NATIONAL ACCESSIBILITY PROGRAM

STANDARDS, POLICIES, AND PROCEDURES



U.S GENERAL SERVICES ADMINISTRATION

TABLE OF CONTENTS

1 PURPOSE

2 HISTORY OF ACCESSIBLE FACILITY DESIGN AT GSA

3 GSA'S NATIONAL ACCESSIBILITY PROGRAM

4 U.S. ACCESS BOARD

5 ACCESSIBLE FACILITY DESIGN PROCESS

6 ABA MODIFICATION AND WAIVER REQUESTS

7 ACCESS BOARD COMPLAINTS

8 FREQUENTLY ASKED QUESTIONS ABOUT ACCESSIBLE FACILITY DESIGN

9 APPENDIX A: STRATEGIC COMMUNICATIONS PLAN

Front Entrance Ramp and Stair - F. Edward Hebert Federal Building, New Orleans



Courtyard Ramp and Stair - Senator Dianne Feinstein Federal Building, San Francisco, California

1

PURPOSE

The U.S. General Services Administration (GSA) is committed to implementing the Architectural Barriers Act (ABA) of 1968. To do so, the agency constructs new facilities that are accessible to persons with disabilities, and it incorporates the most current accessibility design requirements into its alterations of existing buildings. It also leases accessible facilities. GSA takes pride in accommodating all Americans.

GSA's National Accessibility Program makes information about accessible design available to all individuals responsible for designing, constructing, altering, leasing, and operating the agency's inventory.

To that end, this desk guide is intended to assist Public Buildings Service (PBS) employees who are overseeing the design, construction, alteration, leasing, and operation of GSA's inventory. Architects and engineers under contract to GSA to design new facilities or alterations should also look to the guide

as a vital resource. This document compiles the background, program operating procedures, and resources that support GSA's efforts to fully comply with the accessibility requirements of the historic ABA legislation.

STANDARDS, POLICIES, PROCEDURES AND ABAAS

The ABA covers all federal facilities designed, built, altered, or leased with federal funds. In addition, it is GSA policy that all of its buildings and facilities are accessible to persons with disabilities, without the need for special equipment or designated space. In 2006 GSA adopted the Architectural Barriers Act Accessibility Standard (ABAAS) to fulfill this purpose. As landlord of federal civilian workplaces, GSA is in the unique position of implementing or resolving accessibility for all space covered by the ABA except military, postal, and housing facilities. ABAAS applies to both owned and leased properties in the GSA inventory.

ABAAS is divided into 10 chapters. The first two chapters cover the standard's application, administration, and scoping requirements. They also are prefixed by the letter F, as in F206.4 or F206.4.1, to designate that they apply only to federal buildings and facilities. The prefix highlights the distinction between governing laws: while ABAAS and the design standards of the Americans with Disabilities Act (ADA) share common technical requirements, there are important differences in Chapters 1 and 2 pertaining to application, administration, and scoping due to the differences between ABA and ADA statutes.

The remaining chapters of ABAAS contain technical requirements for sites, facilities, buildings, special spaces such as toilet rooms, bathing facilities, and kitchens, and building elements that include doors, ramps, elevators, stairs, platform lifts, plumbing fixtures, signs, communication systems, and work surfaces. Technical requirements specify details like clearances and reach ranges. The current ABA standards have been significantly coordinated to industry standards and model building codes, including the International Building Code. With the 2025 issuance of GSA's Core Building Standards, GSA rescinded policy requiring agency-owned buildings to comply with local or state codes whose accessibility requirements exceeded ABAAS. Lessors must still comply with local and state building code.

Architects and engineers often underestimate the complexity of ABAAS and, indeed, navigating the standard involves understanding many scoping and technical variables. Yet ABAAS's overall mandate is clear: to ensure the accessibility of facilities designed, built, altered, or leased with federal funds as required by the ABA.

National Accessibility Program: Standards, Policies, and Procedures is a companion to ABAAS. Although reading this publication is no substitute for learning the intricacies of ABAAS, it does place ABAAS in historical context and highlight some of its most queried technical requirements. Moreover, Standards, Policies, and Procedures explains the administration of ABAAS, including its variables and exceptions. GSA and U.S. Access Board staff are available to assist with technical and administrative queries alike.



Entrance Ramp and Stairs - William Jefferson Clinton Federal Building, Washington, DC

2

HISTORY OF ACCESSIBLE FACILITY DESIGN AT GSA

ANSI A117.1

In 1959 the American Standards Association—a private-sector standard-setting organization that has been known as the American National Standards Institute, or ANSI, since 1969—spearheaded the first serious effort to accommodate the needs of persons with disabilities in the built environment. Responding to a request by the President's Committee on Employment of the Physically Handicapped, the association held a general conference of allied organizations that recommended development of voluntary accessibility design standards for buildings.

In 1961 the American Standards Association published the first nationally recognized design standards for accessibility entitled American National Standard Specifications for Making Buildings and Facilities Accessible to, and Usable

ACCESSIBILITY MILESTONES

1959 » American Standards Association conference recommends voluntary accessibility design standards for buildings

1961 » Publication of American National Standard Specifications for Making Buildings and Facilities Accessible to, and Usable by, The Physically Handicapped (now known as ANSI A117.1)

1965 » Establishment of National Commission on Architectural Barriers to Vocational Rehabilitation of the Handicapped (NCAB) in the Department of Health, Education, and Welfare

1968 » NCAB issues Design for All Americans

1968 » Congress passes the Architectural Barriers Act (ABA) requiring facilities designed, constructed, altered, or leased with certain federal funds or grants to be accessible to persons with disabilities

1969 » GSA adopts ANSI A117.1 as its first, voluntary standard for accessible design

by, The Physically Handicapped. Based on research conducted by the University of Illinois and funded by the Easter Seal Research Foundation, the standard is known today as ANSI A117.1.

Originally voluntary, the ANSI standard became enforceable when state and local governments began adopting it in the years following its launch. In 1969, subsequent to the passage of the Architectural Barriers Act (ABA), GSA adopted ANSI A117.1 as its first standard for accessible design. Five years later the standard received federal input from the U.S. Department of Housing and Urban Development (HUD), which joined the ANSI secretariat in charge of it.

Architectural Barriers Act

In 1968 Congress passed the ABA to require accessibility for persons with disabilities in facilities that are designed, built, or altered by or on behalf of the United States of America. The act also applies to federally leased properties and to non-federally owned facilities that are constructed or altered with certain types of federal funding. The ABA designates the U.S. Department of Defense (DoD), GSA, HUD, and the U.S. Postal Service (USPS) as the four federal agencies responsible for creating the accessibility standards that implement the ABA.

