



# Revisions for the 2010 ADA Standards: Plumbing Elements and Facilities

An Online Continuing Education Course for Engineers

**Course Number: BD-1015**

**Credit: 1 Hour / 1 PDH / 1 CPD**

# Revisions for the 2010 ADA Standards: Plumbing Elements and Facilities

## Introduction

The course reviews substantive changes for new construction and alterations resulting from the adoption of new ADA Standards for Accessible Design (2010 Standards) in the final rules for title II (28 CFR part 35) and title III (28 CFR part 36) of the Americans with Disabilities Act (ADA). Scoping and technical requirements are discussed together, where appropriate, for ease of understanding the requirements.

Note that the 2010 Standards consist of:

- Title II - the 2004 ADA Accessibility Guidelines (ADAAG) and the requirements contained in 28 CFR 35.151
- Title III - the 2004 ADAAG and the requirements contained in 28 CFR part 36 subpart D

In addition, the course includes selected public comments received by the Department of Justice (DOJ) in response to its September 2004 Advance Notice of Proposed Rulemaking (ANPRM) and its June 2008 Notice of Proposed Rulemaking (NPRM).

*Note that this course does not provide an exhaustive review of all plumbing requirements of the ADA Standards for Accessible Design. The focus is on changes between the prior requirements and the 2010 requirements. Additionally, this course does not cover every change in the 2010 requirements; rather, it reviews only the substantive changes.*

## 211 and 602 Drinking Fountains



**Figure 1 – Barrier Free Dual Height Drinking Fountain**

Sections 4.1.3(10) and 4.15 of the 1991 Standards and sections 211 and 602 of the 2010 Standards require drinking fountains to be provided for persons who use wheelchairs and for others who stand. The 1991 Standards require wall and post-mounted cantilevered drinking fountains mounted at a height for wheelchair users to provide clear floor space for a forward approach with knee and toe clearance and free standing or built-in drinking fountains to provide clear floor space for a parallel approach. The 2010 Standards require drinking fountains mounted at a height for wheelchair users to provide clear floor space for a forward approach with knee and toe clearance, and include an exception for a

parallel approach for drinking fountains installed at a height to accommodate very small children. The 2010 Standards also include a technical requirement for drinking fountains for standing persons.

## 213, 603, 604, and 608 Toilet and Bathing Facilities, Rooms, and Compartments

**General.** Where toilet facilities and bathing facilities are provided, they must comply with section 213 of the 2010 Standards.

A commenter recommended that all accessible toilet facilities, toilet rooms, and compartments should be required to have signage indicating that such spaces are restricted solely for the use of individuals with disabilities. The DOJ believes that it is neither necessary nor appropriate to restrict the use of accessible toilet facilities. Like many other facilities designed to be accessible, accessible toilet facilities can and do serve a wide range of individuals with and without disabilities.

