

Chapter 6

Items 6-1-12 through 6-70-12

June 14, 2013.

This is one of ten documents containing those proposed changes to the A117.1 Standard, 2009 edition; for which Committee Ballot comments or Proponent Comments were received. Each item will be discussed at the meeting of A117.1 Committee during the week of July 15, 2013, in Washington D.C. This document does not contain proposals for which no comments were received. Those proposals, and the Committee decision on each one, can be viewed in the Committee Action Report (CAR) under the title: First Draft Standard Development at this following location: <http://www.iccsafe.org/cs/standards/A117/Pages/default.aspx>

6-1– 12

602.1, 602.2 (New), 602.2.1, 602.2.2, 602.2.2.3, 602.3, 602.3.1 (New), 602.3.2 (New), 602.3.3 (New), 602.3.4 (New), 602.4, 602.5, 602.6

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

602.1 General. Wheelchair accessible drinking fountains shall comply with Sections 602.2 and 307. Drinking fountains for standing persons shall comply with Section 602.3 and 307.

602.2 Wheelchair accessible drinking fountains. Wheelchair accessible drinking fountains shall comply with Section 602.2.1 through 602.2.5.

602.2 602.2.1 Clear Floor Space. A clear floor space complying with Section 305, positioned for a forward approach to the drinking fountain, shall be provided. Knee and toe space complying with Section 306 shall be provided. The clear floor space shall be centered on the drinking fountain.

EXCEPTIONS:

- ~~1. Drinking fountains for standing persons.~~
- ~~2. Drinking fountains primarily for children's use shall be permitted where the spout outlet is 30 inches (760 mm) maximum above the floor, a parallel approach complying with Section 305 is provided and the clear floor space is centered on the drinking fountain.~~

~~602.2.2 602.3 Operable Parts.~~ Operable parts shall comply with Section 309.

~~602.2.3 602.4 Spout Outlet Height.~~ Spout outlets of wheelchair accessible drinking fountains shall be 36 inches (915 mm) maximum above the floor. ~~Spout outlets of drinking fountains for standing persons shall be 38 inches (965 mm) minimum and 43 inches (1090 mm) maximum above the floor.~~

EXCEPTION: At drinking fountains primarily for children's use, the spout outlet shall be 30 inches (760 mm) maximum above the floor.

~~606.2.4 602.5 Spout Location.~~ The spout shall be located 15 inches (380 mm) minimum from the vertical support and 5 inches (125 mm) maximum from the front edge of the drinking fountain, including bumpers.

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EXCEPTION: ~~Where only a parallel approach is provided~~ At drinking fountains primarily for children's use, the spout shall be located 3¹/₂ inches (89 mm) maximum from the front edge of the drinking fountain, including bumpers.

606.2.5 602.6 Water Flow. The spout shall provide a flow of water 4 inches (102 mm) minimum in height. The angle of the water stream from spouts within 3 inches (76 mm) of the front of the drinking fountain shall be 30 degrees maximum, and from spouts between 3 inches (76 mm) and 5 inches (125 mm) from the front of the drinking fountain shall be 15 degrees maximum, measured horizontally relative to the front face of the drinking fountain.

602.3 Drinking fountains for standing persons. Drinking fountains for standing persons shall comply with Section 602.3.1 through 602.3.4.

602.3.1 Operable Parts. Operable parts shall comply with Section 309.3 and 309.4.

602.3.2 Spout Outlet Height. Spout outlets of drinking fountains for standing persons shall be 38 inches (965 mm) minimum and 43 inches (1090 mm) maximum above the floor.

EXCEPTION: Drinking fountains for standing persons and primarily for children's use shall be permitted where the spout outlet is 30 inches (760 mm) minimum and 43 inches (1090 mm) maximum above the floor.

602.3.3 Spout location. The spout shall be located 5 inches (125 mm) maximum from the front edge of the drinking fountain, including bumpers.

602.3.4 Water Flow. The spout shall provide a flow of water 4 inches (102 mm) minimum in height. The angle of the water stream from spouts within 3 inches (76 mm) of the front of the drinking fountain shall be 30 degrees maximum, and from spouts between 3 inches (76 mm) and 5 inches (125 mm) from the front of the drinking fountain shall be 15 degrees maximum, measured horizontally relative to the front face of the drinking fountain.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

The purpose of this proposal for drinking fountains is two-fold. 1) put criteria for children's drinking fountains under the specific requirements. 2) separate criteria for drinking fountains serving wheelchair users from those serving standing persons.

With the exception for children only being for wheelchair drinking fountains, literally standing drinking fountains in a preschool would have to be at an adult height, making them too high for the children they are intended to serve. Also, there are no technical criteria for standing drinking fountains for children. The adult standing requirements are too high for toddlers and pre-schoolers.

This separation of the criteria for wheelchair and standing fountains helps identify which pieces of the criteria are appropriate for each type. Ex: New Section 602.3.1 - Since a wheelchair clear floor space is not needed for access to the drinking fountain for standing persons, a wheelchair clear floor space should not be required for access to the controls through the reference to 309, which picks up a clear floor space under 309.2. (If a clear floor space is desired, it should be similar to that required for tactile signage.)

Are the spout location and water flow necessary for standing drinking fountains? For example, the location of the spout in relation to the back wall is only needed for knee clearance, not standing. Need input from the plumbing industry.

602.1-PAARLBERG.doc

Committee Action

Disapproved

Committee Reason: The Committee was not convinced that the proposal wasn't adding requirements for children who don't have disabilities. For example, why address standing children unless there is data which substantiates a need for children who may not be able to stoop and use a fountain.

**Ballot Comment and Proponent Comment Agenda- July 15-19, 2013:
Proposals of 2012 submitted on the ICC A117.1-2009**

BALLOT COMMENTS

6-1.1

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-1.2

Commenter Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: Drinking fountains are for the occupants of the space. The current requirements place the standing drinking fountain outside of the children's reach. Therefore, the current text is discriminatory against children who are not tall enough to reach the standing drinking fountain.

6-1.3

Commenter Hope Reed, Representing NMGCD

Ballot: Negative with comment:

Comment: The separation of wheelchair drinking fountains and standing person's drinking fountains is useful for adults and children. Children who are ambulatory and using leg braces, walkers, or crutches will need a standing drinking fountain.

Proponent Comment

6-1.4

Commenter: Kim Paarlberg, Representing ICC

Request the proposal be Approved as Submitted:

Reason: The intent is to separate the requirements for drinking fountains serving wheelchairs from drinking fountains serving standing persons. This is similar to what we did for the different types of showers. This should help clarify. For example: 1) you don't need an exception for clearances at the standing drinking fountain. 2) the spout height for children's fountains is located with the spout height, not in an exception under clear floor space. 3) since only children's fountains can use side approach, the depth of the spout requirements are clearer.

There is also the question of the standing drinking fountain required in pre-schools and day care facilities. Where the drinking fountains are for kids (not for the teachers), they should be able to be located at a height to serve standing kids, the same as in adult situations. The height chosen is between the child's wheelchair and standing adult heights. If the committee disagrees with this, the only thing that needs to change is this proposal is the removal of the exception in Section 602.3.2.

The committee reason argued about children stooping. This is more to allow for children to be able to reach the drinking fountain. The standing drinking fountain is too high for most small children.

6-2– 12

602.3

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

602.3 Operable Parts. Operable parts shall comply with Section 309.

**Ballot Comment and Proponent Comment Agenda- July 15-19, 2013:
Proposals of 2012 submitted on the ICC A117.1-2009**

EXCEPTION: Where bottled water fillers are provided as part of drinking fountains serving wheelchair and standing person, the bottled water filler in the drinking fountain for standing persons is not required to comply with Section 309.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

Bottled water fillers are being provided in many university and park settings. Not using disposable bottled water is an important part of recycling efforts. However, if the bottled water filler is behind the standing drinking fountain, it cannot be located in reach ranges. The intent of the exception is to allow for this option only if there is a bottled water filler over the accessible drinking fountain.



602.3 (NEW)-PAARLBERG.doc

Committee Action

Disapproved

Committee Reason: Committee was receptive to concept, but concerned the language didn't accomplish purpose. Perhaps a separate section would be better rather than an exception. Does it need both standing and seated levels?

BALLOT COMMENTS

6-2.1

Commenter: Gene Boecker, Representing NATO

Ballot: Negative with comment:

Comment: Bottle filling stations need to have a part in the standard. Major metropolitan areas are already addressing these within their plumbing codes. The means to address these elements from an accessibility standpoint is important. By the time the standard is effective hundreds of these will already be installed and many more on the way.

Revise as follows:

602 Drinking Fountains and Bottle Filling Stations.

602.7 Bottle Filling Stations. Bottle filling stations which shall comply with sections 602.7.1 and 602.7.2.

Exception: Where bottle filling stations are part of the drinking fountain for standing persons, the bottle filling station is not required to comply with this section provided a bottle filling station is located at the wheelchair accessible drinking fountain.

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602.7.1 Clear Floor Space. A clear floor space complying with Section 305, positioned for a forward or side approach, shall be provided.

602.7.2 Controls. Controls for bottle filling stations shall be hand operated or automatic. Hand operated controls shall comply with Section 309.

6-2.2

Commenter: Kim Paarlberg, Representing ICC
Ballot: Negative with comment:

Comment: These bottled water fillers are increasing common in airports and university settings. They are an important part of 'green' considerations in many states. How to make them accessible needs to be addressed.

Replace proposal as follows:

602 Drinking Fountains and Bottle Filling Stations.

602.7 Bottle Filling Stations. Bottle filling stations which shall comply with sections 602.7.1 and 602.7.2.

Exception: Where bottle filling stations are part of the drinking fountain for standing persons, the bottle filling station is not required to comply with this section provided a bottle filling station is located at the wheelchair accessible drinking fountain.

602.7.1 Clear Floor Space. A clear floor space complying with Section 305, positioned for a forward or side approach, shall be provided.

602.7.2 Controls. Controls for bottle filling stations shall be hand operated or automatic. Hand operated controls shall comply with Section 309.

6-2.3

Commenter: Hope Reed, Representing NMGCD
Ballot: Negative with comment:

Comment: Water bottle fillers, located at the top of drinking fountains, need to be accessible.

Proponent Comment

6-2.4

Commenter: Kim Paarlberg, Representing ICC

Replace the proposal with the following:

602 Drinking Fountains and Bottle Filling Stations.

602.7 Bottle Filling Stations. Bottle filling stations which shall comply with sections 602.7.1 and 602.7.2.

Exception: Where bottle filling stations are part of the drinking fountain for standing persons, the bottle filling station is not required to comply with this section provided a bottle filling station is located at the wheelchair accessible drinking fountain.

602.7.1 Clear Floor Space. A clear floor space complying with Section 305, positioned for a forward or side approach, shall be provided.

602.7.2 Controls. Controls for bottle filling stations shall be hand operated or automatic. Hand operated controls shall comply with Section 309.

Reason: These bottled water fillers are increasing common in airports and university settings. They are an important part of 'green' considerations in many states. How to make them accessible needs to be addressed.

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This new proposal will address when bottled water fillers are stand alone or part of a drinking fountain system. The exception is an allowance that the standing drinking fountain requirements would not allow for reach over the fountain. Therefore, the bottle water filler must be over both fountains or over the wheelchair fountain

6-3- 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-4- 12

604.1

Proposed Change as Submitted

Proponent: Terri Stewart, The American Institute of Architects, representing The Task Force on Aging

Revise as follows:

604.1 General. Accessible water closets and toilet compartments shall comply with Section 604. Compartments containing more than one plumbing fixture shall comply with Section 603. Wheelchair accessible compartments shall comply with Section 604.9. Ambulatory accessible compartments shall comply with Section 604.10.

EXCEPTIONS:

1. Water closets and toilet compartment primarily for children's use shall be permitted to comply with Section 604.10 as applicable.
2. Water closets and toilet compartments for elder use in nursing home or assisted living facilities where fixtures are located in toilet or bath rooms directly accessible from a private or semiprivate bedroom, shall be permitted to comply with Section 604.12

Reason: Sufficient space is not provided for the space needed on both sides of the toilet for independent front approach transfers and assisted transfers.

604.1-STEWARD.doc

Committee Action

Disapproved

Committee Reason: Consistent with the action to disapprove Proposal 6-31-12.

BALLOT COMMENTS

6-4.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Affirmative with comment:

Comment: I believe that some specific criteria for assisted use in the Type B units would be acceptable to ICC A117.1 and not conflict with ADA. This idea should continue to be investigated.

**Ballot Comment and Proponent Comment Agenda- July 15-19, 2013:
Proposals of 2012 submitted on the ICC A117.1-2009**

6-4.2

Commenter: Edward Steinfeld, Representing RESNA
Ballot: Negative with comment:

Comment: The committee was going to reconsider this if the proponents came back with another better proposal. I do not think they had the opportunity to do this and would like to give them that opportunity in the summer. See comment to 6-31-12

6-5– 12 604.4, Figure 604.4

Proposed Change as Submitted

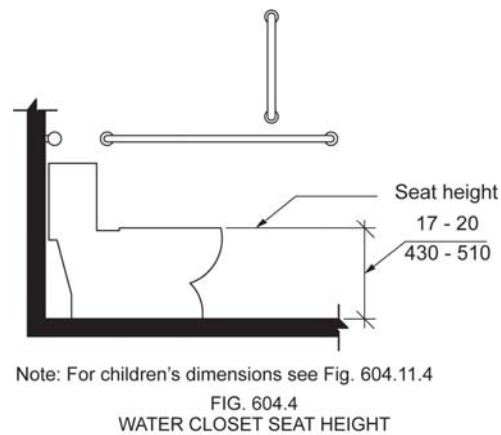
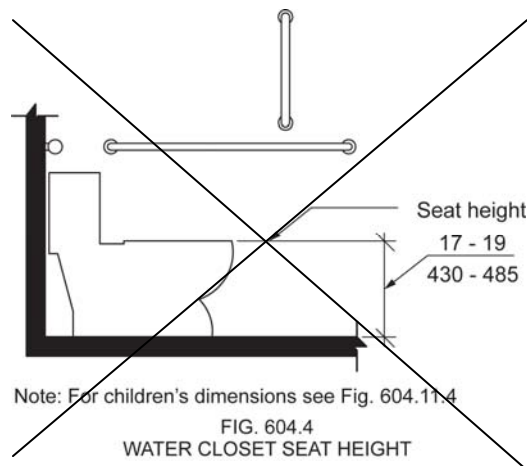
Proponent: Edward Steinfeld, IDEA Center, School of Architecture and Planning, University at Buffalo, State University of New York

Revise as follows:

604.4 Height. The height of water closet seats shall be 17 inches (430 mm) minimum and to 19 20 inches (485 510 mm) maximum above the floor, measured to the top of the seat. Seats shall not be sprung to return to a lifted position.