1973 » Congress passes the Rehabilitation Act of 1973, Section 502 of which creates the Architectural and Transportation Barriers Compliance Board—today known as the U.S. Access Board

1974 » U.S. Department of Housing and Urban Development (HUD) joins secretariat of committee in charge of ANSI A117.1

1975 » James S. Jeffers is appointed the first Executive Director of the U.S. Access Board

1980 » ANSI releases an improved accessible design standard, A117.1-1980

1980 » GSA publishes a mandatory GSA Accessibility Standard based on ANSI A117.1-1980

1982 » U.S. Access Board publishes Minimum Guidelines and Requirements for Accessible Design (MGRAD) as the basis for ABA standards

1984 » Uniform Federal Accessibility Standards (UFAS), based on MGRAD, are published by the four federal standard-setting agencies designated to implement the ABA (DOD, GSA, HUD and USPS)

1988 » Congress passes the Fair Housing Amendments Act, which requires accessible features in eligible multifamily dwellings

1990 » Congress passes the Americans with Disabilities Act (ADA) prohibiting discrimination on the basis of disability in state and local government as well as the private sector, and which requires equal access to programs and services, transportation, the built environment, employment, and communications

Rehabilitation Act

The Rehabilitation Act of 1973 prohibits discrimination against persons with disabilities in programs conducted or financially assisted by the U.S. government, federal employment, and federal contractor employment. The Rehabilitation Act also created the U.S. Access Board, to enforce the ABA and to develop and maintain design guidelines from which the ABA's implementing standards are determined.

Uniform Federal Accessibility Standards

In 1984 the four federal standard-setting agencies—DoD, GSA, HUD, and USPS—published the Uniform Federal Accessibility Standards (UFAS) as the first government-wide implementing standard of the ABA. The basis for the common accessibility standard was the Minimum Guidelines and Requirements for Accessible Design, or MGRAD, which the U.S. Access Board published in 1982.

Later in 1984 GSA issued a policy on accessibility in leased space, because leased facilities were not included in UFAS. For GSA, that year's two publications required all new, renovated, and leased federal civilian workplaces under its control to be accessible to persons with disabilities.

1991 » U.S. Access Board publishes ADA Accessibility Guidelines (ADAAG) for buildings, facilities, and transportation vehicles, which serves as the basis for standards implemented by the Department of Justice (DOJ) and the U.S. Department of Transportation (DOT)

1991 » DOJ adopts ADAAG as the ADA Standards for Accessible Design

1991 » DOT publishes ADA Standards for Transportation Facilities, and ADA Standards for Transportation Vehicles, both of which were based on the Access Board's ADAAG

1992 » Although ADAAG is not applicable to federal facilities, GSA adopts policy of following UFAS or ADAAG requirements—whichever is more stringent—for projects

1998 » U.S. Access Board amends ADAAG to include guidelines for state and local government facilities and building elements designed for children's use

2000 » U.S. Access Board amends ADAAG to include guidelines for play areas

2002 » U.S. Access Board amends ADAAG to include guidelines for recreation facilities

2004 » U.S. Access Board jointly updates ADAAG and its ABA Accessibility Guidelines for synchronized scoping and technical criteria, which are then published as the Americans with Disability Act and Architectural Barriers Act Accessibility Guidelines (ADA-ABA Accessibility Guidelines)

Americans with Disabilities Act

In 1990 Congress passed the Americans with Disabilities Act (ADA), which prohibits discrimination against persons with disabilities in employment, telecommunications, and state and local governments' activities and services. The ADA also establishes accessibility requirements for the design, construction, and alteration of state and local government facilities and private-sector facilities, namely places of public accommodation and commercial activity. The ADA does not apply to federally owned or leased properties.

Architectural Barriers Act Accessibility Standard (ABAAS)

GSA adopted the Architectural Barriers Act Accessibility Standard (ABAAS) in 2005 as its new implementing standard for the ABA. Originally ABAAS was based on the ADA-ABA Accessibility Guidelines published in the Federal Register by the U.S. Access Board in 2004. Today the standard is also based on the Access Board's 2013 supplement regarding outdoor developed areas, as well as the Public Right-of-Way Accessibility Guidelines (PROWAG) of 2023. The public right-of-way requirements apply to pedestrian facilities located in rights-of-way on federal sites, such as sidewalks adjacent to streets and shared-use paths.

2005 » USPS publishes Standards for Facility Accessibility based on the ADA-ABA Accessibility Guidelines of 2004

2005 » GSA publishes the Architectural Barriers Act Accessibility Standard (ABAAS), also based on the ADA-ABA Accessibility Guidelines, to apply to both owned and leased facilities

2006 » DOT publishes ADA Standards for Transportation Facilities based on the ADA-ABA Accessibility Guidelines

2008 » DOD publishes ABA Accessibility Standard for Department of Defense Facilities based on the ADA-ABA Accessibility Guidelines

2010 » DOJ publishes ADA Standards for Accessible Design, for ADA facilities other than transportation, based on the ADA-ABA Accessibility Guidelines

2013 » U.S. Access Board issues a supplement for outdoor developed areas, which GSA integrates into ABAAS

2024 » GSA adopts into ABAAS the Access Board's 2023 Public Right-of-Way Accessibility Guidelines (PROWAG)

2025 » GSA moves ABAAS from the Federal Management Regulation to the Core Building Standards; ABAAS content is unchanged

2026 » Updated GSA accessibility desk guide and Core Buildings Standards documents clarify that ABAAS content is unchanged



E Street Entrance Doors - GSA Headquarters, Washington, DC

3

GSA'S NATIONAL ACCESSIBILITY PROGRAM

PROGRAM HISTORY

GSA's long-running National Accessibility Program has focused on providing barrier-free facilities as required by the ABA. In 1969, the agency adopted ANSI A117.1 as its first standard for accessible design; through most of the following decade, GSA's Public Buildings Service conducted a voluntary program for owned and leased facilities to comply with that standard. When a more comprehensive ANSI standard was released in 1980, GSA used it as a basis for creating its GSA Accessibility Standard later that same year. The GSA Accessibility Standard was mandatory for GSA facilities until the publication of UFAS and related policy for leased space was released, both in 1984.

After passage of the Americans with Disabilities Act in 1990, ADA accessibility standards for commercial and public facilities, known as ADAAG, were published in July 1991. Although the new

STANDARDS VERSUS GUIDELINES

Section 502 of the Rehabilitation Act of 1973 established the U.S. Access Board to enforce ABA compliance. Congress amplified the Access Board's authority in 1978, when it passed amendments to the Rehabilitation Act that sanctioned the Access Board to establish minimum guidelines for the standards used to enforce the ABA.

Guidelines are not enforceable until they are formally adopted as standards by the ABA's four standard-setting agencies, a group that includes GSA. Using the arrangement established in 1978, in 1982 the Access Board published Minimum Guidelines and Requirements for Accessible Design (MGRAD), which would become the basis of 1984's Uniform Federal Accessibility Standards (UFAS). This process was repeated in 2004 when the Access Board published new accessibility design guidelines in the Federal Register, and a year later when GSA adopted these guidelines as ABAAS, the Architectural Barriers Act Accessibility Standard.

The whole arc of guidelines and standards points upward; accessibility

standards were not applicable to federal facilities, they were in some respects more stringent than UFAS. So, a proactive GSA adopted the policy of following UFAS or ADAAG—whichever had the more rigorous requirement—for all new design and construction projects started after July 8, 1992. Other federal agencies soon followed GSA's lead.

GSA adopted the ABA portions of the U.S. Access Board's ADA-ABA Accessibility Guidelines as its new accessibility standard for facility design in 2005, replacing UFAS. This current standard is called the Architectural Barriers Act Accessibility Standard, or ABAAS, and applies to both owned and leased facilities.

It bears repeating that the ADA does not apply to federally owned or leased properties, including GSA's inventory. ABAAS has the same technical requirements as ADA accessibility design standards, but these standards differ in application, administration, and scoping.