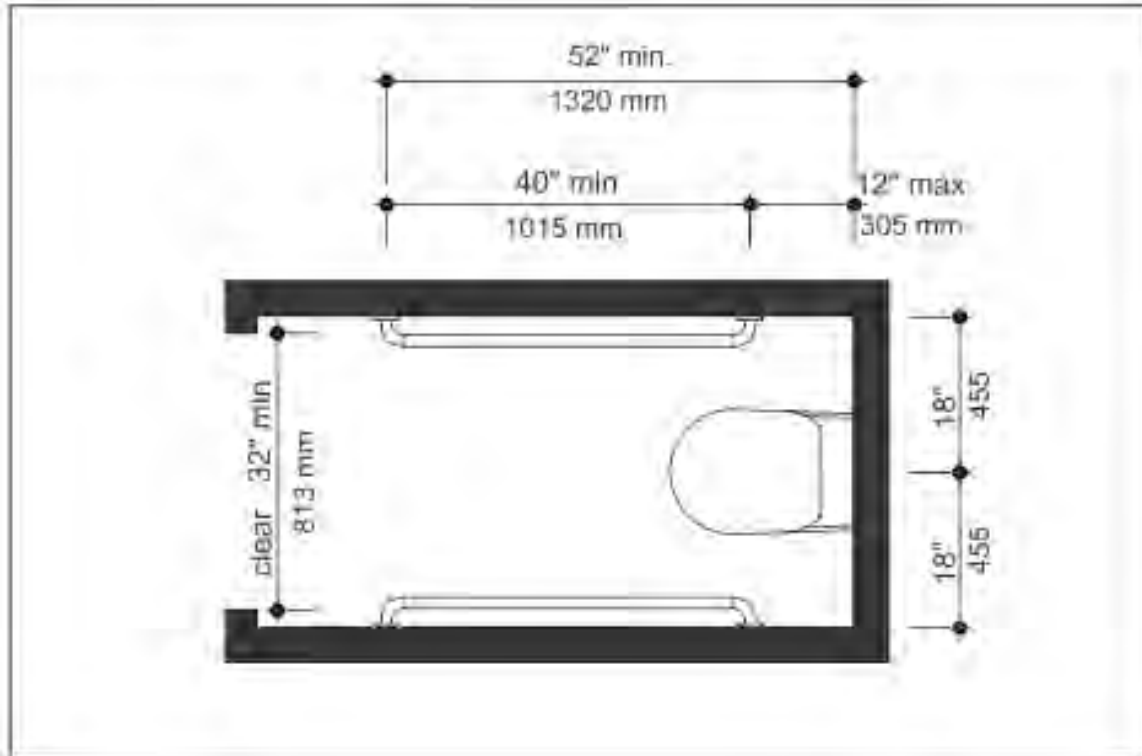


**Figure 2 – The DOJ is considering the need for multiple wheelchair accessible compartments in toilet rooms serving airports and train stations because of travelers with luggage.**

A commenter recommended that more than one wheelchair accessible compartment be provided in toilet rooms serving airports and train stations because these compartments are likely to be occupied by individuals with luggage and persons with disabilities often take longer to use them. The Access Board is examining airport terminal accessibility as part of an ongoing effort to facilitate accessibility and promote effective design.

As part of these efforts, the Access Board will examine requirements for accessible toilet compartments in larger airport restrooms. The DOJ declines to change the scoping for accessible toilet compartments at this time.

**Ambulatory Accessible Toilet Compartments.** Section 213.3.1 of the 2010 Standards requires multi-user men’s toilet rooms, where the total of toilet compartments and urinals is six or more, to contain at least one ambulatory accessible compartment. The 1991 Standards count only toilet stalls (compartments) for this purpose. The 2010 Standards establish parity between multi-user women’s toilet rooms and multi-user men’s toilet rooms with respect to ambulatory accessible toilet compartments.



**Figure 3 – The 2010 Standards require urinals to be counted when considering whether an ambulatory accessible toilet compartment is required.**



**Figure 4 – Toilet rooms with one urinal will no longer be required to provide an accessible urinal.**

**Urinals.** Men’s toilet rooms with only one urinal will no longer be required to provide an accessible urinal under the 2010 Standards. Such toilet rooms will still be required to provide an accessible toilet compartment. Commenters urged that the exception be eliminated. The DOJ believes that this change will provide flexibility to many small businesses and it does not alter the requirement that all common use restrooms must be accessible.

**Multiple Single-User Toilet Rooms.** Where multiple single-user toilet rooms are clustered in a single location, fifty percent (50%), rather than the one hundred percent (100%) required by the 1991 Standards, are required to be accessible by section 213.2, Exception 4 of the 2010 Standards. Section 216.8 of the 2010 Standards requires that accessible single-user toilet rooms must be identified by the International Symbol of Accessibility where all single-user toilet rooms are not accessible.

**Water Closet Location and Rear Grab Bar.** Section 604.2 of the 2010 Standards allows greater flexibility for the placement of the centerline of wheelchair accessible and ambulatory accessible water closets. Section 604.5.2, Exception 1 permits a shorter grab bar on the rear wall where there is not enough wall space due to special circumstances (e.g., when a lavatory or other recessed fixture is located next to the water closet and the wall behind the lavatory is recessed so that the lavatory does not overlap the required clear floor space at the water closet). The 1991 Standards contain no exception for grab bar length, and require the water closet centerline to be exactly 18 inches from the side wall, while the 2010 Standards requirement allows the centerline to be between 16 and 18 inches from the side wall in wheelchair accessible toilet compartments and 17 to 19 inches in ambulatory accessible toilet compartments.

