

SIGNED: FEB. 19, 1998

MEMORANDUM FOR Assistant Regional Administrators
Public Buildings Service
1P, 2P, 3P, 4P, 5P, 6P, 7P, 8P, 9P, 10P, WP

FROM: Anthony Artigliere
Acting Assistant Commissioner
Office of Business Performance - PX

SUBJECT: Best Practices in Applying Accessibility Standards

In response to regional requests, this memorandum clarifies the use of accessibility standards for construction and leasing applications. Previously issued GSA policy and guidance required adherence to both the Uniform Federal Accessibility Standards (UFAS) and the Americans with Disabilities Act Accessibility Guidelines (ADAAG). Best practices call for the most stringent requirement to be followed.

The attached document, "Identifying the More Stringent Standard Between UFAS and ADAAG," lists provisions where UFAS is more stringent or contains different requirements than ADAAG. The provisions are divided into three categories:

- 1. Leasing Commercial Office Space: The following two conditions apply.**
 - a. Those where UFAS provisions are clearly more stringent than ADAAG, and**
 - b. Those where differences are "de minimis," or where provisions result in an equivalent level of access, do not significantly impact accessibility, or are outdated and no longer serve the intended purpose. In these cases, Regions have the option to choose between relevant options.**
- 2. Leasing Special Occupancies: and,**
- 3. Additions and Alterations:**

This office is working with the Architectural and Transportation Barriers compliance Board to develop new accessibility guidelines that will replace the current UFAS. The anticipated release of these new accessibility guidelines is in Fiscal Year 1999. The best practices identified here will remain in effect until that time.

The Design Programs Center is currently revising the "Facilities Standards for the Public Buildings Service" (formerly PBS-PQ100.1). The criteria identifying the best practices in applying accessibility standards will be reflected in the revision.

If you have any questions concerning this matter, please contact Mr. Tony Waller, National Program Manager for Accessibility, on (202) 501-0191.

Attachment

cc: All Directors, Property Development
1PC, 2PC, 3PS, 4PC, 5PC, 6PC, 7PC, 8PF, 9PC, 10PC, WPC
All Directors, Property Acquisition and Realty Services
1PE, 2PE, 3PB, 4PE, 5PE, 6PE, 7PE, 8PB, 9PE, 10PE, WPE
PND, PND-Gupta, PND-Eakin

*Identifying The More Stringent Standard
between the UFAS and ADAAG*

1. Commercial Office Space

1.a *UFAS Clearly More Stringent*

1.a.1 Work Areas: UFAS requires that all areas which may result in employment of physically handicapped persons be accessible. ADAAG requires only that people with disabilities be able to approach, enter, and exit a work area. [UFAS 4.1.4; ADAAG 4.1.1(3)]

1.a.2 Work Surface Scoping: UFAS requires that 5% of all fixed or built-in employee work surfaces be accessible. ADAAG does not require work surfaces in work areas to be accessible. Both UFAS and ADAAG require that 5% of fixed tables in public or common use areas be accessible. [UFAS 4.1.2(17) & 4.32; ADAAG 4.1.1(3) & 4.1.3(18)]

1.a.3 No Elevator Exception: UFAS has no exception to the elevator requirement and requires elevators in all multi-story buildings and facilities. ADAAG provides an exception to the elevator requirement in certain buildings that are under three stories or have less than 3000 square feet per story. [UFAS 4.1.2(5); ADAAG 4.1.3(5) Exception 1]

1.a.4 Entrances in Multi-Grade Buildings: UFAS requires at least one principle entrance at each grade floor level to a building to be accessible. ADAAG requires: 1) that at least 50% of all public entrances be accessible; and 2) that the number of exits required by the applicable building/fire code be used in determining the total number of accessible entrances required in a building or facility. UFAS would require more accessible entrances in certain "multi-grade" buildings. [UFAS 4.1.2(8); ADAAG 4.1.3(8)]

1.a.5 Elevator Controls: UFAS requires elevator controls to be mounted no higher than 48 inches "unless there is a substantial increase in cost", in which case 54 inches is allowed. ADAAG allows 54 inches whenever a parallel approach is provided. UFAS 4.10.12(3); ADAAG 4.10.12(3)]

