Picture This!
Identifying Non-Compliant Elements & Spaces

July 11, 2024

Presenters

Debra Martins
Juliet Shoultz
Agenda

• Role of the United States Access Board
• Application of the ADA/ABA Standards
• Application of PROWAG
• Identifying Non-Compliant Elements & Spaces
• Q&A

Role of the Access Board

▪ Promote equality for people with disabilities
▪ Establish accessible design guidelines & standards
▪ Provide technical assistance & training
▪ Enforce accessible design standards (federal sector)
## Standards & Guidelines

### ADA
- Apply to places of public accommodation, commercial facilities & Title II facilities
- Enforceable since 1991

### ABA
- Apply to facilities designed, built, altered or leased with federal funds
- Adopted by GSA, DOD and USPS
- Access Board enforces the ABA through the investigation of complaints

### PROWAG
- Applies in public right-of-way
- Finalized by Access Board August 2023
- Applies to both ABA & ADA covered entities
- Currently pending adoption by enforcing agencies

## Examples of Non-Compliant Elements & Spaces

- Verbal descriptions of each picture example
- Only addressing specific elements in each picture
- Alignment with a provision in the Standard
- Polls integrated into presentation for knowledge check
Toilet Room

§604.3 Water Closet – Clearance
§604.3.1 Size

AccessibilityOnline Webinar Series
Picture This! Non-Compliant Elements
July 11, 2024
§604.3.2 Overlapping Clearances

Lavatory cannot overlap toilet clearance (except in residential dwelling units)

Handrails
§505.4 Height of Handrails

• Top of gripping surface 34” min and 38” max

• **Consistent height** above walking surfaces, stair nosings, and ramp surfaces.

Sales and Service Counters
§904.4 Sales and Service Counters

Accessible portion must be integral – folding/ pull-out shelves not permitted (new construction or alterations)

§904.4.1 Parallel (Side) Approach

- The clear floor space is positioned parallel to the counter. Centering the space is advisable but not required.
- Clear floor space must abut the counter’s leading edge.
- Shelves, displays, and other elements cannot obstruct the clear floor space or offset it from the leading edge of the counter.
- If both sides of the clear floor space are obstructed more than 15”, the space must be longer.
§904.4.2 Forward Approach

- Counter width (30” min) and clear floor space
- Clear floor space must underlap counter to provide enough room to pull up to counter
- Knee and Toe Space required
- Maximum depth under an element (25” max)
- Minimum depth under an element where required (17” max)

Knee and Toe Clearance

16
Door Maneuvering Clearance

§404.2.4.1 Maneuvering Clearance at Manual Swinging Doors and Gates

- Front approach, pull side
- 18” min. beyond latch parallel to the doorway
- 60” min. perpendicular to doorway
Portable Toilets

Accessible Route to Accessible Portable Toilet Unit

- Multiple single user portable toilets clustered at a single location, no more than 5% must be accessible

- Identified by the ISA

- Accessible route to accessible toilet unit
Clear Width

Minimum Accessible Clear Width

**ADA §403.5.1 ABA §F403.5.1:**
- 36”
- In limited cases, reduction to 32” permitted

**PROWAG §R302.2:**
- 48” (no reduction in width permitted)
- 60” minimum through medians and pedestrian refuge islands
- On shared use paths, the entire width must meet be accessible
**Changes in Level**

**PROWAG: R302.6.2**  
**ADA/ABA Standards: 303**  
Changes in level can be up to 1/4” without treatment or 1/2” if beveled with a slope no steeper than 1:2 (50.0%).
Changes in level greater than ½ inch

**PROWAG**
- Changes in level greater than a ½” up to 6” must have a slope no greater than 1:12 (8.3%)
- Changes in level greater than 6” must be treated as a ramp and comply with ramp requirements in R407

**ADA/ABA Standard**
- Changes in level greater than ½” must be ramped and comply with 405 or 406.

ADA/ABA Changes in Level Exceptions §303

1. Animal Containment Areas
2. Areas of Sport Activity
R311.5 Pedestrian Access Route Connection

- Access aisles must connect to *pedestrian access routes*.

- Where *curb ramps* and *blended transitions* are used, they cannot reduce the required width or length of access aisles.

- *Detectable warning surfaces* are not required on *curb ramps* and *blended transitions* used exclusively to connect access aisles to *pedestrian access routes*.
Bus/Transit Shelters

Clear Space Under Bus/Transit Shelter

**ADA/ABA 810.3 Bus Shelters**
- Bus shelters must provide a minimum (30” x 48” clear floor or ground space entirely within the shelter.

**PROWAG: R309.2 Transit Shelters**
- Transit shelters must provide a minimum (30” x 48” clear space entirely within the shelter.)
Operable Parts

**Operable Parts in the Public Right-of-Way**

**R403.4 Operation**

- Must be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist.
- The force required to activate operable parts cannot exceed 5 pounds (22.2 N)
Bathing Rooms

§608.2.2.1 Clearance  
§608.5.2 and Advisory

- 30" wide min by 60" long min clearance adjacent to shower
- Controls, faucets & shower spray unit located above grab bar
- Seat provided: installation on back wall adjacent to the seat

Advisory
- Without seat: shower head located on any of the three walls of the shower **without adversely affecting accessibility.**
When it all goes wrong...

