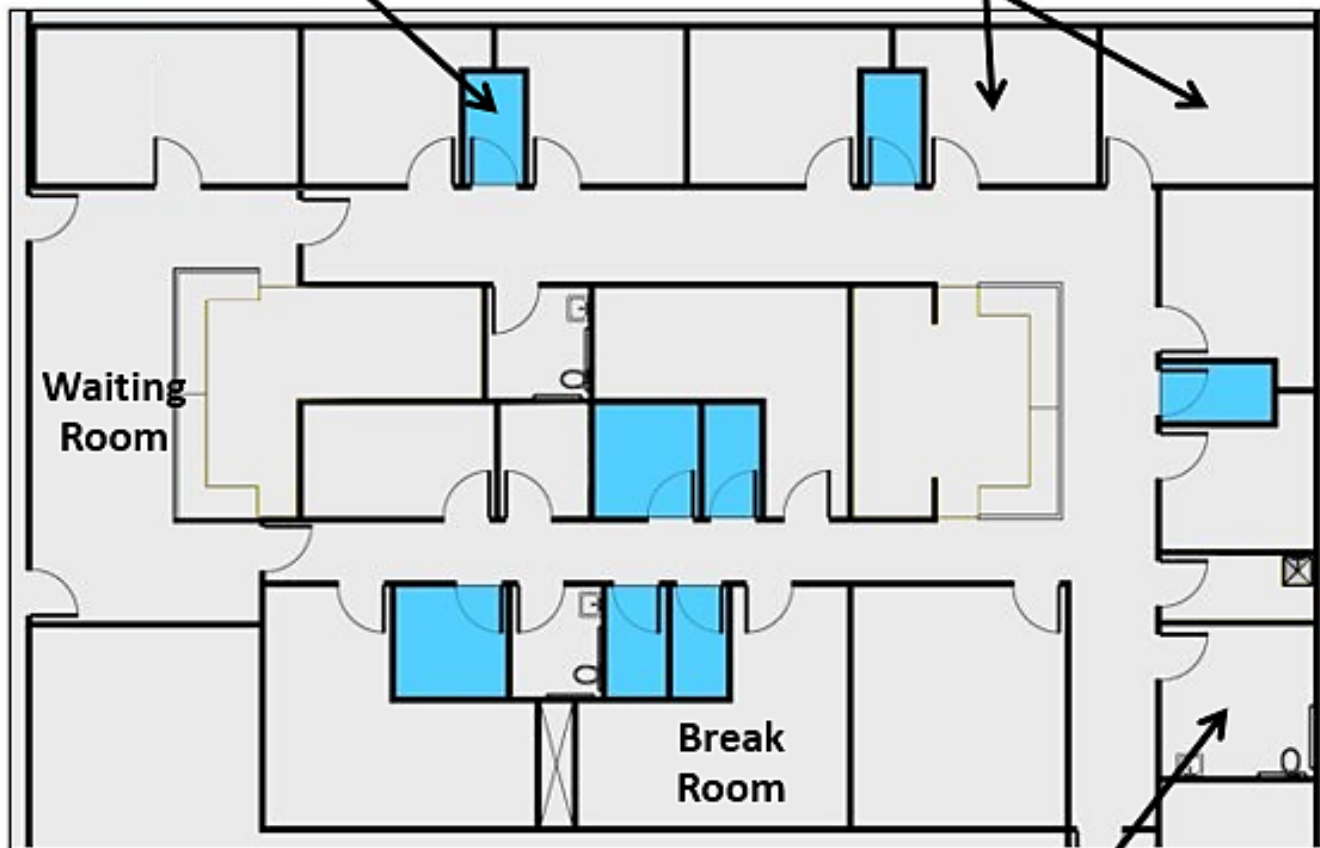
# Example: Medical Care Suite

## Public & Common Use Areas: Full Access



Dressing Rooms: access to at least 5% of each type

Exams Rooms & Doctors' Offices: 100% scoping (public access)



Toilet rooms – access to all

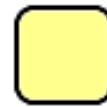
(50%: clustered single user of same type)



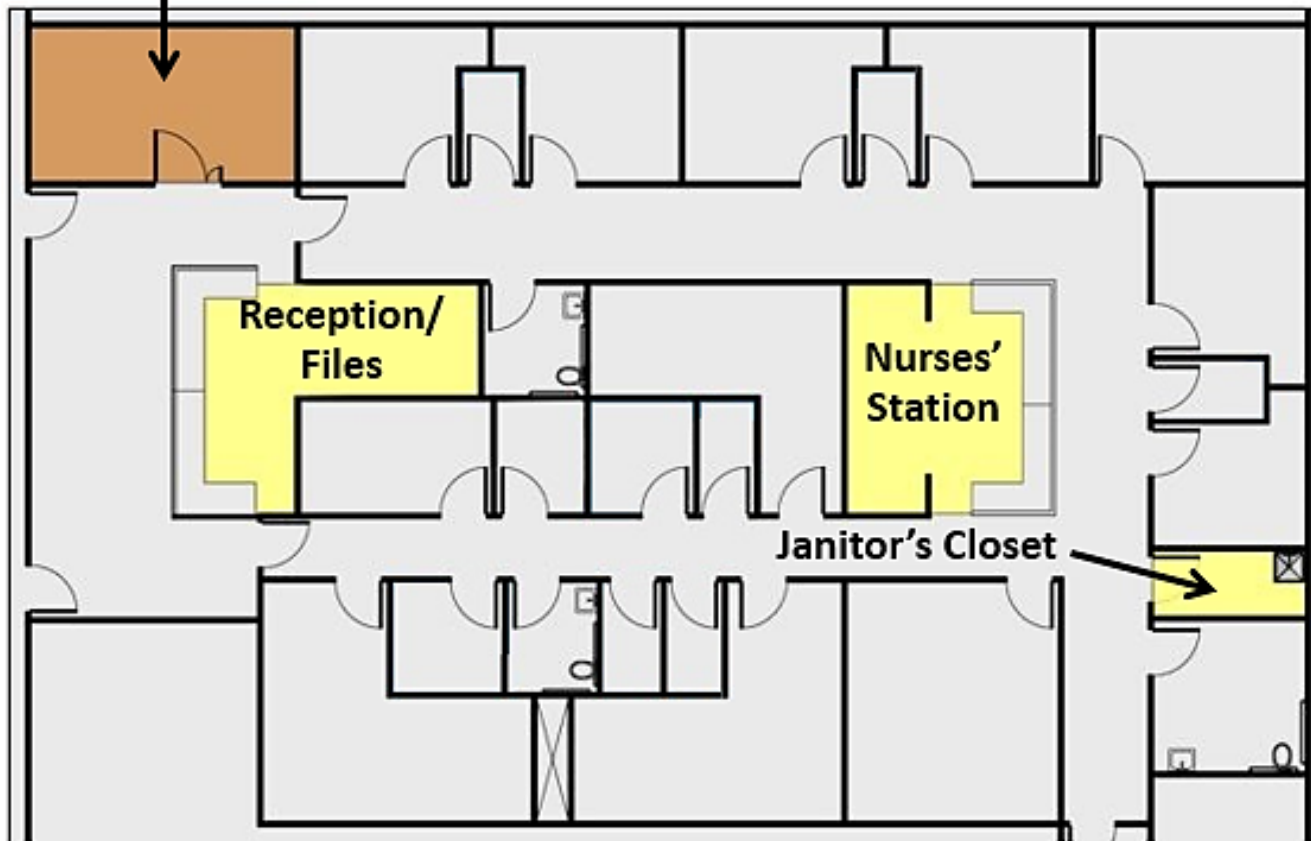
# Example: Medical Care Suite

## Employee Work Areas & Exempt Spaces

Mechanical (exempt)



Employee Only Work Areas



# Employee Work Areas (§203.9)

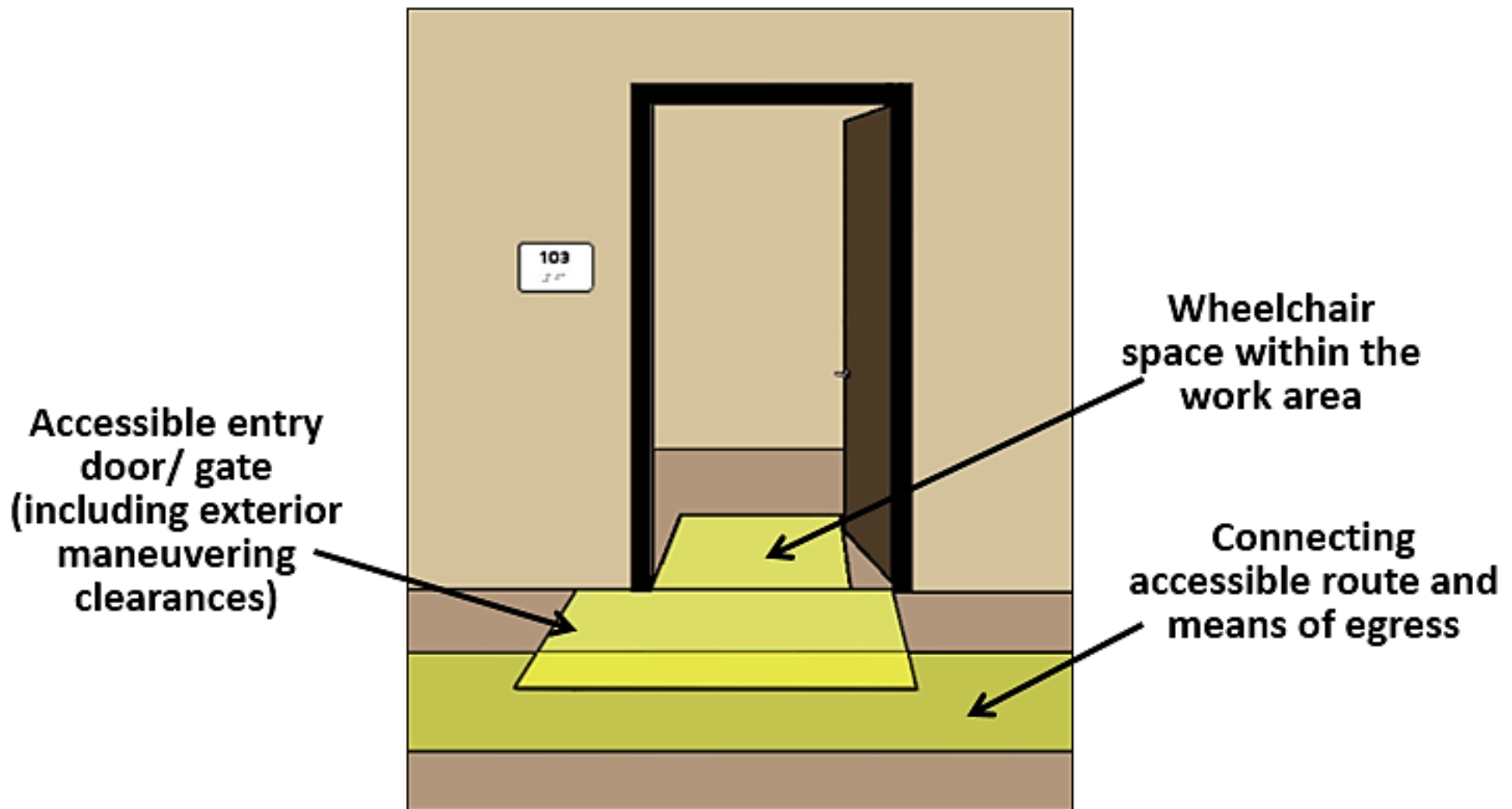
## Minimum requirements:

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



# Employee Work Areas

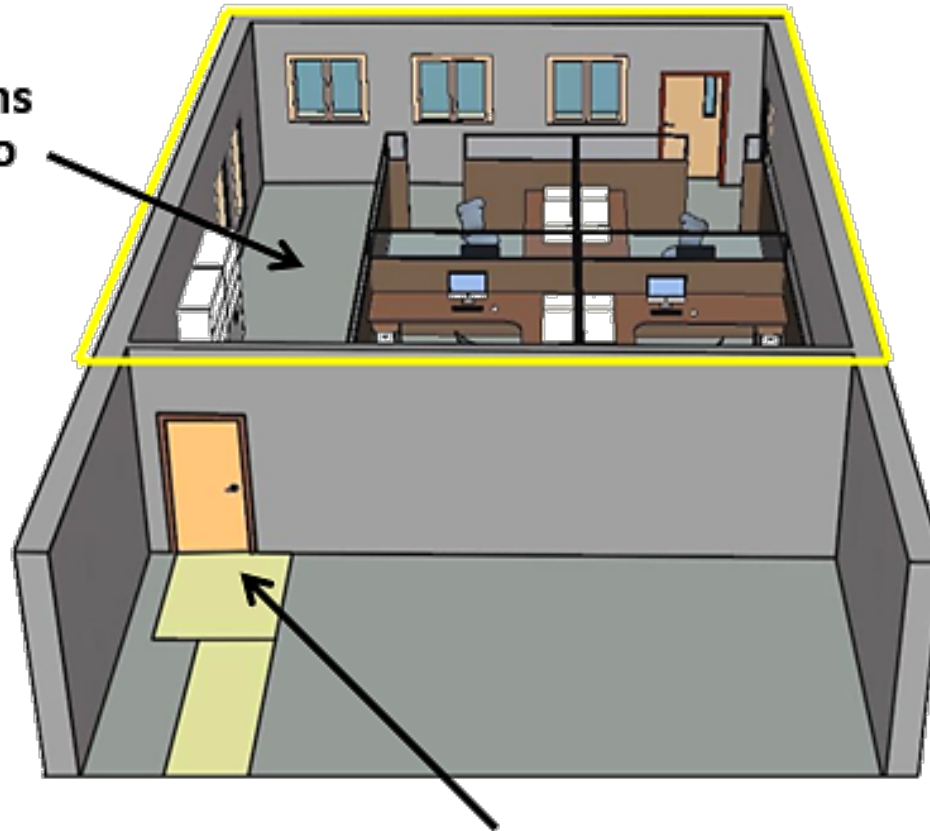
Access for “approach, entry, & exit”



# Employee Work Areas

Less than 1,000 SF

Common use  
circulation paths  
*not* required to  
comply



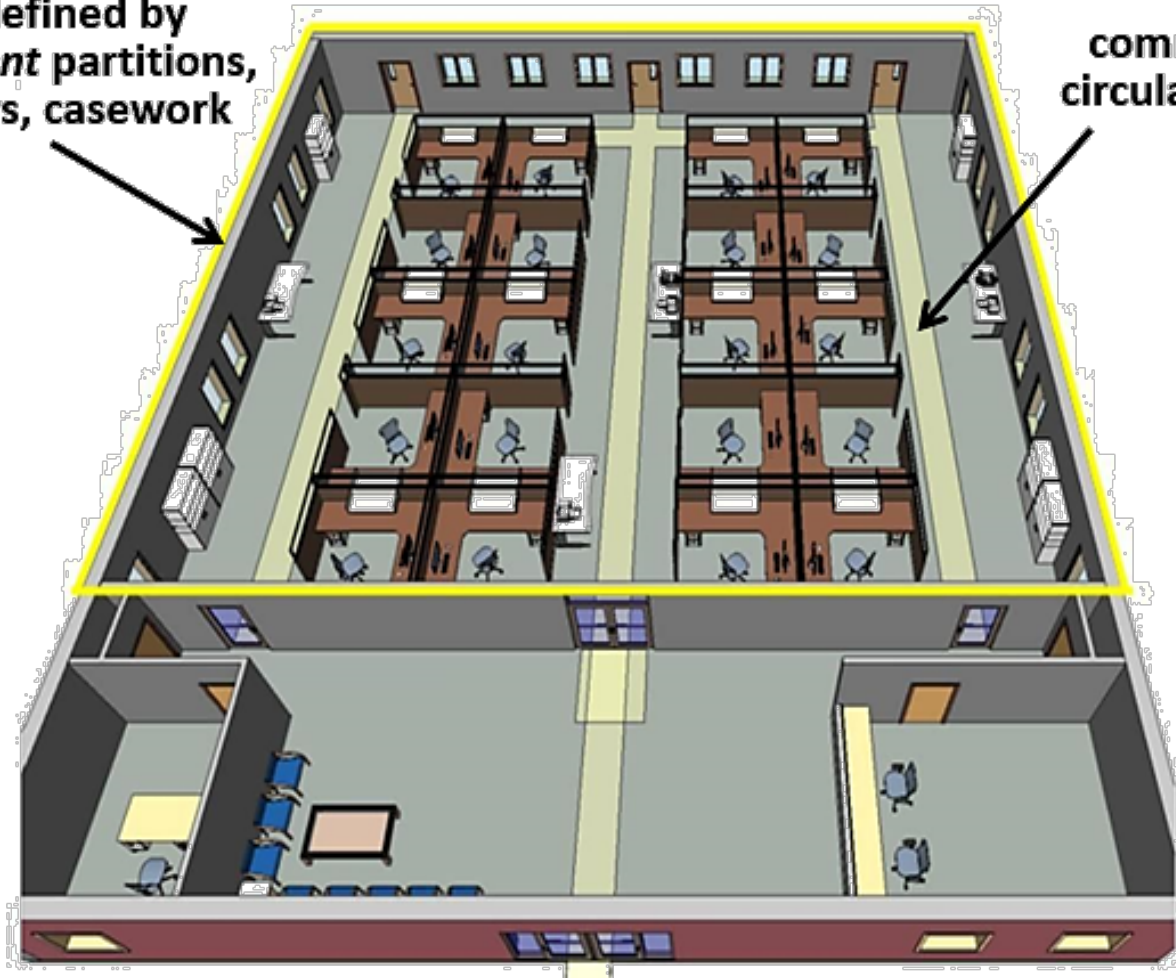
Access for approach, entry, and  
exit to work area required

# Employee Work Areas

1,000 SF or more in size

size defined by  
*permanent* partitions,  
counters, casework

common use  
circulation path

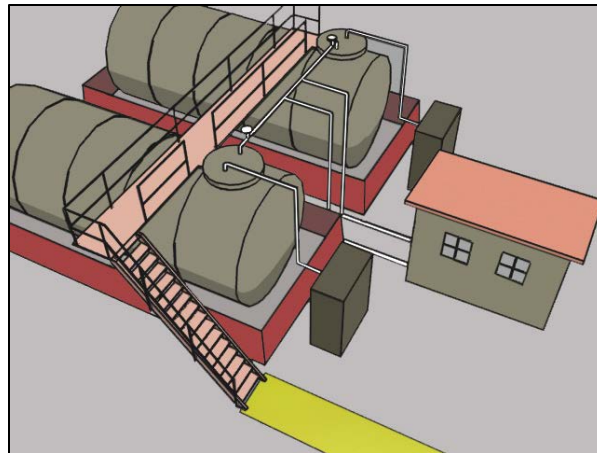


# Employee Work Areas (§206.2.8)

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

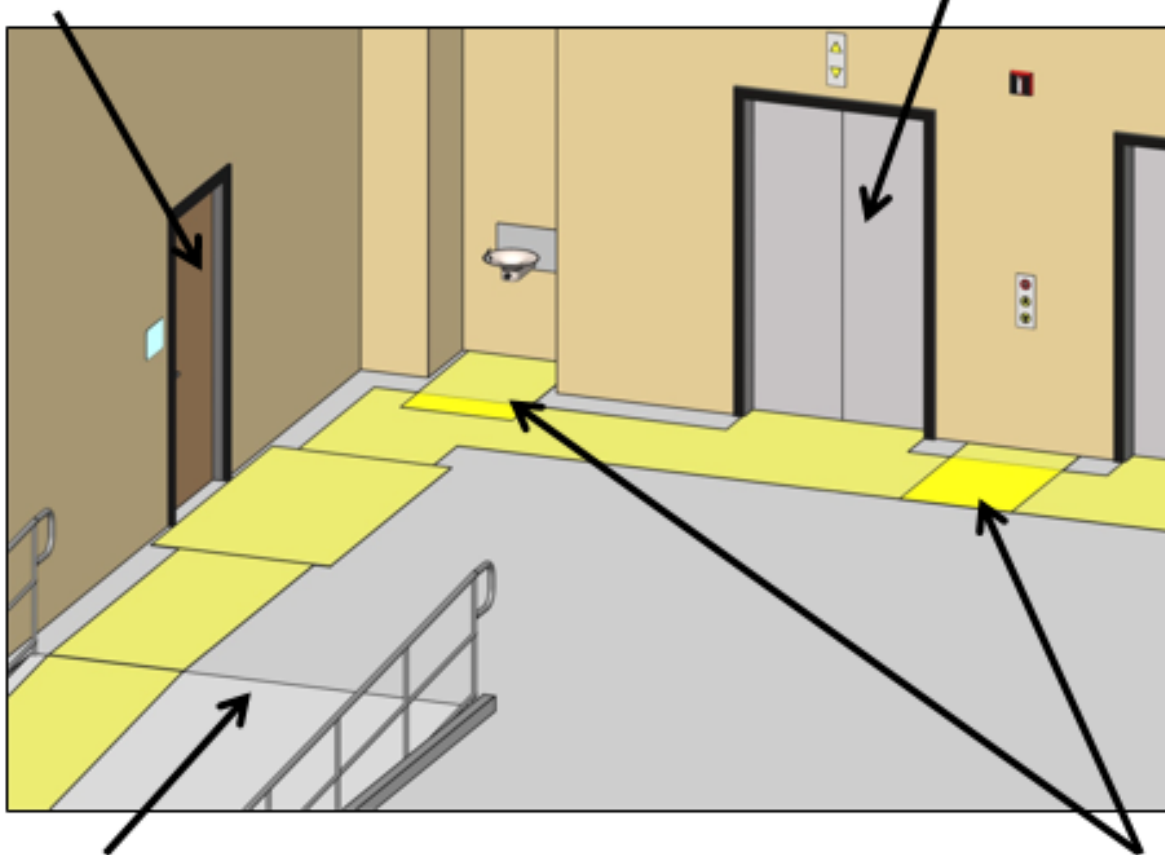


# Accessible Routes

Must connect to:

each accessible room and space

each story (unless an exception applies)



