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ACCESSIBILITY CODES AND STANDARDS FOR MULTIFAMILY HOUSING PROJECTS

Christine Scully, President

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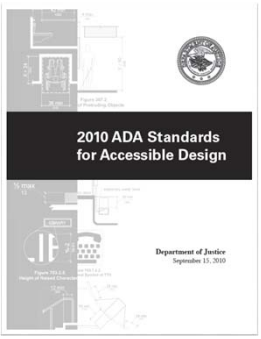
Outline

1. Overview of Federal Codes
2. FHA Safe Harbors and FHA requirements
3. State and Local Codes, IBC and Type A Units
4. Common Errors and Issues
5. Timing for site visits

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2010 ADA Standards

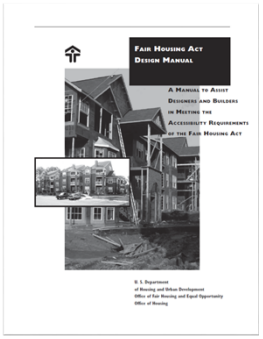
- **Covers:**
 - Leasing centers
 - Employee areas
 - Retail areas
 - Amenities open to members of the public



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Fair Housing Act Accessibility Guidelines

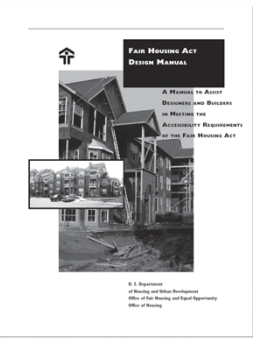
- **Covers:**
 - Multifamily Housing Developments with 4 or more units in one building
 - All units in elevator served buildings
 - First floor units in walk up buildings
 - Resident common use areas



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Fair Housing Act Accessibility Guidelines

- **Dwelling Unit Requirements:**
 - Modest accessibility requirements scoping a large percentage of units
 - FHA units are not "fully accessible" units



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10 Fair Housing Act Safe Harbors:

1. HUD Fair Housing Accessibility Guidelines published on March 6, 1991 and the Supplemental Notice to Fair Housing Accessibility Guidelines: Questions and Answers about the Guidelines, published on June 28, 1994.
2. **HUD Fair Housing Act Design Manual**
3. ANSI A117.1 (1986), used with the Fair Housing Act, HUD's regulations, and the Guidelines.
4. CABO/ANSI A117.1 (1992), used with the Fair Housing Act, HUD's regulations, and the Guidelines.
5. **ICC/ANSI A117.1 (1998), used with the Fair Housing Act, HUD's regulations, and the Guidelines.**
6. Code Requirements for Housing Accessibility 2000 (CRHA).
7. International Building Code 2000 as amended by the 2001 Supplement to the International Codes.
8. International Building Code 2003, with "one condition".
9. **ICC/ANSI A117.1 (2003), used with the Fair Housing Act, HUD's regulations, and the Guidelines.**
10. **2006 International Building Code® (loose leaf)**

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Choosing a Safe Harbor

- Many safe harbors overlap with local building codes and the IBC
- There are pros and cons to each safe harbor
- Most requirements are very similar between the 10 safe harbors
- IBC 2012/2015 and ANSI A117.1-2009 are not yet adopted as safe harbors
- The Fair Housing Act Design Manual is USUALLY the best Safe Harbor to use with IBC 2012/2015

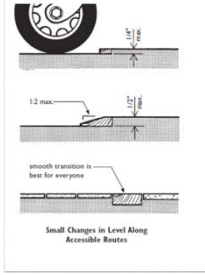
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Fair Housing Act / "Type B" Dwelling Unit Requirement Overview:

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FHA/Type B Unit Requirements

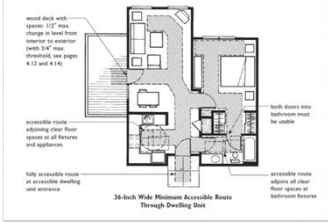
- Doors:
 - 32" clear opening at entry door (3'-0" door)
 - 32" NOMINAL clear opening at user passage doors (2'-10" door)
 - Accessible thresholds and transitions