EXCEPTIONS:

1. An accessible water closet which is adjustable in height or which provides multiple hinged seats is permitted to provide adjustability within a range of 11 inches (280 mm) minimum to 25 inches (635 mm) maximum, provided that at least one adjustment setting provides a seat within the range specified in Section 604.4.
2. A water closet in a toilet room for a single occupant, accessed only through a private office and not for common use or public use, shall not be required to comply with Section 604.4.



Reason: Many of the technical requirements of the ICC/ANSI A117.1 (2009) Accessible and Usable Buildings and Facilities (ICC/ANSI) designed to accommodate wheeled mobility users are based on research completed from 1974 to 1978 using a research sample that included about 60 individuals who used manual wheelchairs (Steinfeld et al., 1979).

The Center for Inclusive Design and Environmental Access (IDeA) at the University at Buffalo, SUNY recently completed an anthropometric study of 500 wheeled manual and powered mobility device users (Steinfeld, et al., 2010). Measurements of body and device size were captured in three dimensions. The functional anthropometric measurements required measuring reaching ability, grip strength and the minimum space needed for turning. It is the most extensive anthropometric study of wheeled mobility device users in the United States. Additional information about the study can be found at <http://www.udeworld.com/ansi-standards->

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[review](#). The proposed revisions are based on new anthropometric information that was generated from the database of anthropometric measurements developed as part of the study.

Analysis

In addition to the findings reported in Steinfeld, et al., 2010, the IDeA Center developed a Design Resource entitled, *Analysis of Seat Height for Wheeled Mobility Devices* that provides more detailed information about the study reported in Steinfeld, et al., 2010. *Analysis of Seat Height for Wheeled Mobility Devices* indicates that the current maximum height of 19 inches (485 mm) accommodates 51% of female manual wheelchair users, 30% of manual wheelchair users, and fewer than 20% of power and scooter users. The report indicates a seat height of 25 inches (635 mm) would accommodate over 95% of all wheeled mobility device users (D'Souza and Steinfeld, 2011, pg. 5).

Increasing the maximum seat height to 20 inches (510 mm) would allow 75% of female manual wheelchair and 53% of male manual wheelchair users (D'Souza and Steinfeld, 2011, pg. 5) to transfer comfortably. Comfort in this case is determined by how closely the height of the transfer surface matches the height of a wheelchair seat. Steinfeld, et. Al., 2010 (pg. 85) report that "keeping the height of a transfer surface close to the height of a wheelchair seat reduces the effort necessary to transfer and provides a safer environment, especially in bathing and toilet rooms."

However, a fixed seat any higher than 20 inches (510 mm) would likely disadvantage people of short stature, particularly if it was the *only* water closet. Encouraging innovation would help to accommodate a greater number of wheeled mobility users without disadvantaging people of short stature. Adjustability is the best option to accommodate the widest population but in the meantime, the upper limit should be raised to 20 inches (Steinfeld, et al., 2010, pgs. 85-86).

Since the current standard indicates a seat height of 11 inches (280 mm) is acceptable for children's use (604.11.4), any product which is adjustable could reasonably lower to such a level at a minimum.

NOTE: This change necessitates a change to Fig. 604.4 to ensure consistency. Thus, the proposed revised figure has been attached, along with the existing figure for comparison purposes.

References (See <http://www.udeworld.com/ansi-standards-review> for full text)

D'Souza, C. and Steinfeld, E. (2011). *Analysis of Seat Height for Wheeled Mobility Devices*. Buffalo, NY: University at Buffalo Center for Inclusive Design and Environmental Access.

Steinfeld, E., Paquet, V., D'Souza, C., Joseph, C., and Maisel, J. (2010). *Final Report: Anthropometry of Wheeled Mobility Project*. Washington, DC: U.S. Access Board.

Steinfeld, E. Schroeder, S. and Bishop, M. (1979). *Accessible buildings for people with walking and reaching limitations*. Washington, DC: U.S. Department of Housing and Urban Development.

604.4-STEINFELD.doc

Committee Action

Disapproved

Committee Reason: The Committee was not convinced that changes in demography and equipment that raising the range to 20 inches was appropriate. Among the concerns was the application to ambulatory accessible compartments. Little persons would find the 20 inch height problematic. Regarding the exception, there was also concern about the durability and usability of the specified equipment.

BALLOT COMMENTS

6-5.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Affirmative with comment:

Comment: See comments to 3-6-12.

In addition, the adjustable seat is not practical from the point of how it should be used and maintained in a safe and healthy manner.

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6-5.2

Commenter: Barbara Huelat, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

6-5.3

Commenter: Edward Steinfeld, Representing RESNA
Ballot: Negative with comment:

Comment: The research results clearly shows that a higher range would be beneficial for wheeled mobility users but allowing fixed heights as high as 25 in. could cause difficulty for people who need low seat heights, as the committee noted in defeating the original proposal. I didn't think about an amendment when we voted on the proposal but only exception #1 was changed it would allow a range from 11-25 in. for adjustable water closets. This would mean that, as adjustable products come on the US market, they would provide a great alternative to the fixed seat height that would be too low for many people yet not disadvantage people of short stature or children with disabilities. At the July meeting, I will offer this proposal.

6-6– 12 604.5

Proposed Change as Submitted

Proponent: Terri Stewart, The American Institute of Architects, representing The Task Force on Aging

Revise as follows:

604.5 Grab Bars. Grab bars for water closets shall comply with Section 609 and shall be provided in accordance with Sections 604.5.1 and 604.5.2. Grab bars shall be provided on the rear wall and on the side wall closest to the water closet.

EXCEPTIONS:

1. Grab bars are not required to be installed in a toilet room for a single occupant, accessed only through a private office and not for common use or public use, provided reinforcement has been installed in walls and located so as to permit the installation of grab bars complying with Section 604.5.
2. In detention or correction facilities, grab bars are not required to be in housing or holding cells or rooms that are specially designed without protrusions for purposes of suicide prevention.
3. In nursing home and assisted living facilities where fixtures are located in toilet or bath rooms directly accessible from a private or semiprivate bedroom, two swing up grab bars complying with Sections 604.5.3 and 609 shall be permitted

Reason: Grab Bar Type. Grab bars on both sides of the toilet permit individuals with limited lower body strength who require assistance to maintain balance while clothing is removed or replaced. For individuals with limited upper body strength who are capable of independent, standing transfer, grab bars on both sides enable them to pull up to a standing position and lower down to a sitting position.

604.5-STEWART.doc

Committee Action

Disapproved

Committee Reason: Consistent with the action to disapprove Proposal 6-31-12.

**Ballot Comment and Proponent Comment Agenda- July 15-19, 2013:
Proposals of 2012 submitted on the ICC A117.1-2009**

BALLOT COMMENTS

6-6.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Affirmative with comment:

Comment: I believe that some specific criteria for assisted use in the Type B units would be acceptable to ICC A117.1 and not conflict with ADA. This idea should continue to be investigated.

6-6.2

Commenter: Edward Steinfeld, Representing RESNA

Ballot: Negative with comment:

Comment: The committee was going to reconsider this if the proponents came back with another better proposal. I do not think they had the opportunity to do this and would like to give them that opportunity in the summer. See comment to 6-31-12

6-7– 12

This proposal was approved by the committee. No ballot or proponent comments were received. It will be included in the Public Draft.

6-8– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-9– 12

604.5.1

Proposed Change as Submitted

Proponent: Hank Falstad, Access Technologies services, Inc., representing self

Revise as follows:

604.5.1 Fixed Side Wall Grab Bars. Fixed side-wall grab bars shall be ~~42~~ 48 inches (~~1065~~ 1220 mm) minimum in length, located 12 inches (305 mm) maximum from the rear wall and extending ~~54~~ 39 inches (~~1370~~ 990 mm) minimum from the rear wall. In addition, a vertical grab bar ~~18~~ inches (~~455~~ mm) minimum in length shall be mounted with the bottom of the bar located ~~39~~ inches (~~990~~ mm) minimum and ~~41~~ inches (~~1040~~ mm) maximum above the floor, and with the center line of the bar located ~~39~~ inches (~~990~~ mm) minimum and ~~41~~ inches (~~1040~~ mm) maximum from the rear wall and 41 inches (1040 mm) maximum at which point the grab bar turns up 90 degrees.

EXCEPTION: ~~The vertical grab bar at water closets primarily for children's use shall comply with Section 609.4.2.~~

Reason: This combines the parallel grab bar and the vertical grab bar giving the user a continuous grab bar with greater leveraging using both the forearm and the hand.

604.5.1-FALSTAD.doc

Committee Action

Disapproved

Committee Reason: The change would not be consistent with the ADA 2010.

BALLOT COMMENTS

6-9.1

Commenter: Barbara Huelat, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

6-10– 12

604.5.2, Figure 604.5.2

Proposed Change as Submitted

Proponent: Terry G. Wendt Jr, AIA, Wisconsin Department of Transportation

Revise as follows:

604.5.2 Rear Wall Grab Bars. The rear wall grab bar shall be 36 inches (915 mm) minimum in length and extend from the centerline of the water closet between 12 inches (305) minimum on the side closest to the wall, and 24 inches (610 mm) minimum on the transfer side, and located 5 inches (125 mm) from the side wall.

EXCEPTIONS:

1. The rear grab bar shall be permitted to be 24 inches (610 mm) minimum in length, centered on the water closet, where wall space does not permit a grab bar 36 inches (195 mm) minimum in length due to the location of a recessed fixture adjacent to the water closet.
2. Where an administrative authority requires flush controls for flush valves to be located in a position that conflicts with the location of the rear grab bar, that grab bar shall be permitted to be split or shifted to the open side of the toilet area.

Revise Figure 604.5.2 to reflect changes of text to Section 604.5.2

Reason: Suggested change will make compliance much easier to accomplish by enabling craftspeople to position the grab bar from a known point (the side wall). Having the grab bar position dependent on the location of the water closet often results in non-compliant installations because the exact position of the water closet fluctuates. The requirement of 5 inches from the side wall was calculated based on the water closet centerline being between 16 and 18 inches from the side wall as required by Section 604.2 – if the end of a 36 inch grab bar is positioned 5 inches from the side wall, the ends will be within 1 inch of the 12 inch / 24 inch relative position currently described in Section 604.5.2 (assuming the water closet is positioned in a compliant manner). This would streamline inspections by only requiring two measurements – distance from the side wall and length. It would also make the rear grab bar requirement similarly described as for the other grab bars (based on distance from walls, not fixtures).

604.5.2-WENDT.doc

Committee Action

Disapproved

Committee Reason: The Committee preferred the current text. The loss of the reference to the centerline of the water closet was not liked. The proposal doesn't specify which side wall the 5 inches is measured from.

BALLOT COMMENTS

6-10.1

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-10.2

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: If this is a concern in the field, as indicated in the reason, the language could be revised to be consistent with the start of the side grab bars.

Replace the proposal as follows:

604.5.2 Rear Wall Grab Bars. The fixed rear wall grab bar shall be 36 inches (915 mm) minimum in length and extend from the centerline of the water closet between 12 inches (305) minimum on the side closest to the wall, and 24 inches (610 mm) minimum on the transfer side, located 6 inches maximum (150 mm) from the side wall and extending 42 inches (1065 mm) from the side wall.

EXCEPTIONS:

1. The rear grab bar shall be permitted to be 24 inches (610 mm) minimum in length, centered on the water closet, where wall space does not permit a grab bar 36 inches (915 mm) minimum in length due to the location of a recessed fixture adjacent to the water closet.
 2. Where an administrative authority requires flush controls for flush valves to be located in a position that conflicts with the location of the rear grab bar, that grab bar shall be permitted to be split or shifted to the open side of the toilet area.
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6-11– 12

Figure 604.5.3 (New)

Proposed Change as Submitted

Proponent: Terri Stewart, The American Institute of Architects, representing The Task Force on Aging

Add new Figure as follows:

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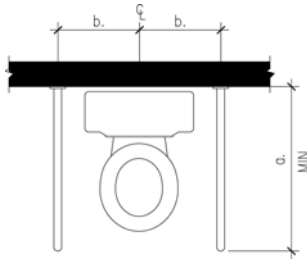


Figure 604.5.3
Swing-up Grab Bars for Water Closet *

* Dimension a. and b will be determined upon research results currently being conducted. (See Chapter 5 of White Paper, April 22, 2012.)

Reason: Rationale: Grab Bar Type. Grab bars on both sides of the toilet permit individuals with limited lower body strength who require assistance to maintain balance while clothing is removed or replaced. For individuals with limited upper body strength who are capable of independent, standing transfer, grab bars on both sides enable them to pull up to a standing position and lower down to a sitting position.

604.5.3(NEW)(FIGURE)-STEWART.doc

Committee Action

Disapproved

Committee Reason: Consistent with the action to disapprove Proposal 6-31-12.

BALLOT COMMENTS

6-11.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Affirmative with comment:

Comment: I believe that some specific criteria for assisted use in the Type B units would be acceptable to ICC A117.1 and not conflict with ADA. This idea should continue to be investigated.

6-11.2

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-12- 12

604.6, 604.11.6, 1003.11.2.4.6

Proposed Change as Submitted

Proponent: Len Swatkowski, Plumbing Manufacturers International

Revise as follows:

604.6 Flush Controls. Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with Section 309. Hand operated flush controls shall be located on the open side of the water closet or center mounted on the water closet or wall behind it as long as its location complies with one or more of the reach ranges specified in Section 308.

EXCEPTION: In ambulatory accessible compartments complying with Section 604.10, flush controls shall be permitted to be located on either side of the water closet.

604.11.6 Flush Controls. Flush controls primarily for children's use shall be hand operated or automatic. Hand operated flush controls shall comply with Sections 309.2 and 309.4 and shall be installed 36 inches (915 mm) maximum above the floor. Hand operated flush controls shall be located on the open side of the water closet or center mounted on the water closet or wall behind it as long as its location complies with one or more of the reach ranges specified in Section 308.

EXCEPTION: In ambulatory accessible compartments complying with Section 604.10, flush controls shall be permitted to be located on either side of the water closet.

1003.11.2.4.6 Flush Controls. Flush controls shall be hand-operated or automatic. Hand operated flush controls shall comply with Section 309. Hand-operated flush controls shall be located on the open side of the water closet or center mounted on the water closet or wall behind it as long as its location complies with one or more of the reach ranges specified in Section 308.

Reason: Provide reach ranges for flushing controls – acceptability of flush controls mounted on the center of toilet tanks
Provide reach-range requirements for flush controls, especially those located in the center of the tank. 604.6, 604.11.6, 1003.11.2.4.6

604.6-SWATKOWSKI.doc

Committee Action

Approval as Modified

Modification

604.6 Flush Controls. Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with Section 309. Hand operated flush controls shall be located on the open side of the water closet or centered mounted on the water closet or wall behind it as long as its location complies with one or more of the reach ranges specified in Section 308.