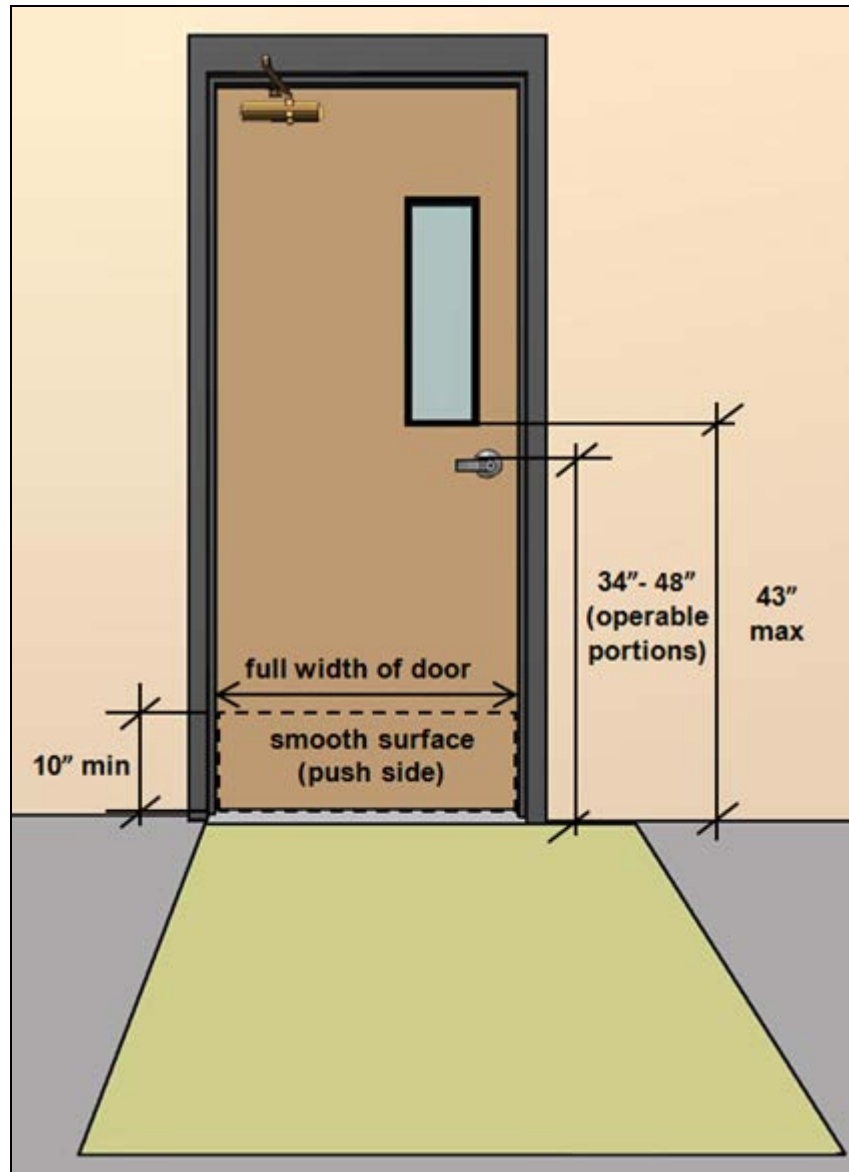
each level on a floor required to be accessible

each accessible element



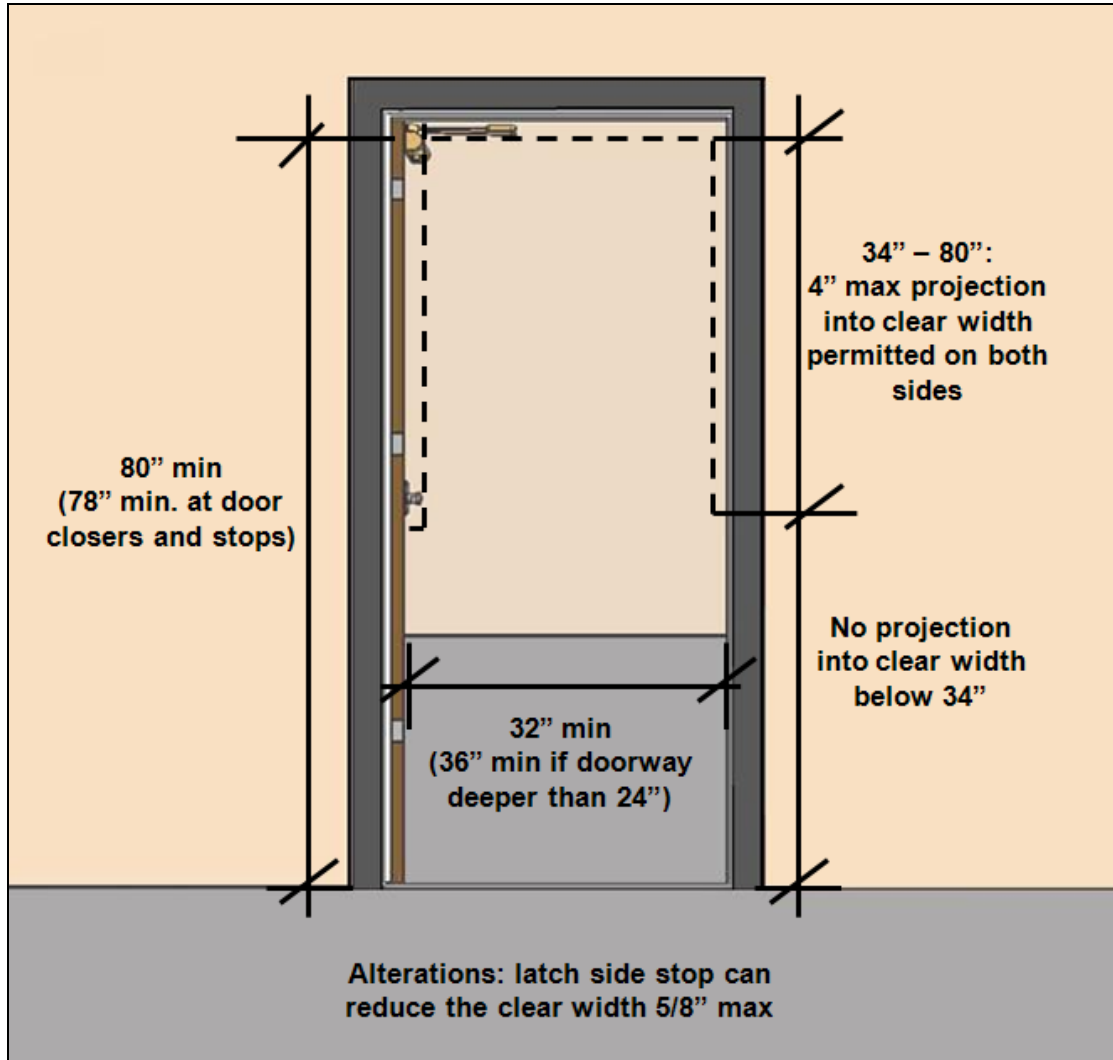
# Doors, Doorways, and Gates

# Doors, Doorways, Gates (§404)



- Clear Width (32" min.)
- Closing Speed
- Opening Force (5 lbf max)
- Vision/ Side Lights
- Compliant Hardware
- Smooth Surface (bottom, push side)
- Thresholds (1/2" max)
- Maneuvering Clearance (both sides unless usable in 1 direction only)

# Doors, Doorways, Gates

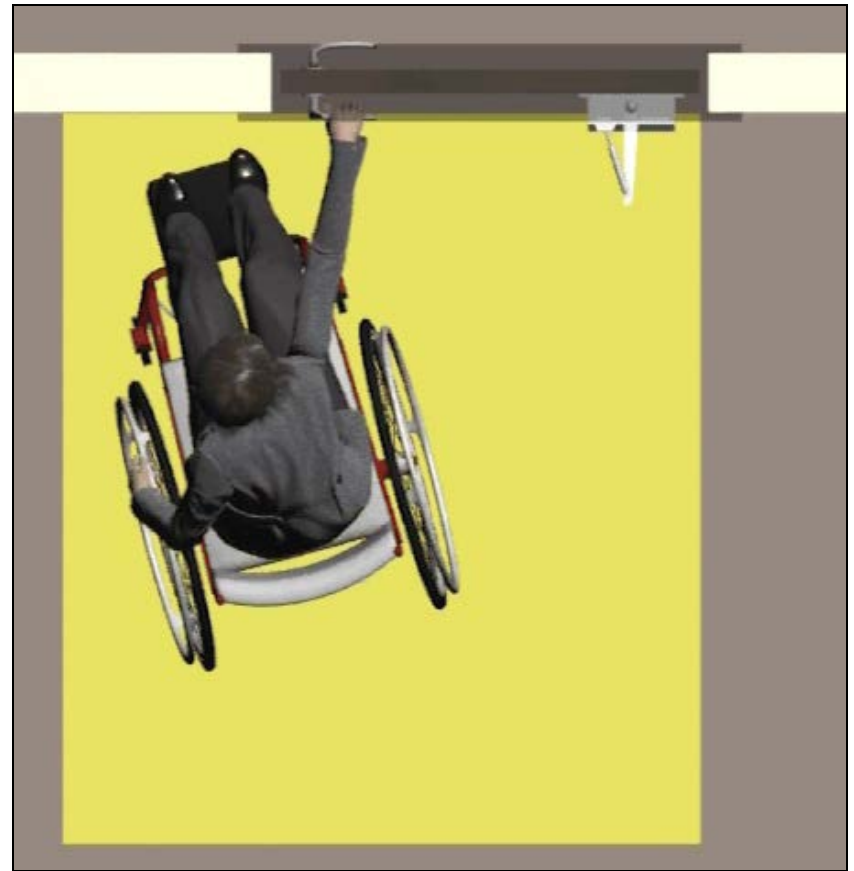


**Limited  
projections into  
door clear width**

**Hardware height:  
34" – 48"**

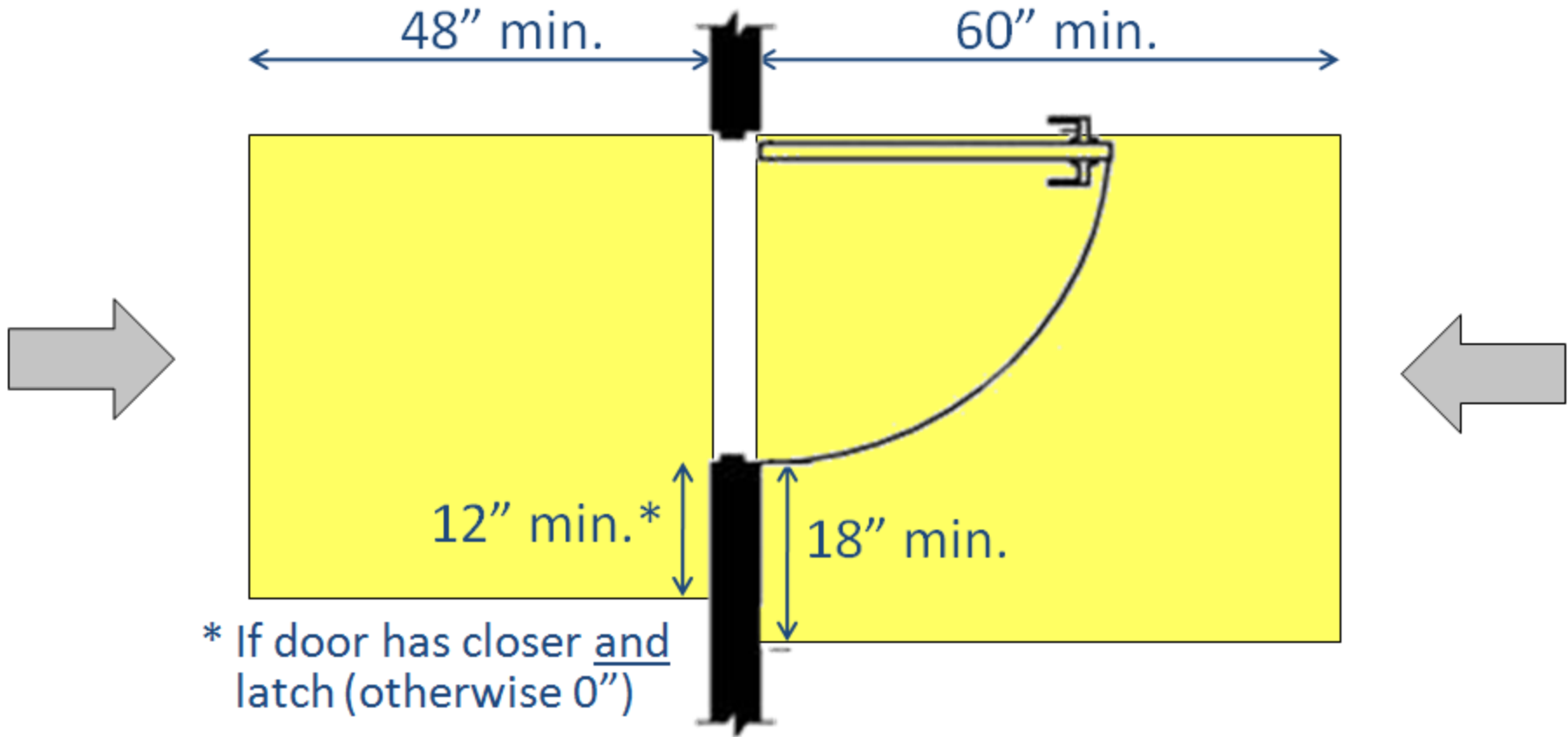
# Maneuvering Clearances

Minimum space for positioning/  
maneuvering at doors



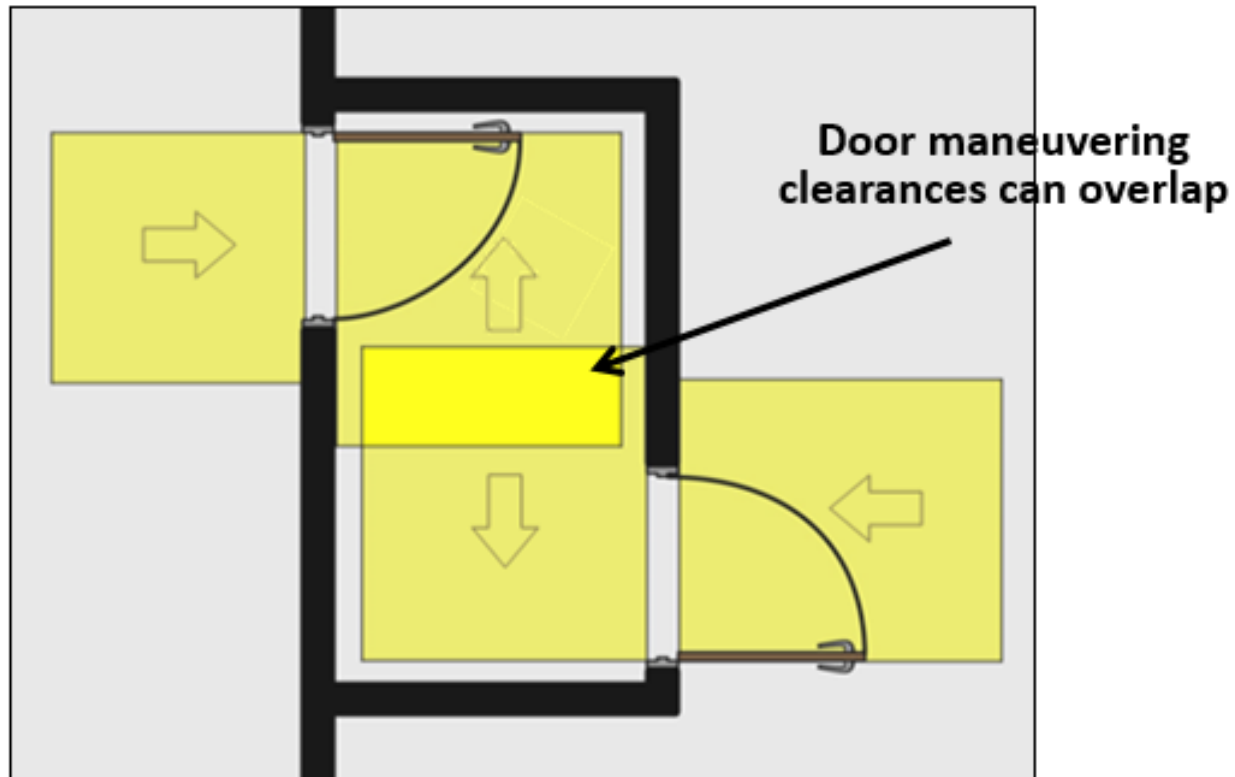
# Maneuvering Clearances

## Forward Approach



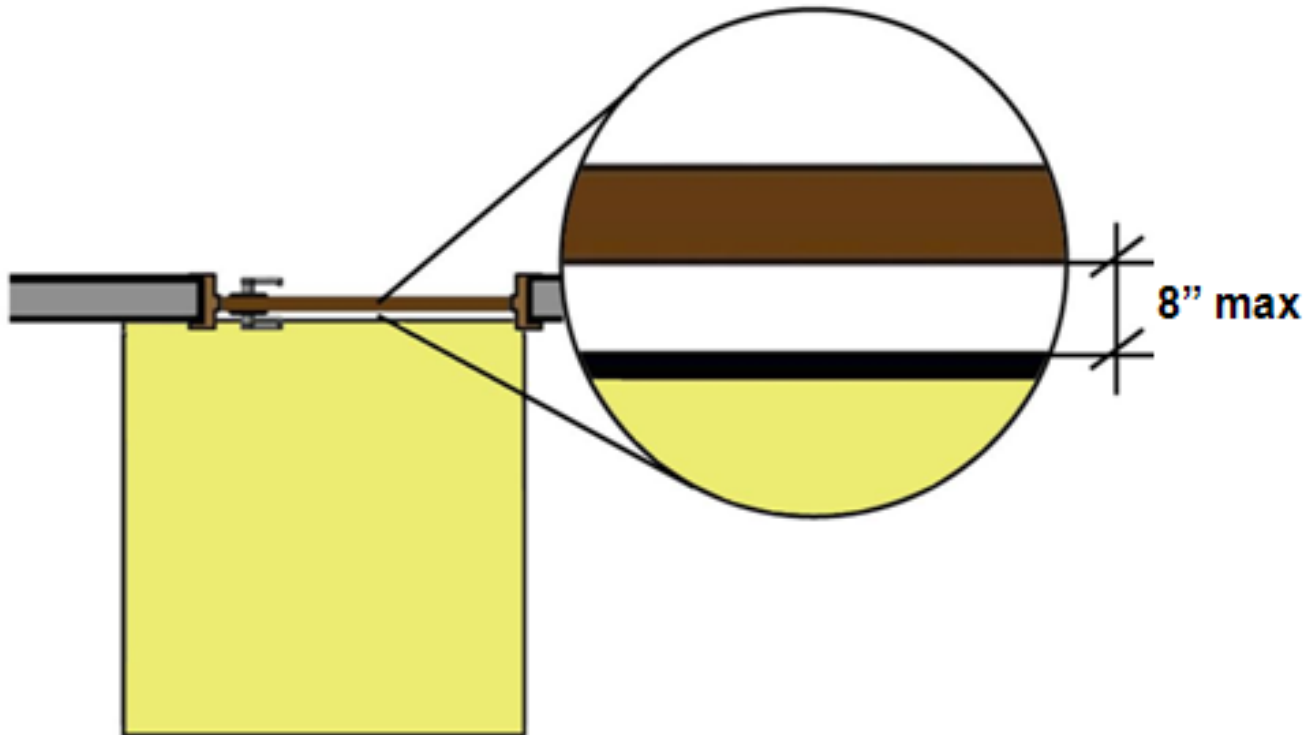
# Maneuvering Clearances

Required at each accessible door based on approach & swing



# Maneuvering Clearances

Maneuvering clearance measured from the wall - cannot be offset more than 8" from the face of the door