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FHA/Type B Unit Requirements

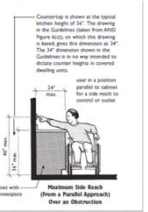
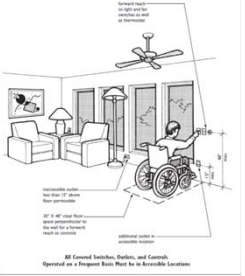
- Route Through Unit:
 - 36" min. clear route throughout unit
 - Accessible thresholds and transitions



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FHA/Type B Unit Requirements

- Accessible Outlets, Switches and Thermostats

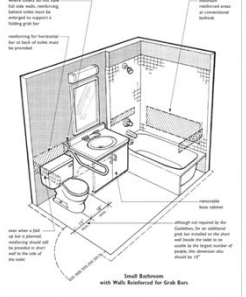




All Covered Switches, Outlets, and Controls Operated as a Protruding Reach Must be in Accessible Locations

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FHA/Type B Unit Requirements

- Grab Bar Reinforcement
 - All tubs, showers and toilets
 - All bathrooms
 - All covered units

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FHA/Type B Unit Requirements

- Kitchens
 - Sink, clear floor space centered for a parallel approach
 - Range, clear floor space centered for a parallel approach
 - Dishwasher, clear floor space can be offset
 - Refrigerator, clear floor space depends on safe harbor

Overlapping Clear Floor Spaces and Accessible Route Provide Maneuvering Space

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FHA/Type B Unit Requirements

- Kitchen Clearances
 - Galley Kitchen or Island, 40" clearance
 - U-shaped kitchen, 60" clearance, some differences with safe harbors

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FHA/Type B Unit Requirements: Bathrooms

- Two Types of Bathrooms:
 - Spec/Option A Bathrooms
 - Spec/Option B Bathrooms

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FHA/Type B Unit Requirements: Bathrooms

- Spec/Option A:
 - All bathrooms in unit
 - Clear floor space at ALL lavatories and bathing fixtures under current FHA Safe Harbors
 - Perpendicular approach allowed at bathtub
 - Parallel approach at shower
- Spec/Option B:
 - Only one bathroom in unit
 - Clear floor space at one lavatory and one bathing fixture
 - Parallel approach required at tub
 - Parallel approach required at shower
 - 34" max. counter height at shower
 - Better option if only using showers

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FHA/Type B Unit Requirements: Bathrooms

- Lavatories:
 - Clear floor space for a centered parallel approach OR removable base cabinet
 - Offset bowl can be used at narrow cabinets
 - 34" max. high counter in Option/Spec B (recommended at all bathrooms for consistency)

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FHA/Type B Unit Requirements: Bathrooms

- Toilets:
 - 48" min. wide x 56" deep
 - Lavatory can overlap if the 33" min. width is provided at back wall
 - 66" min. deep if there is a door in front of the toilet

2
48" X 56"

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FHA/Type B Unit Requirements: Showers

- Showers:
 - Clear floor space for a parallel approach flush with edge of shower and starting at the control wall
 - 36" min. x 36" min. finished size when the shower is the only bathing fixture in the unit
 - On new projects recommend using 1 36" min. x 36" min. shower in units with multiple showers

Guideline Requirements for Clear Floor Space at Showers

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FHA/Type B Unit Requirements: Bathtubs

- Bathtubs:
 - Clear floor space for a parallel approach in Spec/Option B bathrooms
 - Clear floor space for a front approach in Spec/Option A bathrooms

2 Specification "A" Bathrooms 48" X 60"

3 Specification "B" Bathrooms 30" X 48"

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State and Local Accessibility Codes

- Many municipalities adopt IBC
- Some municipalities make modifications to Chapter 11 Accessibility of the IBC
- IBC generally requires 2% of units to be "Type A" adaptable/accessible units

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Type A Units

- Only required by local or state code, not federal standard
- Typically 2% of the units must be Type A
- Commonly referred to as "ADA" or "HC" units
- Higher level of accessibility than FHA/Type B units
- Entity adopting standard can amend Type A requirements that exceed FHA requirements
- If code official allows exceptions, try to get them in writing for file