EXCEPTION: In ambulatory accessible compartments complying with Section 604.10, flush controls shall be permitted to be located on either side of the water closet.

604.11.6 Flush Controls. Flush controls primarily for children's use shall be hand operated or automatic. Hand operated flush controls shall comply with Sections 309.2 and 309.4 and shall be installed 36 inches (915 mm) maximum above the floor. Hand operated flush controls shall be located on the open side of the

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water closet or centered ~~mounted on the water closet or wall behind it as long as its location complies with one or more of the reach ranges specified in Section 308.~~

EXCEPTION: In ambulatory accessible compartments complying with Section 604.10, flush controls shall be permitted to be located on either side of the water closet.

1003.11.2.4.6 Flush Controls. Flush controls shall be hand-operated or automatic. Hand operated flush controls shall comply with Section 309. Hand-operated flush controls shall be located on the open side of the water closet or centered ~~mounted on the water closet or wall behind it as long as its location complies with one or more of the reach ranges specified in Section 308.~~

Committee Reason: Initially the Committee was concerned that the wall placement together with phrase about center mounted would lead to confusion. What would a wall mounted flush mechanism be centered on? The proposal was revised to eliminate the wall mounting option. While there was concern that this option lessened accessibility from the current standard, on balance the Committee felt the need to allow dual flush mechanisms was important.

BALLOT COMMENTS

6-12.1

Commenter: Christopher Bell, Representing ACB

Ballot: Negative with comment:

Comment: This proposal is a significant reduction in accessibility. One of the primary improvements in accessible restroom design over the last years has been the concept of providing the flush control on the open side of the toilet compartment, where it is reachable to a very high degree. Also, some of the center-mounted button models are quite difficult to push. Can they be operated without fine motor skills, with 5 pounds of force? Probably not.

Dual flush mechanisms are an excellent innovation, but should be provided on the open side in accessible units. A search on the Internet revealed models that can do this. An important principle is that the policy should drive the technology – the Committee should establish the correct specification and it, in turn, will push the mark

6-12.2

Commenter: Marilyn Golden, Representing DREDF

Ballot: Negative with comment:

Comment: This proposal is a significant reduction in accessibility. One of the primary improvements in accessible restroom design over the last years has been the concept of providing the flush control on the open side of the toilet compartment, where it is reachable to a very high degree. Also, some of the center-mounted button models are quite difficult to push. Can they be operated without fine motor skills? Probably not.

Dual flush mechanisms are an excellent innovation, but should be provided on the open side in accessible units. A search on the Internet revealed models that can do this. An important principle is that the policy should drive the technology – the Committee should establish the correct specification and it, in turn, will push the market to develop many additional models.

6-12.3

Commenter: Gina Hilberry, Representing UCP

Ballot: Negative with comment:

Comment: It is not clear that this does not reduce accessibility or that the flush mechanism is still required to be within reach ranges. In addition, wall mounted flush controls that are located on the open side of the toilet seem to be prohibited by this language.

6-12.4

Commenter: Edward Steinfeld, Representing RESNA

Ballot: Negative with comment:

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Comment: The implications of this proposal were not well thought out. It may mean that accessible toilets cannot be water saving toilets. A simple fix would be to allow the control to be to provide more leeway in the location of the control vis a vis the clear floor space.

6-13– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-14– 12

604.7, 604.11.7

Proposed Change as Submitted

Proponent: Ed Roether, ADA/A117.1 Harmonization Task Group

Revise as follows:

604.7 Dispensers. Toilet paper dispensers shall comply with Section 309.4. Where the dispenser is located above the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 36 inches (915 mm) maximum from the rear wall. Where the dispenser is located below the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 42 inches (1065 mm) maximum from the rear wall. The outlet of the dispenser shall be located 18 inches (455 mm) minimum and 48 inches (1220 mm) maximum above the floor. Dispensers shall comply with Section 609.3. Dispensers shall not be of a type that control delivery, or do not allow continuous paper flow.

EXCEPTION: Toilet paper dispensers that accommodate a maximum of 2 toilet paper rolls of not more than 5 inch diameter each shall be permitted to be located 7 inches minimum and 9 inches maximum in from the of the water closet measured to the centerline of the dispenser.

604.11.7 Dispensers. Toilet paper dispensers primarily for children's use shall comply with Section 309.4. The outlet of dispensers shall be located within an area 24 inches (610 mm) minimum and 42 inches (1065 mm) maximum from the rear wall. The outlet of the dispenser shall be 14 inches (355 mm) minimum and 19 inches (485 mm) maximum above the floor. There shall be a clearance of 1^{1/2} inches (38 mm) minimum below the grab bar. Dispensers shall not be of a type that control delivery or do not allow continuous paper flow.

EXCEPTION: Toilet paper dispensers that accommodate a maximum of 2 toilet paper rolls of not more than 5 inch diameter each shall be permitted to be located 7 inches minimum and 9 inches maximum in from the of the water closet measured to the centerline of the dispenser

Reason: The ADA/A117 Harmonization Task Group (HTG) was created as a task group of the A117.1 Committee to compare the 2010 ADA with the 2009 A117.1 Standard. The HTG has recommend a series of changes through a set of change proposals. The HTG is recommending changes, for the most part, address where the ADA was viewed as more stringent than the A117. Where the A117 contained provisions not addressed in the ADA, these were not considered a conflict needing action to amend the A117. In addition there are a number of places where the ADA and A117.1 are different as a result of specific actions, by the A117.1 Committee during the development of the 2009 edition, to remain or create a difference where, in the judgment of the committee the ADA was deficient.

Reason for dispensers. While the intent of the provisions in the 2009 ICC A117.1 was intended to allow for a larger toilet paper rolls and recessed dispensers within reach of a person using the water closet (and be considered equivalent to the intent of the 2010 ADA standard), there have been concerns that there may be some reviewers that would not consider the option equivalent to

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what is required by the 2010 ADA Standard. The committee has already identified that the 2010 ADA standard does not work with the mega roll design. Therefore the intent of the exception is to allow for someone using the standard toilet paper roll at the location addressed in the 2010 ADA standard.

802.10.1-Roether.doc

Committee Action

Approved

604.7 Dispensers. Toilet paper dispensers shall comply with Section 309.4. Where the dispenser is located above the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 36 inches (915 mm) maximum from the rear wall. Where the dispenser is located below the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 42 inches (1065 mm) maximum from the rear wall. The outlet of the dispenser shall be located 18 inches (455 mm) minimum and 48 inches (1220 mm) maximum above the floor. Dispensers shall comply with Section 609.3. Dispensers shall not be of a type that control delivery, or do not allow continuous paper flow.

EXCEPTION: Toilet paper dispensers that accommodate a maximum of 2 toilet paper rolls of not more than 5 inch diameter each shall be permitted to be located 7 inches minimum and 9 inches maximum in front of the water closet measured to the centerline of the dispenser.

604.11.7 Dispensers. Toilet paper dispensers primarily for children's use shall comply with Section 309.4. The outlet of dispensers shall be located within an area 24 inches (610 mm) minimum and 42 inches (1065 mm) maximum from the rear wall. The outlet of the dispenser shall be 14 inches (355 mm) minimum and 19 inches (485 mm) maximum above the floor. There shall be a clearance of 1¹/₂ inches (38 mm) minimum below the grab bar. Dispensers shall not be of a type that control delivery or do not allow continuous paper flow.

EXCEPTION: Toilet paper dispensers that accommodate a maximum of 2 toilet paper rolls of not more than 5 inch diameter each shall be permitted to be located 7 inches minimum and 9 inches maximum in front of the water closet measured to the centerline of the dispenser

Committee Reason: The exceptions allow specific compliance with the 2010 ADA within the context of the Standard. The Standard's existing text has been judged as equivalent to the ADA provisions.

Note: The proposal had an editorial error with the use of 'from the' which should have simply been 'front'. The sentences did not read properly with the wrong words.

BALLOT COMMENTS

6-14.1

Commenter: Marsha K. Mazz, Representing Access Board

Ballot: Affirmative with comment:

Comment: The committee's reason statement should be modified for clarity. It says "The exceptions allow specific compliance with the 2010 ADA within the context of the Standard. The Standard's existing text has been judged as equivalent to the ADA provisions." In the first sentence, the meaning of the phrase "within the context of the Standard" is an ambiguous qualifier. The second sentence leaves it up to the reader to determine who or what entity "judged" this action "equivalent to the ADA provision". Given that, under the ADA, only the Department of Justice or a court of law can make this judgment, I recommend revising the statement to say that the "Committee" judged this action to be equivalent.

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6-15- 12
604.7, Figure 604.7

Proposed Change as Submitted

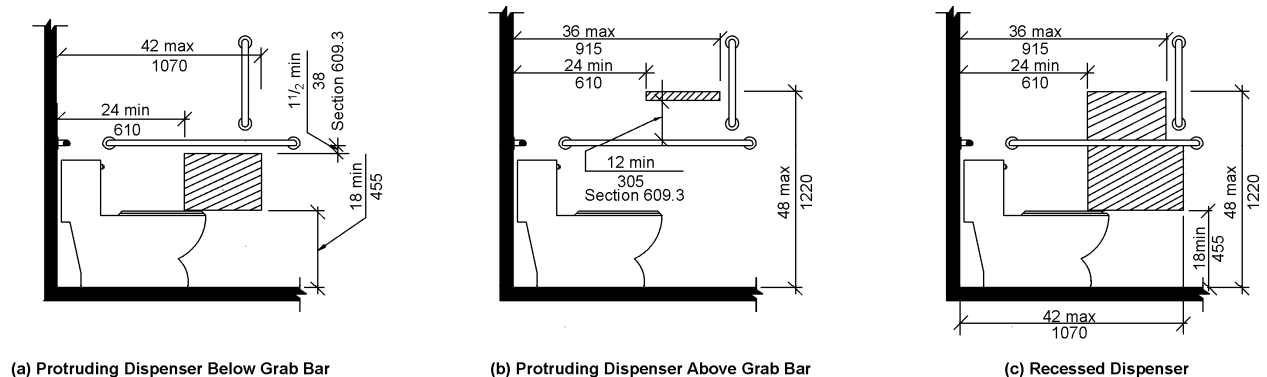
Proponent: Alan Gettelman, Bobrick Washroom Equipment, Inc.

Revise as follows:

604.7 Dispensers. Toilet paper dispensers shall comply with Section 309.4. Where the dispenser is located above the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 36 inches (915 mm) maximum from the rear wall, Where the dispenser is located below the grab bar, the outlet of the dispenser shall be located within an area 24 inches (610 mm) minimum and 42 inches (1070 mm) maximum from the rear wall. The outlet of the dispenser shall be located ~~48 inches (1220 mm)~~ 15 inches (380 mm) minimum and 48 inches (1220 mm) maximum above the floor. Dispensers shall comply with Section 609.3. Dispensers shall not be of a type that control delivery, or do not allow continuous paper flow.

Revise Figure as follows:

Change the vertical dimension on figures (a) and (c) indicating the vertical placement of dispensers above the floor from : ~~48 min (455)~~ to 15 min (380).



Note: For children's dimensions see Fig. 604.11.7 dispenser outlet location

Fig. 604.7
DISPENSER OUTLET LOCATION

Reason:

1. Inconsistent with ICC A117.1- 2009
 Section 3098.2 Forward Reach, 308.2.1 Unobstructed (Page 11), " low forward reach shall be 15 inches (380 mm) minimum"
 Figure 308.2.1 Unobstructed Forward Reach (Page 11), dimension call out "15 min (380 mm)"
 Section 308.3 Side Reach, 308.3.1 Unobstructed (Page 13, " low side reach shall be 15 min (380 mm)"
2. Inconsistent with 2010 ADA Standards
 Section 604.7 Dispensers (page 201), "the outlet of the dispenser shall be 15 inches (380 mm) minimum"
 Figure 604.7 Dispenser Outlet Location (page 202), dimension call out "15 min (380 mm)"
3. Having a common dimension of 15 inches minimum would be more efficient eliminating the current inconsistency which impacts installers and inspectors.
4. The change to a common dimension of 15 inches, in effect, may increase accessibility and encourage greater compliance.
5. It isn't clear that anthropometric or ergonomic data support an 18" dimension in this location.

604.7-GETTELMAN.doc

Committee Action

Disapproved

Committee Reason: The action to approve Proposal 6-14-12 was preferred. This is a designed developed by the Committee during the last cycle and it is still preferred over the wording of the ADA 2010.

BALLOT COMMENTS

6-15.1

Commenter: Alan Gettelman

Ballot: Affirmative with comment:

Comment: For consistency the ADA should harmonize with preferred, approved Proposal 6-14-12, "The outlet of the dispenser shall be 14 inches minimum and 19 inches maximum above the floor."

6-16– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-17– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-18– 12

604.9.2.3 (New)

Proposed Change as Submitted

Proponent: Gina Hilberry, United Cerebral Palsy Association

Add new text as follows:

604.9.2.3 Compartments with Enhanced Approach Area: Where enhanced approach area is required at toilet compartments, the minimum area of an enhanced wheelchair accessible compartment shall be 60 inches (1525 mm) minimum width measured perpendicular to the side wall, and 82 inches (2083 mm) minimum in depth for both wall hung and floor mounted water closets measured perpendicular to the rear wall.

Reason: 604.9.2.3 Standard 56" and 59" deep toilet compartments do not have enough space for people using a front transfer approach to the fixture. By definition the area occupied by the full size chair and person exceeds the space in between the front of the fixture and the partition. Because of this, users are forced to solve the problem by leaving the door open. It should be noted that this is not a scoping suggestion. This is much like the enhanced lavatories or the Type C Units, adding the clause will allow for future editions of the IBC or local jurisdictions to include this requirement in specific circumstances.

604.9.2.3 (New)-HILBERRY.doc

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Committee Action

Approved

Committee Reason: The Committee approved the proposal essentially endorsing the concept. However there was concern regarding using the term 'enhanced' here because it has been used in the Standard previously and, as such, may be confusing. While not a proposal of the Wheeled Mobility Task Group, it addresses similar issues of using other mobility devices.

BALLOT COMMENTS

6-18.1

Commenter: Gene Boecker, Representing NATO
Ballot: Affirmative with comment:

Comment: In addition, another exception must be added to the approved text for 6-19:

3. Toilet compartment doors with enhanced approach in accordance with Section 604.9.2.3 shall be allowed to swing inward, over the minimum compartment size, if the door is 66 inches (1675 mm) minimum from the rear wall.

Without this exception, only outward swinging doors would be permitted for the majority of these compartments. The 66-inch dimension was used because it is compatible with the additional depth needed where toe space is not provided (Section 604.9.5).