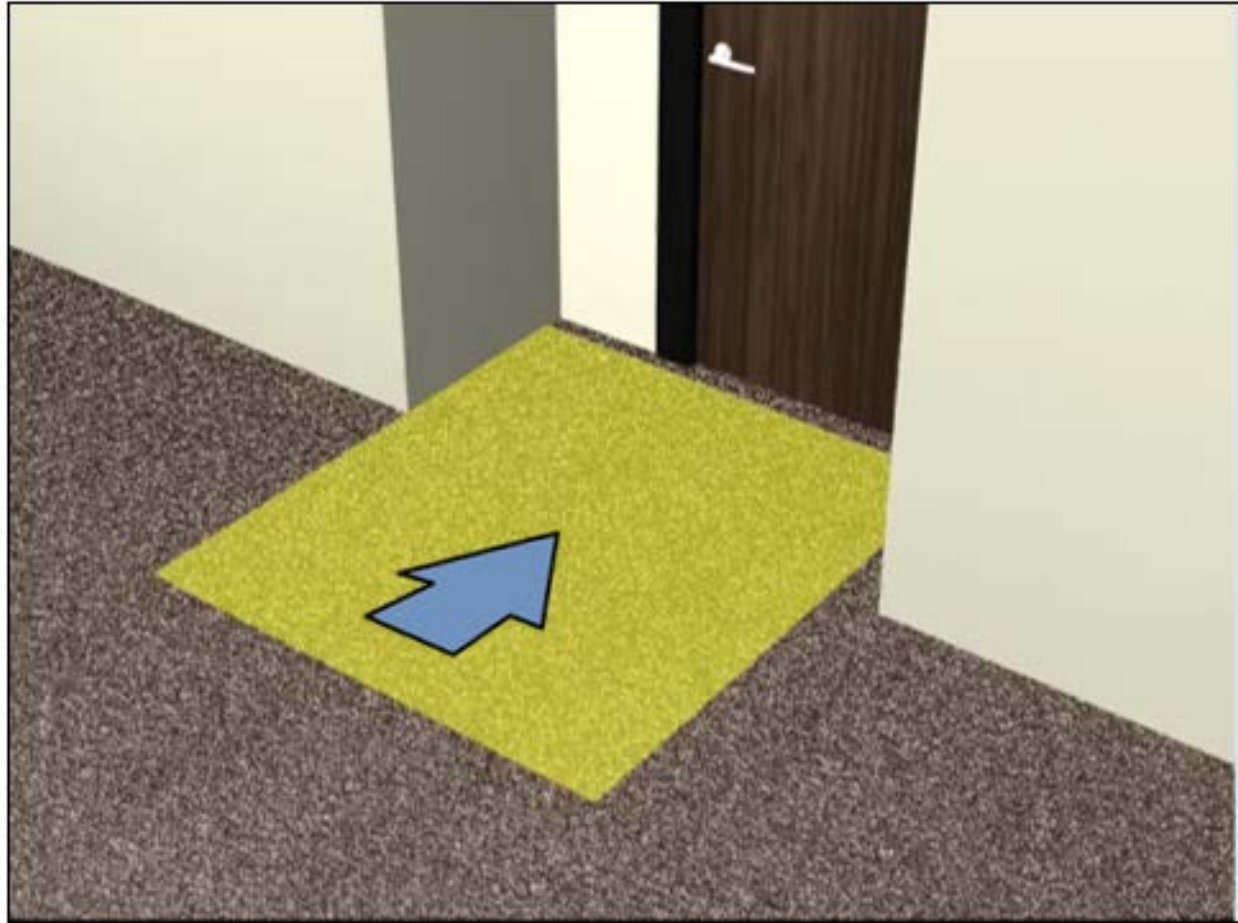
# Maneuvering Clearances

8" max. offset from face of door





# Maneuvering Clearances

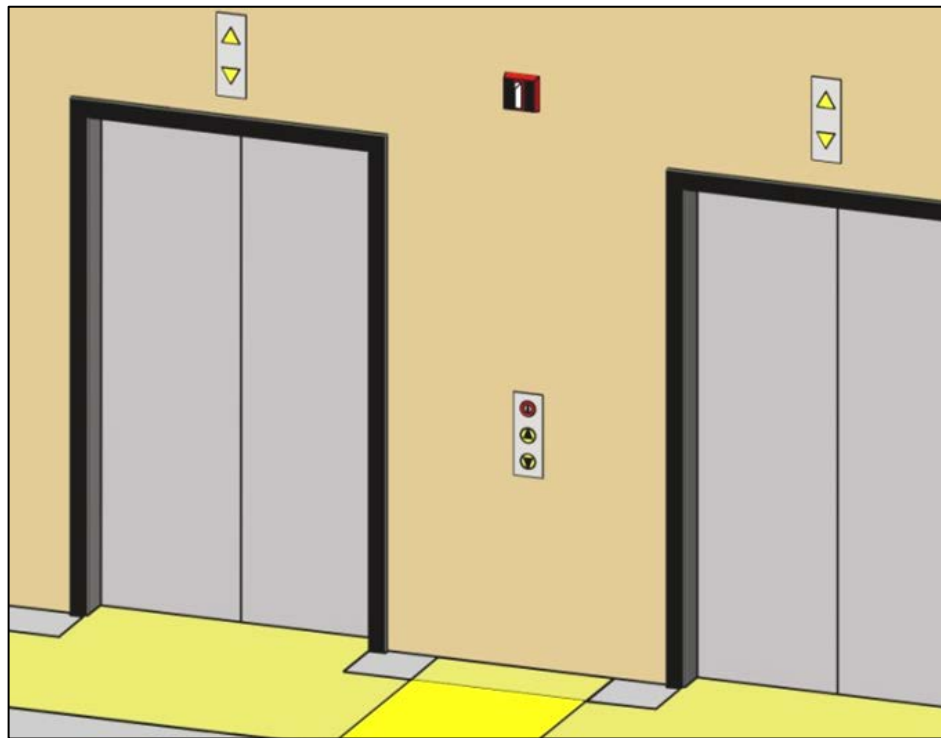


**Recess > 8": maneuvering clearance for forward approach located 8" max. from face of door**

# Accessible Routes Between Stories

# Multi-Story Facilities (§206.2.3)

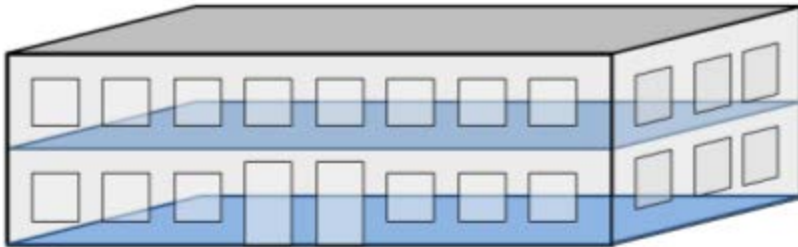
At least one accessible route must connect each story and mezzanine unless an exception applies



# Exceptions (§206.2.3)

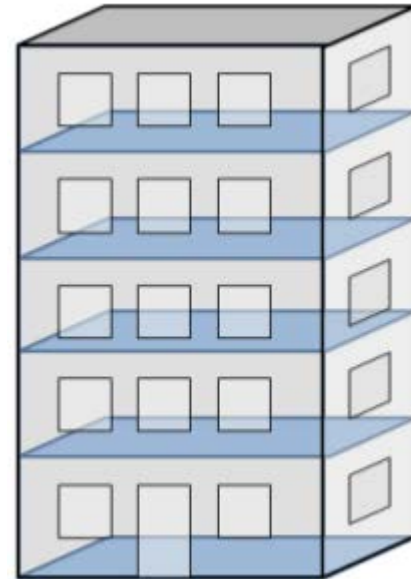
AR between floors (“elevator exception”)

Private sector facilities only:



less than 3 stories

OR



less than 3,000 sf/ flr)

# Exceptions

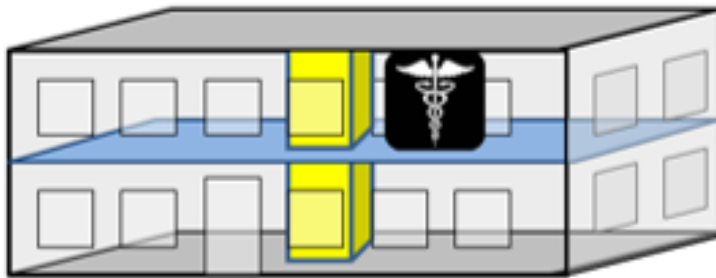
## Exception not allowed for:

- Shopping centers/ malls with 5 or more sales or rental establishments)
- Professional offices of health care providers
- Terminal, depots, or stations used for public transportation
- Government Facilities



# Exceptions

**Accessible route required to upper story:**



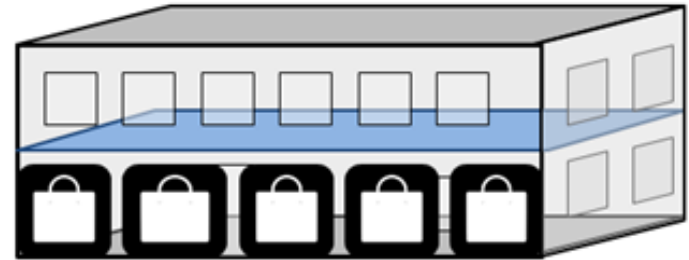
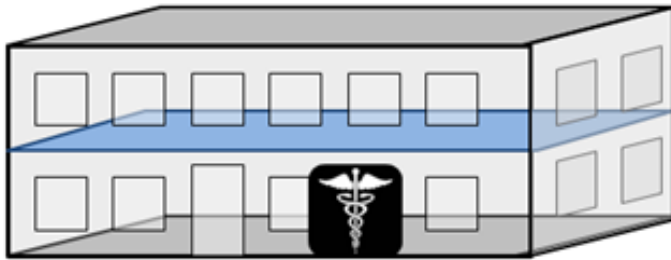
**containing a health  
care facility**



**containing a sales/rental  
establishment (if facility  
contains at least 5 total)**

# Exceptions

- Accessible route not required to upper story without a health care facility or a sales/rental establishment



# Exceptions

**If facility qualifies for exception,**

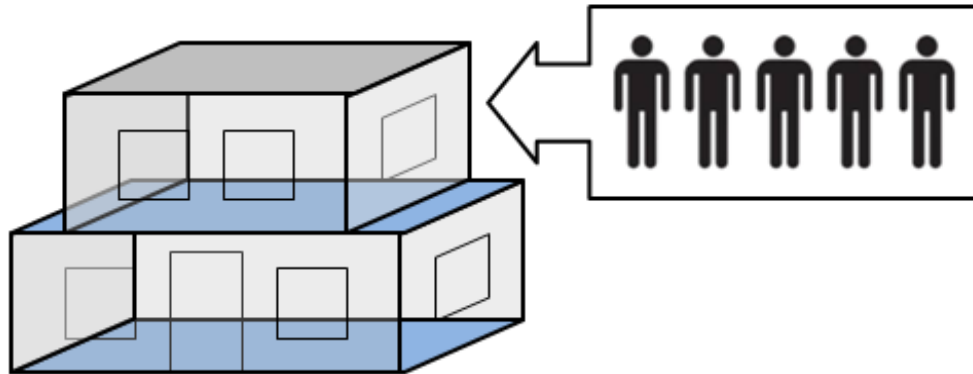
- all other provisions in the standards still apply to stories/ mezzanines not served by AR**
- elevators provided anyway must fully comply (as standard or LULA elevators)**
- vertical access still may be required by state or local code.**



# Exception: Gov't Buildings

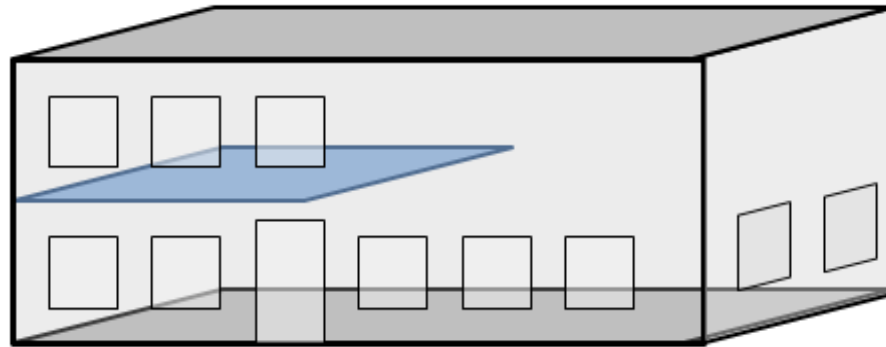
Exception for public (government) buildings:

- 2 story only AND
- 1 floor has: no public space AND max. occupancy of 5



# Exceptions: Mezzanines

**AR not required to mezzanines in buildings not required to have an elevator**



**Additional conditions for restaurants & cafeterias**

# Exceptions

## Additional exceptions:

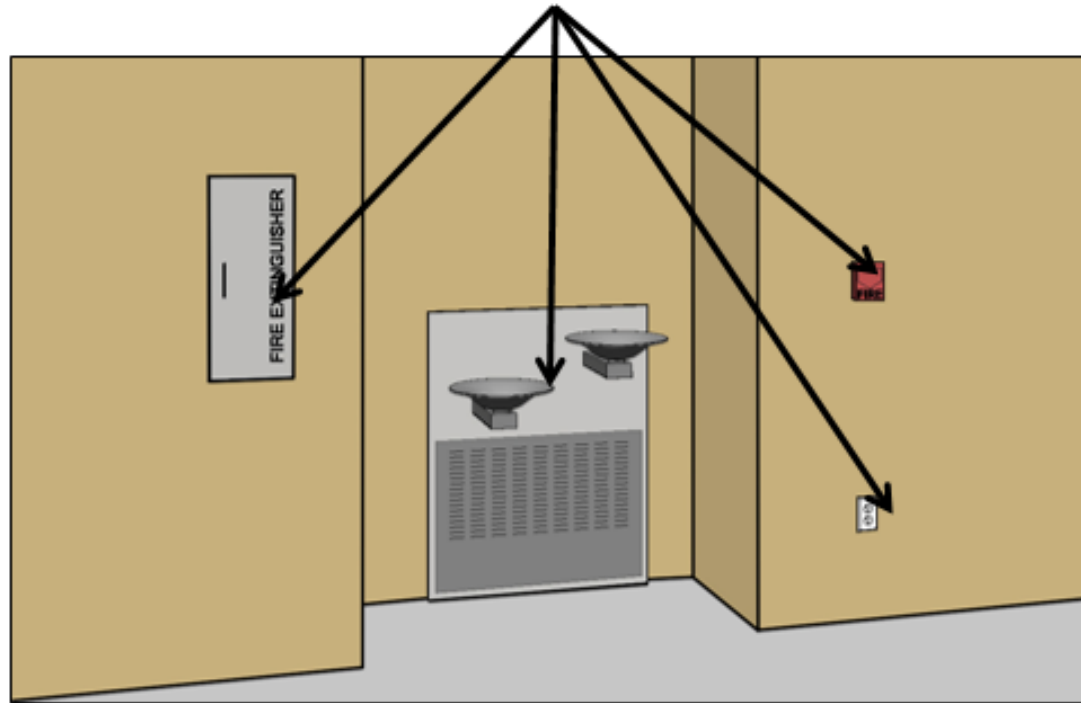
- **detention and correctional facilities**
- **residential facilities**
- **transient lodging (multi-story units)**
- **air traffic control tower cab**
- **qualified historic facilities**
- **press boxes**



# Operable Parts & Elements

# Operable Parts

Standards apply to *fixed or built-in* elements



Moveable elements/ furnishings not covered  
by the standards

# Operable Parts (§309)

- **Operability**
- **Reach range**
- **Clear floor space**
- **AR connection**



# Reach Ranges (§308)

Side reach range reduced:

48" – 15"

(same as forward reach)



# Clear Floor Space (§305)

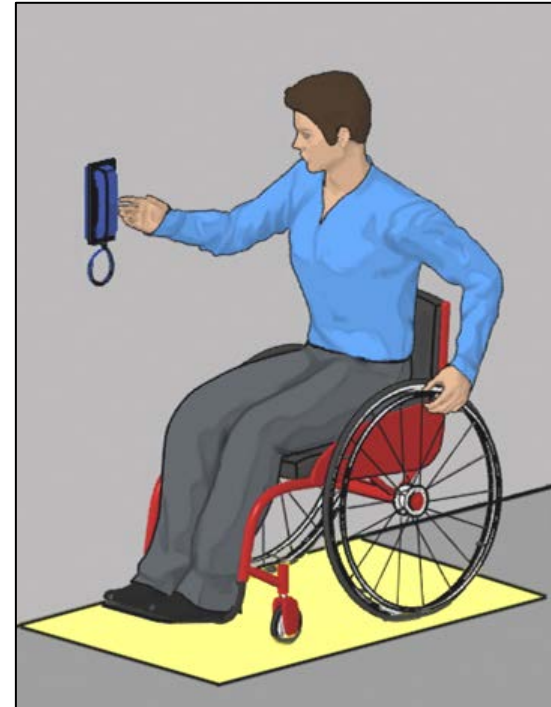
## Forward Approach



**Required at:**

- dining/ work surfaces
- drinking fountains
- lavatories & most sinks

## Side Approach



**Allowed at other elements (including sales/service counters), specified for: beds & most appliances**

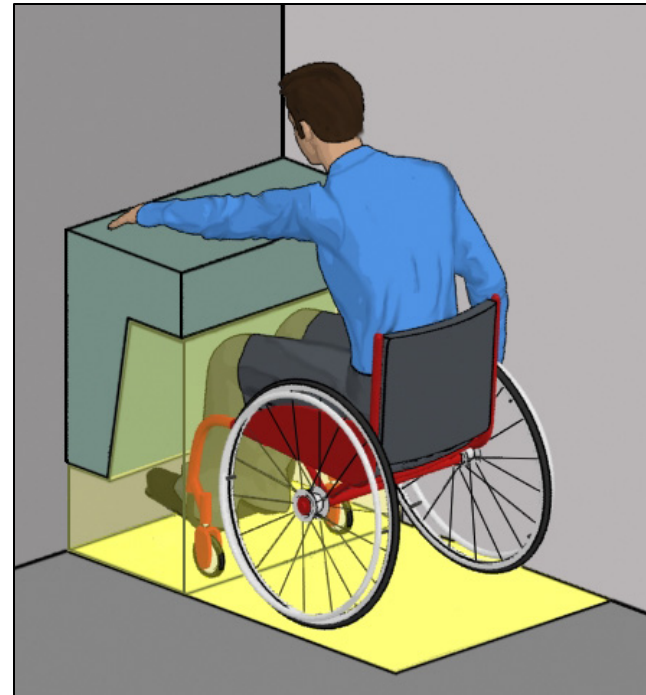


# Clear Floor Space (§306)

**Forward Approach: Objects with knee/toe clearance can overlap a portion of the space (required at some elements, e.g. DFs & lavs)**



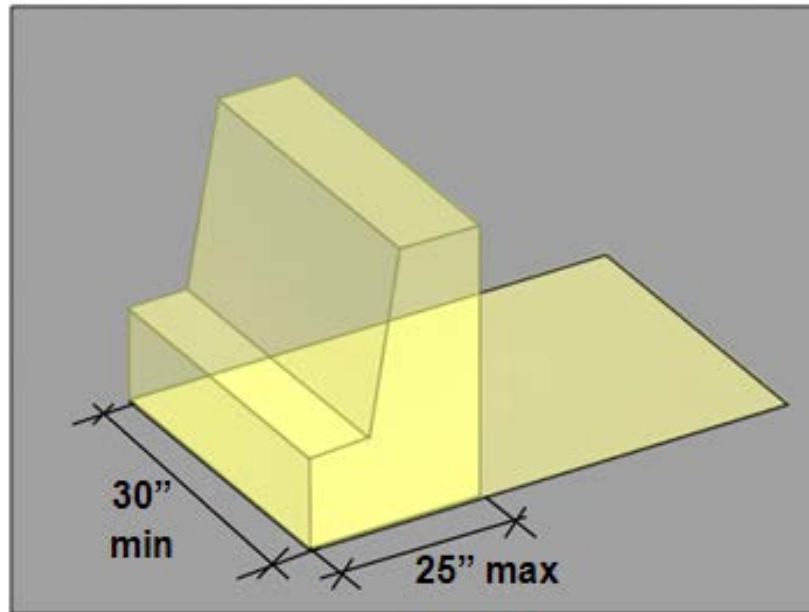
**Toe space (9" high min.):  
Max. depth 6"**



**Knee & Toe Space:  
Max. depth 25"**

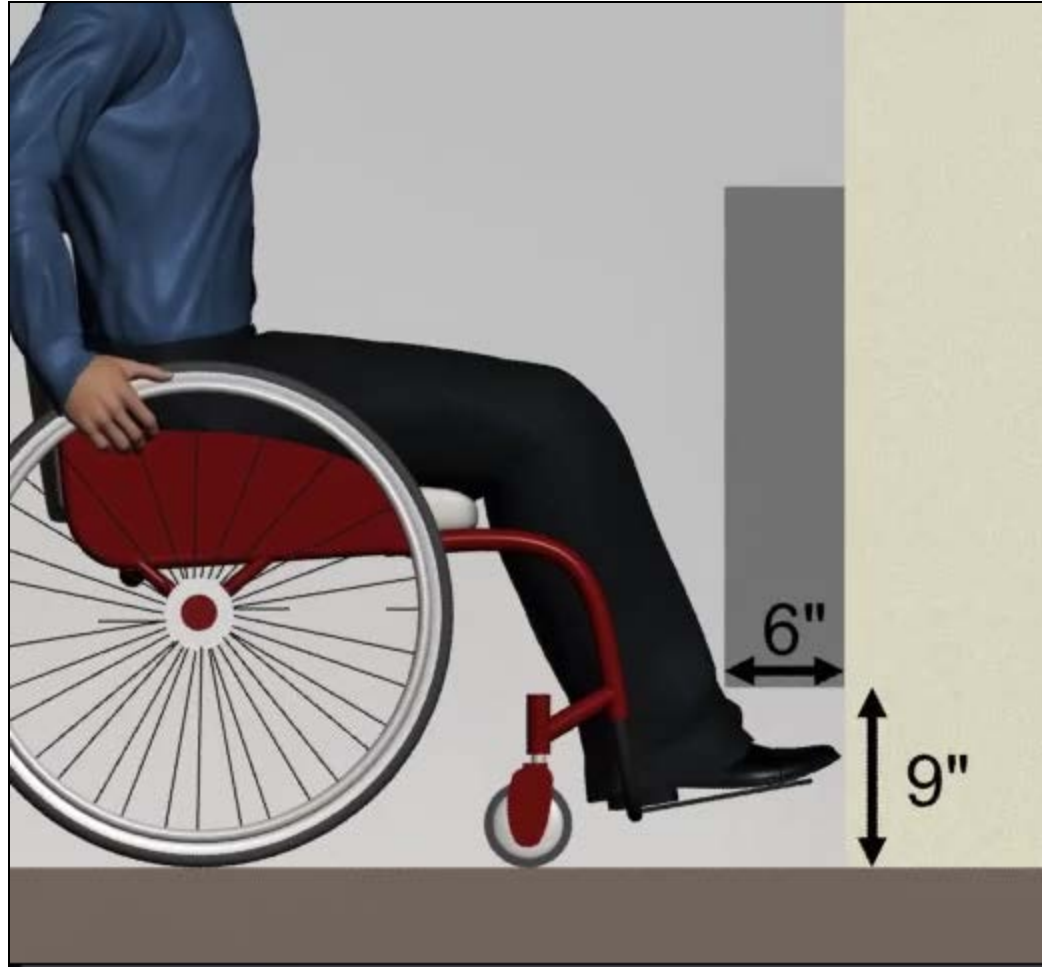
# Clear Floor Space

**Knee/toe specifications allow space for plumbing, enclosures, and supports**



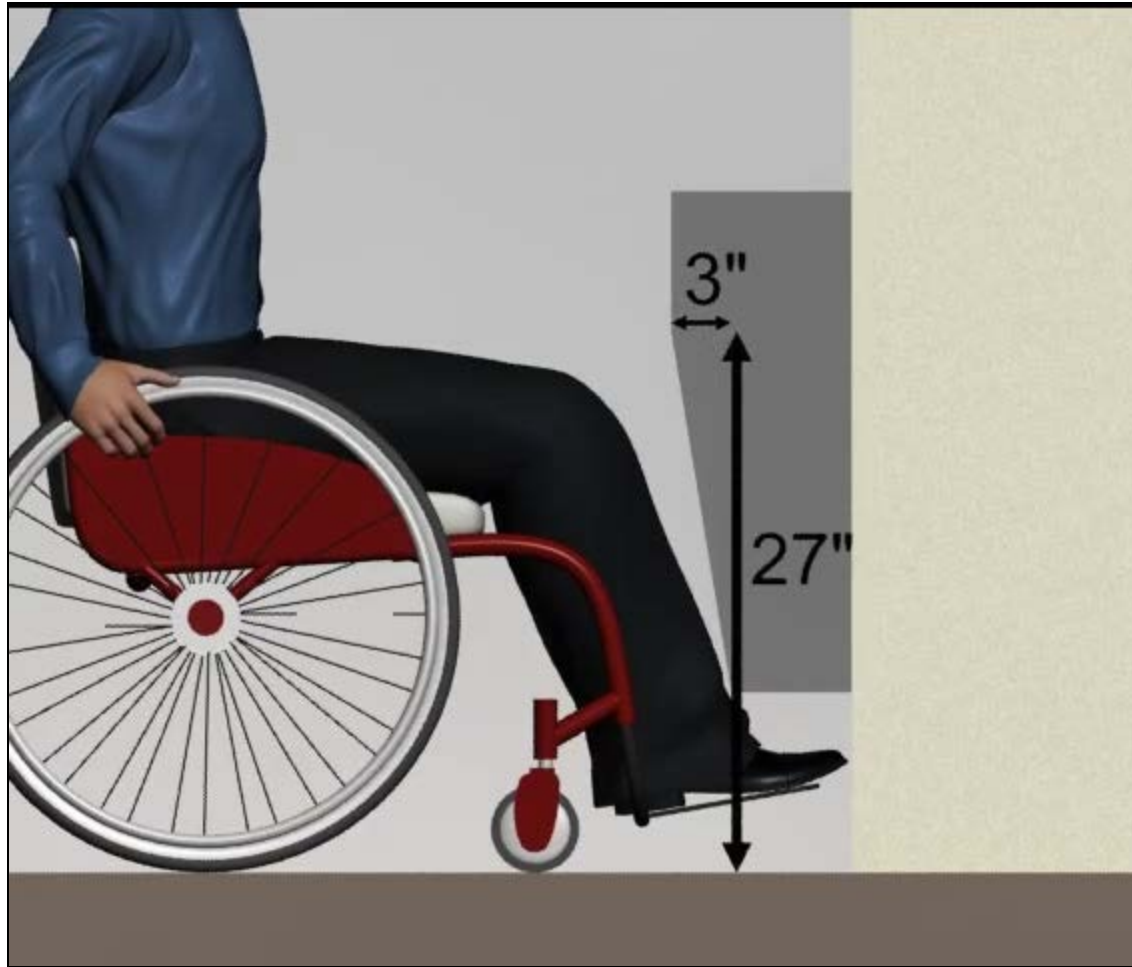
**No object can protrude into min. clearances (other than dip of overflow at lavs & sinks)**