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Type A Unit Requirements

- Maneuvering Clearances at Doors
 - Entry Door
 - All Bedroom Doors
 - Accessible bathroom door and outside of other bathroom doors
 - Walk in closet doors

FIGURE 1001.2.1 MANEUVERING CLEARANCES AT DOORS

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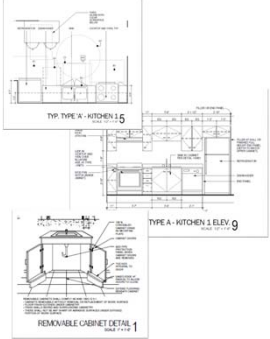
Type A Unit Requirements

- Bathrooms:
 - 1 "accessible" bathroom
 - Turning space
 - Accessible shower or bathtub
 - Toilet with full side wall for a grab bar and grab bar reinforcement
 - Removable base cabinet at lavatory
 - No shower door (may be able to get exception)

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Type A Unit Requirements

- Kitchens:
 - Removable base cabinet at sink
 - Removable base cabinet at "work surface"
 - Accessible height microwave (may be able to get exception)
 - Accessible range hood controls
 - 34" max. counter or adjustable counter at sink and work surface

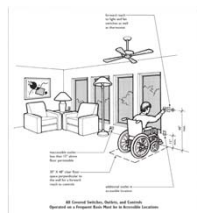


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COMMON ERRORS AND ISSUES

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1. OUTLET, SWITCH, ELECTRICAL PANEL AND THERMOSTAT LOCATIONS



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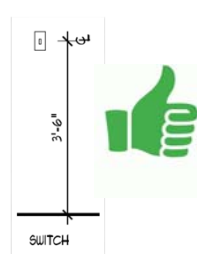
SWITCHES

- Must be 48" max. above finished floor to the top control
- If over a counter, must be 46" max. above finished floor to the top control
- Common issues:
 - Dimensions for switches over counters not given
 - Dimensions don't have sufficient info
 - Architectural drawings and Electrical are inconsistent
- Recommendation:
 - Design switches to be at a lower height than the max. allowable

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SWITCHES

- Switch height is compliant over counter or not over counter
- Provides a tolerance to account for slight errors in the field and flooring changes



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OUTLETS

- If over a counter, must be 46" max. above finished floor to the top control
- For low outlets on wall must be 15" min. aff to the centerline of the bottom receptacle
- Common issues:
 - Dimensions for outlets over counters not given
 - Dimensions don't have sufficient info
 - Architectural drawings and Electrical are inconsistent
 - Outlets are lower than 15" under TV's or windows
- Recommendation:
 - Design outlets to be at a lower/higher height than the min. and max. allowable
 - Space outlets so they are not under windows

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OUTLETS

- Outlet heights show the height to the proper receptacle
- Outlet heights provide a tolerance to account for slight errors in the field and flooring changes

Mounting Height for Outlets

thumbs up

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OUTLETS IN KITCHENS

- Info about horizontal outlet placement rarely provided

Electrical Outlets on Walls Over Cabinets Must Be a Minimum of 36" from a Corner

ELECTRICAL DEVICES—DWELLING UNIT, KITCHEN

NOT TO SCALE

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ELECTRICAL PANELS

- Must be at accessible height in ALL Type B units under ANSI A117.1-2009
- Make sure this is coordinated in architectural and electrical
- Sometimes missed in the field because this is somewhat new

ELECTRICAL PANEL TYPE A AND TYPE B UNITS

thumbs up

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2. TOILET CENTERLINES

*18 min (455) to a fixture
(a) Water Closet Location

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TOILET CENTERLINES

- 18" HOLD to side wall
- 18" MIN. to a short wall or fixture

Common issues:

- Dimension is not clearly noted to FINISHED side wall
- Extra standard of care needed in field to meet centerline

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3. CLEAR FLOOR SPACE AT LAVATORIES

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CLEAR FLOOR SPACE AT LAVATORIES