1.b **ADAAG/UFAS Differences "De Minimis"**

1.b.1 Entrance Signage: UFAS always requires the International Symbol of Accessibility (ISA) at accessible entrances. ADAAG requires the ISA at accessible entrances only when there are inaccessible building entrances in the facility. If all entrances are accessible the ISA is not required under ADAAG. [UFAS 4.1.1(7); ADAAG 4.1.2(7)]

1.b.2 Stairs Exception: UFAS exempts stairs from complying with 4.9 only if an elevator connects the same levels the stairs do. ADAAG exempts stairs from section 4.9 when there is any accessible means of vertical access connecting the same levels that are connected by the stairs. UFAS 4.1.2(4); ADAAG 4.1.3(4)]

1.b.3 Handrail Height: UFAS requires that handrails at stairs and ramps be placed with the gripping surface between 30 and 34 inches above the surface of the stair or ramp. ADAAG requires that such gripping surfaces be placed between 34 and 38 inches. [UFAS 4.8.5(5) & 4.9.4(5); ADAAG 4.8.5(5) & 4.9.4(5)]

1.b.4 Tactile Warnings: UFAS requires that doors to hazardous areas be equipped with tactile warnings. This provision is reserved in ADAAG. [UFAS 4.1.2(14), 4.13.9, 4.29.3, 4.29.7; ADAAG 4.13.9, 4.29.3]

1.b.5 Pictograms: UFAS requires pictogram symbols to be tactile and does not allow tactile simple serif characters. ADAAG does not require pictogram (pictorial symbols signs) to be raised and does allow the use of simple and sans serif tactile characters. UFAS only allows sans serif characters. [UFAS 4.30.4; ADAAG 4.30.4]

2. Special Occupancies: UFAS More Stringent or Different Than ADAAG

2.a Assembly Areas

2.a.1 Scoping for 101 or More Fixed Seats: UFAS requires a greater number of wheelchair locations than ADAAG in larger assembly areas where the number of fixed seats exceeds 101. [UFAS 4.1.2(18); ADAAG 4.1.3(19)(a)]

2.a.2 Dispersion for 300 or Fewer Fixed Seats: UFAS requires that wheelchair spaces be dispersed throughout the seating area, regardless of seating capacity. ADAAG requires that wheelchair spaces be provided in more than one location when seating capacity exceeds 300. [UFAS 4.33.3; ADAAG 4.33.3]

2.b Transient Lodging

2.b.1 Scoping: UFAS requires 5% of transient lodging facilities to be accessible to persons with mobility impairments which, in very large facilities, would result in a higher number of accessible units than ADAAG would require. As required by the ADA, ADAAG provides for an exception for facilities with 5 or fewer units that contain the residence of the proprietor. UFAS does not provide for such an exception. [UFAS 4.1.4(11); ADAAG 9.1.1 Exception, 9.1.2]

2.c Housing

2.c.1 Scoping and Technical Provisions: UFAS has scoping and technical provisions for housing. Section 13 Housing of the ADAAG interim final rule has not been adopted as a standard by the Department of Justice. The Board is considering reserving section 13 in its entirety when the final guideline for State and local government facilities is issued. [UFAS 4.1.1(5)(d), 4.1.4(11), 4.34; ADAAG - proposes to reserve housing]

2.d Restaurants and Cafeterias

2.d.1 Table Aisles: UFAS requires that there be access aisles between tables in restaurants and cafeterias which comply with 4.3 Accessible Routes. ADAAG requires that all accessible fixed tables shall be accessible by means of an access aisle at least 36 inches clear between parallel edges of tables or between a wall and the table edges. [UFAS 5.1; ADAAG 5.3]

2.d.2 Vending Machine Controls: UFAS requires that the controls and operating mechanisms of vending machines in restaurants and cafeterias comply with all of 4.27. ADAAG

only requires that the spaces where vending machines are located comply with the space allowance and reach ranges requirements. [UFAS 5.4; ADAAG 5.8]

2.e Health Care

2.e.1 Canopy at Passenger Loading Zone: The application of the term "Health Care buildings and facilities" in UFAS, which is not expressly defined, may require more facilities to provide a canopy or roof overhang and a passenger loading zone at their entrances. ADAAG specifically defines "Medical care facilities" which must have a roof canopy or overhang and a passenger loading zone at an accessible entrance. [UFAS 6.1; ADAAG 6.1]