# Knee & Toe Space



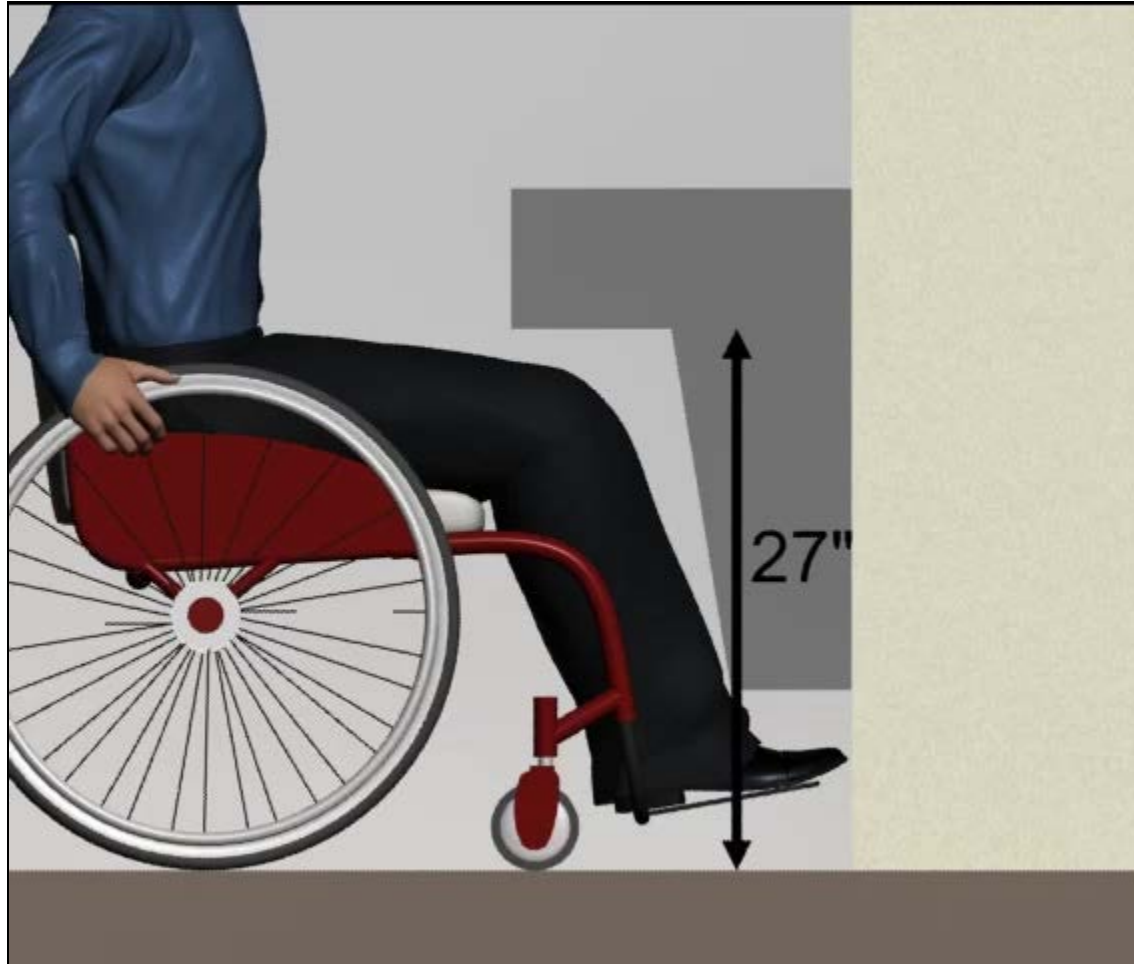
**Toe space**

# Knee & Toe Space



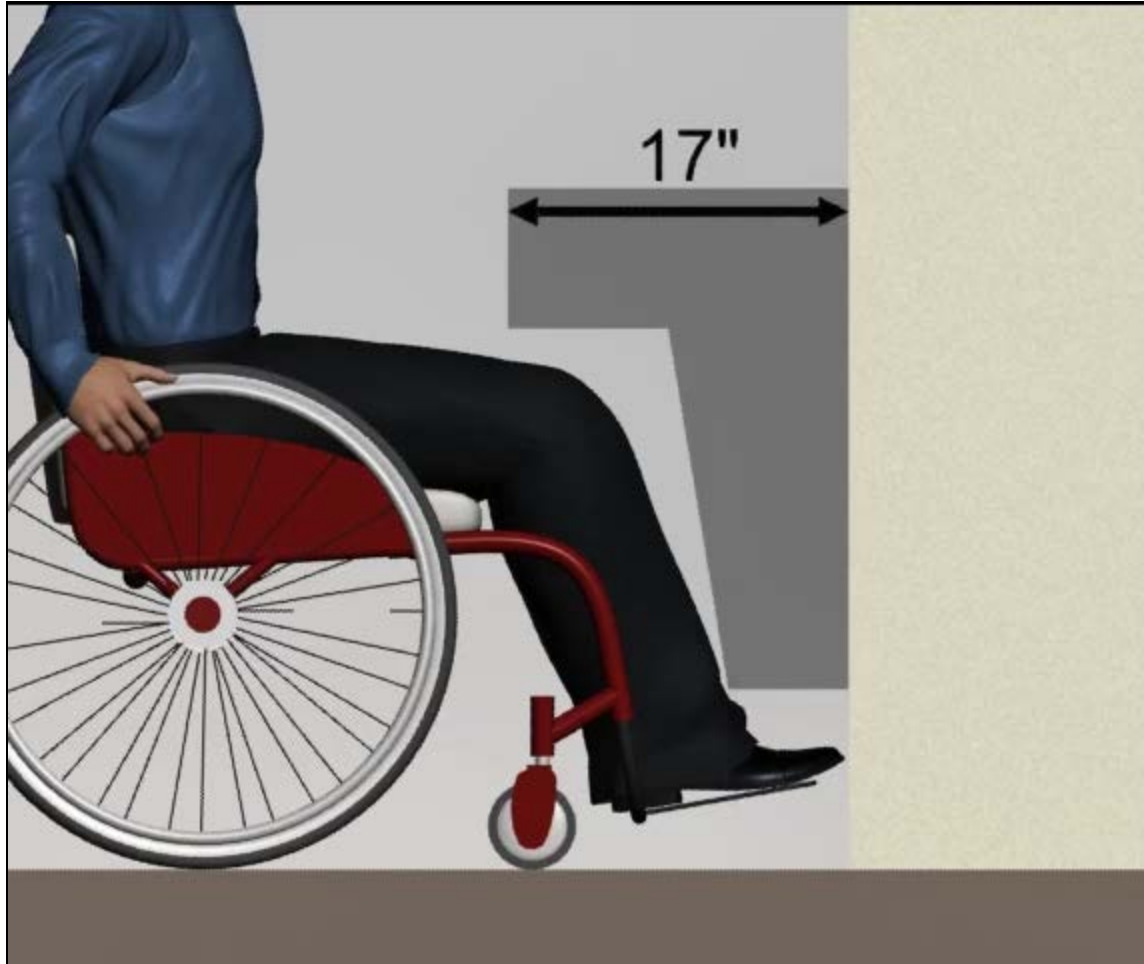
**Beyond toe space, clearance increases from 9" to 27" min. high over 3" span (6:1 slope)**

# Knee & Toe Space



**Knee Space (8" deep min. where knee space required)**

# Knee & Toe Space



**Required knee & toe space must be at least 17" deep**

# Knee & Toe Space



**Additional depth must provide clearance for knees  
(27" high min.)**

# Knee & Toe Space

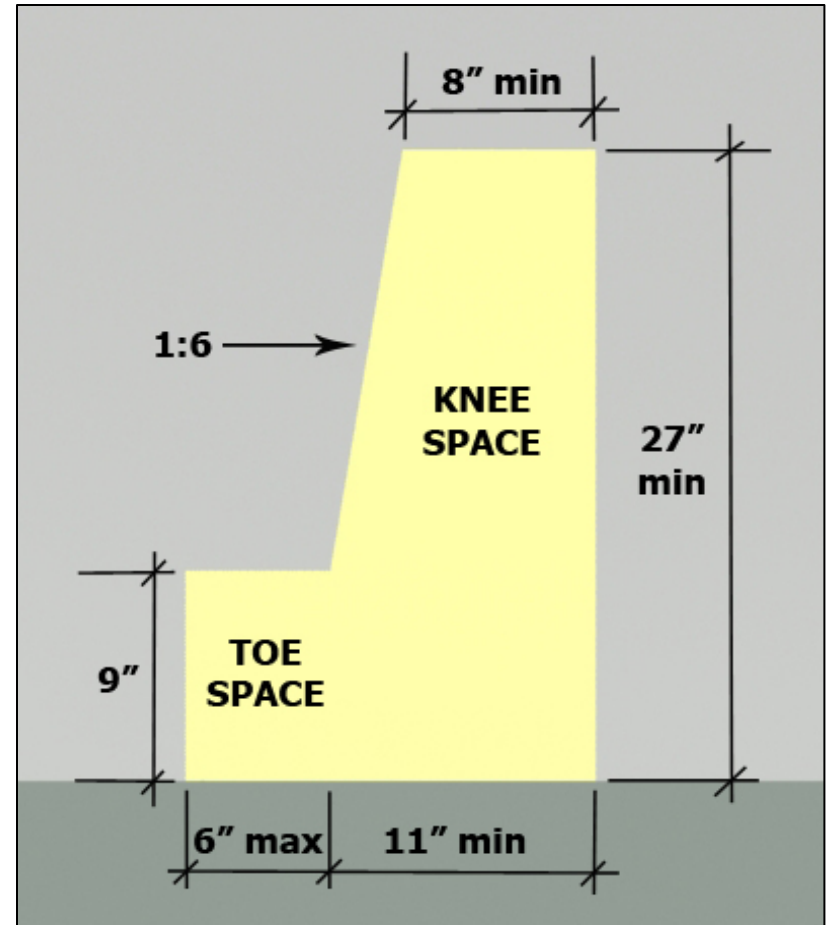
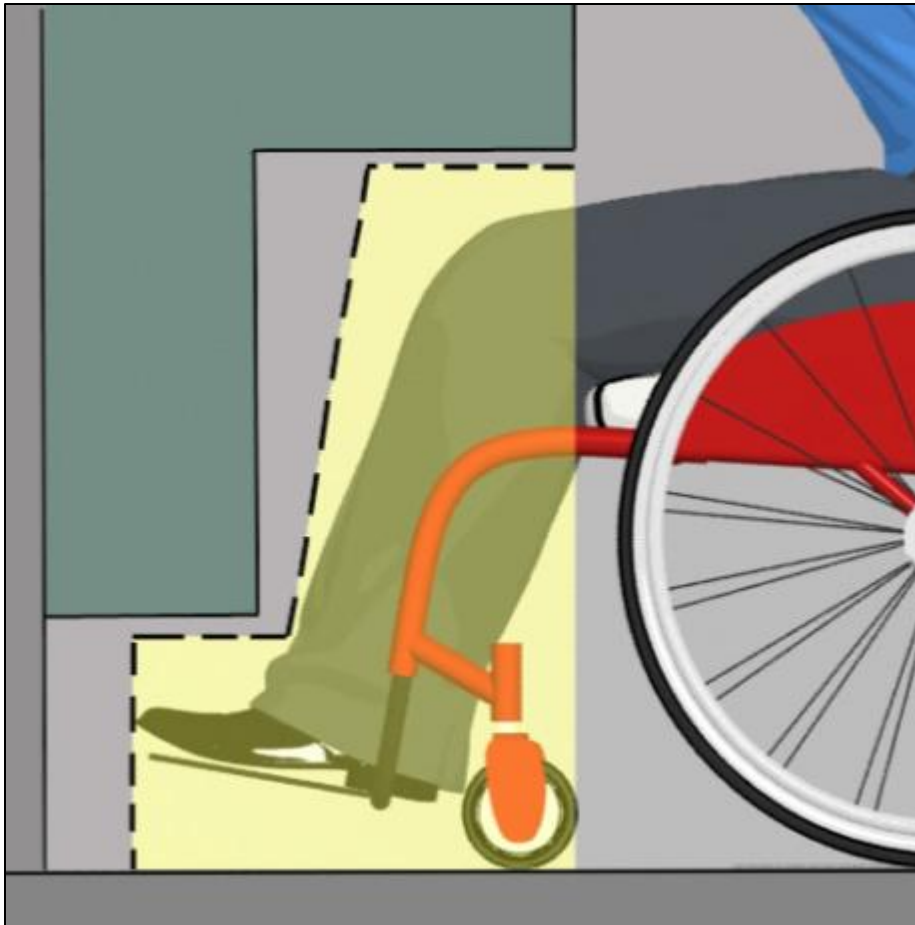


**Space beyond 25" depth can exist but is not usable**

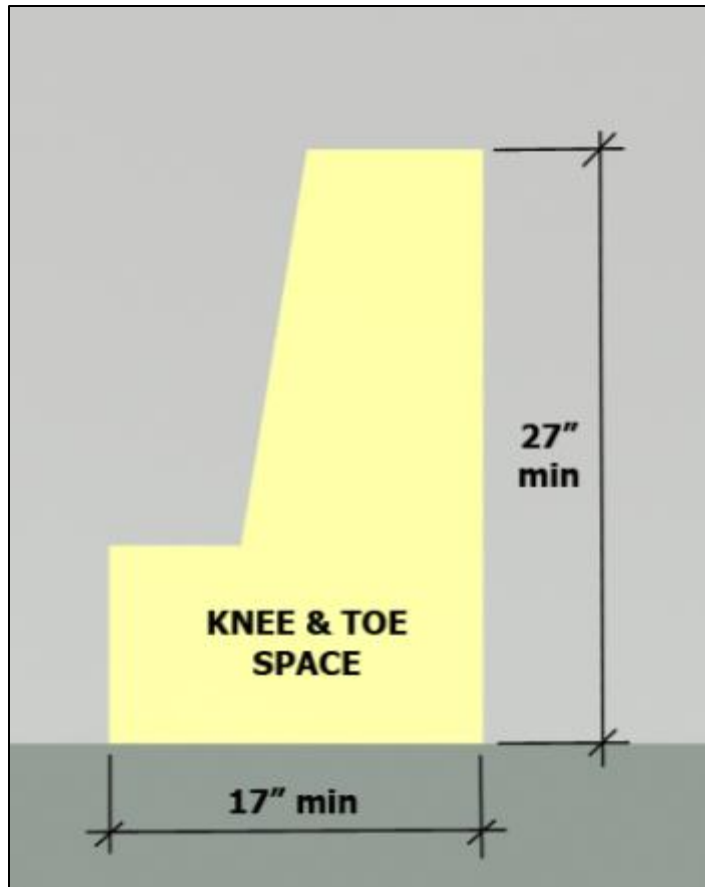


# Knee & Toe Space (§306)

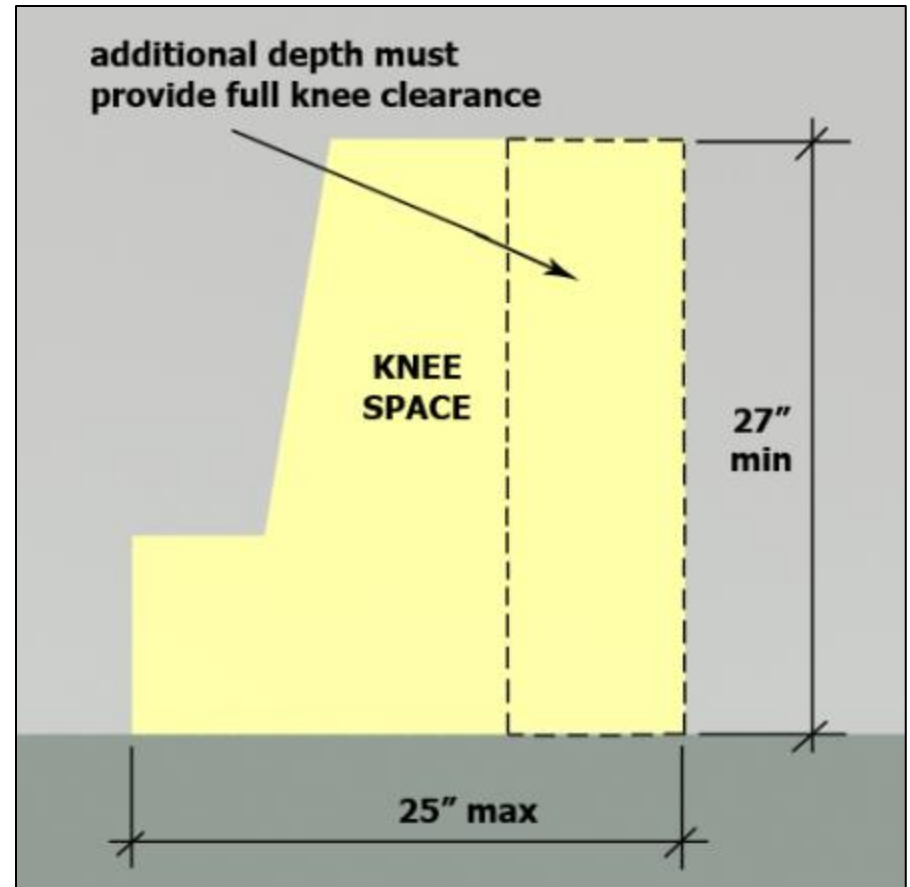
## Knee and Toe Clearances



# Knee & Toe Space



**17" min. depth at DFs, lavs,  
sinks, dining/work surfaces**



**25" max. depth (all  
elements)**

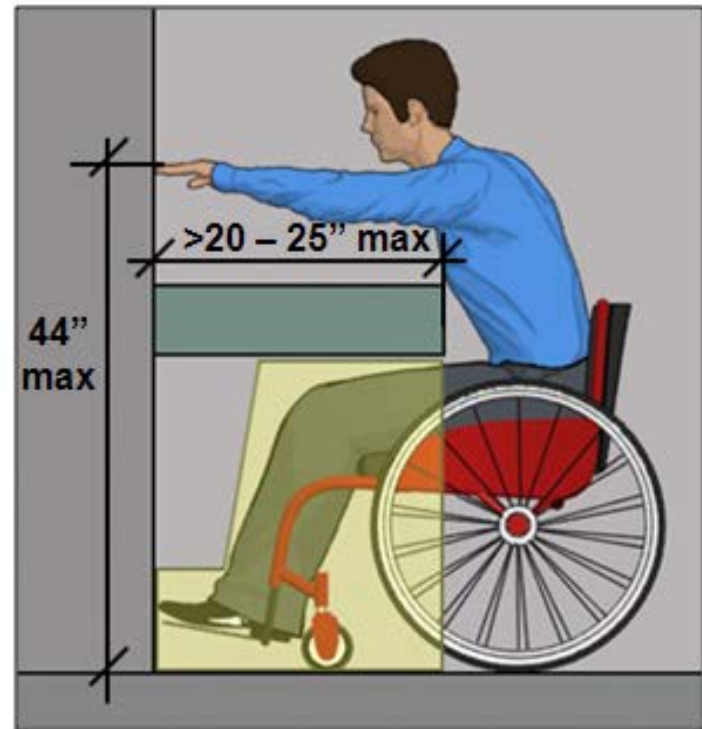
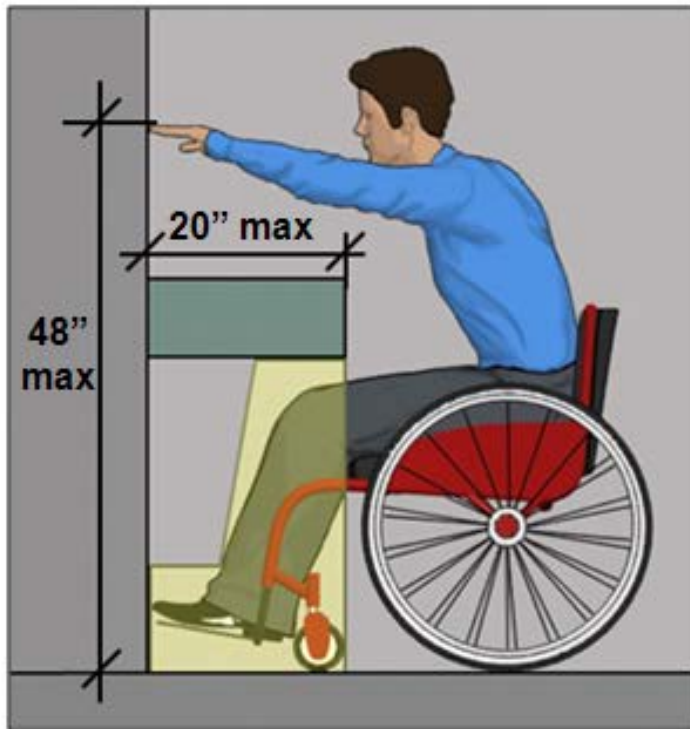
# Knee & Toe Space