- Must be provided at a minimum of one lavatory and one bathroom within a unit, sometimes more than one
- Centerline of bowl 24" min. from a side wall OR removable base cabinet

Common issues:

- Centerline of lavatory not dimensioned
- Insufficient info provided to have a removable base cabinet

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CLEAR FLOOR SPACE AT LAVATORIES

- Bowl shown offset on vanity but not dimensioned
- Initial shops show bowl centered on the vanity (not compliant)

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CLEAR FLOOR SPACE AT LAVATORIES

- Bowl is shown offset on vanity
- Bowl centerline is dimensioned
- Initial cabinet shops pick up offset bowl

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4. SHOWER SIZES AND CLEAR FLOOR SPACE

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SHOWER SIZES

- If shower is the only bathing fixture in unit, must be 36" min. x 36" min.
- Larger shower sizes can be used

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SHOWER SIZES

- Common issues:
 - Drawings show a 36"x36" pan, will not provide a finished 36" min. x 36" min. size
- Solution:
 - Spec a larger shower sizes in one bathroom units

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SHOWER CONTROL WALL LOCATION

- Requirement:
 - 30" min. x 48" min. clearance beside shower parallel to fixture and flush with control wall

Guideline Requirements for Clear Floor Space at Showers

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SHOWER CONTROL WALL LOCATION

- Common issues:
 - Drawings do not clearly show control wall or show controls on the wrong wall
 - Coordination issues between architectural and plumbing drawings

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SHOWER CONTROL WALL LOCATION

- Solution:
 - Control wall switched

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SHOWER CONTROL WALL LOCATION

- Solution:
 - Clearly note control wall on drawings
 - Coordinate with plumbing drawings
 - Coordinate between plan and elevation

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SHOWER CLEARANCE DEPTH AND TOILET INTERFERENCE

- Requirement:
 - Clear floor space must be 48" min. deep starting at the control wall

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SHOWER CLEARANCE DEPTH AND TOILET INTERFERENCE

- Common issue:
 - Toilet depth and elongate bowl not accounted for
- Solution:
 - Use rounded bowl toilet

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MANEUVERING CLEARANCES AT DOORS

- Requirement:
 - Maneuvering clearances required at:
 - Common area doors
 - All unit entry doors, outside of door
 - Under ANSI A117.1-2009, all unit entry doors, inside of door
 - Doors throughout Type A units

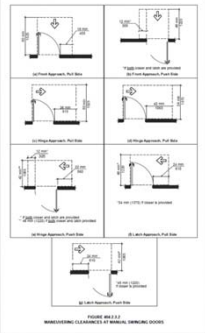
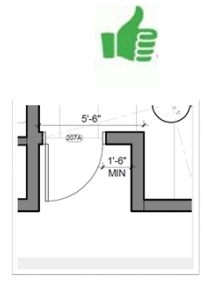


FIGURE 802.2.1
MANEUVERING CLEARANCES AT VARIOUS OPERATING DOORS

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MANEUVERING CLEARANCES AT DOORS

- Common Issues:
 - Drawings do not dimension horizontal door location
 - Insufficient information provided to locate door correctly
- Solution:
 - Dimension maneuvering clearance
 - Dimension door centerline



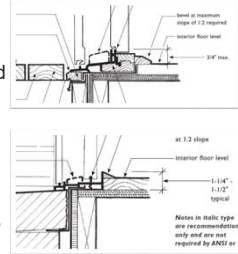
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8. BALCONY DOORS

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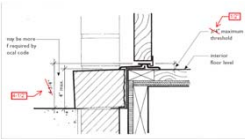
SLIDING BALCONY DOORS IN TYPE B/FHA UNITS

- Common Issues:
 - Thresholds not compliant, would need to recess the threshold to get the 3/4" max. level change inside
 - Door clear opening: A 6' sliding glass door will typically only provide a 28-1/2" clear opening, must be 31-3/4" clear
- Solution:
 - Use swing doors



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SWING BALCONY DOORS IN TYPE B/FHA UNITS