Program Responsibilities

GSA's National Accessibility Program resides in its Public Buildings Service. The National Accessibility Officer manages this program and reports to the GSA Chief Architect. The program ensures that ABAAS requirements are incorporated into the designs of all new, altered, and leased facilities.

standards in the United States have improved over time, and they continually evolve. ANSI A117.1 included rudimentary technical requirements but lacked details like the dimensions of accessible toilet stalls and parking spaces, and it contained no scoping requirements. Current standards provide scoping and technical requirements that reflect greater understanding of the needs of persons with disabilities.

In addition, GSA's National Accessibility Officer manages the accessibility complaint process for GSA's owned and leased facilities; sets accessibility policy; and interprets ABAAS for GSA staff, government tenant agencies, architects, designers, private citizens, and accessibility organizations.

The Rehabilitation Act of 1973 establishes GSA's Administrator as a permanent member of the U.S. Access Board's governing board. The Administrator normally designates a liaison to the Access Board who is responsible for briefing the Administrator or his or her delegate on relevant accessibility issues, as well as measures poised for a board vote, prior to board meetings. The National Accessibility Officer is typically designated by the Administrator as the GSA liaison to the Access Board. The liaison serves as a nonvoting proxy for the Administrator at board meetings in case of his or her absence. The Administrator also looks to the GSA Chief Architect and the National Accessibility Officer for general and technical guidance on the subject of accessibility in buildings.



Entrance Ramp - Department of Transportation Headquarters, Washington, DC

4

U.S. ACCESS BOARD

ITS COMPOSITION AND PURPOSE

Several years after the 1968 passage of the Architectural Barriers Act, Congress observed that compliance had been uneven, and that the four federal agencies designated by the ABA to implement federal standards for accessibility had not created them. Consequently, when Congress considered the Rehabilitation Act of 1973, it conceived a separate federal agency to enforce the ABA and expedite development of accessibility design standards for implementation. Section 502 of this law established the U.S. Access Board to ensure federal compliance with the ABA and to propose solutions to environmental barriers addressed in the ABA.

The Access Board is devoted to accessibility for persons with disabilities. It has a permanent staff of more than 20 federal employees, and a 25-person governing board whose membership comprises 12 federal agency representatives and 13 Presidential appointees serving 4-year terms on a rotating basis.

GSA's Administrator, or his or her delegate, fills one of the 12 federal slots of the governing board; a majority of the 13 Presidential appointees must have a disability. The governing board oversees the Access Board's mission, priorities, budget, research programs, and development of design guidelines and outreach goals.

Today the Access Board is responsible for accessibility design guidelines for the built environment, transportation vehicles, and telecommunications equipment, as well as accessibility standards for electronic and information technology and medical diagnostic equipment, under a variety of laws that include the ABA and ADA. It provides technical assistance and training for all its design criteria, and it enforces the implementing standards of the ABA for federally funded facilities.

The Access Board does not oversee or enforce Section 504 of the Rehabilitation Act, which protects qualified individuals from disability-based discrimination in federally conducted or federally funded programs. These requirements are set by individual agencies, and enforcement is coordinated and overseen by the Department of Justice.

The Access Board functions as a coordinating body among federal agencies. It also directly

represents the public, particularly persons with disabilities, through its website and presentations, as well as formal meetings that are often attended by representatives of various disability advocacy groups.

THE ACCESS BOARD AND ABA ACCESSIBLE-DESIGN CRITERIA

A key mission of the Access Board is establishing accessibility design criteria for buildings and facilities, and it is continually developing or updating these criteria. Since 1978, the Access Board has been responsible for issuing accessibility design guidelines for federally funded facilities.

In 1990 that role expanded after Congress passed the ADA, which empowered the Access Board to develop accessibility design guidelines for state and local government facilities, places of public accommodation, commercial facilities, and transportation facilities and vehicles. Subsequent laws passed by Congress further expanded the board's mission to cover access to telecommunications equipment, electronic and information technology in the federal sector, and medical diagnostic equipment.

ABA Enforcement

The ABA compliance process emphasizes informal resolution. When informal resolution cannot be achieved, the U.S. Access Board can initiate

formal proceedings before an administrative law judge to obtain an order of compliance. For GSA properties deemed noncompliant with the agency's implementing standard of the ABA (ABAAS), penalties can include withholding or suspension of federal funds. Penalties can be imposed in proportion to the level of noncompliance found.

ABA Information Assistance

The Access Board provides information about the ABA by telephone, fax, or email. Design professionals and others can contact the Access Board for general information and for technical assistance regarding the guidelines and standards covered by the ADA, ABA, and Section 508 of the Rehabilitation Act.

Contact the Access Board at:
Phone: (202) 272-0080
Fax: (202) 272-0081
General Inquiries Email: info@access-board.gov
Technical Assistance Email: ta@access-board.gov

Information about the Access Board and its current activities may be found at:
http://www.access-board.gov

Training

The Access Board provides training on its guidelines and standards to various groups and organizations

at locations across the country. Training may concern accessibility design requirements for private, state, and local government facilities, as well as federal facilities, telecommunications equipment, and electronic and information technology.

The Access Board tailors training to the needs and interests of each audience. It is a particularly valuable resource for designers and architects, facility operators and managers, transportation professionals, disability advocates, and members of other professions and groups that work with any of the board's guidelines and standards. In training sessions, time is typically reserved for question-and-answer segments. This kind of interaction helps the Access Board gauge the information needs of various audiences.

Training sessions are held at the request of, or in partnership with, organizations or groups holding conferences and seminars whose agendas include accessibility, the ABA, or the ADA. Due to budget constraints, the Access Board usually requests travel reimbursement for its participation. Board policy requires that these events be conducted in accessible facilities, with accessible communication formats upon request. The Access Board often arranges additional training sessions once it is scheduled to be in a particular area.

For more information or to request training from the Board, contact its Training Coordinator at training@access-board.gov (email) or (202) 272-0020 (phone).

Virtual Training

AccessibilityOnline represents a collaborative training program between the ADA National Network and the U.S. Access Board. The program includes a series of free monthly webinars and audio conferences covering topics that include accessibility in the built environment, information and communication technologies, and transportation. They are coordinated and hosted by the Great Lakes ADA Center on behalf of the ADA National Network to provide accurate and quality training on ADA accessibility design guidelines, ABA accessibility design guidelines, and electronic and information technology accessibility standards (Section 508). Previous webinars are archived at the AccessibilityOnline portal. Webinar attendees can also earn continuing education credits (CEUs).



Approach to Main Entrance - Charles R. Jonas Federal Building and United States Courthouse, Charlotte, North Carolina

5

ACCESSIBLE FACILITY DESIGN PROCESS

IDENTIFYING CONFLICTING GOALS

Successful integration of accessibility into the design process requires a project team to consider synergies across disciplines from a project's earliest stages.

A project team must also foresee conflicts: sustainability, historic preservation, security, and visual expression can compete with and sometimes interfere with goals of accessible design. The following are a few examples of conflicts involving GSA property types.

Energy performance

A new federal courthouse that has lowered office and corridor lighting power density by law has adversely affected building occupants and visitors with low vision, because they require brighter lighting.