6-18.2

Commenter: Kim Paarlberg, Representing ICC
Ballot: Negative with comment:

Comment: While I appreciate the idea, I would like see the justification for the width and depth of the stall. With a 48" wheelchair space, this is assuming a water closet depth of (82-48=34) 34 inches? I also find the name confusing. If this is to allow for both a front and side approach option, we should state that for clarity. Maybe to just call this an alternate wheelchair compartment (similar to alternate roll-in shower) would be a better idea. Is the current graphic Figure 604.9.3.1(c) adequate? Then we might want to also revise the door overlap requirements in Section 604.9.3. The two options for exceptions would allot someone to get into the stall and maneuver. The 2nd option has the same language as 603.2.2 Exception 2.

Is this going to change if the wheelchair space size changes? Then it is even more important to understand the size justification.

Further modify proposal as follows:

604.9.2.3 Alternate wheelchair accessible Compartments with Enhanced Approach Area: Where ~~enhanced approach area~~ an alternate wheelchair compartment is required ~~at toilet compartments,~~ the minimum area of an ~~enhanced alternate~~ wheelchair accessible compartment shall be 60 inches (1525 mm) minimum width measured perpendicular to the side wall, and 82 inches (2083 mm) minimum in depth ~~for both wall hung and floor mounted water closets~~ measured perpendicular to the rear wall.

604.9.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404, except if the approach is to the latch side of the compartment door clearance between the door side of the stall and any obstruction shall be 42 inches (1065 mm) minimum. The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the required minimum area of the compartment.

Exception: In an alternate wheelchair accessible compartment, the door can swing into the stall where the clear floor space past the swing of the door meets the clearance for a wheelchair accessible compartment.

-or-

Exception: In an alternate wheelchair accessible compartment, the door can swing into the stall where a clear floor space complying with Section 305.3 is provided within the stall beyond the arc of the door swing.

6-19- 12
604.9.3, 604.10.3

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

604.9.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404, ~~except if the approach is to the latch side of the compartment door clearance between the door side of the stall and any obstruction shall be 42 inches (1065 mm) minimum.~~ The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the required minimum area of the compartment.

EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door clearance between the door side of the stall and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.

604.10.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404, ~~except if the approach is to the latch side of the compartment door the clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum.~~ The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Compartment doors shall not swing into the required minimum area of the compartment.

EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door, clearance between the door side of the stall and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

This proposal will do two things:

1. Relocating the existing text "except if the approach.....42 inches minimum" from the base paragraph into Exception 1 will match the normal format for exceptions and will clearly show that it is an exception which alters the base requirement to comply with Section 404.
2. It will clarify that the 42 inch requirement is intended for the exterior of the compartment and that the interior of the compartment does not need the door to comply with the maneuvering clearances of Section 404. This clarification does require exception 2 be added but it is consistent with the way the requirement has previously been applied.

In essence the only new text within the proposal is the wording "Outside of the compartment" at the beginning of Exception 1 and then all of the text within Exception 2.

604.9.3-PAARLBERG.doc

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Committee Action

Approved

Committee Reason: The change clarifies the location of the maneuvering clearance requirements with respect to compartment doors.

BALLOT COMMENTS

6-19.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Affirmative with comment:

Comment: Editorial correction

Revise as follows:

604.9.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404. The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the required minimum area of the compartment.

EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door clearance between the door side of the ~~stall~~ compartment and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.

604.10.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404. The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Compartment doors shall not swing into the required minimum area of the compartment.

EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door, clearance between the door side of the ~~stall~~ compartment and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.

Proponent Comment

6-19.2

Commenter: Kim Paarlberg, Representing ICC

Further modify the proposal as follows:

604.9.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404. The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the required minimum area of the compartment.

EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door clearance between the door side of the ~~stall~~ compartment and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.

604.10.3 Doors. Toilet compartment doors, including door hardware, shall comply with Section 404. The door shall be self-closing. A door pull complying with Section 404.2.6 shall be placed on both sides of the door near the latch. Compartment doors shall not swing into the required minimum area of the compartment.

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EXCEPTIONS:

1. Outside of the compartment, where the approach is to the latch side of the compartment door, clearance between the door side of the ~~stall~~ compartment and any obstruction shall be 42 inches (1065 mm) minimum.
2. Within the compartment, maneuvering clearances at the door are not required to comply with Section 404.

Reason: This should be an editorial correction.

6-20– 12

Table 604.9.3.1, Figure 604.9.3.1

Proposed Change as Submitted

Proponent: Alan Gettelman, Bobrick Washroom Equipment, Inc.

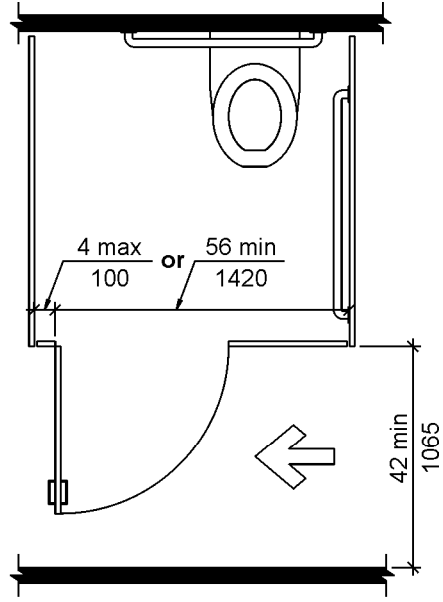
Revise as follows:

Table 604.9.3.1 – Door Opening Location

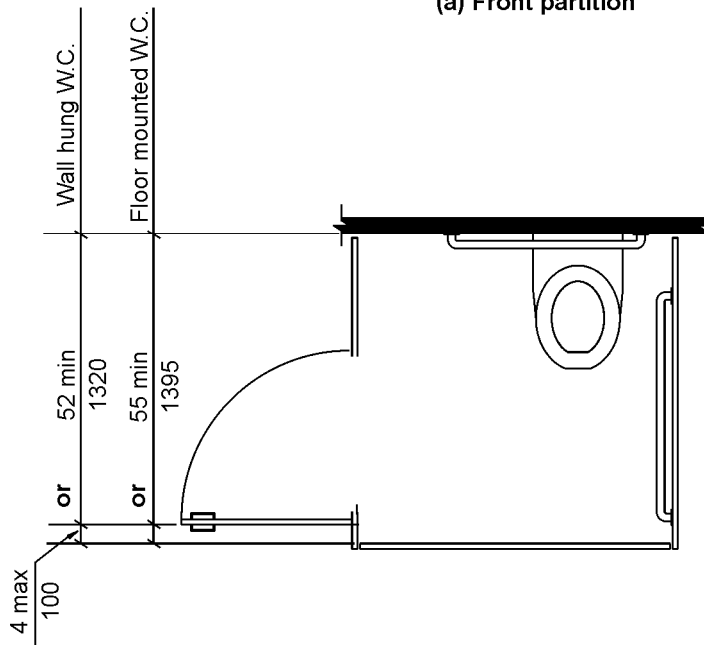
Door Opening Location	Measured From	Dimension
Front Wall or Partition	From the side wall or partition closest to the water closet	56 inches (1420 mm) minimum
	or	
	From the side wall or partition farthest from the water closet	4 inches (102 mm) maximum <u>4 inches 100 mm) minimum to 6 inches maximum (150 mm)</u>
Side Wall or Partition - Wall-Hung Water Closet	From the rear wall	52 inches (1320 mm) minimum
	or	
	From the front wall or partition	4 inches (102 mm) maximum <u>4 inches 100 mm) minimum to 6 inches maximum (150 mm)</u>
Side Wall or Partition - Floor-Mounted Water Closet	From the rear wall	55 inches (1395 mm) minimum
	or	
	From the front wall or partition	4 inches (102 mm) maximum <u>4 inches 100 mm) minimum to 6 inches maximum (150 mm)</u>

Revise Figure as follows:

Change the called dimension for door opening location to read: 4 inches (100 mm) minimum to 6 inches (150mm) maximum).



(a) Front partition



(b) Side wall or partition

Fig. 604.9.3.1

Wheelchair Accessible Compartment Doors

Reason:

1. Current absolute 4 inch (100 mm) maximum space from inside edge of side partition and door opening is an overly restrictive dimension creating installation and structural problems.
2. To maintain the 4 inch maximum space with a gap at the side all or with a coved floor into the wall the stile must be moved away from the wall and a 3" wide stile must be used. In many circumstances a 3" wide stile has a single floor anchor point providing minimum structural support for hinging the door.
3. As long as it would be allowed under the condition providing a wider compartment at the same time, allowing a range of 4 inches to 6 inches space for the door opening location would accommodate a number of field conditions; allowing the use

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of a 4" to 6" wide stile with two floor anchor points would greatly enhance the stability of the partition and door without compromising accessibility.

4. The 4" to 6" range for the location of the door opening would alleviate a structural issue on the Wheelchair Accessible Compartments wider than 60". With the current 4 inch maximum space stile at the other side of the door must be very wide reducing design flexibility and installation options.

604.9.3.1(TABLE)-GETTELMAN updated.doc

Committee Action

Disapproved

Committee Reason: The change would make the table more difficult to understand and therefore use. Changing from 4 inches maximum to a 4 inch minimum/6 inch maximum range would eliminate currently acceptable installations which are less than 4 inches.

BALLOT COMMENTS

6-20.1

Commenter: Alan Gettelman
Ballot: Negative with comment:

Comment: Change to 4 inch minimum to 6 inch maximum space for stile would be more practical to install and comply. Tables and figures with 4 – 6 inch range would be consistent with other tables and figures that present ranges (Example: Table of Dimensions at Water Closets Serving Children Ages 3 through 12). Since 4 inch wide stiles are industry standard, acceptable installations less than 4 inches are in the minority. Additionally, the 4 inch or less wide stile is not the most ideal from a strength standpoint support from which to hinge a 32 inch plus wide outswing door.

6-20.2

Commenter: Barbara Huelat, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

Proponent Comment

6-20.3

Commenter: Alan Gettelman

Revise Table as follows:

Table 604.9.3.1 – Door Opening Locations

Door Opening Location	Measured From	Dimension
Front Wall or Partition	From the side wall or partition closest to the water closet	56 inches (1420 mm) minimum
	or	
	From the side wall or partition farthest from the water closet	4 inches (102mm) maximum 4 inches (100mm) minimum to 6 inches maximum (150mm)
Side Wall or Partition - Wall-Hung Water Coset	From the rear wall	52 inches (1320 mm) minimum
	or	
	From the front wall or partition	4 inches (102mm) maximum

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		<u>4 inches (100mm) minimum</u> <u>to 6 inches maximum (150mm)</u>
Side Wall or Partition - Floor-Mounted Water Closet	From the rear wall	55 inches (1395 mm) minimum
	or	
	From the front wall or partition	<u>4 inches (102mm) maximum</u> <u>4 inches (100mm) minimum</u> <u>to 6 inches maximum (150mm)</u>

Revise Figure as follows:

Change the called dimension for door opening location to read: 4 inches (100mm) minimum to 6 inches (150mm) maximum.

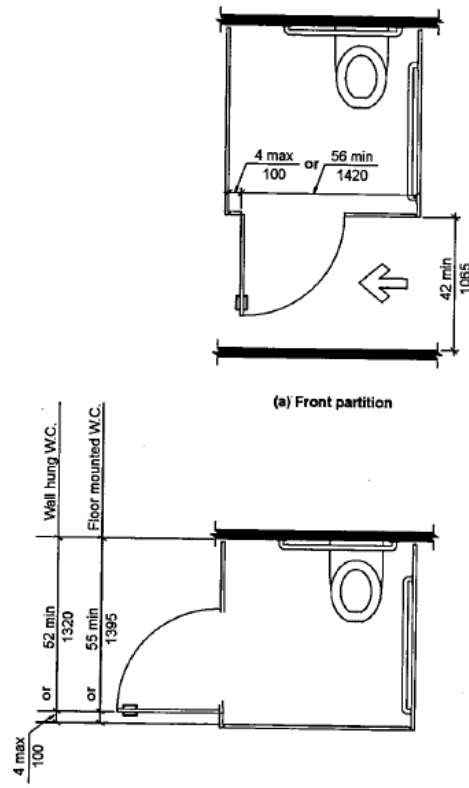


Fig. 604.9.3.1
Wheelchair Accessible Compartment Doors

Reasons:

1. Change to a single 6 inch maximum dimension is easily understood. This revision to the original proposal overcomes one of Committee' two reasons for disapproving the original proposal.
2. The 6 inch maximum dimension would include current acceptable installations which are less than 4 inches. This revision to the original proposal overcomes the second of Committee' two reasons for disapproving the original proposal.
3. Current 4 inch (100mm) maximum space for the door opening location from side partition or side wall surface to door opening is an overly restrictive dimension. The 4 inch maximum space creates installation problems with the stile and structural support issues with the out-swing door.

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4. To maintain the 4 inch maximum space for the door opening location at the side wall with a coved floor a 3 inch wide stile must be moved away from the wall to accommodate the radius of the cove. A 3 inch wide stile has a single floor anchor point providing minimum structural support for hinging the 32 + inch wide out-swing door.
 5. Allowing the 6 inch maximum space for the door opening location would allow the use of stiles wider than 3 inches having two floor anchor points increasing the structural support for hinging the 32+ inch wide out-swing door.
-

6-21– 12

This proposal was judged to be editorial. The work of the Editorial Task Group will be submitted to the full Committee at a future date.

6-22– 12

604.9.5, Figure 604.9.5, 609.5.1, 609.5.2

Proposed Change as Submitted

Proponent: Edward Steinfeld, IDEA Center, School of Architecture and Planning, University at Buffalo, State University of New York

Revise as follows:

604.9.5 Toe Clearance at Accessible Compartments. ~~Toe clearance for compartments primarily for children's use shall comply with Section 604.9.5.2. Toe clearance for other wheelchair accessible compartments shall comply with Section 604.9.5.1.~~

604.9.5.1 Toe Clearance at Compartments. ~~The front partition and at least one side partition of~~ compartments shall provide a toe clearance of 9 12 inches (~~230~~ 305 mm) minimum above the floor and extending 6 8 inches (~~450~~ 205 mm) beyond the compartment side face of the partition, exclusive of partition support members.