Knee/ toe space must equal or exceed the reach depth over obstruction



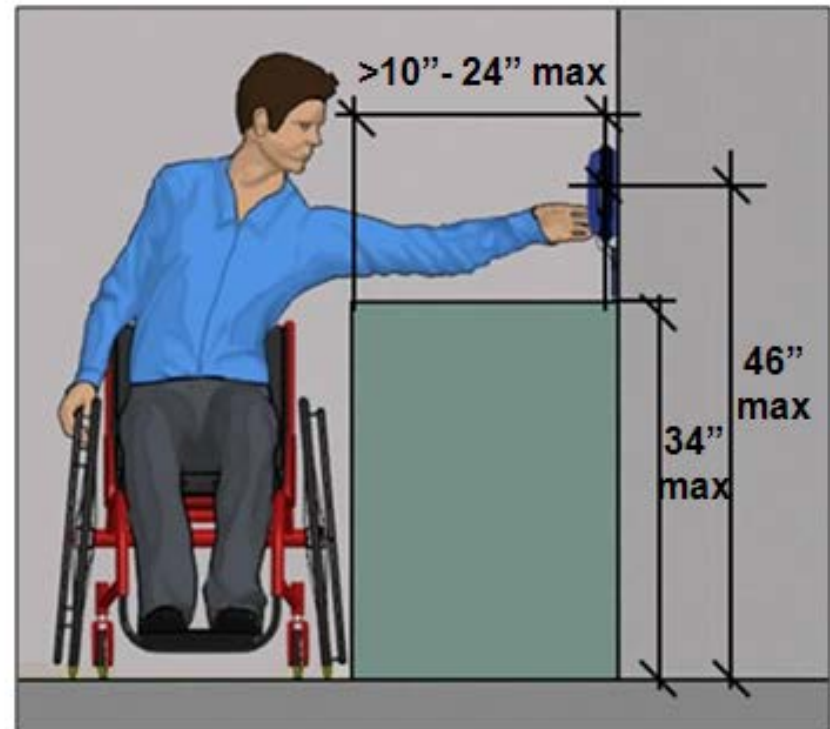
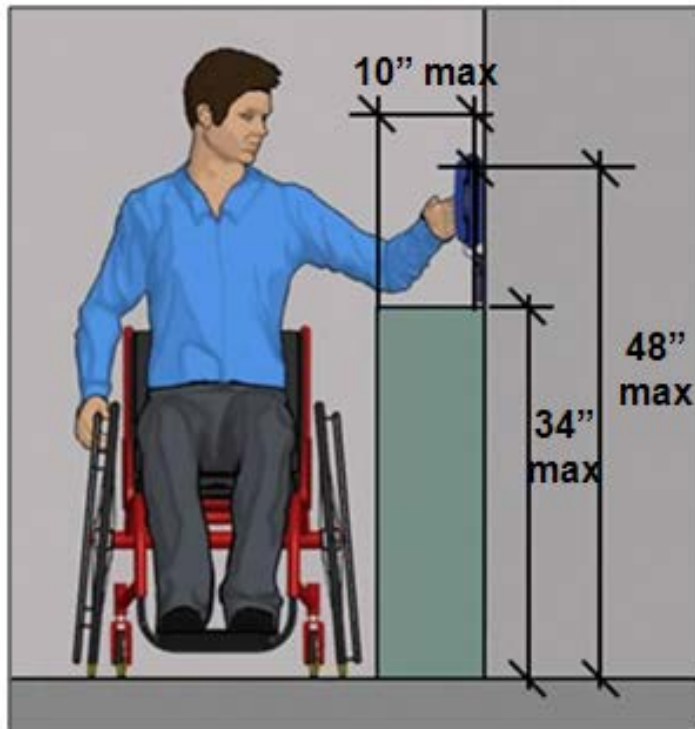
# Reach Range (§308)

Forward reach depth over obstruction limited to 25"  
(max. height reduced to 44" when depth exceeds 20")



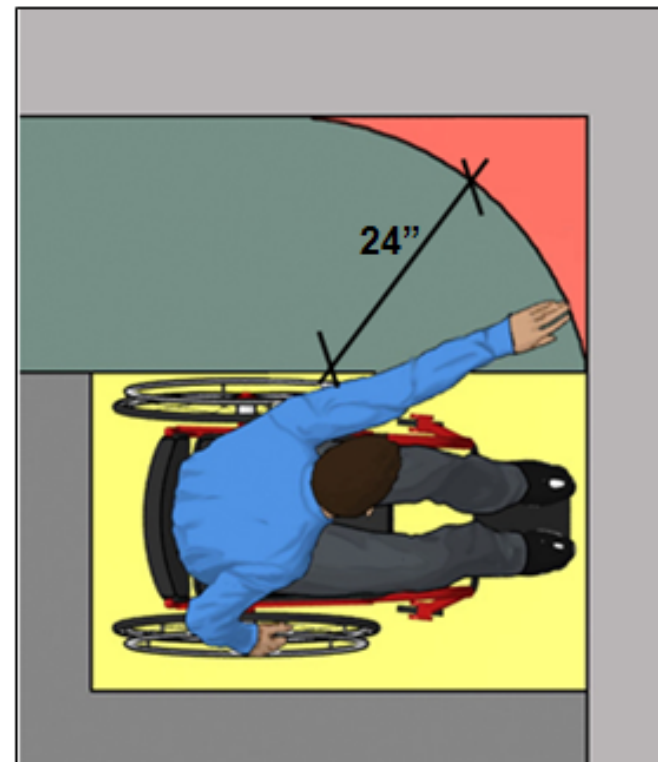
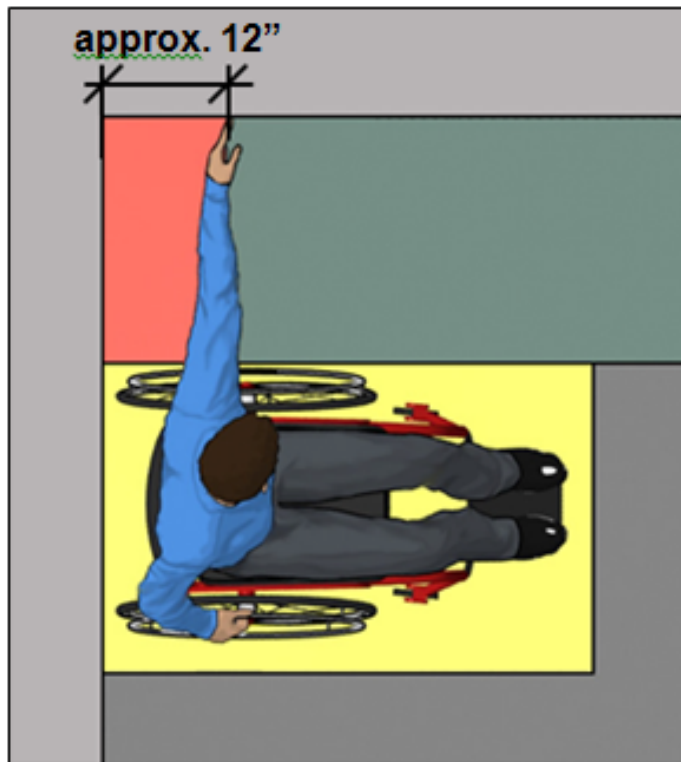
# Reach Range

Side reach depth over obstruction limited to 24"  
(max. height reduced to 46" when depth exceeds 10")



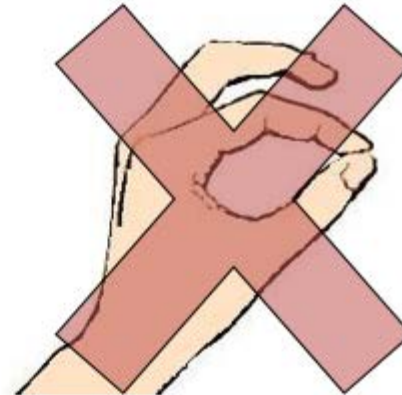
# Reach Range

Elements in corners can be hard to reach (side approach) Recommendation: locate away from corners where possible or within reach radius



# Operability

- 1 hand operation
- no tight grasping, pinching, twisting of wrist
- 5 lbf max.



# Technical Guides on the Standards

Available on the Board's website



**UNITED STATES ACCESS BOARD**  
*Advancing Full Access and Inclusion for All*

The Board | Guidelines & Standards | Training | Enforces

The U.S. Access Board is a federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards for the environment, transportation, communication, medical diagnostic equipment, and information technology.

Communications & IT

- Buildings & Sites
- Recreation Facilities
- Streets & Sidewalks
- Transportation
- Health Care

**BOARD NEWS**

- Board Issues Final Guidelines for Federal Outdoor Recreation Sites (September 26)
- The Rehabilitation Act and Creation of the Access Board (September 26)
- Boy Scouts Improve Accessibility at National River Area (August 20)
- Board Extends Comment Period for Proposed Vessel Guidelines



**U.S. ACCESS BOARD TECHNICAL GUIDE**  
**Operable Parts**

**Operable Parts Covered [§205]**

Compliance is required for operable parts located in accessible routes. Operable parts include light switches, receptacles, thermostats, alarm pulls, automatic doors, and other devices that are used by facility occupants.

**Examples of Operable Parts**

Compliance is required for the operable portion of fixed elements, such as cabinet hardware, if not for operable portions or its non-fixed components, such as the extinguisher.



Provisions for other elements also apply the



**U.S. ACCESS BOARD TECHNICAL GUIDE**  
**Floor and Ground Surfaces**

Specifications for floor and ground surfaces address surface characteristics, carpeting, openings, and changes in level. They apply to:

- interior and exterior accessible routes, including walking surfaces, ramps, elevators, and lifts
- stairways that are part of a means of egress
- required clearances, including clear floor space, wheelchair seating spaces, turning space, and floor maneuvering clearances
- accessible parking spaces, access aisles, and accessible passenger loading zones.

**Firmness, Stability, and Slip Resistance [§202.5]**

Accessible floor and ground surfaces must be firm, stable, and slip resistant. Accessible surfaces remain smooth, level, and free of any protruding objects.





**Questions?**



# **U.S. Access Board**

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

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

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

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



# ADA Standards

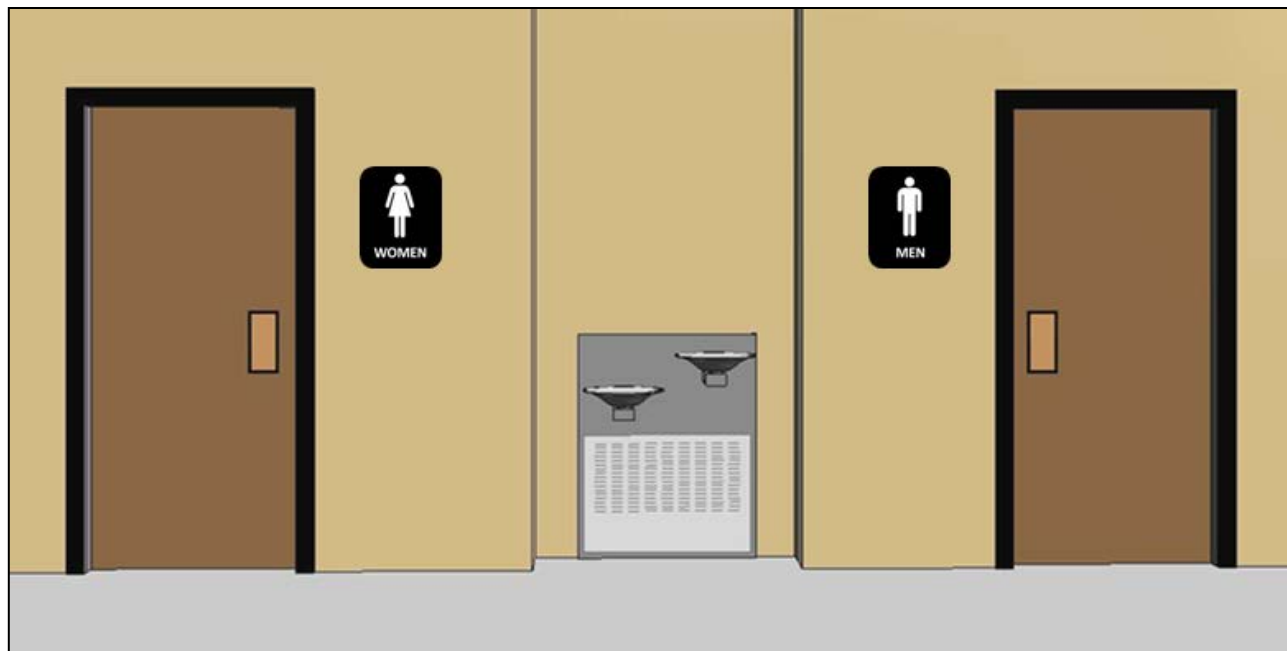
## Part 2

Alterations  
**UNITED STATES ACCESS BOARD**

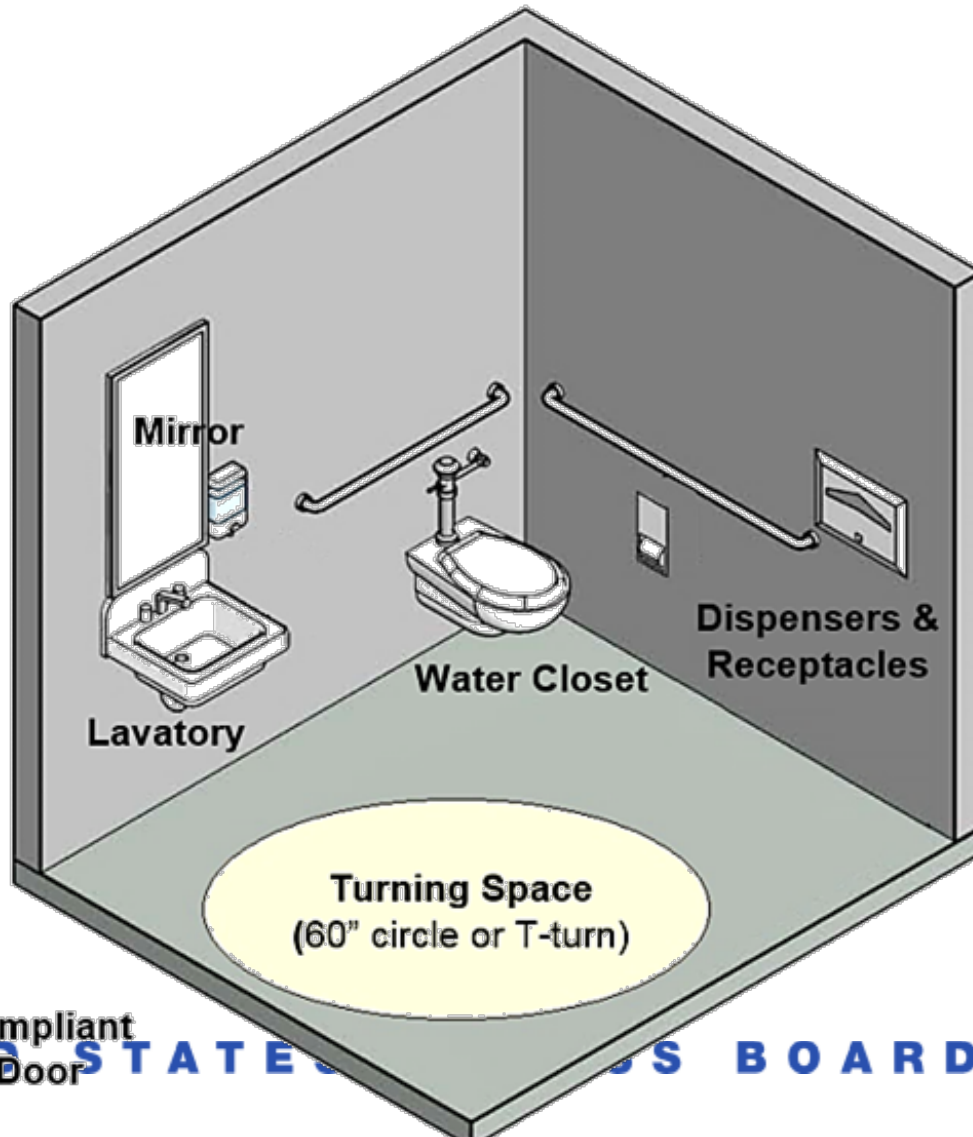
# Toilet & Bathing Facilities (§213)

In new construction, all toilet and bathing facilities must be accessible, except:

- portable units (5% min)
- clustered single user toilet rooms (50% min)



# Toilet Rooms (§603)



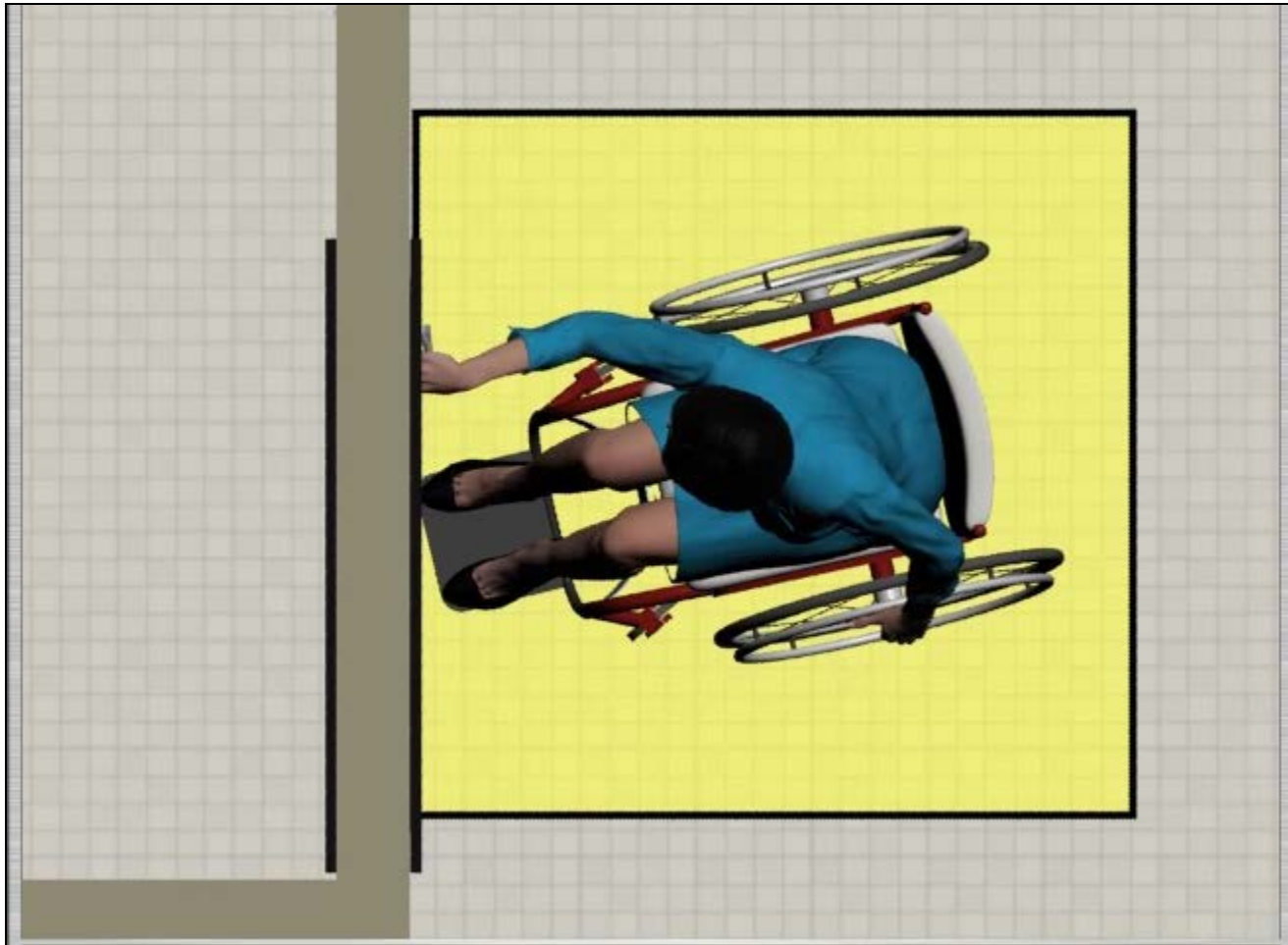
Coat Hooks  
& Shelves



Urinal  
(if more than  
one provided)