Stormwater management

A parking lot for a new federal building is designed with pervious pavers to help meet stormwater-management goals. The openings between pavers measure 5/8 inch. The architect is unaware that ABAAS Section 302.3 (Floor and Ground Surfaces, Openings) requires a maximum opening of 1/2 inch along the accessible route to the building.

Historic preservation

A historic federal building has a monumental entrance raised 5 feet above grade, accessible only by stairs. The State Historic Preservation Officer has determined that altering that entrance to include a wheelchair ramp would destroy historic fabric and instead supports converting a window opening near grade, adjacent to the main entrance, into a wheelchair lift. GSA objects to the cost of that option, although the lift would allow disabled persons to experience the building's historic lobby interior like their able-bodied counterparts. In this case, ABAAS Section F206.4 (Entrances) provides an exception that allows an alternative existing locked entrance with a notification system to provide access. The locked entrance is selected as a "no cost" option, although persons with disabilities will have a diminished entry experience.

Security

A new federal courthouse has 4-foot-square security planters installed at the site perimeter, space 34 inches apart. The planters that intersect the accessible route to the building are in violation of ABAAS Section 403.5.1 (Clearances, Clear Width), which requires a minimum clearance of 3 feet between planters crossing the accessible route.

Visual expression

For a new federal building located on a steeply sloping site, the entrance location requires pedestrians to negotiate a 10-foot grade change from a street-level public transit stop. The architect has designed a series of landscaped terraces and stairs to transition from street level to the entry plaza but has used an enclosed elevator to accommodate persons with disabilities, because ramps would "compromise" the intended visual expression. Two months after opening, mechanical problems force the elevator out of service.

DESIGN REVIEWS

Design Reviews of GSA Projects

By working together from inception to coordinate program goals and identify potential conflicts, a project team can produce a thoughtful, successful project for all stakeholders. The PBS employees responsible for executing GSA's National Accessibility

Program support this collaboration by conducting accessible-facility design reviews at regular intervals in a project's evolution. Most projects involve progressive design submissions.

Minimizing a building or facility's accessibility design concerns begins in early design phases. The following points clarify when accessibility reviews should be conducted with a project team, as well as their associated activities:

Design narrative

This accessibility review verifies that design narrative documents reference ABAAS and PROWAG instead of obsolete standards like ANSI A117.1, and it removes references to ADAAG and the ADA.

Concept development

Because rudimentary plans often lack sufficient detail to warrant specific comments about accessibility, this review generates general comments concerning the facility's design. Feedback may cover accessible routes and accessible parking, as well as building elements and spaces that include entrances, horizontal and vertical circulation, and toilet rooms. Projects that involve alterations and additions require careful analysis of existing conditions and correct application of the scoping requirements in ABAAS, to determine what existing elements need to be made compliant with current standards as part of the proposed project.

Design development

Drawings at this phase provide enough detail for accessibility design review to guide a project team's design toward conformance with ABAAS and PROWAG. Both documents provide technical validation for comments. Comments may cover design elements that include: surface parking lot layouts, exterior accessible routes, parking garage layouts, entrance/security details, interior door widths and maneuvering clearances, toilet rooms, locker/shower rooms, break rooms, service counters and work surfaces, courtrooms, holding cells, and laboratory layouts.

Construction documents and contract documents

Documents at each design milestone submission must be reviewed. Accessible-facility design reviews of contract documents verify that the pending building or facility embodies mandated accessibility design requirements. In a progress design submission, primary accessibility features—such as parking, accessible route to the building, entrances, elevators and toilet rooms, locker/shower rooms, kitchenettes, accessible seating and assistive listening in places of assembly, and courtroom stations and spectator seating—should be sufficiently detailed to enable an in-depth review.

A final check of the documents that are issued for construction makes sure that changes occurring during the design process still result in an ABAAS-compliant design. If design changes have occurred, then the accessibility reviewer will check specific elements for conformance with ABAAS.

THE DESIGN PROCESS IN CONTEXT

GSA advocates accessibility awareness from the earliest phases of design. The agency identifies PBS employees as subject matter experts (SMEs) in the field of accessible design, and it empowers them to conduct accessibility design reviews over a project's evolution. The agency's integrated design reviews, meanwhile, ensure that a project accommodates all stakeholders holistically.

GSA's actions evidence an industry-wide move toward integrated project delivery (IPD). As the American Institute of Architects describes it, IPD "leverages early contributions of knowledge and expertise through the utilization of new technologies, allowing all team members to better realize their highest potentials while expanding the value they provide throughout the project lifecycle."

This definition of IPD relies partly on software platforms, like BIM, by which many skilled practitioners can communicate and reconcile individual design and construction decisions. Yet IPD is valid even without a specific technology at a team's disposal. At its core IPD is collaboration in which: team members contribute their individual expertise to a problem from the outset of design; exchange ideas in an ongoing manner; and make decisions collectively.

IPD begins in properly defining a problem and identifying limiting conditions and potential outcomes. Once actual design has started, integrated delivery is distinguished by regular feedback that allows the individual expertise of each member to come to the fore, to ensure that the team is addressing as many concerns as possible. Although design has always been a non-linear undertaking—new data can send a team "back to the drawing board," after all—IPD depends on open communication and eschews hierarchy. The process, and its culture of trust and sharing, precludes waste and maximizes solutions.

IPD officially describes the collaboration of a design and construction team. It can also refer to a contractual agreement. As described here, GSA stewards its design and construction teams in the spirit of IPD. Readers should consult RFPs and standards publications for the latest agency directives about IPD in project delivery.



Entrance Ramp - United States Courthouse Annex, San Diego, California

6

ABA MODIFICATION AND WAIVER REQUESTS

EXCEPTIONAL CONDITIONS

Section 6 of the Architectural Barriers Act authorizes GSA's Administrator "to modify or waive on a case-by-case basis, upon application made by the head of department, agency, or instrumentality of the United States concerned," any ABA standard for the design, construction, and alteration of federally owned and leased buildings and facilities when "clearly necessary," except for properties owned and leased by DOD, USPS, or HUD. This authority has been delegated by the Administrator to the Commissioner of GSA's Public Buildings Service. See GSA's Delegations Manual for the latest status of such delegated authority.

In addition, Section 502(b)(1) of the Rehabilitation Act of 1973 authorizes the U.S. Access Board, as enforcer of the ABA, to review all of GSA's approved modifications and waivers to make sure they are based on fact and consistent with the ABA.

Modifications and waivers are approved only in rare circumstances, and only after GSA and its tenant agencies have demonstrated that it is impossible to comply with the ABA. Waivers and modifications are not authorized for reasons of cost-effectiveness, convenience, or expediency. GSA does not have the authority to circumvent the accessibility mandated by law.

TECHNICAL INFEASIBILITY

In existing buildings, ABAAS Section F106 defines the term "technically infeasible" as unable 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; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full compliance with the minimum requirements.

There are several exceptions throughout the standard for which a waiver or modification of the ABA standard is not required. Included among them are exceptions to full compliance when such compliance would be technically infeasible.

Consider a GSA building on the National Register of Historic Places that is undergoing alteration, which has an existing door opening with a swinging door and

a clear width of 31.2 inches located on the accessible route. The doorway is classified as part of the historic fabric of the building, while ABAAS Section 404.2.3 (Manual Doors, Doorways, and Manual Gates, Clear Width) requires that "Doorways shall provide a clear opening width of 32 inches (815 mm) minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees." In alterations, a projection of 5/8 inch (0.62 inches) into the required clear opening width is permitted by the standard for the latch-side stop (see Exception 1). Modifying the standard to allow the existing clear opening width is not required in this example, because alteration of the historic fabric is not acceptable under the National Historic Preservation Act.