EXCEPTIONS:

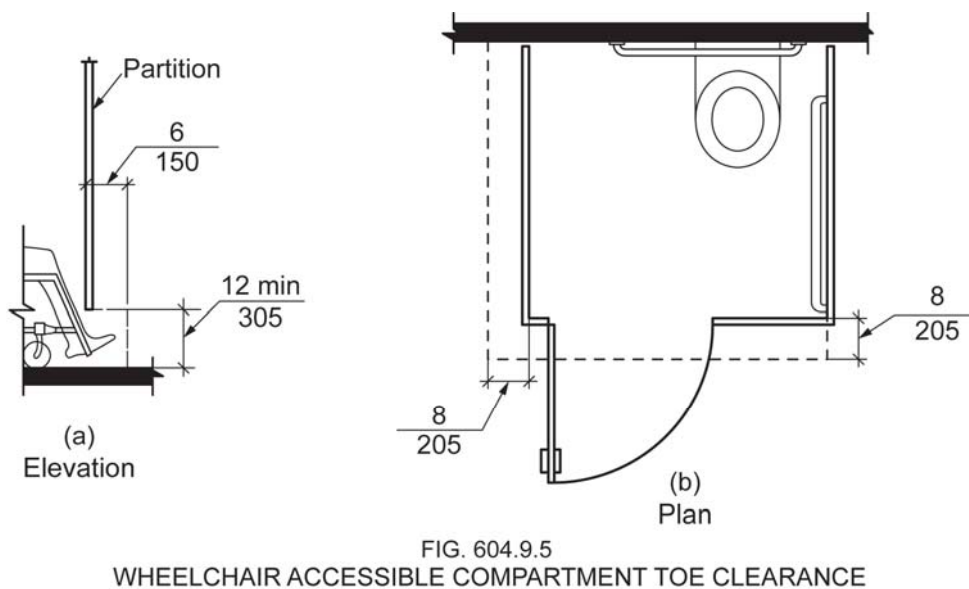
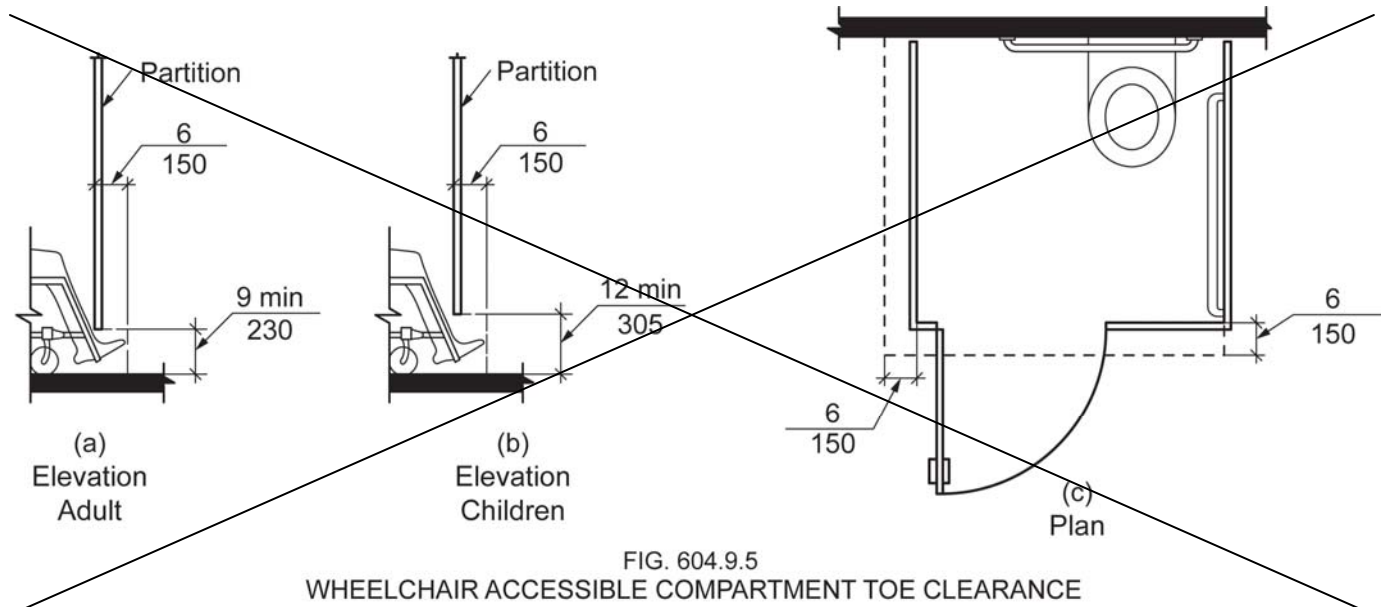
1. At compartments not designed for children's use, toe clearance at the front partition is not required in a compartment greater than 62 64 inches (4575 1625 mm) in depth with a wall-hung water closet, or greater than 65 67 inches (4650 1700 mm) in depth with a floor-mounted water closet.
2. At compartments designed for children's use, toe clearance at the front partition is not required in a compartment greater than 67 inches (1700 mm) in depth.
- ~~23.~~ Toe clearance at the side partition is not required in a compartment greater than ~~66~~ 68 inches (~~4675~~ 1730 mm) in width.

604.9.5.2 Toe Clearance at Compartments for Children's Use. ~~The front partition and at least one side partition of compartments primarily for children's use shall provide a toe clearance of 12 inches (305 mm) minimum above the floor and extending 6 inches (150 mm) beyond the compartment side face of the partition, exclusive of partition support members.~~

EXCEPTIONS:

1. ~~Toe clearance at the front partition is not required in a compartment greater than 65 inches (1650 mm) in depth.~~
2. ~~Toe clearance at the side partition is not required in a compartment greater than 66 inches (1675 mm) in width.~~

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Reason: Many of the technical requirements of the ICC/ANSI A117.1 (2009) Accessible and Usable Buildings and Facilities (ICC/ANSI) designed to accommodate wheeled mobility users are based on research completed from 1974 to 1978 using a research sample that included about 60 individuals who used manual wheelchairs (Steinfeld et al., 1979).

The Center for Inclusive Design and Environmental Access (IDeA) at the University at Buffalo, SUNY recently completed an anthropometric study of 500 wheeled manual and powered mobility device users (Steinfeld, et al., 2010). Measurements of body and device size were captured in three dimensions. The functional anthropometric measurements required measuring reaching ability, grip strength and the minimum space needed for turning. It is the most extensive anthropometric study of wheeled mobility device users in the United States. Additional information about the study can be found at <http://www.udeworld.com/ansi-standards-review>. The proposed revisions are based on new anthropometric information that was generated from the database of anthropometric measurements developed as part of the study.

Analysis

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In addition to the findings reported in Steinfeld, et al., 2010, the IDeA Center developed a Design Resource entitled, *Knee and Toe Clearances for Wheeled Mobility Users* that provides more detailed information about the study reported in Steinfeld, et al., 2010.

The toe clearance necessary in a toilet compartment is necessarily different from that which is necessary when reaching or using a fixture such as a sink. This is because the objective for providing such clearance in a toilet compartment is to provide sufficient space for a wheeled mobility user to maneuver within the confined space. Hence, the objective is turning, as opposed to moving as close to the wall as possible (as would be the case in reaching).

When a wheeled mobility user is limited by a barrier at the ankle (a toilet compartment partition, for example), the current ANSI height of 9 inches accommodates fewer than 50% of manual wheelchair users. The 6 inches horizontal extension of toe clearance into the adjacent compartment accommodates fewer than 25% of manual wheelchair users. Changing these numbers to 12 inches and 8 inches, respectively, would increase the percentage accommodated to 75%. (D'Souza, et al., 2011, fig. 2)

These figures assume the wheelchair occupant is as far forward to the partition as possible but it does not account for the total occupied length of the device. Based on the existing ANSI standard, we propose that the exceptions be changed accordingly to account for the additional 2 inches of space added for toe clearance. This means that if an adjacent compartment does not have the requisite 8 inches, the accessible compartment must have 2 more inches than previously required in order to be exempted. Further, Steinfeld, et al., 2010 (pg. 95, fig. 4-5) notes that in order to allow 95% of power and manual wheelchair users to perform a 180-degree turn, a 67-inch width is necessary, which is consistent with the proposed change to the exemptions.

There is no research to support changes to the children's figure, thus our proposal of a 12-inch toe clearance height now aligns with the existing children's toe clearance height, therefore we have eliminated the distinction in this proposal.

NOTE: This change necessitates a change to Fig. 604.9.5 to ensure consistency. Thus, the proposed revised figure has been attached, along with the existing figure for comparison purposes.

References (See <http://www.udeworld.com/ansi-standards-review> for full text)

D'Souza, C., White, J., Steinfeld, E., and Paquet, V. (2011). *Knee and Toe Clearances for Wheeled Mobility Users*. Buffalo, NY: University at Buffalo Center for Inclusive Design and Environmental Access.

Steinfeld, E., Paquet, V., D'Souza, C., Joseph, C., and Maisel, J. (2010). *Final Report: Anthropometry of Wheeled Mobility Project*. Washington, DC: U.S. Access Board.

Steinfeld, E. Schroeder, S. and Bishop, M. (1979). *Accessible buildings for people with walking and reaching limitations*. Washington, DC: U.S. Department of Housing and Urban Development.

604.9.5-STEINFELD.doc

Committee Action

Approved

Committee Reason: The Committee felt the changing range of wheeled mobility equipment in use necessitates these increases.

BALLOT COMMENTS

6-22.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: See the comment to 3-6-12.

In addition, it has proved to be necessary to keep the children's provisions in a separate section for ease of use of the standard. Even if this proposal goes through to change the size, the format for separate sections should be maintained.

6-22.2

Commenter: David S. Collins, representing American Institute of Architects

Ballot: Negative with comment:

Comment: The work of the study group isn't finalized and the research that formed the basis for this change has not been validated.

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6-23- 12
604.9.5.1, 604.9.5.2

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

604.9.5.1 Toe Clearance at Compartments. The front partition and at least one side partition shall provide a toe clearance of 9 inches (230 mm) minimum above the floor ~~and extending that extends~~ 6 inches (150 mm) minimum beyond the compartment side face of the partition, exclusive of partition support members.

EXCEPTIONS:

1. Toe clearance at the front partition is not required in a compartment greater than 62 inches (1575 mm) in depth with a wall-hung water closet, or greater than 65 inches (1650 mm) in depth with a floor-mounted water closet.
2. Toe clearance at the side partition is not required in a compartment greater than 66 inches (1675 mm) in width.

604.9.5.2 Toe Clearance at Compartments for Children's Use. The front partition and at least one side partition of compartments primarily for children's use shall provide a toe clearance of 12 inches (305 mm) minimum above the floor ~~and extending that extends~~ 6 inches (150 mm) minimum beyond the compartment side face of the partition, exclusive of partition support members.

EXCEPTIONS:

1. Toe clearance at the front partition is not required in a compartment greater than 65 inches (1650 mm) in depth.
2. Toe clearance at the side partition is not required in a compartment greater than 66 inches (1675 mm) in width.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

This proposal is intended to help clean up a problem that existed in the 2003 edition of the standard and then was partially addressed by the committee in the 2009 edition.

Figure 604.8.5 in the 2003 edition showed the toe space extending "6 Min" [6 inches minimum] beyond the compartment partition. At the committee's July 2006 meeting a decision was made by the committee to issue an errata and delete the word "min" from the figure. While deleting that wording from the figure does coordinate the figure with the actual text shown in the standard (604.9.5.1 in 2009 standard) it also established the 6 inch requirement as an absolute dimension. Since section 104.2 states "Dimensions that are not stated as "maximum" or "minimum" are absolute." it now appears that the open space beneath the partition may not extend beyond the 6 inch depth versus only allowing the 6 inches to count as toe clearance. It cannot be less than 6 inches, and cannot be more than 6 inches. To enforce this provision to the absolute, a barrier would be required to be installed to exactly 6 inches out from the inside portion of the toe clearance to ensure the clearance is maintained at an absolute 6-inch dimension.

Consideration needs to be given to Section 306.2 that outlines the minimum and maximum toe clearances. During the final development work of the 2009 standard the editorial task group looked at this issue and made the following comment and suggestion:

It is more probable that errata should never have been issued to change Figure 604.8.5. It is the text of Section 604.8.5 as shown in the 2003 edition that needs to be revised as follows:

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604.8.5 Toe Clearance. The front partition and at least one side partition shall provide a toe clearance of 9 inches (230 mm) minimum above the floor ~~and extending that extends~~ 6 inches (150 mm) minimum beyond the compartment side face of the partition, exclusive of partition support members. *(Remainder unchanged)*

Since revising the 6 inch dimension from an absolute requirement to a minimum would have been considered a substantive change the task group was not able to approve this as an editorial revision. This proposal is being brought forward to allow the committee to consider the editorial task group's recommendation and to clarify that the 6 inch toe space is not an absolute dimension but that it may extend beyond the 6 inch depth and coordinate with Section 306.2.4 and allow the additional clearance but simply not count it as toe clearance.

604.9.5.1-PAARLBERG.doc

Committee Action

Disapproved

Committee Reason: The text proposed is inappropriate as it implies that the toes could extend more than 6 inches beyond the partition. The existing language is preferred.

BALLOT COMMENTS

6-23.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: The committee's reason statement is incorrect. The proposed language does not imply that the toes can extend more than 6 inches beyond the partition, merely that the TOE CLEARANCE is allowed beyond that point. As currently worded the toe clearance is limited to 6 inches which is both a minimum and a maximum. There is no justifiable reason to prevent the clearance from being larger than the 6 inch dimension.

Perhaps language similar to that in 306.1 is a solution. It could say "Additional space shall not be prohibited beyond the 6 inch dimension, but shall not be considered as part of the required toe clearance."

There will be a modification offered for this proposal.

Proponent Comment

6-23.2

Commenter: Kim Paarlberg, Representing ICC

Replace the proposal with the following:

604.9.5.1 Toe Clearance at Compartments. The front partition and at least one side partition shall provide a toe clearance of 9 inches (230 mm) minimum above the floor ~~and extending and extends~~ 6 inches (150 mm) minimum horizontally beyond the compartment side face of the partition, exclusive of partition support members.

EXCEPTIONS:

1. Toe clearance at the front partition is not required in a compartment greater than 62 inches (1575 mm) in depth with a wall-hung water closet, or greater than 65 inches (1650 mm) in depth with a floor-mounted water closet.
2. Toe clearance at the side partition is not required in a compartment greater than 66 inches (1675 mm) in width.

604.9.5.2 Toe Clearance at Compartments for Children's Use. The front partition and at least one side partition of compartments primarily for children's use shall provide a toe clearance of 12 inches (305 mm) minimum above the floor ~~and extending and extends~~ 6 inches (150 mm) minimum horizontally beyond the compartment side face of the partition, exclusive of partition support members.

EXCEPTIONS:

1. Toe clearance at the front partition is not required in a compartment greater than 65 inches (1650 mm) in depth.
2. Toe clearance at the side partition is not required in a compartment greater than 66 inches (1675 mm) in width.

Reason: The committee's reason statement is incorrect. The proposed language does not imply that the toes can extend more than 6 inches beyond the partition, merely that the TOE CLEARANCE is allowed beyond that point. As currently worded the toe

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clearance is limited to 6 inches which is both a minimum and a maximum. There is no justifiable reason to prevent the clearance from being larger than the 6 inch dimension.

6-24- 12

This proposal was approved by the committee. No ballot or proponent comments were received. It will be included in the Public Draft. However, please note the editorial correction found after the committee decision.