§603.3 Mirrors
§606.5 Exposed Pipes and Surfaces

• Accessible mirror can be located above lavatories
• Above lavatory or countertop = 40” max.
• No lavatory or countertop = 35” max. above finish floor
• Insulated water supply/drainpipes.
• No sharp or abrasive surfaces
Protruding Objects

§307 Protruding Objects

- Minimally protruding objects along entire circulation paths
  - anywhere people are expected to be walking
  - Not limited to accessible routes
- Projection depth measured from cane detection obstruction
Drinking Fountains

§602.2 Clear Floor Space

• Clear floor or ground space
  • Positioned for forward approach
  • **Centered** on the unit
  • Knee and toe space
Reach Range

§308 Reach Range
Unobstructed Reach Ranges

Side Reach: Obstructions 10” max. between element and clear floor or ground space is still considered “Unobstructed”
Obstructed Forward Reach Ranges

Obstructed reach: 44” max. if reach depth exceeds 20”

Obstructed Side Reach

- Obstruction limited to 34” max. height
- Reach 46” max. high if depth exceeds 10”
- 24” max. reach depth
Large Roll Toilet Paper Dispenser

§604.7 Toilet Paper Dispensers

Why is this toilet paper dispenser out of compliance?

• Required to comply with operation (§309.4)
• Not control delivery or does not allow continuous paper flow.
§206.2.1 Site Arrival Points
§402 Accessible Routes
§206.4 Accessible Entrance

- At least one accessible route
- Each site arrival point must be connected by an accessible route to the accessible building entrance.

- Accessible route components: walking surfaces, doorways, ramps, curb ramps, elevators and where permitted, platform lifts

- Changes in level >1/2” must be spanned by ramps, curb ramps, or elevators.
Parking Space Identification

§502.3 Access Aisle

• No elements, including bollards, columns or poles, can encroach into the defined area of access aisles.

• Best practice—static parking space identification
§216.2 Designations
§703 Signs

• Signs for interior rooms/spaces
• Sign not likely to change over time
  • Required for all signs that are up for more than 7 days

• Visual and tactile characters required
• Raised characters required
• Contracted Braille required
• Location—alongside the door at the latch side
Pedestrian Pushbutton Location

BEFORE

ACCESSIBLE PEDESTRIAN PUSHBUTTON

AFTER

Accessible Pedestrian Pushbutton

BEFORE

AFTER
Accessible Pedestrian Pushbuttons

R403.2 Clear Space
- A 30” x 48” minimum clear space must be provided at operable parts.

R406.2 Reach Range Limits
- For forward and parallel approaches, the high reach is 48” max. and the low reach is 15” min. above the ground surface.
- High reach is reduced to 34” max. if parallel approach is obstructed

R403.4 Operation
- Operable with one hand and cannot require tight grasping, pinching, or twisting of the wrist.
- 5 pounds max. force to activate operable parts.

Area of Sport Activity
F206.2.2 Accessible Routes Within a Site

▪ An accessible route is required to connect to the boundary of each area of sport activity.

▪ Area of sport activity: That portion of a room or space where the play or practice of sport occurs

▪ Ex. of areas of sport activity: bowling lawns, soccer fields, basketball courts, baseball fields, running tracks, skating rinks.

▪ Where multiple sports fields or courts are provided, an accessible route is required to each field or area of sport activity.

Compliant Ramps

- Clear Width (§405.5)
- 36" min (between leading edge of handrail)
- Run (§405.6)
- 36" max per run
- Surfaces (§405.4)
- Firm, stable, and slip-resistant (run and landing surfaces)
- Edge Protection (§405.9)
- Along ramp run and landings
- Handrails (§405.8)
- On both sides if rise greater than 6"
Questions?
Submit Questions via the Q&A Option
Questions submitted in the Chat will not be responded to

Technical Guides on the Standards

www.access-board.gov/ada/guides/
U.S. Access Board
(202) 272-0080, Ext. 3

E-mail: ta@access-board.gov
www.access-board.gov

“Advancing Full Access and Inclusion for All”

Webinar Series

• Accessibility Online
  – First Thursday of each month (2:30 – 4:00 p.m. ET)
  – Continuing Education Credits available
  – Live and Self-Paced webinars
  – Archived Webinars available

• Section 508
  – Fourth Tuesday (1:00 – 2:30 p.m. ET)
  – Every other month (January, March, May, July, September, November)
  – Archived Webinars available

Information at:
www.access-board.gov/webinars/
Continuing Education

AIA Provider Number: I017
AICP Provider Name: Great Lakes ADA Center

Course Title: Picture This! Identifying Non-Compliant Elements and Spaces
Course Number: GL20240711
Date: July 11, 2024

Credits earned on completion of this course will be reported to AIA CES for AIA members. Certificates of Completion are available upon request.

This course is registered with AIA, ICC and LA CES for continuing professional education. As such, it does not include content that may be deemed or construed to be an approval or endorsement by the professional organizations of any material of construction or any method or manner of handling, using, distributing, or dealing in any material or product.

Questions will be addressed at the conclusion of this presentation.

Thank you for participating in today’s webinar

Next scheduled session:
Access to Medical Care Facilities, Exam Rooms, and Long-Term Care Facilities
August 1st, 2024