Determinations of technical infeasibility must be reviewed and approved by the National Accessibility Officer. The documentation follows the same procedure and forms established by the GSA Chief Architect for waivers, equivalencies, and variances of building code.

Technical infeasibility does not apply to new construction.

MODIFICATION

A modification is an authorized written change to a specific requirement in an ABA standard. It must

be approved by the GSA Administrator or by his or her delegate on a case-by-case basis. Modifications may be utilized when applying the standard as written is not possible but a lesser degree of accessibility can be provided if a less stringent standard is applied.

In the example of unusually heavy doors such as blast doors or those found in certain energy lab facilities, those doors could not comply with opening force requirements and no powered-door operator can be used. The doors are also so deeply set that maneuvering clearance cannot be achieved within 8 inches of the door face. Yet there is still a reasonable need to establish a maximum opening force and manageable maneuvering clearance for the users of this door. So, a modification to the opening force and maneuvering clearance requirements in the standard would be requested. The clear-width requirements are achievable and require no modification.

WAIVER

A waiver grants temporary authority to not comply with a specific requirement in the ABA standard. It must be approved by the GSA Administrator or his or her delegate on a case-by-case basis. Waivers may only be granted after every effort has been made to comply with the standard.

A waiver may be issued to recognize an existing condition that prevents compliance with the requirement, such as a site whose gradient prevents access to one of two public entrances. In this scenario, one public entrance of a new federal building is accessible and the other requires the use of a series of stairs and landings to traverse a 45-degree slope; an accessibility design evaluation has determined that a series of switchback ramps and three wheelchair lifts would make the slope accessible, because the site does not have adequate space for the use of ramps alone. The necessity of three wheelchair lifts makes it highly probable that at least one will be out of service at any given time, eliminating the accessible route. For GSA buildings, ABAAS Section F206.4.1 (Public Entrances) states that at least 60 percent of all public entrances must be accessible. Because ABAAS requires two accessible public entrances in the case of this building, a waiver of Section F206.4.1 would be requested for the non-accessible entrance.

Procedures for Submitting Modification and Waiver Requests

1. Inquiries concerning modifications and waivers may be initiated by contacting GSA's National Accessibility Officer. After discussions between the National Accessibility Officer and the

requestor have concluded and the accessibility officer agrees with the need, then the requestor drafts a letter of request for a modification or waiver and submits it to the GSA Administrator or his or her delegate. The request must include all of the following items:

- **a.** Date of request
- **b.** Purpose of request, specifying waiver or modification as well as the ABAAS requirement(s) to which the request pertains
- **c.** Description and support for request, including conditions that affect accessibility and alternative solutions that have been considered
- **d.** Consequence if no modification or waiver is permitted
- **e.** Conclusion, including contact details for additional information requests
- **f.** Photographs and available drawings for documentation
- **g.** Other attachments/enclosures of any supporting information (copies of codes, etc.)
- **h.** Signature and agency of requestor

2 The requestor's letter is submitted to the National Accessibility Officer, who reviews it and prepares a memo recommending the GSA Administrator's approval or denial. The latest delegation of authority dated August 5, 2020 identifies the Commissioner of PBS (and not the Deputy Commissioner) as the Administrator's delegate. Any determination that

affects historic property requires the concurrence of the Federal Preservation Officer.

3. The PBS Commissioner reviews the memo; documentation of the Commissioner's approval/denial is returned to the National Accessibility Officer, also via memo.
4. The National Accessibility Officer drafts an outgoing letter informing the requestor of the decision, for the Commissioner's signature.
5. The draft is forwarded to the PBS Commissioner's correspondence control group for review of formatting and other non-content issues. After review by the National Accessibility Officer, the final draft with photographs, floor plans, or other appropriate attachments is forwarded to the Commissioner for signature. The final, signed letter is then sent to the requestor and copied to the U.S. Access Board.

REPORTS TO CONGRESS AND CONGRESSIONAL COMMITTEES

In accordance with Section 7 of the Architectural Barriers Act, during the first week of January of each year, GSA's Administrator shall report to Congress on GSA's activities and those of other departments, agencies, and instrumentalities of the federal government during the preceding fiscal year. Activities include but are not limited to standards issued, revised, amended, or repealed, as well as all case-by-case modifications and waivers of such standards.



District Courtroom - United States Courthouse, Salt Lake City, Utah

7

ACCESS BOARD COMPLAINTS

INTRODUCTION

Ensuring access for persons with disabilities is financially manageable when it is incorporated into the earliest design phases of new construction, modernizations, and alterations. The opposite may be true when accessibility is ignored and ABA complaints are filed with the U.S. Access Board after construction completion.

The most common accessibility complaints concern accessible routes, parking, entrances, interior doors, and toilet rooms. A user of a federally owned or leased property or a federal employee or contractor submits an accessibility complaint to the U.S. Access Board via the online complaint form or by email, standard mail, or phone.

The latest information about how to file a complaint can be found at https://www.access-board.gov/enforcement/. Additional information such as the

property's age, known sources of funding, and photographs may be included but is not necessary.

Complaints can be made anonymously, although in all cases a complainant's name and contact information is kept confidential.

The U.S. Access Board makes a preliminary analysis of a complaint to determine whether the complaint could be covered by the ABA. If so, the board opens a complaint investigation and sends the complainant an acknowledgment letter. If the Access Board determines that the ABA does not apply to the given case, then it does not open a complaint and sends the complainant a letter presenting its findings and referral information.

GSA RESPONSE PROCEDURES

If a complaint is submitted against a GSA-owned or -leased property and preliminary analysis determines the complaint could be covered by the ABA, then the U.S. Access Board will initiate a case and provide an initial notice and request for information to GSA's National Accessibility Officer or other designated GSA official. Please note that, in the procedures detailed below, the terms "National Accessibility Officer" and "GSA" may be used interchangeably.

1. Upon receipt of the initial notice, GSA must provide a response to the U.S. Access Board within 30 days. This response must include factual information sufficient to establish compliance or noncompliance with the applicable ABA standard.

   To inform this initial response, the GSA National Accessibility Officer reviews the Asset Business Plan database to determine whether the cited property is in GSA's inventory, as well as its age and its history of alterations. If further information is required, then the National Accessibility Officer requests assistance from additional PBS employees.
2. GSA prepares a file that includes the initial notice and all documents that establish the relevant facts. The National Accessibility Officer and any PBS employees assigned to the complaint collaboratively evaluate the existing facility for compliance with ABAAS, gathering documentation such as drawings, photographs, and field measurements.
3. Based on the information collected during GSA's investigation, the National Accessibility Officer will decide whether GSA agrees that the allegations presented in the initial notice constitute violations of the ABA.
4. If the National Accessibility Officer finds that there is an ABA violation, then GSA will prepare a

corrective action plan to submit with its response to the Access Board. The corrective action plan will seek to swiftly address any violations. The corrective action plan must be in place within 180 days of receipt of the complaint according to U.S. Access Board regulations.