2.e.2 Patient Bed Spacing: UFAS requires that there be 36 inches along each side of a bed in patient bedrooms, 48 inches between beds, 42 inches between the foot of a bed and the wall, and 48 inches between the foot of a bed and the foot of the opposing bed. UFAS separately identifies requirements for one-bed rooms, two-bed rooms, and four-bed rooms. ADAAG treats beds in all rooms the same and requires that there be 36 inches along each side of a bed. [UFAS 6.3; ADAAG 6.3]

2.f Mercantile

2.f.1 Service Counters: UFAS requires that "a portion" of service counters in mercantile facilities be between 28 and 34 inches high. ADAAG requires a 36 inch length of service counter which is a maximum of 36 inches high. [UFAS 7.2; ADAAG 7.2]

2.f.2 Check-Out Counter Height: UFAS requires at least one check-out counter to be no higher than 36 inches. ADAAG requires that a specific number of check-out counters be no higher than 38 inches and that the top of the lip of the counter not exceed 40 inches. [UFAS 7.3(2); ADAAG 7.3(2)]

2.g Libraries

2.g.1 Knee Space at Check-Out Area: UFAS requires that at least one lane at each check-out area provide a counter surface that is between 28 to 34 inches high with knee clearance that is 27 inches high, 30 inches wide and 19 inches deep in libraries. ADAAG requires that at least one lane at each check-out area provide a 36 inch length of counter which is a maximum of 36 inches high. ADAAG does not require knee space. [UFAS 8.3; ADAAG 8.3]

2.h Postal Facilities

2.h.1 Customer Service Counters: UFAS requires that the aisles in front of customer service counters in postal facilities be at least 48 inches wide. ADAAG requires service counters to be on an accessible route (36 inches minimum width). [UFAS 9.2; ADAAG 7.2]

2.h.2 Partitions: UFAS requires that in postal facilities all fixed partitions withstand 250 lbf from any direction. ADAAG does not have a similar provision. [UFAS 9.2(1); ADAAG - no provision]

2.h.3 Handrails: UFAS requires that in postal facilities, where handrails are provided (regardless of whether they are required or not), the walls must be capable of supporting 250 lbf in any direction. ADAAG requires the support only where handrails are required. [UFAS 9.2(2); ADAAG 4.26.3]

2.h.4 Lockers: UFAS has technical requirements for lockers in postal facilities. The scoping in UFAS is vague, providing that "lockers in easily accessible areas must be provided for use by handicapped people." ADAAG does not have a similar provision. [UFAS 9.5; ADAAG - no provision]

2.h.5 Attendance Recording Equipment: UFAS requires that attendance recording equipment (i.e., time clocks, etc.) be mounted no higher than 48 inches in postal facilities and that counter space at these check-in areas be no higher than 36 inches above the floor. ADAAG does not have a similar provision. [UFAS 9.6; ADAAG - no provision]

2.i Detention and Correctional Facilities

2.i.1 Scoping: UFAS requires 5% of residential units in detention and correctional facilities to be accessible. This figure is greater than the percentage proposed in section 12 of the final rule on ADAAG for State and local government facilities. [UFAS 4.1.4(9); ADAAG 12.4.1]

3. Additions and Alterations - UFAS More Stringent or Different Than ADAAG

3.a Additions: UFAS requires that if an addition to a building or facility does not provide an accessible route, an accessible entrance, or accessible toilet facilities, and such facilities are provided in the existing building then at least one of each shall be made accessible. ADAAG may require these items to be accessible under the path of travel obligation, depending on the amount of money required to build the addition. [UFAS 4.1.5; ADAAG 4.1.5]

3.b Substantial Alterations: UFAS requires greater accessibility when substantial alterations are made to a facility depending on the amount of money spent on the alteration and the size of the building or site. ADAAG requires that when an alteration is made to an area containing a primary function that the path of travel to that altered area and the restrooms, telephones, and drinking fountains that serve that area be made accessible unless the additional cost of doing so would be disproportionate to the overall cost and scope of the original alteration to the primary function area. The level of disproportionality is set at 20% of the cost of the original alteration to the primary function area. [UFAS 4.1.6(3); ADAAG 4.1.6(2)]

3.c Alterations: ADAAG provides that in alterations, the requirements of 4.1.3(9), 4.3.10 and 4.3.11 concerning egress and areas of rescue assistance do not apply. UFAS does not have a similar exception. [UFAS - no exception; ADAAG 4.1.6(g)]