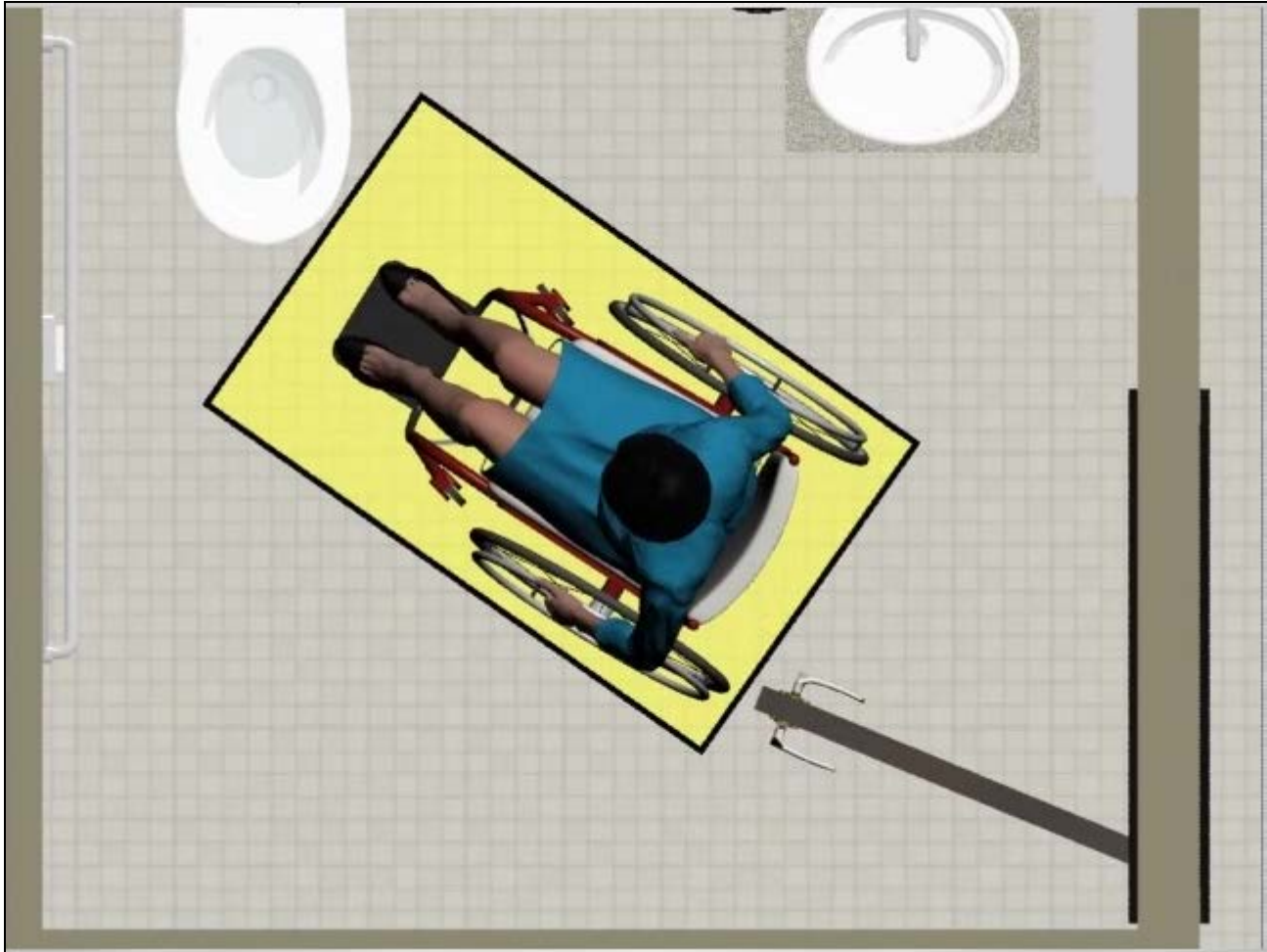
# Toilet Rooms

## Door maneuvering clearance (exterior)



# Toilet Rooms

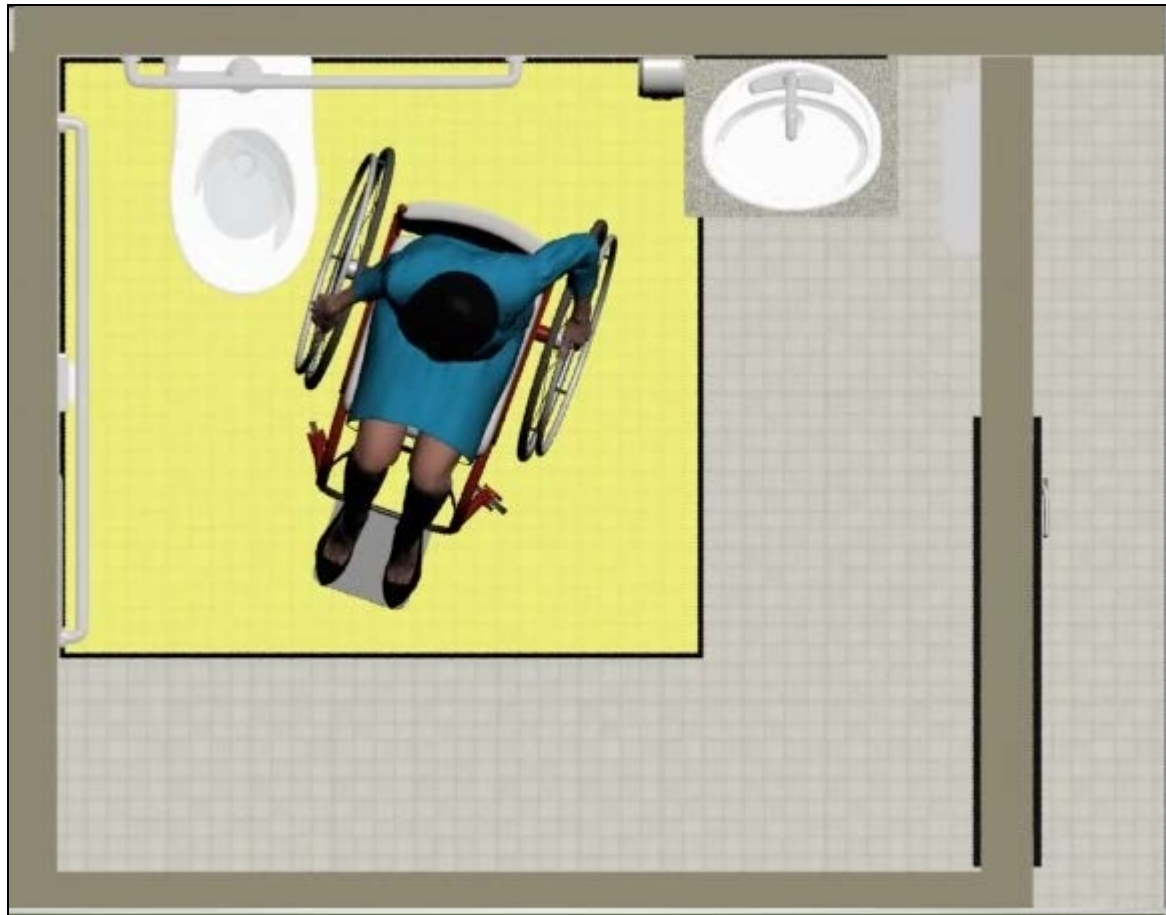
Wheelchair space beyond door swing





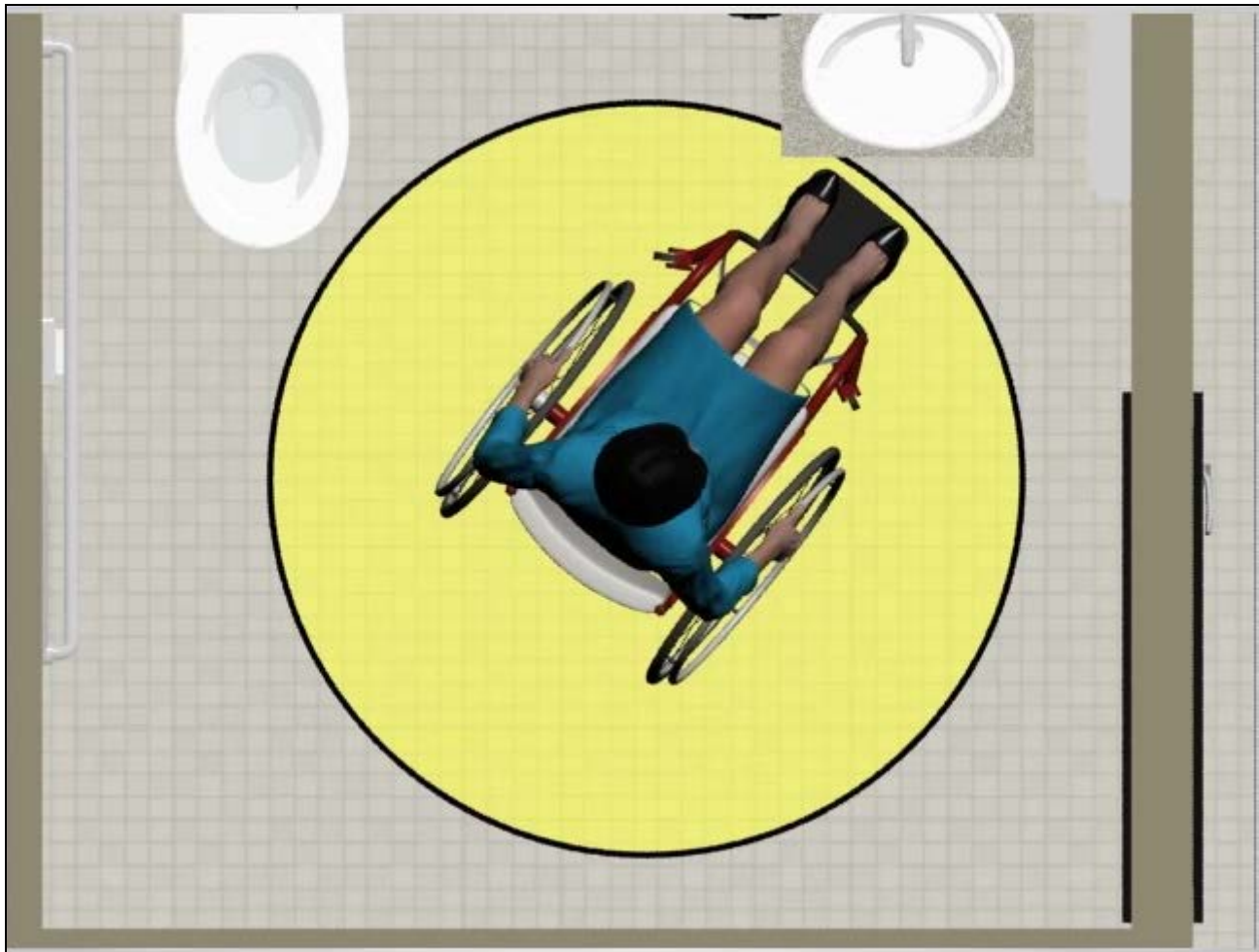
# Toilet Rooms

Clear floor space at toilet for approach & transfer



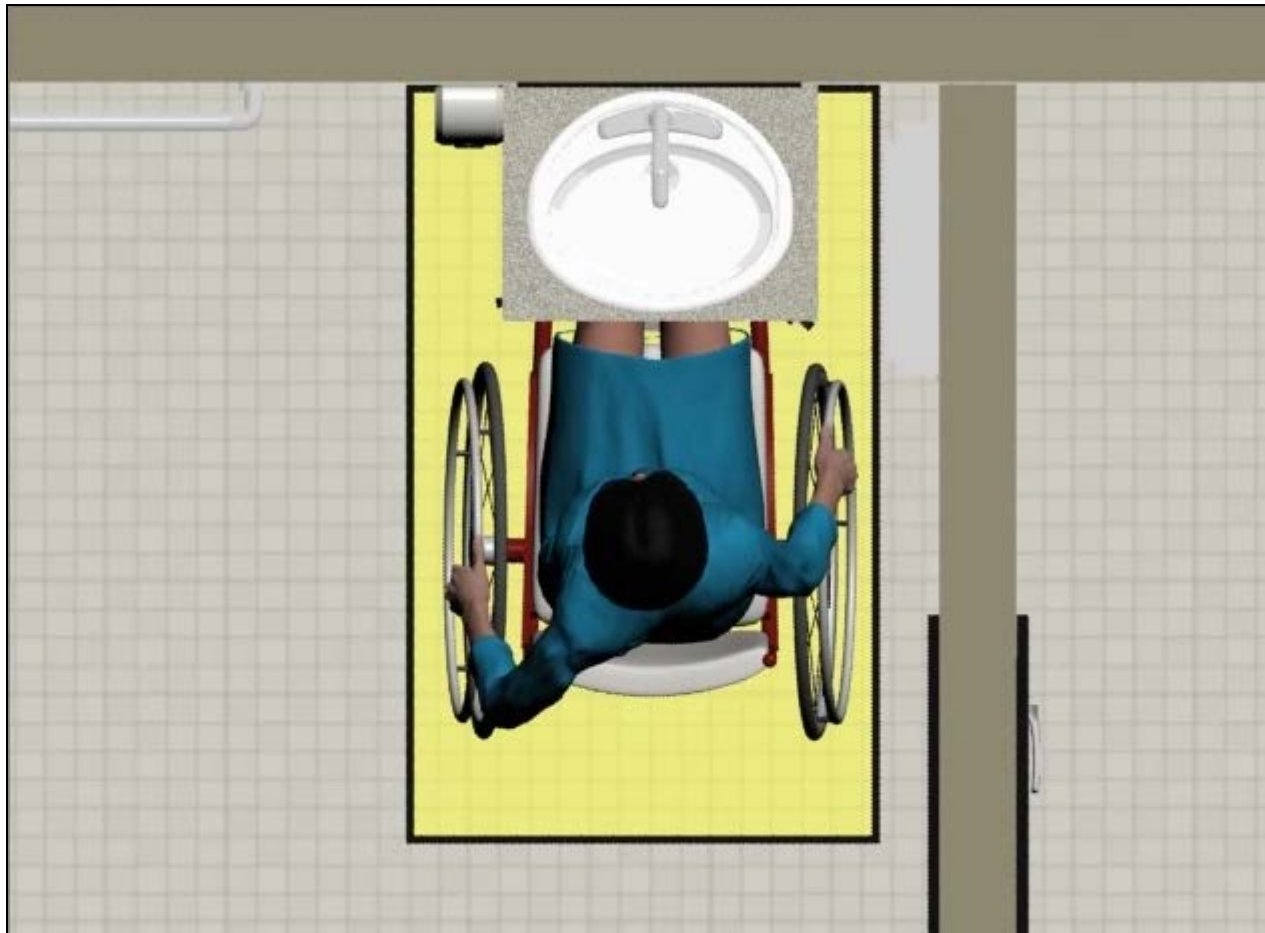
# Toilet Rooms

Turning space (circular or T-shaped)



# Toilet Rooms

Clear floor space at fixtures & elements



# Toilet Rooms

## Interior door maneuvering clearance



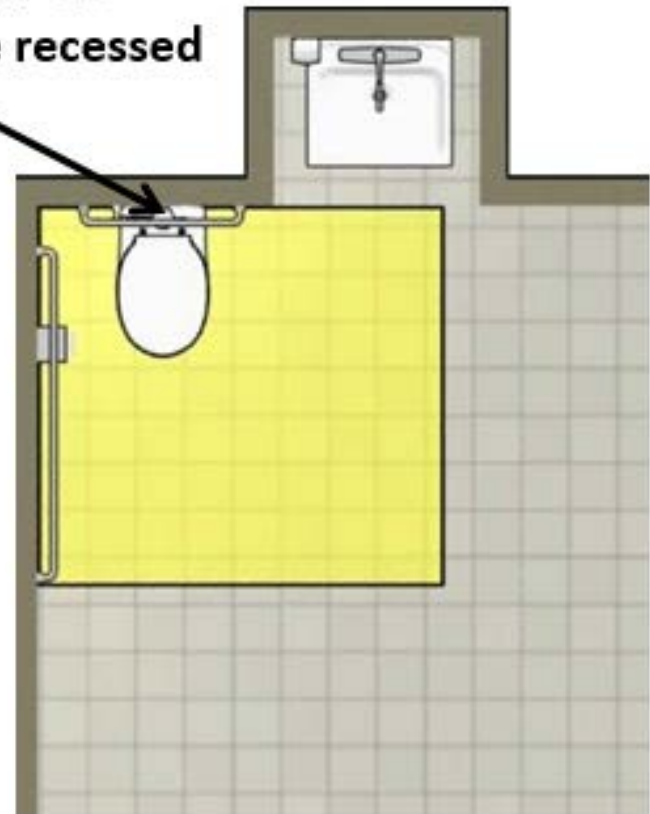
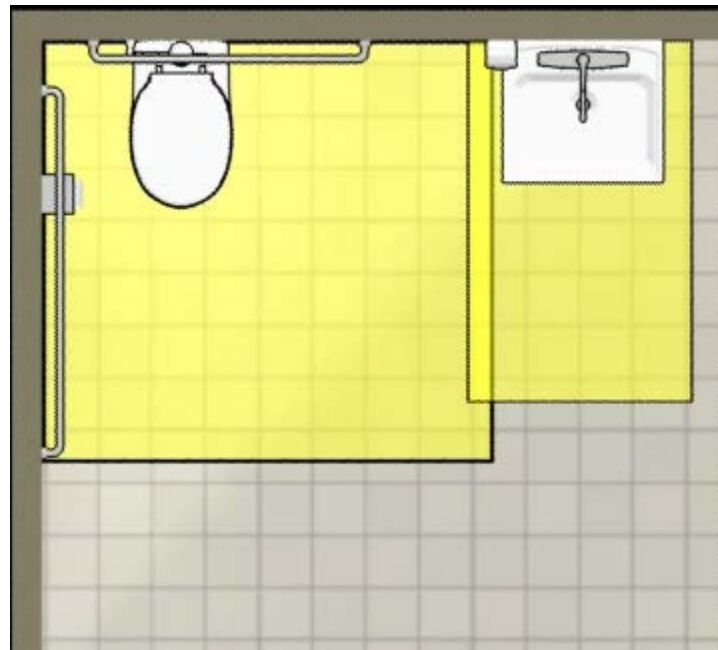
# Toilet Rooms

- **Size of toilet rooms determined by:**
  - **Room layout**
  - **Number & configuration of fixtures**
  - **Swing of doors**
  - **Other factors**
- **Overall room dimensions not specified**

# Toilet Rooms

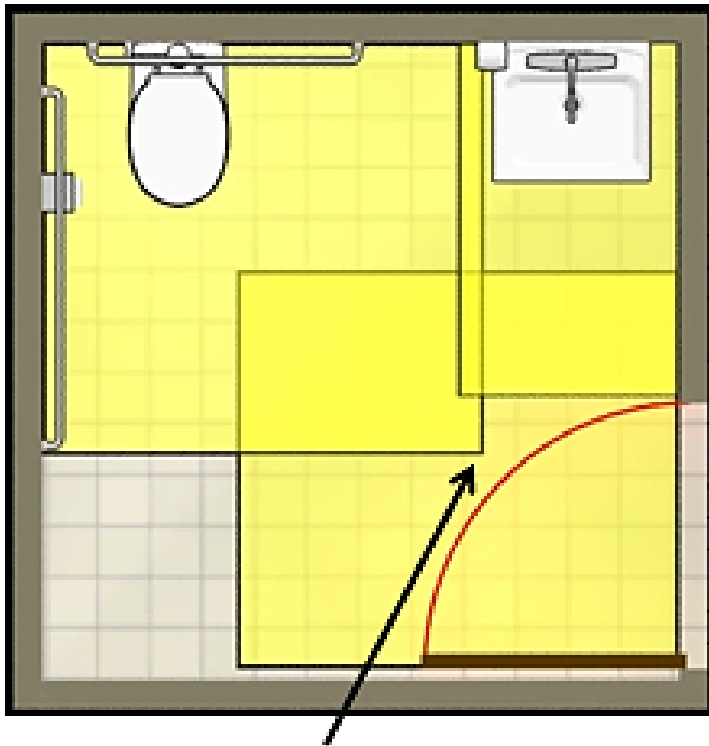
Lavatory cannot overlap toilet clearance  
(except in dwelling units)

Shorter (24" min.) rear GB  
allowed when fixture recessed

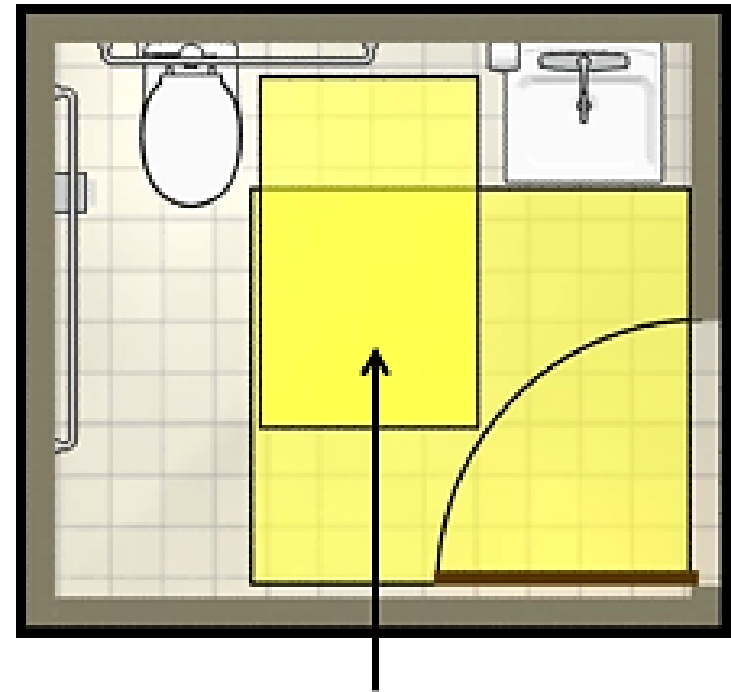


# Toilet Rooms

## Door maneuvering clearance



Keep swing outside fixture clearances or ...