If GSA disagrees that the allegations in the notice constitute a violation of the ABA, then GSA will prepare an initial response, supported by documentation, detailing its findings. The Access Board will make the final determination as to whether a violation exists.

5. GSA submits its initial response to the Access Board.
6. The Access Board evaluates GSA's initial response, all related documentation provided by GSA, any documentation provided by the complainant, and any publicly available information. In some instances, the Access Board may conduct a site visit. Based on all the information available, the Access Board determines whether there is a violation of the ABA.

   If the Access Board finds no violation, the case is closed.

   If the Access Board finds one or more violations of the ABA, then the Access Board evaluates GSA's proposed corrective action plan for

sufficiency. The board works collaboratively with the National Accessibility Officer on a final corrective action plan that will achieve compliance with the applicable standard. Once the Access Board approves the corrective action plan, GSA must execute it, at which point it becomes a project. This project may range in scale and complexity. Depending on the nature of the violation, corrective action plans may include simple procedures such as adjusting a door closer, providing a missing sign, or doing a minor alteration project, or they may involve major capital projects that require extensive planning and resources.

7. Once all issues are resolved, including the execution of any required corrective actions, GSA submits documentation to the Access Board establishing that compliance has been achieved.
8. When the Access Board concurs that the violation has been resolved, the Access Board sends a closure letter to GSA and notifies the complainant of the outcome of the case. GSA then closes out the case file.



Ground-Floor Wheelchair Platform Lift - GSA Headquarters, Washington, DC

8

FREQUENTLY ASKED QUESTIONS ABOUT ACCESSIBLE FACILITY DESIGN

What is GSA's policy for accessibility in buildings?

It is GSA's policy to make all of its properties accessible, eliminating special equipment or spaces intended solely for persons with disabilities. The policy intends for standard products set at prescribed heights and with prescribed maneuvering clearances, per ABAAS, to ensure access by employees and visitors in newly constructed buildings and in alterations of existing buildings.

Who must comply with ABAAS, GSA's current implementing standard for accessibility?

All persons involved in the design, construction, alteration, and leasing of GSA's owned or leased buildings and facilities. They include architects/

engineers and associated designers, general contractors, realty specialists, facility managers, and building owners.

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Is ABAAS retroactive?

Where existing, unaltered elements of a GSA building or facility comply with an earlier ABA standard like UFAS, retrofitting for compliance with ABAAS is not required. If these elements are altered, then they must comply with all applicable requirements of the ABA implementing standard at the time of the alteration—currently ABAAS.

Elements of a leased facility were required to comply with an earlier ABA standard, but they did not comply. Now that the lease is up for renewal, are these elements subject to ABAAS?

Yes. Prior to lease renewal, elements that should have complied with an earlier ABA standard are required to be altered to comply with the current implementing standard.

Besides ABAAS, does GSA use other accessibility design standards?

While all GSA design and construction projects must comply with ABAAS, the architect/engineer is also responsible for complying with the current edition of the International Code Council (ICC)

family of codes, as per the PBS Core Building Standards. Also, PROWAG applies to GSA projects to ensure that pedestrian facilities located in the public right-of-way (including a public right-of-way that forms the boundary of a site or that lies within a site bounded by a property line), are readily accessible to and usable by pedestrians with disabilities.

GSA policy as of 2026 does not mandate compliance with state and local building codes in federally owned buildings, but lessors must comply with state or municipal code should the locality of a GSA-leased space demand a more stringent accessibility requirement.

What are some of the major elements that must be located along an accessible route?

Accessible parking spaces, entrance doors and vestibules, interior doors, corridors, toilet rooms, telephones and TTYs, drinking fountains, visible and audible alarms, signage, service counters, and wheelchair seating in assembly areas and dining facilities, as well as ramps, wheelchair platform lifts, or elevators where changes in level are necessary.

Are all repair and alteration (R&A) projects required to include costs for upgrading accessibility features?

ABAAS Section F106.5 (Defined Terms) defines

"alteration." Normal maintenance, reroofing, painting or wallpapering, or changes to mechanical and electrical systems are not considered alterations unless they affect the usability of the building or facility. For example, if a wall containing doors or doorways must be demolished to install new plumbing and vent risers, then new doors or doorways that are installed in the rebuilt wall must comply with ABAAS, including requirements for clear widths, accessible hardware, and maneuvering clearances.

ABAAS Section F202.4 (Alterations Affecting Primary Function Areas) requires that alterations to areas containing a primary function include accessible routes, toilet rooms, telephones, and drinking fountains to serve the altered areas, unless the cost and scope of accessible features are "disproportionate" to the overall alterations as determined by GSA. What spaces are considered primary function areas?

GSA defines "primary function areas" as spaces that contain a major activity for which the facility is intended. Primary function areas include areas where services are provided to customers or the public. They also include offices and other areas in which the federal agency carries out its work. Ancillary spaces such as mechanical rooms, boiler rooms, supply storage rooms, employee lounges or locker

rooms, janitorial closets, toilet rooms, corridors, and entrances are not primary function areas.

Is there a point at which the costs of providing an accessible path of travel to an altered area containing a primary function are considered "disproportionate" to the cost of the overall alteration and, therefore, additional accessible path-of-travel improvements are not required?
All of GSA's new leases must provide an accessible path of travel to an altered primary function area, regardless of cost. New leases must comply with ABAAS Section F202.6 (Leases).

For GSA-owned facilities that are subject to ABAAS, the costs of providing an accessible path of travel to an altered area containing a primary function are deemed disproportionate when they exceed 20 percent of the cost of altering the primary function area. If a series of small alterations are made to areas containing a primary function, and the costs of individual alterations do not result in an accessible path of travel to the altered areas, then the total cost of alterations made within the 3-year period after the initial alteration is the benchmark against which to calculate disproportionate cost. Accessible route improvements are always required for an alteration to a primary function area, but the 20-percent rule puts a cap on the amount that must be spent for this

property type. However, at least this amount must be expended on providing an accessible path of travel even when full compliance will not be achieved.

Are alterations to historic properties required to meet ABAAS?

Alterations to properties that are listed or eligible for listing in the National Register of Historic Places, or designated as historic under state or local law, are required to meet ABAAS. There are exceptions for accessible routes, entrances, and toilet facilities when the State Historic Preservation Officer or the Advisory Council on Historic Preservation determines that compliance with ABAAS would threaten or destroy the historic significance of the property. These ABAAS exceptions, which are located in Sections F206.2.1, F206.2.3, F206.4, and F213.2, specify alternative means or levels of access.

Are new leases negotiated by the federal government for buildings and facilities required to meet ABAAS?

All new leases are required to meet ABAAS Section F202.6 (Leases). Lease renewals, lease options, and similar transactions must be treated as new leases. Exceptions to this rule are: buildings or facilities leased to service disasters on a temporary, emergency basis; buildings or facilities leased

for 12 months or less, with no option to extend or renew.

Are construction tolerances permitted in ABAAS?

Where dimensions for clearances are stated in ABAAS as absolute dimensions, ABAAS recognizes conventional industry tolerances in Section F104.1.1. Allowances for construction tolerances ensure that the finished construction is in full compliance with the stated dimensions.

Does ABAAS permit the use of partially built-in ramps that require assistance to deploy before use, or of lifts that require assistance to use?