**Water Closet Clearance.** Section 604.3 of the 2010 Standards represents a change in the accessibility requirements where a lavatory is installed adjacent to the water closet. The 1991 Standards allow the nearest side of a lavatory to be placed 18 inches minimum from the water closet centerline and 36 inches minimum from the side wall adjacent to the water closet. However, locating the lavatory so close to the water closet prohibits many individuals with disabilities from using a side transfer. To allow greater transfer options, including side transfers, the 2010 Standards prohibit lavatories from overlapping the clear floor space at water closets, except in covered residential dwelling units.

A majority of commenters, including persons who use wheelchairs, strongly agreed with the requirement to provide enough space for a side transfer. These commenters believed that the requirement will increase the usability of accessible single-user toilet rooms by making side transfers possible for many individuals who use wheelchairs and would have been unable to transfer to a water closet using a side transfer even if the water closet complied with the 1991 Standards. In addition, many commenters noted that the additional clear floor space at the side of the water closet is also critical for those providing assistance with transfers and personal care for persons with disabilities. Numerous comments noted that this requirement is already included in other model accessibility standards and many state and local building codes and its adoption in the 2010 Standards is an important part of harmonization efforts. The DOJ agrees that the provision of enough clear floor space to permit side transfers at water closets is an important feature that must be provided to ensure access for persons with disabilities in toilet and bathing facilities. Furthermore, the adoption of this requirement closely harmonizes with the model codes and many state and local building codes.

Other commenters urged the DOJ not to adopt section 604.3 of the 2010 Standards claiming that it will require single-user toilet rooms to be two feet wider than the 1991 Standards require, and this additional requirement will be difficult to meet. Multiple commentators also expressed concern that the size of single-user toilet rooms would be increased but they did not specify how much larger such toilet rooms would have to be in their estimation. In response to these concerns, the DOJ developed a series of single-user toilet room floor plans demonstrating that the total square footage between representative layouts complying with the 1991 Standards and the 2010 Standards are comparable. The DOJ believes the floor plan comparisons clearly show that size differences between the two Standards are not substantial and several of the 2010

Standards-compliant plans do not require additional square footage compared to the 1991 Standards plans. These single-user toilet room floor plans are shown below.

Several commenters concluded that alterations of single-user toilet rooms should be exempt from the requirements of section 604.3 of the 2010 Standards because of the significant reconfiguration and reconstruction that would be required, such as moving plumbing fixtures, walls, and/or doors at significant additional expense. The DOJ disagrees with this conclusion since it fails to take into account several key points. The 2010 Standards contain provisions for in-swinging doors, 603.2.3, Exception 2, and recessed fixtures adjacent to water closets, 604.5.2, Exception 1. These provisions give flexibility to create compact room designs and maintain required clearances around fixtures. Any alterations must comply to the extent that it is

The requirements around the water closet only to covered residential spaces. The Standards increase a concern about other and coat hooks on the transfer. Section 604. dispensers, sanitary n space. These are item

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low required clearance s. An exception that applies ated no closer than 18 tion 604.3.2 of the 2010 ommenter expressed as dispensers, shelves, d be positioned for a ociated grab bars, erlap the clear floor ar floor space.

**Toilet Room Doors.** Section 2010 Standards permit into the required turning single-user toilet room: permits the door to swing that measures at least 30

and Section 603.2.3 of the ing doors to swing t any fixture. In n 2 of the 2010 Standards an accessible fixture if a clear floor space that measures at least 30 inches is provided outside of the door swing.

Several commenters expressed reservations about Exception 2 of Section 603.2.3. Concerns were raised that permitting doors of single-user toilet or bathing rooms with in-swinging doors to swing into the clearance around any fixture will result in inaccessibility to individuals using larger wheelchairs and scooters. Additionally, a commenter stated that the exception would require an unacceptable amount of precision maneuvering by individuals who use standard size wheelchairs. The DOJ believes that this provision achieves necessary flexibility while providing a minimum standard for maneuvering space. The standard does permit additional maneuvering space to be provided, if needed.

In the NPRM, the DOJ provided a series of plan drawings illustrating comparisons of the minimum size single-user toilet rooms. These floor plans showed typical examples that met the minimum requirements of the proposed ADA Standards. A commenter was of the opinion that the single-user toilet plans shown in the NPRM demonstrated that the new requirements will not