- Common Issues:
 - High thresholds used to keep water out
 - Door clear opening: A 6' sliding glass door will typically only provide a 28-1/2" clear opening, must be 31-3/4" clear
 - Compliant door clear opening not provide
- Solution:
 - Make sure threshold is 1/2" max. high from interior finished floor to top of threshold
 - Take advantage of the 4" level change allowed from interior of unit to impervious deck surface
 - Sometimes a leaf as wide as 40" is needed to provide a 31-3/4" clear opening

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9. SITE WORK AND CURB RAMP ISSUES

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SITE WORK AND CURB RAMP ISSUES

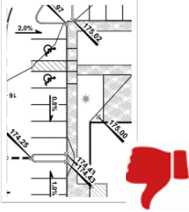
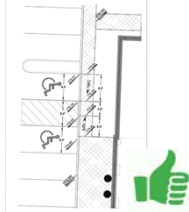
- Common issues:
 - Insufficient information provided regarding sidewalk slopes, parking and curb ramps

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SITE WORK AND CURB RAMP ISSUES

- Issues:
 - Insufficient detail provided
 - Curb ramp slopes not resolved

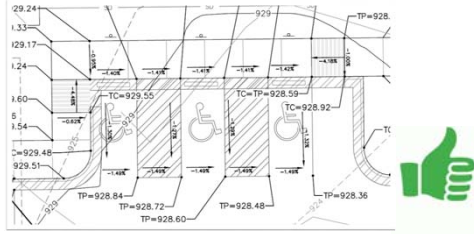
- Solution:
 - Accessible parking spaces shifted
 - Curb ramps detailed

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SITE WORK AND CURB RAMP ISSUES

- Solution:
 - Details about grades and spot elevations provided
 - Incorporates tolerances



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10. MAILBOXES

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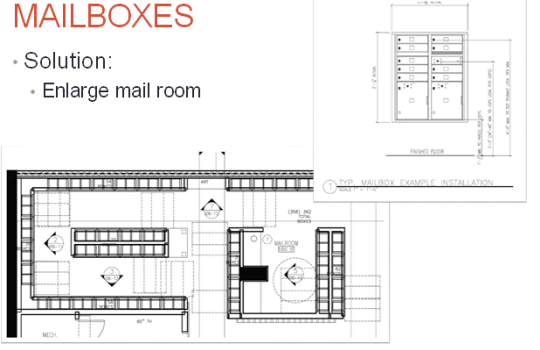
MAILBOXES

- Issues:
 - HUD feels that all mailboxes serving covered FHA units must be at an accessible height
 - In elevator served building, ALL mailboxes
 - High reach range is 48" max. aff for most projects, 54" if some safe harbors are used
 - Post office will usually have low reach requirements

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MAILBOXES

- Solution:
 - Enlarge mail room



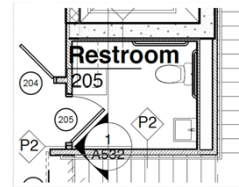
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11. DRAWING ISSUES

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INSUFFICIENT INFO:

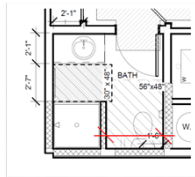
- Examples:
 - Maneuvering clearances not dimensioned
 - Mounting heights not included
 - Clearances shown but not dimensioned



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NO TOLERANCE IN DESIGN:

- Examples:
 - Ramps designed to the max. allowable slope
 - Clearances designed to the min. allowable clearances
 - Wall finishes, drywall and wall base not accounted for



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TIMING SITE VISITS:

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FRAMING

- 1st phase/floor of units framed
- Outlet, switch and thermostat boxes in sampling of unit
- Grab bar reinforcement in a sampling of units

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DRYWALL/CABINET VISIT

- Drywall up in some units
- Cabinets installed in some units
- Common areas framed

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FINAL PUNCH VISIT

- Units completed
- Majority of common areas completed
- Sidewalks completed

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Resources

- Fair Housing Act Design Manual
<https://www.huduser.gov/portal/publications/PDF/FAIRHOUSING/fairfull.pdf>
- Fair Housing Accessibility First:
<http://www.fairhousingfirst.org/>
- ANSI A117.1 standards and commentary available for purchase on the ICC website

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