ABAAS requires independent accessibility, permitting only those ramps and platform lifts that can be used unassisted.

Does ABAAS permit the use of stairway chairlifts?

Stairway chairlifts are not permitted under ABAAS, because they do not accommodate an occupied wheelchair. Only platform lifts are recognized by ABAAS, and their use as an alternative to ramps or elevators is limited to certain spaces or conditions specified in ABAAS Section F206.7 (Platform Lifts).

Does ABAAS permit a parallel approach to accessible drinking fountains?

A parallel approach is not allowed under ABAAS, except at certain children's drinking fountains that cannot accommodate knee clearances because of the lowered height. ABAAS Section 602.2 (Drinking Fountains, Clear Floor Space) allows a parallel approach to units for children's use, where the maximum spout height is 30 inches above the finish floor or ground and the spout is located no more than 3-1/2 inches from the front edge of the unit, including bumpers.

Can an accessibility complaint's corrective action be placed on hold until the next repair project is undertaken?

An accessibility complaint corrective action cannot be placed on hold. A valid complaint must be corrected at the earliest possible date, since the U.S. Access Board is legally bound to resolve such a complaint within 180 days. In that period a correction or corrective plan of action must be proposed by the standard-setting agency that has jurisdiction over the complaint.

To which facilities does the Architectural Barriers Act apply?

a The Architectural Barriers Act applies to any facility that is intended for use by the public or that may result in the employment or residence

therein of individuals with disabilities, which meets one of the following criteria of federal jurisdiction:

- **i.** Constructed or altered by, or on behalf of, the United States
- **ii.** Leased in whole or in part by the United States
- **iii.** Financed in whole or in part by a grant or loan made by the United States, if the building or facility is subject to standards for design, construction, or alteration issued under the authority of the law authorizing such a grant or loan
- **iv.** Constructed under the authority of the National Capital Transportation Act of 1960, the National Capital Transportation Act of 1965, or Title III of the Washington Metropolitan Area Transit Regulation Compact

b The Architectural Barriers Act does not apply to any privately owned residential facility unless leased by the federal government for subsidized housing programs, nor to any facility on a military installation designed and constructed primarily for use by able-bodied military personnel.

What standards must be met by facilities subject to the Architectural Barriers Act?

a GSA adopts appendices C and D to 36 CFR part 1191 (ABA Chapters 1 and 2, and Chapters 3 through 10), and 36 CFR part 1190 (Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way),

as the Architectural Barriers Act Accessibility Standard (ABAAS). Facilities subject to the ABA (other than facilities described in paragraphs (b) and (c) of this section) must comply with ABAAS as set forth below:

i. For construction or alteration of facilities subject to the Architectural Barriers Act (other than federal lease-construction and other lease actions described in paragraphs (a)(ii) and (iii), respectively, of this section), compliance with ABAAS is required if the construction or alteration commenced after May 8, 2006. If the construction or alteration of such a facility commenced on or before May 8, 2006, compliance with the Uniform Federal Accessibility Standards (UFAS) is required.

ii. For federal lease-construction actions subject to the ABA, where the federal government expressly requires new construction to meet its needs, compliance with ABAAS is required for all such leases awarded on or after June 30, 2006. UFAS compliance is required for all such leases awarded before June 30, 2006.

iii. For all other lease actions subject to the Architectural Barriers Act (other than those described in paragraph (a)(ii) of this section), compliance with ABAAS is required for all

such leases awarded pursuant to solicitations issued after February 6, 2007. UFAS compliance is required for all such leases awarded pursuant to solicitations issued on or before February 6, 2007.

b Residential facilities subject to the Architectural Barriers Act must meet the standards prescribed by the Department of Housing and Urban Development.

c Department of Defense and United States Postal Service facilities subject to the Architectural Barriers Act must meet the standards prescribed by those agencies.

d GSA projects must use the latest published edition of the ICC I-Codes in effect at the time of project solicitation throughout design and construction in accordance with 40 U.S. Code § 3312.

What costs are included in the costs of alterations to provide an accessible path of travel to an altered area containing a primary function for facilities subject to ABAAS?

For facilities subject to ABAAS, the costs of alterations to provide an accessible path of travel to an altered area containing a primary function include the costs associated with:

a Providing an accessible route to connect the altered area and site arrival points, including but not limited to interior and exterior ramps, elevators and lifts, and curb ramps.

b Making entrances serving the altered area accessible, including but not limited to widening doorways and installing accessible hardware.

c Making restrooms serving the altered area accessible, including, but not limited to, enlarging toilet stalls, installing grab bars and accessible faucet controls, and insulating pipes under lavatories.

d Making public telephones serving the altered area accessible, including, but not limited to, placing telephones at an accessible height and installing amplification devices and TTYs.

e Making drinking fountains serving the altered area accessible.

f Making parking spaces serving the altered area accessible.

What is required if the costs of alterations to provide an accessible path of travel to an altered area containing a primary function are disproportionate to the costs of the overall alterations for facilities subject to ABAAS?

For facilities subject to ABAAS, if the costs of alterations to provide an accessible path of travel to an altered area containing a primary function are disproportionate to the costs of the overall alterations, then the path of travel must be made accessible to the extent possible without exceeding

20 percent of the costs of the alterations to the primary function area. Priority should be given to those elements that will provide the greatest access in the following order:

a An accessible route and an accessible entrance
b At least one accessible restroom for each sex or a single unisex restroom
c Accessible telephones
d Accessible drinking fountains
e Accessible parking spaces

What is a primary function area for purposes of providing an accessible route in leased facilities subject to ABAAS?

For purposes of providing an accessible route in leased facilities subject to ABAAS, a primary function area is an area that contains a major activity for which the leased facility is intended. Primary function areas include areas where services are provided to customers or the public, and offices and other work areas in which the activities of the federal agency using the leased facility are carried out.

What does "public right-of-way" mean?

Public right-of-way means public land acquired for or dedicated to transportation purposes, or other land where there is a legally established right for use by the public for transportation purposes.

What standard must public rights-of-way subject to the Architectural Barriers Act and covered under ABAAS meet?

a GSA adopts the appendix to 36 CFR part 1190 without additions or modification as the accessibility standard for pedestrian facilities in the public right-of-way. Pedestrian facilities in the public right-of-way subject to the Architectural Barriers Act (other than facilities in paragraphs (b) and (c) of this section) must meet the accessibility standard for pedestrian facilities in the public right-of-way so that pedestrian facilities located in the public right-of-way are readily accessible to and usable by pedestrians with disabilities. Compliance with this accessibility standard is mandatory–provided, however, that this standard does not address existing pedestrian facilities in the public right-of-way under the Architectural Barriers Act unless the pedestrian facilities are altered at the discretion of a covered entity.

b Residential public rights-of-way subject to the Architectural Barriers Act must meet the standards prescribed by the Department of Housing and Urban Development.

c Department of Defense and United States Postal Service public rights-of-way subject to the Architectural Barriers Act must meet the standards prescribed by those agencies.

Where pedestrian facilities subject to ABAAS are altered, must an alteration to a pedestrian facility be connected by a compliant pedestrian access route to an existing pedestrian circulation path?

Yes, pedestrian facilities in public rights-of-way subject to ABAAS that are altered must always be connected by a compliant pedestrian access route to an existing pedestrian circulation path.

Who has the authority to waive or modify ABAAS?