604.10.2, 604.11.2, 605.2

Proposed Change as Submitted

Proponent: Ed Roether, representing the ADA/A117 Harmonization Task Group

Revise as follows:

604.10.2 Size. The minimum area of an ambulatory accessible compartment shall be 60 inches (1525 mm) minimum in depth and a width of 35 inches (890 mm) minimum and 37 inches (940 mm) maximum-36 inches (915 mm) in width.

Fig. 604.10 Ambulatory Accessible Stall

Revise figure to be consistent with change to Section 604.10.2 -

604.11.2 Location. The water closet primarily for children's use shall be located with a wall or partition to the rear and to one side. The centerline of the water closet shall be 12 inches (305 mm) minimum and 18 inches (455 mm) maximum from the side wall or partition except that the water closet shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum from the side wall or partition in the ambulatory accessible toilet compartment specified in 604.10.1. Water closets located in ambulatory accessible toilet compartments specified in Section 604.10 shall be located as specified in Section 604.2.

605.2 Height and Depth. Urinals shall be of the stall type or shall be of the wall hung type with the rim at 17 inches (430 mm) maximum above the floor. ~~Wall hung~~ Urinals shall be 13 ½ inches (345 mm) minimum in depth measured from the outer face of the urinal rim to the wall.

Reason: The ADA/A117 Harmonization Task Group (HTG) was created as a task group of the A117.1 Committee to compare the 2010 ADA with the 2009 A117.1 Standard. The HTG has recommend a series of changes through a set of change proposals. The HTG is recommending changes, for the most part, address where the ADA was viewed as more stringent than the A117. Where the A117 contained provisions not addressed in the ADA, these were not considered a conflict needing action to amend the A117. In addition there are a number of places where the ADA and A117.1 are different as a result of specific actions, by the A117.1 Committee during the development of the 2009 edition, to remain or create a difference where, in the judgment of the committee the ADA was deficient.

This proposal incorporates all identified issues in Chapter 6

Reason for 604.10.2, 604.11.2, Figure 604.10: ADA has changed the width of the ambulatory accessible stall from a set 36 inches to a range of 35 to 37. This requires adjusting the A117.1.

Reason for 605.2: ADA does not limit the application of this section to just wall hung urinals.

604.10.2-ROETHER.doc

Committee Action

Approved

Committee Reason: Provides requirements consistent with the ADA 2010.

Editorial Correction

604.10.2 Size. The minimum area of an ambulatory accessible compartment shall be 60 inches (1525 mm) minimum in depth and a width of 35 inches (890 mm) minimum and 37 inches (940 mm) maximum-~~36 inches (915 mm) in width.~~

Reason: The proposal fails to show the text to be crossed out.

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6-25– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-26– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-27– 12

604.11.1, Table 604.11.1 (New)

Proposed Change as Submitted

Proponent: Hope Reed, New Mexico Governor's Commission on Disability (NMGCD)

Revise as follows:

604.11.1 General. Accessible water closets and toilet compartments primarily for children's use shall comply with Section 604.11. Table 604.11.1 provides the specifications for water closets for children according to the age group served and reflects the differences in the size, stature, and reach ranges of children ages 3 through 12. The specifications chosen shall correspond to the age of the primary user group. The specifications of one age group shall be applied consistently in the installation of a water closet and related elements.

Table 604.11.1 – Specifications for Water Closets Serving Children Ages 3 through 12			
	Ages 3 and 4	Ages 5 through 8	Ages 9 through 12
<u>Water closet centerline</u>	<u>12 inches (305 mm)</u>	<u>12 to 15 inches (305 to 380 mm)</u>	<u>15 to 18 inches (380 to 455 mm)</u>
<u>Toilet Seat Height</u>	<u>11 to 12 inches (280 to 305 mm)</u>	<u>12 to 15 inches (305 to 380 mm)</u>	<u>15 to 17 inches (380 to 430 mm)</u>
<u>Horizontal Grab Bar Height</u>	<u>18 to 20 inches (455 to 510 mm)</u>	<u>20 to 25 inches (510 to 635 mm)</u>	<u>25 to 27 inches (635 to 685 mm)</u>
<u>Vertical Grab Bar Height at bottom</u>	<u>21 to 30 inches (535 to 760 mm)</u>	<u>21 to 30 inches (535 to 760 mm)</u>	<u>21 to 30 inches (535 to 760 mm)</u>
<u>Vertical Grab Bar Distance to rear wall</u>	<u>34 to 36 inches (865 to 915 mm)</u>	<u>34 to 36 inches (865 to 915 mm)</u>	<u>34 to 36 inches (865 to 915 mm)</u>
<u>Dispenser Height</u>	<u>14 inches (355 mm)</u>	<u>14 to 17 inches (355 to 430 mm)</u>	<u>17 to 19 inches (430 to 485 mm)</u>

Reason: This guide provides useful information **within** the A117.1, provides compliance with 2010 ADA Advisory 604.9, and it includes the ANSI vertical grab bar. Standards should be written so they "support" those who are expected to enforce them.

604.11.1-REED.doc

Committee Action

Disapproved

Committee Reason: The Committee was not sure this should be codified into the Standard as a requirement. Jurisdictions which previously adopted similar provisions found them difficult to enforce. Without removing existing text in a number of places of the Standard, this would create an internal

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conflict. Some of the proposed text is 'explanation' and not a standard. This may be better placed in commentary.

BALLOT COMMENTS

6-27.1

Commenter: Rick Lupton, Representing WABO
Ballot: Affirmative with comment:

Comment: Having worked with many childcare proposals over the years I am supportive of including such standards –however the provisions basically need to say use of these dimensions will not conflict with the accessibility standard to give the designer the necessary flexibility to use them. I believe this could be accomplished by changing “shall comply with” to “shall be permitted to comply with” in the 1st sentence of 604.11.1.

6-27.2

Commenter: Kim Paarlberg, Representing ICC
Ballot: Affirmative with comment:

Comment: If we develop an appendix for best practices, this table for children’s sizes could be added.

6-28– 12

604.11.4

Proposed Change as Submitted

Proponent: Edward Steinfeld, IDEA Center, School of Architecture and Planning, University at Buffalo, State University of New York

Revise as follows:

604.11.4 Height. The height of water closet seats primarily for children’s use shall be 11 inches (280 mm) minimum and 17 inches (430 mm) maximum above the floor, measured to the top of the seat. Seats shall not be sprung to return to a lifted position. The height of water closet seats primarily for children’s use shall not be less than the toe clearance height of any adjacent partition.

Reason: Section 604.9.5.2 requires a 12-inch (305 mm) toe clearance under the partition at children’s water closets. The current minimum standard of only 11 inches (280 mm) height could then be visible under the partition. This contradiction would reduce privacy of those using the water closet, particularly in larger restrooms with greater viewing angles and viewers of short stature (such as other children). Since the standard allows a range, this would not *always* pose a privacy problem, but could. Adding the proposed language ensures that any seat within or adjacent to the accessible stall would be high enough to not be visible by any standing person, regardless of room size, or the viewer’s eye height.

604.11.4-STEINFELD.doc

Committee Action

Approved

Committee Reason: Consistent with the action on proposal 6-22-12.

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BALLOT COMMENTS

6-28.1

Commenter: Kim Paarlberg, Representing ICC
Ballot: Negative with comment:

Comment: This is a design issue, not an accessibility issue. This should not be in ICC A117.1.

6-29– 12

604.11.7

Proposed Change as Submitted

Proponent: Hope Reed, New Mexico Governor's Commission on Disability (NMGCD)

Revise as follows:

604.11.7 Dispensers. Toilet paper dispensers primarily for children's use shall comply with Section 309.4. The outlet of dispensers shall be located within an area 24 inches (610 mm) minimum and ~~42~~ 36 inches (~~4065~~ 915 mm) maximum from the rear wall. The outlet of the dispenser shall be 14 inches (355 mm) minimum and 19 inches (485 mm) maximum above the floor. There shall be a clearance of 1½ inches (38 mm) minimum below the grab bar. Dispensers shall not be of a type that control delivery or do not allow continuous paper flow.

Reason: For adults the reach range to the dispenser below the grab bar is 42 inches maximum. Provide a standard maximum useable reach range for all children.

604.11.7-REED.doc

Committee Action

Disapproved

Committee Reason: The Committee was unclear that this would be consistent with the ADA 2010. The depth of the toilet would seem to affect this requirement. Better documentation for this dimension was needed.

BALLOT COMMENTS

6-29.1

Commenter: Rick Lupton, Representing WABO
Ballot: Affirmative with comment:

Comment: Needs to be tied to toilets using dimensions in proposal 6-27-12.

6-30– 12

This proposal was judged to be editorial. The work of the Editorial Task Group will be submitted to the full Committee at a future date.

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6-31- 12

604.12 (New), 604.12.1 (New), 604.12.2 (New), Figure 604.12.2 (New), 604.12.3 (New), Figure 604.12.3 (New), 604.12.3.1 (New), 604.12.3.2 (New), 604.12.4 (New), 604.12.5 (New), 604.12.6 (New), 604.12.7 (New)

Proposed Change as Submitted

Proponent: Terri Stewart, The American Institute of Architects, representing The Task Force on Aging

Add new text as follows:

604.12 Water Closets and Toilet Compartments for Elder Use.

604.12.1 General. Accessible water closets and toilet compartments primarily for elder use shall comply with Section 604.12.

604.12.2 Location. The water closet shall be located with a wall or partition to the rear. The centerline of the water closet shall be 30 inches (760 mm) minimum from any side wall, partition or fixture. Water closets located in ambulatory accessible toilet compartments specified in Section 604.9 shall be located as specified in Section 604.2.

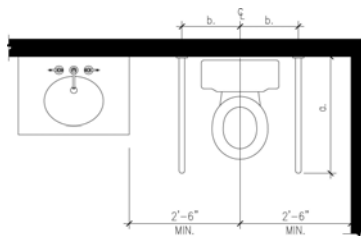


Fig. 604.12.2
Elder Water Closet Location*

* Dimension a. and b will be determined upon research results currently being conducted. (See Chapter 5)

604.12.3 Clearance.

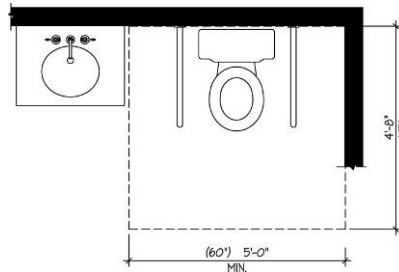


Fig. 604.12.3
Elder Size of Clearance for Water Closet

604.12.3.1 Size A clearance around a water closet 60 inches (1525 mm) minimum, measured perpendicular from the sidewall, and 56 inches (1420 mm) minimum, measured perpendicular from the rear wall, shall be provided.

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604.12.3.2 Overlap. The required clearance around the water closet shall be permitted to overlap the water closet, associated grab bars, paper dispensers, sanitary napkin receptacles, coat hooks, shelves, accessible routes, clear floor space at other fixtures and the turning space. No other fixtures or obstructions shall be within the required water closet clearance.

604.12.4 Height. The height of water closet seats complying with Section 604.4 shall be provided.

604.12.5 Grab Bars. Grab bars for water closets shall comply with Section 604.5.3

604.12.6 Flush Controls. Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with Section 309. Flush controls shall be permitted to be located on either side of the water closet.

604.12.7 Dispensers. Toilet paper dispensers shall comply with Section 309.4 and shall be located on the fold-up grab bar 3 inches (76 mm) maximum behind the front of the water closet measured to the center line of the dispenser. The outlet of the dispenser shall be 21 inches (533 mm) minimum above the floor. There shall be a clearance of 1 inch (38 mm) minimum below the grab bar. Dispensers shall not be of a type that control delivery or do not allow continuous paper flow.

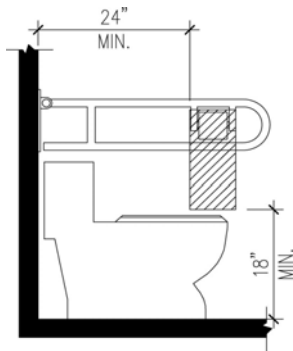


Fig. 604.12.7
Dispenser Location

Reason: Increased side wall clearance. Space is needed on both sides of the toilet to accommodate the range of transfer techniques including the front approach normally used in independent sit to stand transfers; caregivers to stand on either or both sides, for one- or two-person assisted transfers as necessary; and for use of a mechanical lifting device.

Dispenser Location for Caregivers. For both independent and assisted toileting, dispensers need to be located for both resident and caregiver, convenience when using fold up grab bars and when the distance from the center of the toilet exceeds 19 inches.

604.12 (New)-STEWART.doc

Committee Action

Disapproved

Committee Reason: The intent of the proposal is to establish standards for toilet facilities where elderly persons can be easily assisted in these functions. The Committee felt that the basic premise of this and the related proposals is contrary to the principal premise of the A117.1 Standard which is to provide design standards by which people with disabilities can do things for themselves without assistance. The Committee suggested that at best these provisions could be an appendix to this standard or perhaps a distinct standard developed under the umbrella of this Committee. The Committee identified provisions such as grab bars not installed to be in a permanent position. This presents an issue for people who need to push up on a grab bar. Location of grab bars eliminates the use of elbows during transfer. If transfer is an intended option, why is clear floor space not provided. Finally, the Committee was concerned that it had no control over the scoping of these designs and worried that such could be

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provided instead of the toilet facilities current contained in the standard. If they seek scoping via the International Building Code, the use of terminology similar to family/assisted use would conflict the current use of such term in the IBC. It describes a fully accessible facility.

The Committee expressed support of the issues raised by the proposal, but more discussions were needed, including how to address scoping.

BALLOT COMMENTS

6-31.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Affirmative with comment:

Comment: I believe that some specific criteria for assisted use in the Type B units would be acceptable to ICC A117.1 and not conflict with ADA. This idea should continue to be investigated.

6-31.2

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-31.3

Commenter: Edward Steinfeld, Representing RESNA

Ballot: Negative with comment:

Comment: The proponents should have a chance to revise and resubmit this very worthy idea. There is good documentation on the need for standards for assisted transfer and there should be a way to address this in some way. The Committee invited the group to resubmit a proposal.

6-31.4

Commenter: Hope Reed, Representing NMGCD

Ballot: Negative with comment:

Comment: Toilet room accommodations for the elderly population needs further consideration.

6-32– 12

606.2

Proposed Change as Submitted

Proponent: Candace Biddle, City of Des Moines, IA

Revise as follows:

606.2 Clear Floor Space. A clear floor space complying with Section 305.3, positioned for forward approach, shall be provided. ~~The clear floor space shall be centered on the fixture.~~ Knee and toe clearance complying with Section 306 shall be provided. The dip of the overflow shall not be considered in the determining knee and toe clearances.