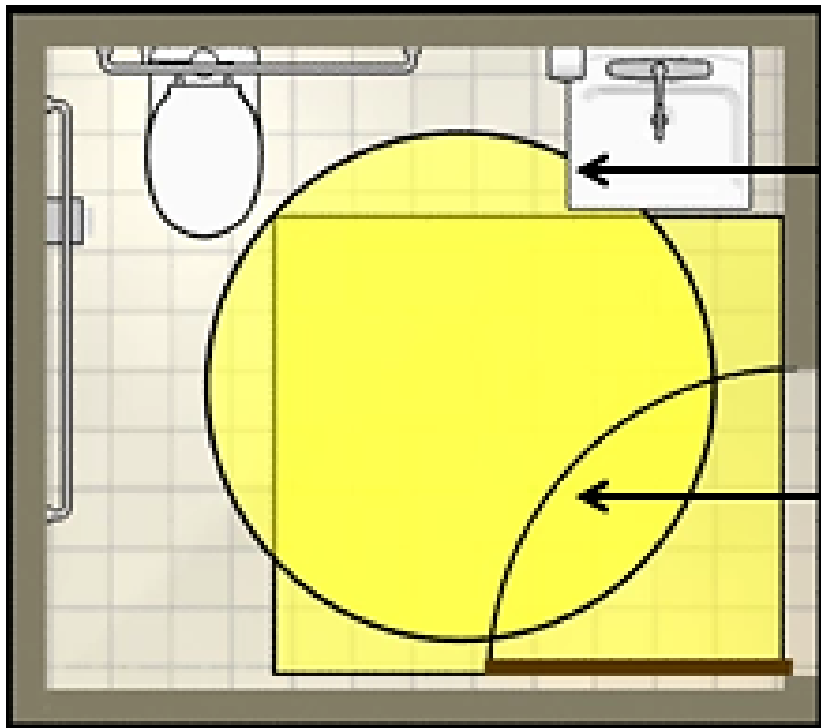


... provide unobstructed clear floor space (30" x 48" min.) outside swing (location not specified)

# Toilet Rooms

**Turning Space:**

**60" diameter circle or "T" shaped space**



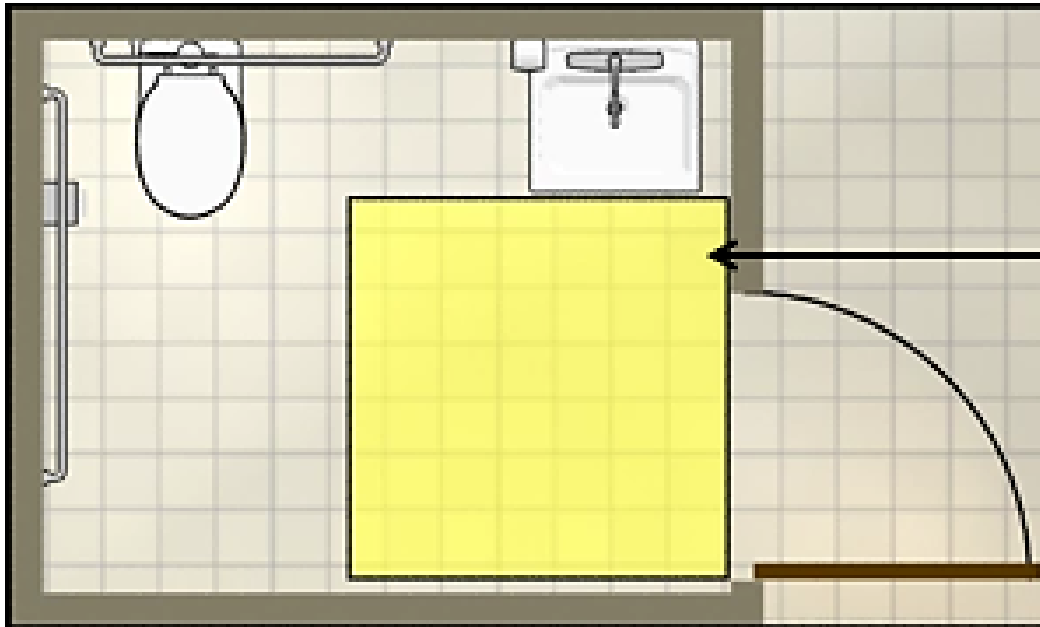
**Elements with knee/toe clearance can overlap turning space**

**Door can always swing into turning space**



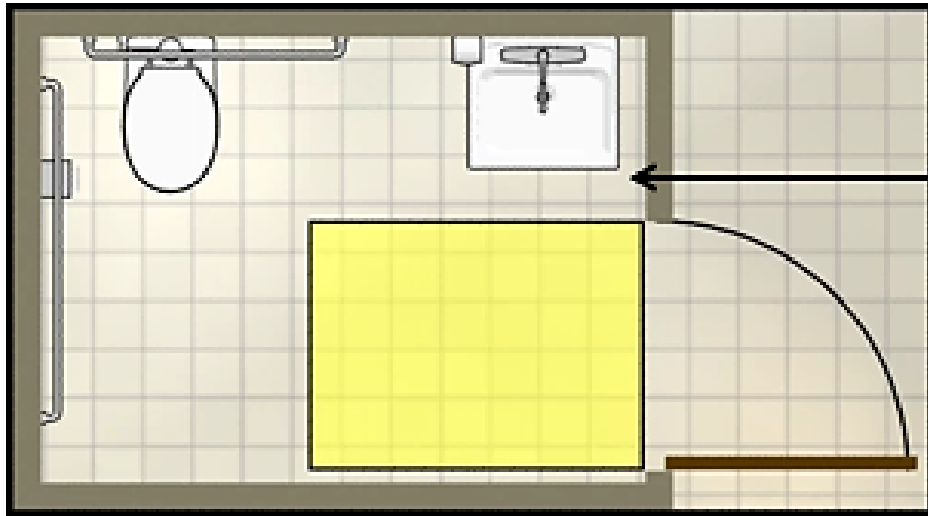
# Toilet Rooms

**Doors: Out-swinging doors allow smaller room size (require less interior maneuvering clearance)**

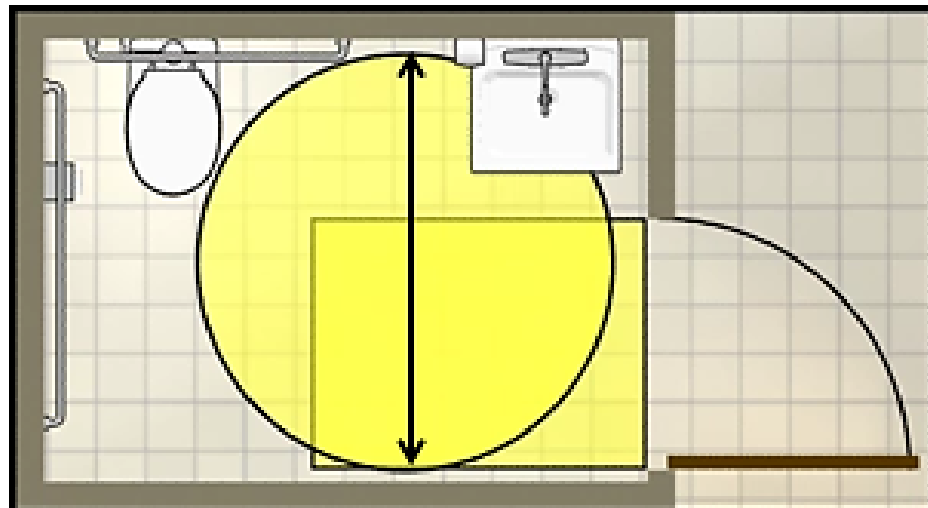


**12" min. latch-side clearance required on push side (forward approach) if door has both a closer & latch**

# Toilet Rooms



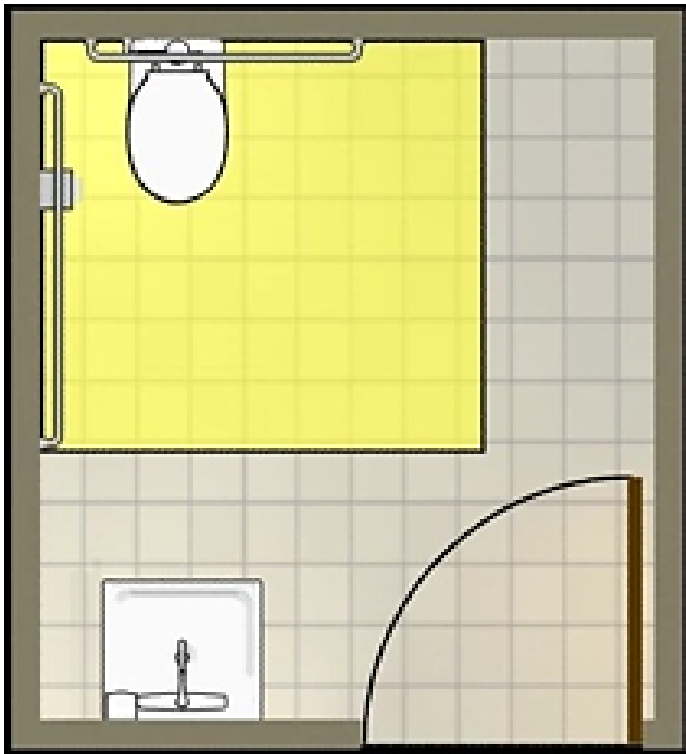
If out-swinging door does not have both a closer & latch, no additional clearance beyond opening required.



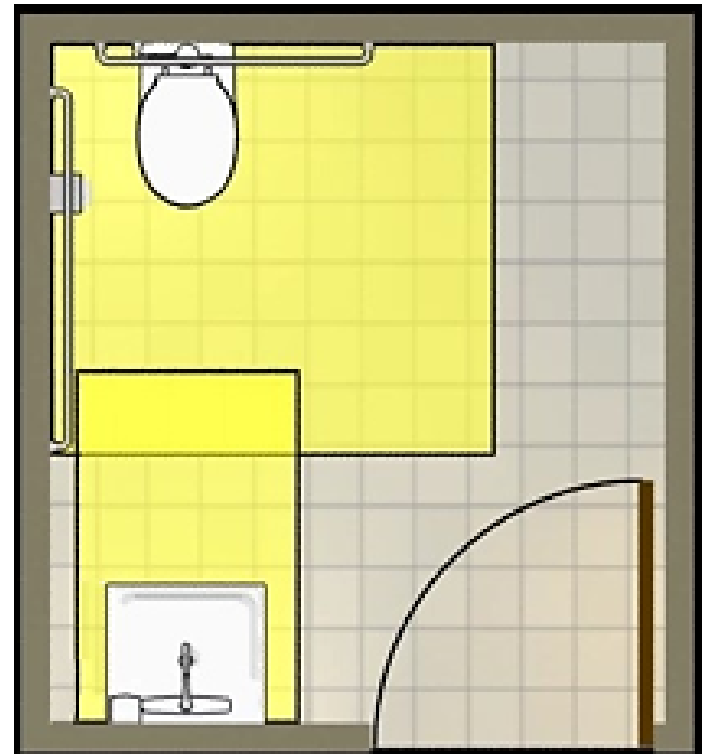
In this case, room depth is usually determined by turning space.

# Toilet Rooms

These requirements apply to all types of layouts

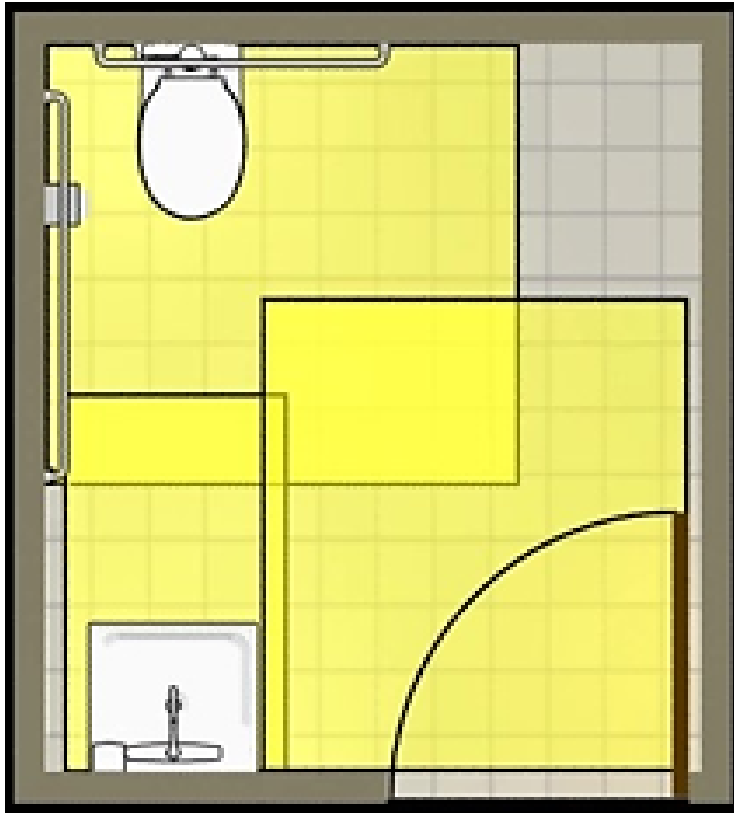


Water closet clearance

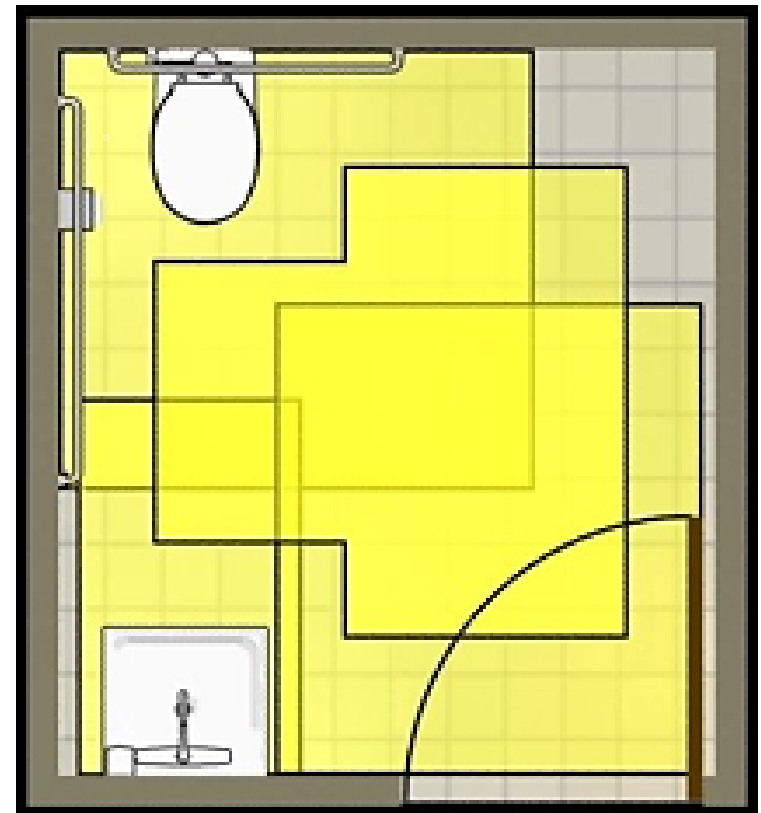


Lavatory clearance

# Toilet Rooms



**Door maneuvering clearance  
(swing outside fixture clearances  
unless clear floor space beyond  
swing provided)**



**Turning space  
(can overlap fixture  
clearances and door swing)**

# **Ch. 6: Plumbing Elements & Facilities**

- **Drinking Fountains**
- **Toilet & Bathing Rooms**
- **Water Closets & Urinals**
- **Lavatories & Sinks**
- **Bathtubs & Shower Compartments**
- **Washing Machines & Clothes Dryers**
- **Saunas & Steam Rooms**

# Ch. 7: Communication Elements & Features

- **Fire Alarm Systems**
- **Signs**
- **Telephones**
- **Detectable Warnings**
- **Assistive Listening Systems**
- **ATMs & Fare Machines**
- **Two-Way Communication Systems**



# Signs (§216, §703)

- Tactile/ visual – labels for permanent rooms & spaces, exit doors
- Visual only – directional or informational signs
- Exempt: temporary signs, building menus, directories, addresses, company names and logos

# Tactile Signs

Signs identifying “permanent” rooms & spaces:

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





# Tactile Signs

- room and floor numbers/letters
- room names
- labels for restrooms, locker rooms, cafeterias, mechanical rooms, and other permanent rooms/spaces
- doors at exit stairways, exit passageways, and exit discharge (label required)
- signs identifying rail stations/entrances



# Signs

## Tactile & Visual

“Room 123”

“Restroom”

“Mechanical Room”

“Exit” (at certain doors)

“Floor B”

“Ballroom A”

“C. Smith Room”

## Visual Only

“Exit →”

“Employees Only”

“Visitors must sign in”

## Exempt

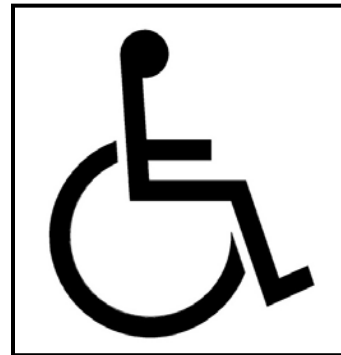
building directory

“Mr. C. Smith, Accountant”

# Signs

## International Symbol of Accessibility

- entrances
- toilet and bathing rooms
- check-out aisles
- parking
- existing elevators



Not required where *all* are accessible

# Ch. 8: Special Rooms, Spaces, & Elements



**Assembly Areas**



**Dressing, Fitting, &  
Locker Rooms**



**Kitchens/Kitchenettes**



**Medical/ Long-term  
Care**



**Transient Lodging**



**Prison Cells**



**Courtrooms**



**Dwelling Units**



**Transportation  
Facilities**



**Storage**

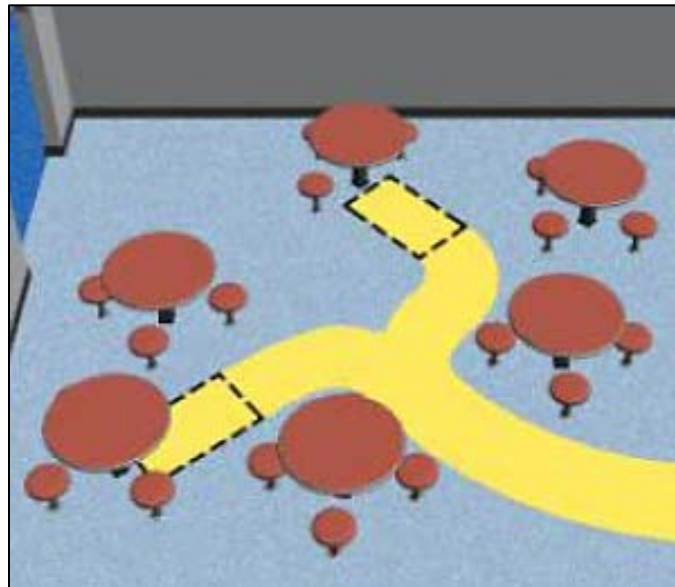
# Ch. 9: Built-In Elements

- Dining Surfaces & Work Surfaces
- Benches
- Sales & Service Counters, Check-out Aisles



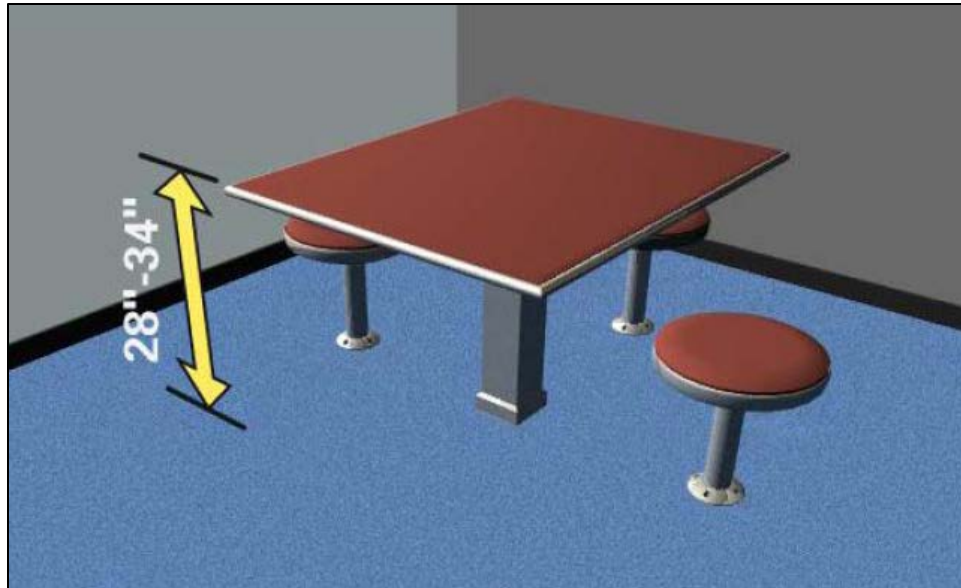
# Dining & Work Surfaces (§226)

- Access to at least 5% of seating & standing spaces at dining surfaces
- Access to at least 5% of work surfaces (other than those used by employees)
- Dispersion



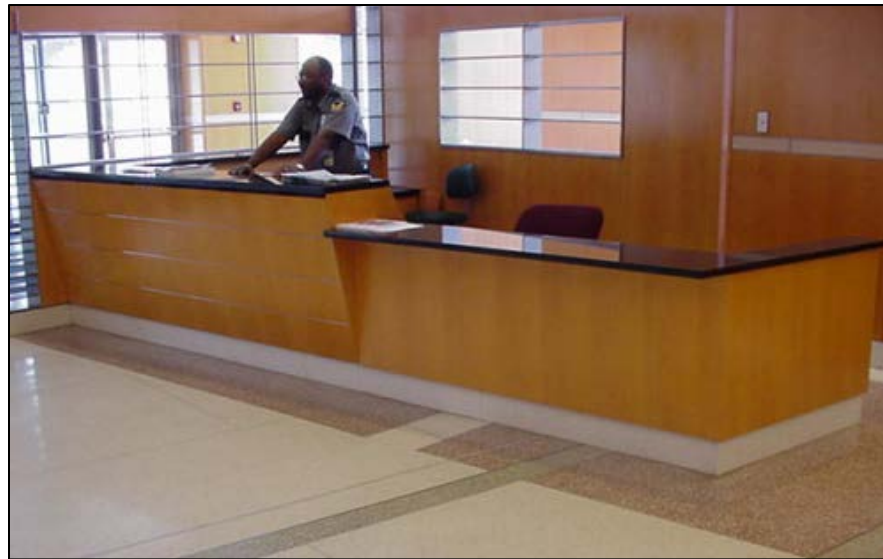
# Dining & Work Surfaces (§902)

- 28" – 34" surface height
- Forward approach access (knee/toe space)
- Alternative dimensions for children's use



# **Sales & Service Counters (§227)**

**At least one of each type of sales and service counter must comply**

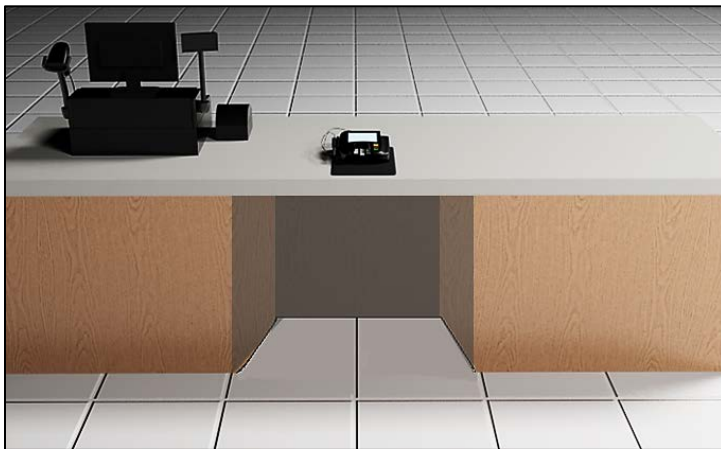


**Queues/ waiting lines and food service lines also addressed**



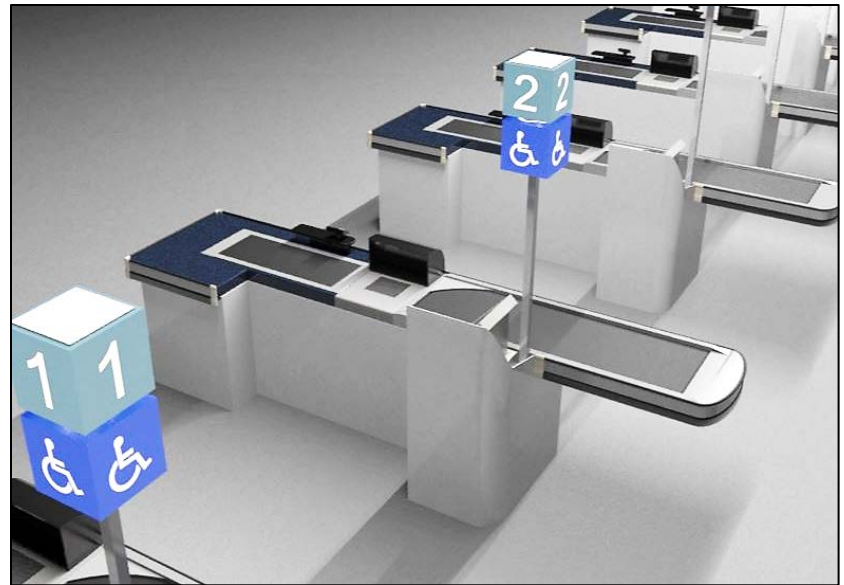
# Sales & Service Counters (§904)

- 36" max. height (accessible portion)
- applies to full depth of counter
- forward or side approach
- method to facilitate voice communication required where security glazing provided



# Check-out aisles (§227)

- aisle width
- 38" max. counter height (2" max. high edge protection)
- check writing surface 28" – 34" high
- labeled by ISA  
(unless all accessible)



# Ch. 10: Recreation Facilities

- Amusement Rides
- Recreational Boating Facilities
- Exercise Machines & Equipment
- Fishing Piers & Platforms
- Golf & Miniature Golf Facilities
- Play Areas
- Swimming Pools, Wading Pools, & Spas
- Shooting Facilities



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# Existing Facility Goal

Alterations



Barrier Removal  
(Public Accommodations)



Program Access  
(State and Local Governments)



Employment



Goal = meet new construction unless an  
exception applies

# Toilet Room Example

**213.2 Toilet Rooms and Bathing Rooms.** Where toilet rooms are provided, [each](#) toilet room shall comply with 603. Where bathing rooms are provided, [each](#) bathing room shall comply with 603.