GSA's Administrator or his or her delegate has the authority to waive or modify the accessibility standards for buildings and facilities covered by the ABA on a case-by-case basis, if an agency head or a GSA department head submits a request for waiver or modification and the Administrator (or delegate) determines that the waiver or modification is clearly necessary. The Administrator or delegate must consult with the Access Board to ensure that the waiver or modification is based on findings of fact and not inconsistent with the ABA.

What record-keeping responsibilities do federal agencies have?

a The head of each federal agency must ensure that documentation is maintained on each contract, grant, or loan for the design, construction, or

alteration of a pedestrian facility in a public right-of-way subject to ABAAS containing one of the following statements:

i. The standard has been or will be incorporated in the design, the construction, or the alteration.

ii. The grant or loan has been or will be made subject to a requirement that the standard will be incorporated in the design, the construction, or the alteration.

iii. The standard has been waived or modified by the GSA Administrator, and a copy of the waiver or modification is included with the statement.

b If a determination is made that a pedestrian facility in a public right-of-way is not subject to ABAAS because the Architectural Barriers Act does not apply to the facility, then the head of the federal agency must ensure that documentation is maintained to justify the determination.

9

APPENDIX A: STRATEGIC COMMUNICATIONS PLAN

PUBLIC AWARENESS OF THE ARCHITECTURAL BARRIERS ACT COMPLAINT PROCESS

1 EXECUTIVE SUMMARY

This Strategic Communications Plan responds to a 2026 U.S. Government Accountability Office recommendation that the Administrator of the U.S. General Services Administration (GSA) take steps to increase public awareness of the Architectural Barriers Act (ABA) complaint process for accessibility barriers in GSA office buildings.

This plan provides a framework for developing awareness campaigns that help the public understand: that an accessibility complaint process exists; what types of barriers can be addressed by that complaint process; and where to find accurate information about filing a complaint. The goal is to ensure that visitors, employees, contractors, and other users of GSA-managed facilities can identify the appropriate complaint pathway when they encounter or observe an accessibility barrier.

2 STRATEGIC GOAL: Increase Public Awareness and Understanding of the ABA Complaint Process

GSA's National Accessibility Program should establish awareness campaigns aimed at increasing knowledge of the ABA complaint process. A successful awareness campaign should help people who work in or visit a GSA-managed facility:

- Know that an ABA complaint process exists
- Understand, at a basic level, what the process addresses
- Know that the U.S. Access Board accepts ABA complaints
- Can easily find current, accurate information about how to file an ABA complaint

3 APPROACH

Any awareness campaign should be built around the following four principles.

Centrally Governed

GSA's National Accessibility Program should establish the core message, accessibility standards, design framework, and other campaign requirements. The program should consult with the U.S. Access Board to ensure that messaging about the ABA complaint process is accurate and current. GSA's Office of Strategic Communication

(OSC) should also be involved, to ensure alignment with GSA priorities, communications standards, and broader messaging goals.

Site-Specific

Facility and building managers should be able to select and deploy communication tools based on their buildings, visitor populations, traffic patterns, and available communications channels.

Multi-Platform

No single channel will be sufficient for every facility or audience. Each awareness campaign should consider a range of physical, digital, and interpersonal communications channels such as posters, handouts, web content, social media, or staff talking points.

Partner-Enabled

GSA should work through organizations and channels that already have trusted relationships with relevant audiences. This includes the Access Board, disability advocacy organizations, professional associations, medical societies, nonprofit groups, and community organizations.

4 IMPLEMENTATION

In any implementation and distribution activity, communications should use centrally approved

messages and direct audiences to current Access Board information rather than creating independent interpretations of the complaint process. For any awareness campaign, GSA's National Accessibility Program should establish a detailed execution plan that includes:

- Campaign roles and responsibilities
- Approved core messaging, graphics, and any other campaign collateral
- Plans and details for deployment at GSA facilities
- Baseline goals for measuring the campaign's impact and effectiveness

The campaign lifecycle should be repeatable annually, but it may also be updated whenever substantive changes, evaluation findings, or other events require updates. Awareness campaigns may align with annual observances such as:

- The Interagency Accessibility Forum, held in May and cohosted by GSA and the Access Board
- Global Accessibility Awareness Day, observed on the third Thursday of May
- The Access Board's annual update on ABA complaint resolutions, typically occurring in mid-October

Awareness campaigns should not vary widely in terms of their core messaging. Rather, they will target particular building types, specific

stakeholders, and/or distribution channels. Some examples include:

- High-public-traffic facilities such as VA clinics, Social Security offices, and passport locations
- Facilities with significant exterior or pedestrian environments
- Veterans and other specific user populations
- Federal employees and contractors occupying GSA-managed facilities
- Disability rights groups and individual advocates

5 COMMUNICATION PARTNERS

U.S. Access Board

The U.S. Access Board is the authoritative source for the formal ABA complaint process. Communications should direct the public to the Access Board's current information rather than recreate detailed complaint procedures. Appointed members or staff of the Access Board may also support GSA's National Accessibility Program in terms of messaging accuracy, campaign development, and outreach.

GSA Office of Strategic Communication

OSC is an internal partner that should help ensure that campaign messaging aligns with GSA's broader communications priorities and standards. OSC is also the conduit for sharing content on GSA's website and social media channels.

Internal Implementation Partners

Implementation stakeholders are responsible for helping distribute campaign materials and directing people to authoritative information. They include:

- Facility and building managers
- Public-facing personnel
- Accessibility personnel, including Office of Civil Rights staff
- Communications staff
- Tenant agencies

External Implementation Partners

External implementation partners can help extend awareness through trusted relationships with established audiences. Depending on the campaign, they may share approved content, provide feedback on audience needs, or collaborate with GSA's National Accessibility Program on campaign development. Potential partners include:

- Disability advocacy organizations
- Medical societies
- Community-based organizations
- U.S. Access Board members and staff

6 AUDIENCE

The primary audience is the public, especially people who use or visit federally owned or leased

facilities and may encounter accessibility barriers, including:

- People with disabilities
- Caregivers and companions
- Visitors who observe potential accessibility barriers
- Federal employees working in or visiting GSA-managed facilities
- Federal contractors working in or visiting GSA-managed facilities

7 DEFINING SUCCESS

During and after implementation of an awareness campaign, GSA's National Accessibility Program should collect and analyze data to determine whether the campaign was successful. Possible data points may include the following metrics:

Implementation

- Number of participating facilities deploying approved materials
- Number of internal and external partners distributing non-physical collateral

Reach

- Physical locations' use of materials
- Digital-signage impressions where measurable
- Social-media reach and engagement

Engagement

- Visits to the relevant information page
  QR-code scans
- Engagement with educational social content

Understanding

Where feasible, pre- and post-implementation surveys or other user research should be conducted to determine whether audiences understand:

- That an ABA complaint process exists
- What the process is generally intended to address
- That the U.S. Access Board accepts complaints
- Where to obtain additional information

In a similar emphasis on qualitative learning, feedback collected from facility personnel, accessibility professionals, people with disabilities, and partner organizations can determine the clarity and usefulness of the awareness campaign.

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U.S. GENERAL SERVICES ADMINISTRATION
PUBLIC BUILDINGS SERVICE
1800 F STREET NW
WASHINGTON, DC 20405