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EXCEPTIONS:

1. A parallel approach complying with Section 305 and centered on the sink, shall be permitted to a kitchen sink in a space where a cook top or conventional range is not provided.
2. The requirement of knee and toes clearance shall not apply to a lavatory in a toilet or bathing facility for a single occupant, accessed only through a private office and not for common use or public use.
3. A knee clearance of 24 inches (610 mm) minimum above the floor shall be permitted at lavatories and sinks used primarily by children ages 6 through 12 where the rim or counter surface is 31 inches (785 mm) maximum above the floor.
4. A parallel approach complying with Section 305 and centered on the sink, shall be permitted at lavatories and sinks primarily by children ages 5 and younger.
5. The requirement for knee and toe clearance shall not apply to more than one bowl of a multi-bowl sink.
6. A parallel approach complying with Section 305 and centered on the sink, shall be permitted at wet bars.

Reason: 2009 IPC currently states the following:

"A water closet, urinal, lavatory or bidet shall not be set closer than 15 inches (381 mm) from its center to any side wall, partition, vanity or other obstruction, or closer than 30 inches (762 mm) center to center between adjacent fixtures"

People who have mobility issues or who do not have use of one side of their body such as a stroke victim would be unable to reach the controls of a lavatory that is shoved into the corner of a restroom.

606.2-BIDDLE.doc

Committee Action

Approved

Committee Reason: The Committee believes that the added text states what many have assumed. There have occurred enforcement issues on this in the field, having specific text would be very helpful. As the location of the controls is also important, there may need to be more revision, but this change is important to accept.

BALLOT COMMENTS

6-32.1

Commenter: Gene Boecker, Representing NATO

Ballot: Affirmative with comment:

Comment: Consider combining the two sentences to say:

"A clear floor space complying with Section 305.3, positioned for a forward approach, shall be provided. ~~The clear floor space shall be centered on the fixture.~~"

6-32.2

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: This section is for lavatories and sinks. The allowance for not centering on the sink was to allow for situations with double bowls or garbage disposals. The reason statement says their concern was that a fixture would be closer than 15" to the wall. The plumbing code already requires the center line of the fixture to be at least 15" from the wall. This proposal should be disapproved.

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6-33– 12

This proposal was approved by the committee. No ballot or proponent comments were received. It will be included in the Public Draft.

6-34– 12

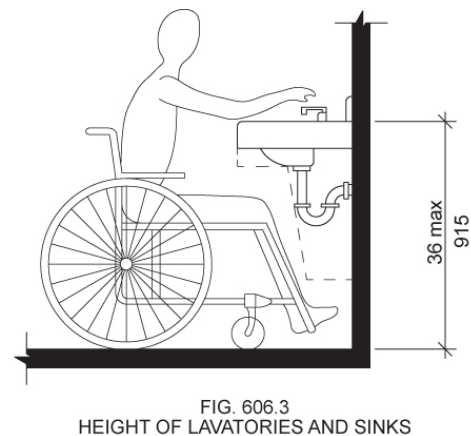
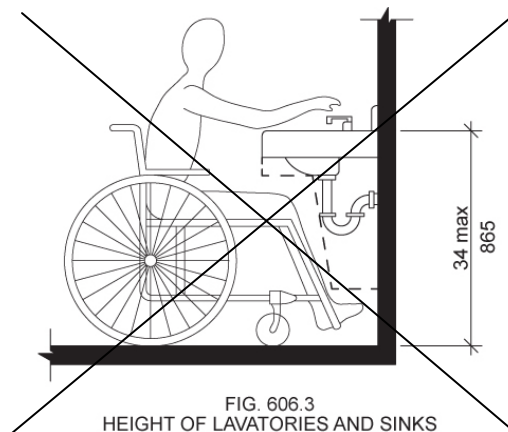
606.3, Figure 606.3

Proposed Change as Submitted

Proponent: Edward Steinfeld, IDEA Center, School of Architecture and Planning, University at Buffalo, State University of New York

Revise as follows:

606.3 Height. The front of lavatories and sinks shall be ~~34~~ 36 inches (~~865~~ 915 mm) maximum above the floor, measured to the higher of the rim or counter surface.



Reason: Many of the technical requirements of the ICC/ANSI A117.1 (2009) Accessible and Usable Buildings and Facilities (ICC/ANSI) designed to accommodate wheeled mobility users are based on research completed from 1974 to 1978 using a research sample that included about 60 individuals who used manual wheelchairs (Steinfeld et al., 1979).

The Center for Inclusive Design and Environmental Access (IDeA) at the University at Buffalo, SUNY recently completed an anthropometric study of 500 wheeled manual and powered mobility device users (Steinfeld, et al., 2010). Measurements of body and device size were captured in three dimensions. The functional anthropometric measurements required measuring reaching

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ability, grip strength and the minimum space needed for turning. It is the most extensive anthropometric study of wheeled mobility device users in the United States. Additional information about the study can be found at <http://www.udeworld.com/ansi-standards-review>. The proposed revisions are based on new anthropometric information that was generated from the database of anthropometric measurements developed as part of the study.

Analysis

A proposed change to Section 306 would raise the knee clearance height minimum to 29 inches, up from 27 inches, a difference of 2 inches. Changing the maximum rim height by the same 2 inches would allow many existing lavatory products to still comply with the standard by only being mounted 2 inches higher. Steinfeld, et al., 2010 demonstrates that the limiting factor in reaching a target (faucet controls, for example) when using a forward approach is not the height of the obstruction; it is the depth that influences control reachability for people using wheeled mobility devices. This proposal will allow more wheelchair users to get a forward approach to the lavatory, as is often required for use of the lavatory.

Further, by raising the maximum height to 36 inches, it would now align with the common industry practice of 36-inch height countertops. It is reasonable to assume such a change would not affect other groups of individuals such as those with short stature because the proposed 36 inches is still lower than the current ANSI requirement of 38 inches maximum height for checkout counters.

NOTE: This change necessitates a change to Fig. 606.3 to ensure consistency. Thus, the proposed revised figure has been attached, along with the existing figure for comparison purposes.

References (See <http://www.udeworld.com/ansi-standards-review> for full text)

Steinfeld, E., Paquet, V., D'Souza, C., Joseph, C., and Maisel, J. (2010). *Final Report: Anthropometry of Wheeled Mobility Project*. Washington, DC: U.S. Access Board.

Steinfeld, E. Schroeder, S. and Bishop, M. (1979). *Accessible buildings for people with walking and reaching limitations*. Washington, DC: U.S. Department of Housing and Urban Development.

606.3-STEINFELD.doc

Committee Action

Disapproved

Committee Reason: The Committee did not find that the information provided justified raising the height of lavatories. Many users would be inconvenienced at this new height.

BALLOT COMMENTS

6-34.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Affirmative with comment:

Comment: Same comment as 3-6-12

If the knee and toe clearance is raised, would accessibility be increased with the subsequent raise of the work surface to 36" in height?

6-34.2

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-34.3

Commenter: Edward Steinfeld, Representing RESNA

Ballot: Abstain with reason:

Reason: Although as the proponent I don't agree with the conclusion, there is little hope of changing the Committee's mind.

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6-35– 12
606.4

Proposed Change as Submitted

Proponent: Len Swatkowski, Plumbing Manufacturers International

Revise as follows:

606.4 Faucets. Faucets, whether they are side mounted faucets or provisions for approaching the sink from the side if space is available, shall comply with Section 309. Hand-operated metering faucets shall remain open for 10 seconds minimum.

Reason: Clarify the use of dual-handles in side sink locations by addressing dual faucet handles in side sink mounting situations to ensure adequate access to both controls. This also needs to address side mounted faucets and provisions for approaching the sink from the side if space is available.

606.4-SWATKOWSKI.doc

Committee Action

Disapproved

Committee Reason: The existing text covers all faucet installations as it is currently written. The proposal is unclear what is to be accomplished.

BALLOT COMMENTS

6-35.1

Commenter: Len Swatkowski, Representing PMI
Ballot: Negative with comment:

Comment: The proposal clarifies the use of dual-handles in side sink locations by addressing dual faucet handles in side sink mounting situations to ensure adequate access to both controls. This also addresses the installation of side mounted faucets and provisions for approaching the sink from the side if space is available.

6-36– 12

This proposal was approved with modifications by the committee. No ballot or proponent comments were received. It will be included in the Public Draft.

6-37– 12
606.5 (New)

Proposed Change as Submitted

Proponent: Judith K. Pipher, IndependenceFirst

Add new text as follows:

606.5 Basin Location. The interior edge of the rim of the lavatory basin shall be located 3 inches (75 mm) maximum from the front edge of the fixture or countertop.

Reason: Lavatory basins need to be accessible not only regarding reach ranges for faucets but for persons performing hygiene activities such as brushing their teeth or using mouthwash. Quite simply, basins need to be located to allow a person in a wheelchair to move his or her head and mouth over the basin to spit out toothpaste, mouthwash or other waste materials. Particularly where lavatories are dropped into countertops (but also where pedestal lavatories have especially deep horizontal ledges between their leading edges and the bowl) the location of the basin should be within a range that makes it usable to persons in a seated position.

A dimension of ±3 inches (75 mm) is typical of kitchen sink locations and should be sufficient to providing this level of access to wheelchair users and persons of short stature at bathroom and toilet room lavatories.

While this issue is greatest in dwelling units, many persons perform hygiene activities in commercial facilities such as office or airport toilet rooms. Because of this, the change in Section 606 is appropriate.

606.5 (New)-PIPHER.doc

Committee Action

Approved

Committee Reason: The proposal provides a reasonable standard to address a growing issue of the placement of lavatory basins. Three inches provide a reasonable setback from the edge of the countertop for inset basins.

BALLOT COMMENTS

6-37.1

Commenter: Rick Lupton, Representing WABO

Ballot: Affirmative with comment:

Comment: To be consistent with our usual policy, the proponent really should provide data that shows the 3-inches is within neck reach range –though it does “seem” adequate.

6-38– 12
606.6

Proposed Change as Submitted

Proponent: : Kim Paarlberg, International Code Council

Revise as follows:

606.6 Exposed Pipes and Surfaces. Water supply and drainpipes under lavatories and sinks shall be insulated padded or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

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Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

There are some suppliers that are using the word 'insulated' to interpret that the pipes must meet the same flame spread and smoke development as specified in the building code for pipe insulation. The differing interpretations of the requirement have led to significant competitive actions between various manufacturers. It is not the intent of this language to specify piping insulation.

606.6-PAARLBERG.doc

Committee Action

Disapproved

Committee Reason: The proposal doesn't address the real issue of misinterpretation of the IBC requirements.

BALLOT COMMENTS

6-38.1

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-38.2

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: The committee did not like the word 'padded'. This is another option.

Replace the proposal as follows:

606.6 Exposed Pipes and Surfaces. Water supply and drainpipes under lavatories and sinks shall be ~~insulated~~ shielded or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

Proponent Comment

6-38.3

Commenter: Kim Paarlberg, Representing ICC

Replace the proposal with the following:

606.6 Exposed Pipes and Surfaces. Water supply and drainpipes under lavatories and sinks shall be ~~insulated~~ covered or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

Reason: The committee felt that the proposed language of 'padded' doesn't address the real issue of misinterpretation of the IBC requirements. However, the term 'insulated' has totally different connotations that what most people considered the word to mean. In addition, there are requirements for very high temperature pipes to be insulated to prevent heat loss. It is hoped that this proposal can address the concerns of the committee and the misinterpretation.

6-39- 12
607.2

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

607.2 Clearance. A clearance in front of bathtubs extending the length of the bathtub and 30 inches (760 mm) minimum in depth shall be provided. Where a permanent seat is provided at the head end of the bathtub, the clearance shall extend the depth of the seat and 12 inches (305 mm) minimum beyond the wall at the head end of the bathtub.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

Section 607.4.1 sets the 'depth' of the seat. The current language skips the piece between the 'length of the tub' and the end of the extension. This is a technical issue that just gives you all the pieces. Please see graphic revision attached.

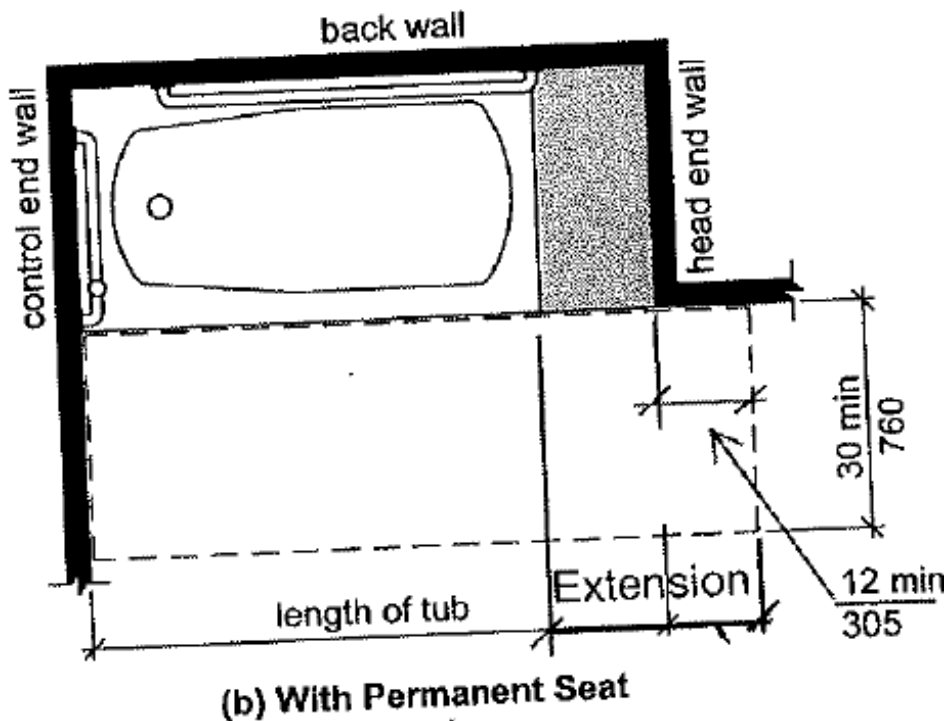


FIG. 607.2(b)
CLEARANCE FOR BATHTUBS

607.2(NEW)-PAARLBERG.doc

Committee Action

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Disapproved

Committee Reason: The Committee believes that the current text is clear and no amendment is needed.

BALLOT COMMENTS

6-39.1

Commenter: Rick Lupton, Representing WABO
Ballot: Affirmative with comment:

Comment: The language is clear but not precise and I've found that imprecision leads to more questions and more mistakes. That said most use the graphics anyway –even though they're not really the Standard language.

6-39.2

Commenter: Kim Paarlberg, Representing ICC
Ballot: Negative with comment:

Comment: The language needs to match Figure 607.2(b). The current text has a gap between the end of the tub and the space past the end wall.

Replace proposal as follows:

607.2 Clearance. A clearance in front of bathtubs extending the length of the bathtub and 30 inches (760 mm) minimum in depth shall be provided. Where a permanent seat is provided at the head end of the bathtub, the clearance shall extend along the seat and an additional 12 inches (305 mm) minimum beyond the wall at the head end of the bathtub.