- EXCEPTIONS:**
1. In [alterations](#) ... *technically infeasible* ... unisex toilet room or bathing ... same area ... same floor ... .
  2. ... [alterations](#) to *qualified historic buildings or facilities* ... no fewer than one toilet room for each sex ... or one unisex toilet room ... shall be provided.
  3. ... multiple single user [portable](#) toilet or bathing units are clustered at a single location, no more than 5 percent of the toilet units and bathing units at each cluster ...
  4. Where multiple [single user](#) toilet rooms are [clustered](#) at a single location, no more than 50 percent of the single user toilet rooms for each use at each cluster ... .

# Alterations (§F202.3)

*“A change to a building or facility that affects or could affect the usability of the building or facility or portion thereof.”*

**Standards apply based on:**

- **planned scope of work**
- **technical feasibility**
- **primary function areas/ path of travel**

# Alterations

Including (but not limited to):

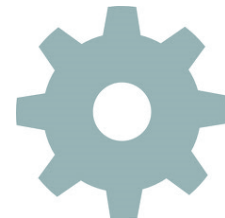
- remodeling
- renovation
- rehabilitation/ reconstruction
- historic restoration
- resurfacing of circulation paths/ vehicular ways
- changes/ rearrangement of structural parts, elements, or plan configuration of walls & full-height partitions



# Alterations

**Not alterations (unless usability affected):**

- **normal maintenance**
- **reroofing**
- **painting or wallpapering**
- **changes to mechanical and electrical systems**



# Alterations

*Example: Parking Lot*

**Filling potholes = maintenance**



# Alterations

*Example: Parking Lot*

**Resurfacing and restriping of lot = alteration**

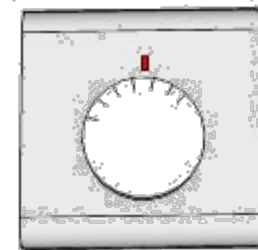
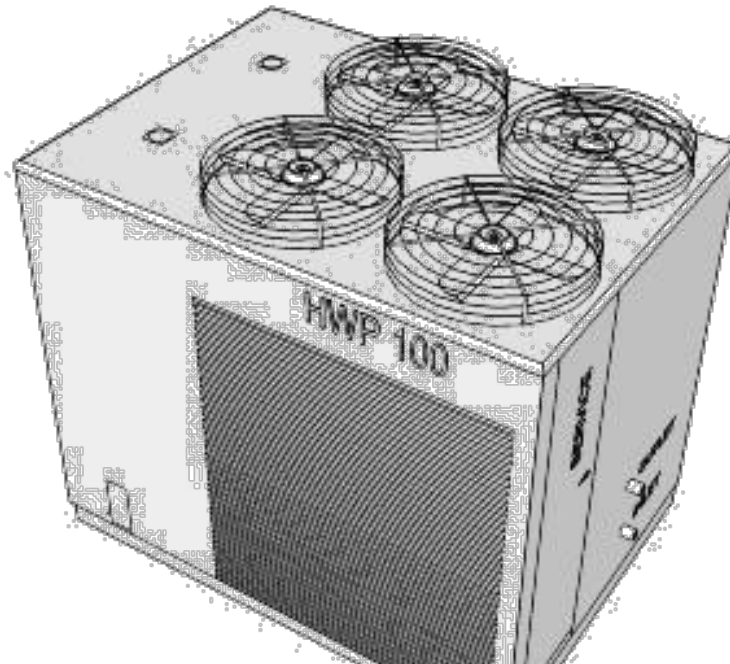


# Alterations

*Example: Replace HVAC system*

**Covered where usability affected**

**(e.g., new thermostats installed – operable parts)**



# 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

## Recommendation:

**Maximize opportunities for access beyond minimum required where possible – often more cost-effective when work is already underway.**

# Alterations

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



# Specific Provisions

## *Example (scoping): Elevators*

If car altered, all cars programmed to respond to the same hall call also must be altered (§206.6.1)





# Specific Provisions

## *Example (technical): Ramp Slope*

**Steeper running slopes allowed for short ramps where space is limited (§405.2):**

**6" max. rise: 1:10 max. slope**

**3" max. rise: 1:8 max. slope**

# Alterations

**New construction = basis for alterations  
(aside from specific provisions/ exceptions)**



**Alterations:**

**not required to exceed NC  
level of access (§202.3.2)**

**NEW CONSTRUCTION LEVEL OF ACCESS**



**can't reduce access below  
NC level (§202.3.1)**

# Technical Infeasibility (§106.5)

Defined as:

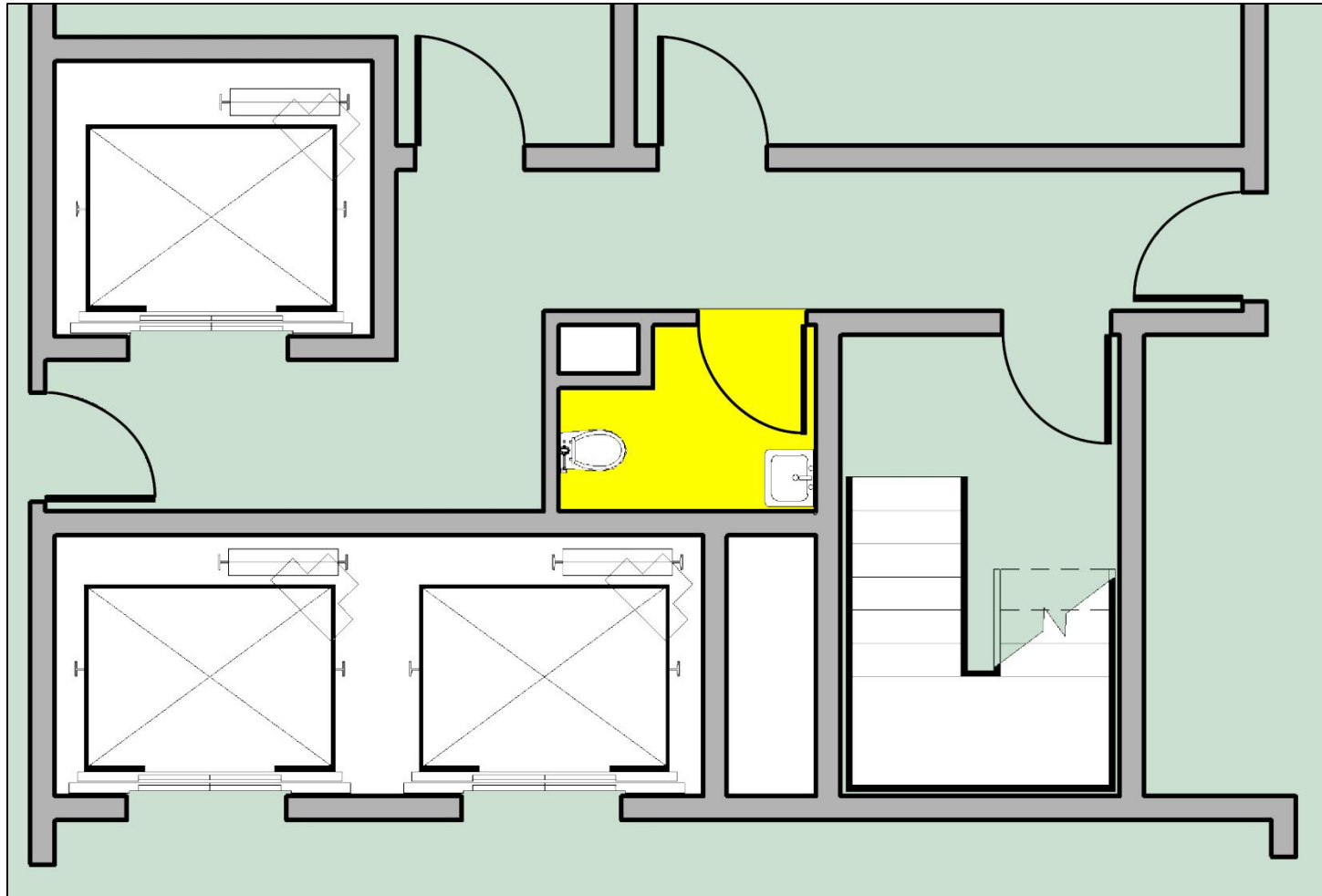
*“Something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame ...*

# Technical Infeasibility

*“... or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements.”*

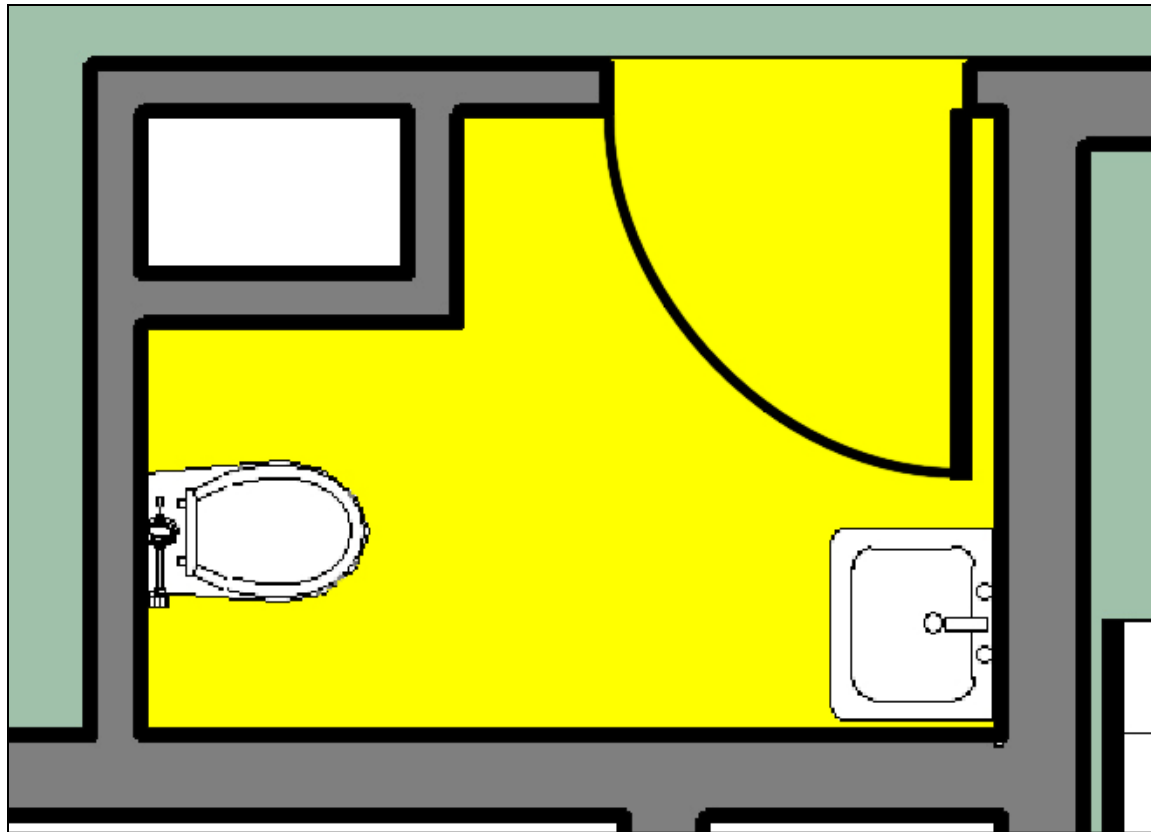
# Technical Infeasibility

Space limitations and technical infeasibility



# Technical Infeasibility

Compliance required to the  
“maximum extent feasible”



# Technical Infeasibility



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

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# 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)

**Additional requirements for alterations (and additions) that affect or could affect usability of/ access to areas containing a “primary function” (i.e., major activity for which the facility is intended)**

# Primary Function Areas

Examples include (not limited to):

- dining areas of a restaurant
- retail space in a store
- exam rooms in a doctor's office
- guest rooms in a hotel
- classrooms in a school
- offices & other work areas where activities of a covered entity are carried out

# Primary Function Areas

*Not primary function areas:*

- entrances & corridors
- break rooms & employee locker rooms
- mechanical & electrical closets
- supply storage rooms
- restrooms (unless primary purpose of a facility, e.g., highway rest stop)

# Primary Function Areas

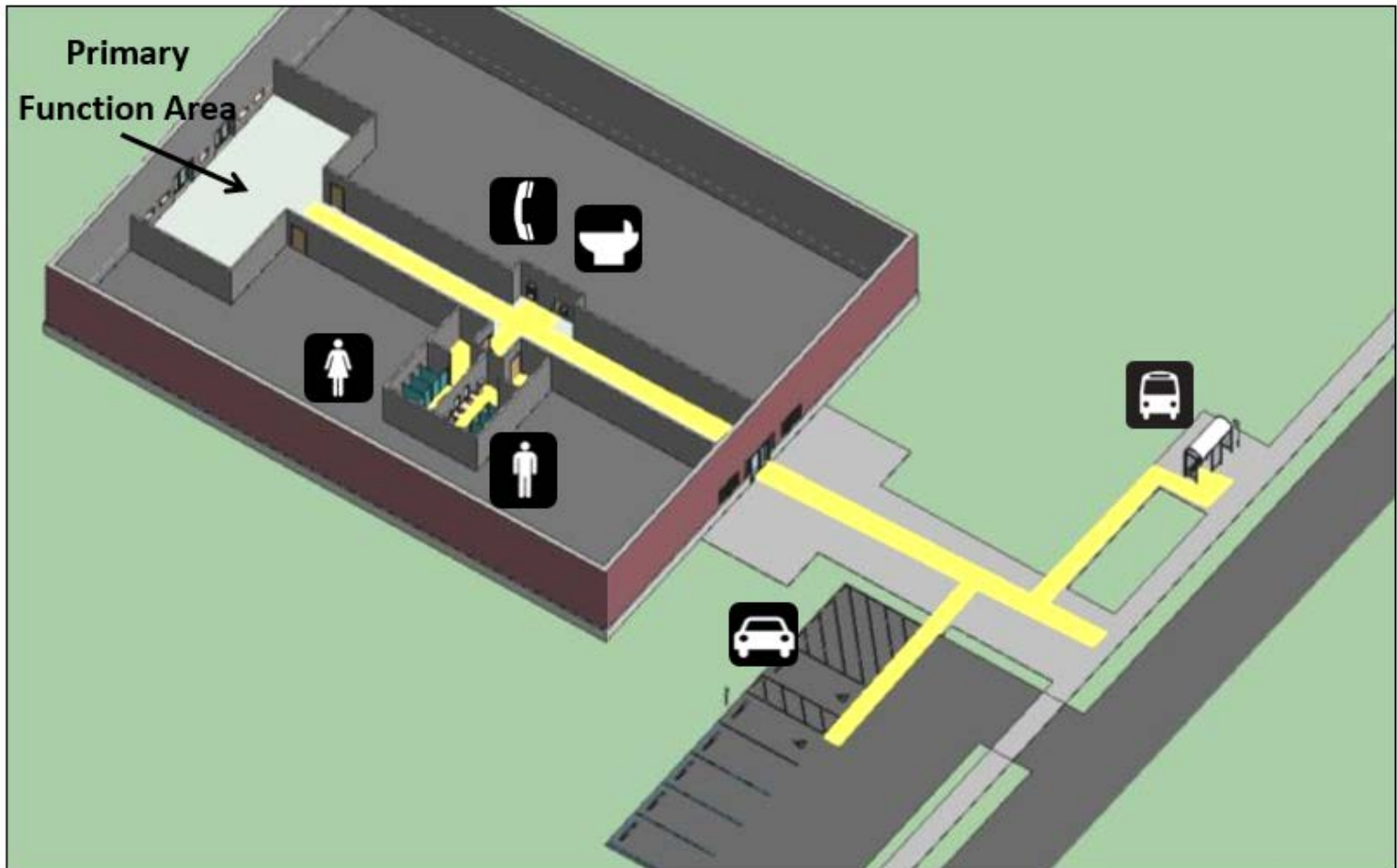
Required: Accessible “path of travel”:

- accessible route from PF area to facility entrance & site arrival points (e.g., parking)
- restrooms (for each sex unless only unisex provided)
- phones
- drinking fountains



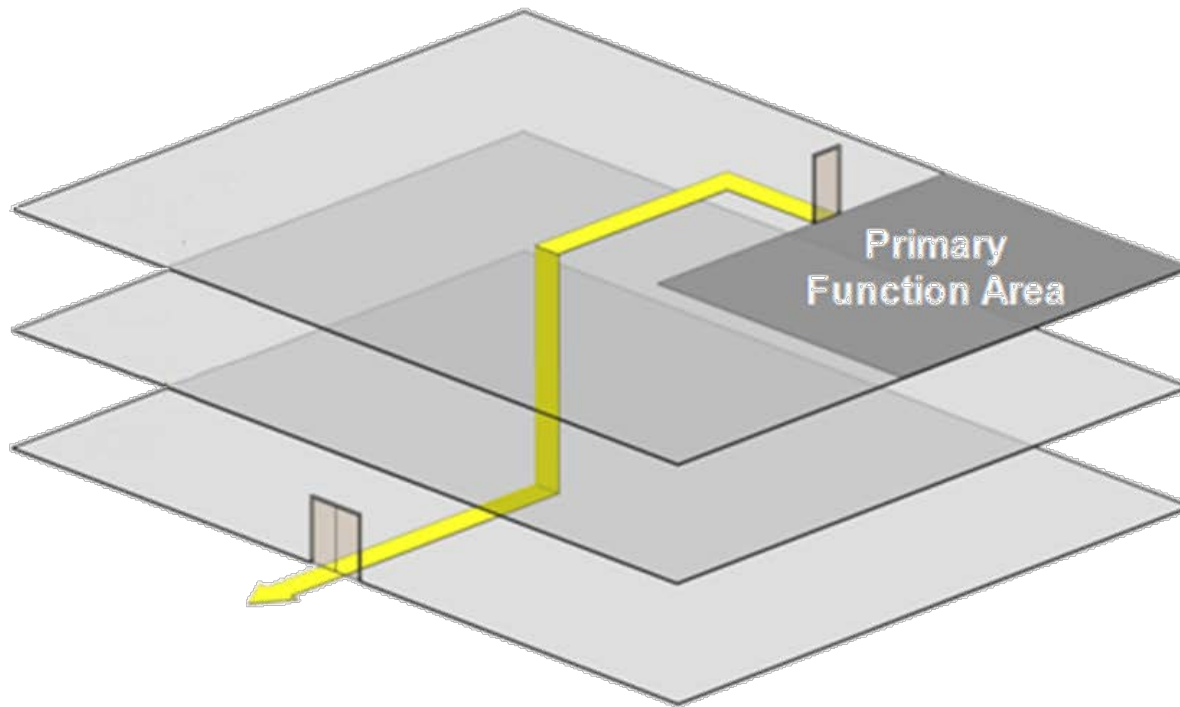
# Alterations: Path of Travel

Example of “path of travel”



# Path of Travel

Path of travel may require vertical access between floors



Exceptions for vertical access allowed in new

UNITED STATES CONSTRUCTION STILL APPLY

# 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

# Path of Travel

*Example project calculation:*



<b>Total cost of <u>all</u> alterations:</b>	<b>\$200,000</b>
<b>Cost pertaining to <u>PF</u> areas:</b>	<b>\$100,000</b>
<b>Path of travel cost cap:</b>	<b>\$20,000 (20%)</b>



# Path of Travel

**Recommended prioritization if 20% cap reached:**

- 1. entrance**
- 2. route connecting primary function area**
- 3. restrooms**
- 4. phone**
- 5. drinking fountain**
- 6. other elements (e.g. parking, storage, etc.)**

# PF Areas & Path of Travel

- **Excluded:** alterations to windows, hardware, controls, electrical outlets, signs
- **POT components that meet earlier standards (e.g., 1991 ADAAG) do not have to be upgraded to the current standards (unless altered)**
- **Series of smaller alterations – costs of alterations over 3 year period must be included in 20% calculation**

**UNITED STATES ACCESS BOARD**



# **U.S. Access Board**

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

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