6-39.3

Commenter: Hope Reed, Representing NNGCD
Ballot: Negative with comment:

Comment: The permanent seat and extra 12" beyond needs better description.

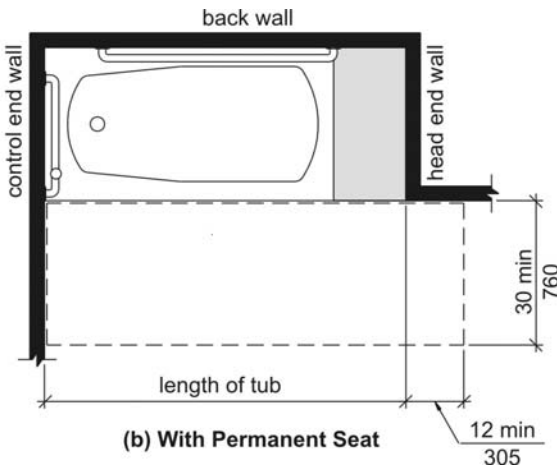
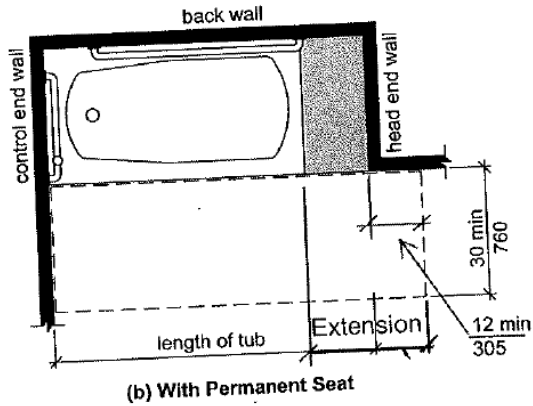
Proponent Comment

6-39.4

Commenter: Kim Paarlberg, Representing ICC

Replace the proposal with the following:

607.2 Clearance. A clearance in front of bathtubs extending the length of the bathtub and 30 inches (760 mm) minimum in depth shall be provided. Where a permanent seat is provided at the head end of the bathtub, in addition to the length of the tub, the clearance shall extend the depth of the seat and 12 inches (305 mm) minimum beyond the wall at the head end of the bathtub.



Reason: The committee said the current language was clear, however, I sincerely believe they were looking at my corrected drawing, and not the existing Figure 607.2(b). See below. Definitely what is shown is not the length of the tub. If the language is clear, the drawing should be corrected – or both.

6-40– 12

607.2, 607.2.1 (New)

Proposed Change as Submitted

Proponent: Thomas Hirsch FAIA, Hirsch Group LLC, representing Thomas Hirsch & Henry Kosarzycki

Revise as follows:

607.2 Transfer Clearance. A clearance in front of bathtubs extending the length of the bathtub and 30 inches minimum in depth shall be provided. Where a permanent seat is provided at the head end of the bathtub, the clearance shall extend 12 inches minimum beyond the wall at the head end of the bathtub.

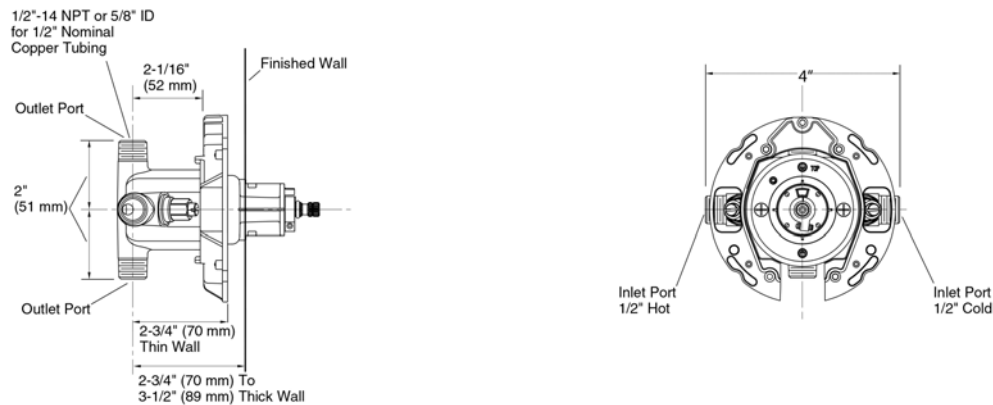
607.2.1 Control Clearance. Where the controls are located within 5" from the approach side of the bathtub the clearance shall extend 5 inches minimum beyond the control end wall. Where the controls measured from the approach side of the bathtub are located between 5 and 9 inches from the approach side of the tub the clearance shall extend 9 inches minimum beyond the control end wall.

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Reason: Current Reach Ranges permit controls which realistically can only be used by 15% of persons with upper body mobility (those likely to bathe without assistance). 2012 Anthropometry of Wheeled Mobility Report, page 105, and elsewhere, indicates side reach is possible for far greater numbers of persons if feet extend beyond plane of the controls ("toe space").

1. Closest valve installation is 5" from approach side to center line, and not higher than 29" AFF to avoid conflict with in-wall blocking for grab bars. (Kohler valve installation diagrams, attached)
2. For toe space at 5" if offset is 5" 58% of sample could reach; if offset is 9" then 45% of sample could reach.
3. For toe space at 9" if offset is 5" then 72% of sample could reach, and if offset is 9" then 65% of sample could reach.

Tub/Shower valve installation diagrams, based on Kohler 304-PS



KOHLER

607.2 #2-HIRSCH.doc

Committee Action

Disapproved

Committee Reason: The Committee felt the result of the proposed text is unclear other than there is a concern that it will result in an increase in the size of bathrooms. The ergonomics of using this and the bathtub doesn't seem correct. There was concern this was based on the equipment of a single manufacturer.

BALLOT COMMENTS

6-40.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Affirmative with comment:

Comment: This proposal does address the idea of appropriate reach for a person in a wheelchair. However, this should be part of the coordination with the research from Dr. Steinfeld. See comments to 3-6-12.

Proponent Comment

6-40.2

Commenter: Tom Hirsch FAIA, Hirsch Group LLC, representing Thomas Hirsch & Henry Kosarzycki

We believe the Committee erred in disapproving this provision as it applies to Bathtubs (608.2.1), for the following reasons:

Reason:

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1. Increases size of the bathroom: the toe space provided past the control end has the potential but not inevitability of increasing size; that is a designer's challenge. At the same time proposed changes in "building blocks" will cause much more substantial increased in room sizes at which point any increase this proposal would cause will not be material. More importantly both the "building blocks" changes as well as this one are needed to make the Standard effective and truly workable.
2. The ergonomics of this proposal were supported by the 2012 Anthropometry of Wheeled Mobility Report, page 105, and elsewhere.
3. The Kohler valve information was supportive only, not part of the governing language, and was intended only to be illustrative for non-architect members of the Committee to demonstrate practical limitations in valve placement.

6-41– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-42– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-43– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-44– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-45– 12

106.5, 607.6, 608.5

Proposed Change as Submitted

Proponent: Len Swatkowski, Plumbing Manufacturers International

Revise as follows:

106.5 Defined Terms.

Hand-held shower. An accessory to a supply fitting, that can be held or fixed in place for the purpose of spraying water on a bather, and which is connected to a flexible hose.

607.6 Hand-held Shower. A hand shower with a hose 59 inches (1500 mm) minimum in length, that can be used as both a fixed shower head and as a hand shower, shall be provided. ~~The hand shower shall have a control with a nonpositive shut-off feature.~~ Where provided, an adjustable-height hand shower mounted on a vertical bar shall be installed so as to not obstruct the use of grab bars.

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608.5 Hand-held Showers. A hand shower with a hose 59 inches (1500 mm) minimum in length, that can be used both as a fixed shower head and as a hand shower, shall be provided. ~~The hand shower shall have a control with a nonpositive shut-off feature.~~ Where provided, an adjustable-height hand shower mounted on a vertical bar shall be installed so as to not obstruct the use of grab bars.

EXCEPTION: In other than Accessible units and Type A units, a fixed shower head located 48 inches (1220 mm) maximum above the shower floor shall be permitted in lieu of a hand shower.

Reason: The reference in Hand showers to non-positive shutoffs has created confusion and potential safety issues in the field. Remove the reference to non-positive shutoffs to align with the language in ADAAG, CSA B651, California and Texas.

Also, the term "hand-held shower" is not defined in standard ASME/ICC A117.1 and therefore is being proposed for this standard as it is also being proposed for ASME A112.18.1-2011/CSA B125.1-11.

607.6-SWATKOWSKI.doc

Committee Action

Disapproved

Committee Reason: The Committee had previously worked extensively to get this requirement in the standard. Contrary to the proponent's reason, deleting this provision would move the standard out of consistency with the 2010 ADA. The Committee is open to exploring other ways to accomplish the goal of this section, but is not willing to eliminate it altogether. If a revised version were to be suggested by the proponent, the defined term should also appear in the text of the sections, not just the title.

BALLOT COMMENTS

6-45.1

Commenter: Gene Boecker, Representing NATO

Ballot: Affirmative with comment:

Comment: A concern exists over the term "non-positive shut-off." That is not defined in the standard and is difficult to find outside of the plumbing industries own jargon. Even searches on the internet lead to confusing and often conflicting understandings. Consider retaining the language but adding a definition or expanding the terminology to describe the intended function so that designers and inspectors know what they should be looking for.

6-45.2

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-45.3

Commenter: Len Swatkowski, Representing PMI

Ballot: Negative with comment:

Comment: The reference in Hand showers to non-positive shutoffs has created confusion and potential safety issues in the field. Remove the reference to non-positive shutoffs to align with the language in ADAAG, CSA B651, California and Texas. Also, the term "hand-held shower" is not defined in standard ASME/ICC A117.1 and therefore is being proposed for this standard as it is also being proposed for ASME A112.18.1-2011/CSA B125.1-11.

The use of a non-positive shutoff can reduce the flow of water at the hand-held shower and create a dangerous thermal shock or scalding situation for the user. Pressure balancing or thermostatic shower valves provide the level of safety to prevent the bather from being exposed to a thermal shock (cold) or scalding event. A shutoff or throttling of the water at the hand-held device cannot provide this safety and is subject to mixing of too much cold or hot water while in the throttled state.

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The reference to a “non-positive” shutoff creates an unintended consequence that was not accounted for in the original language and needs to be deleted.

6-46– 12

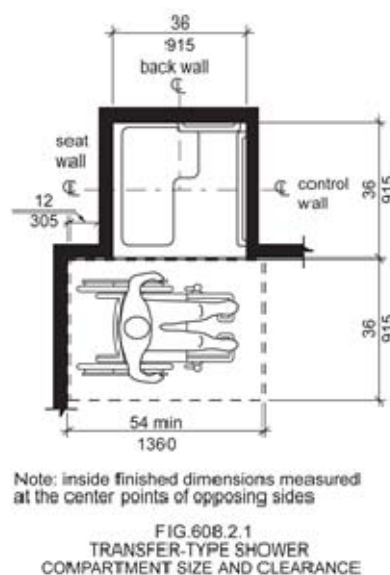
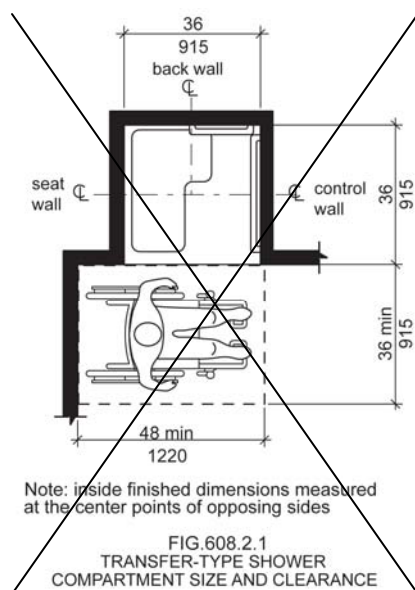
608.2.1.2, Figure 608.2.1

Proposed Change as Submitted

Proponent: Edward Steinfeld, IDEA Center, School of Architecture and Planning, University at Buffalo, State University of New York

Revise as follows:

608.2.1.2 Clearance. A clearance of ~~48~~ 54 inches (4220 1360 mm) minimum in length measured perpendicular from 12 inches beyond the ~~control~~ seat wall, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment.



Reason: Many of the technical requirements of the ICC/ANSI A117.1 (2009) Accessible and Usable Buildings and Facilities (ICC/ANSI) designed to accommodate wheeled mobility users are based on research completed from 1974 to 1978 using a research sample that included about 60 individuals who used manual wheelchairs (Steinfeld et al., 1979).

The Center for Inclusive Design and Environmental Access (IDeA) at the University at Buffalo, SUNY recently completed an anthropometric study of 500 wheeled manual and powered mobility device users (Steinfeld, et al., 2010). Measurements of body and device size were captured in three dimensions. The functional anthropometric measurements required measuring reaching ability, grip strength and the minimum space needed for turning. It is the most extensive anthropometric study of wheeled mobility device users in the United States. Additional information about the study can be found at <http://www.udeworld.com/ansi-standards-review>. The proposed revisions are based on new anthropometric information that was generated from the database of anthropometric measurements developed as part of the study.

Analysis

Unlike turning spaces that are based on dynamic requirements, clear floor space represents the space required for a stationary wheeled mobility device. This area is typically depicted as a rectangular space the dimensions of which are based on measurements of occupied length and occupied breadth of wheeled mobility devices, which are defined as follows:

- **Occupied length:** measured as the horizontal distance between the forward-most point and the rear-most point on the wheelchair or occupant.

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- Occupied width: measured as the horizontal distance between the side-most points of the wheelchair or participant on the right and left sides.

The results of our analysis suggest that the existing standard on clear floor space (48" length, 30" width) does not accommodate the occupied lengths and widths of the wheeled mobility user population and excludes powered wheeled mobility device users disproportionately as compared to manual device users. A length of 48" accommodates the occupied length of 75% of manual wheelchair users and only about 50% of powered chair and scooter users. A width of 30" accommodates the occupied width of 90% of manual wheeled mobility device users and only 75% of powered chair users.

We have taken the position that the clear floor space standards should accommodate the occupied lengths and widths of at least 90% of manual and powered wheeled mobility device users. A width of 32" accommodates the occupied widths of over 95% of manual wheeled mobility device users and 90% of the powered wheelchair users. **Proposed changes to subsection 608.2.1.2 Clearance would accommodate an occupied length of 54" while not changing the overall dimensions of the shower facility. Instead, we propose allowing the front of the wheelchair and/or person to extend beyond the control wall by the additional 6" in order to accommodate those with large occupied wheelchair lengths.**

The analysis was summarized in the Final Project Report to the U.S. Access Board and in a memorandum entitled "Evaluation of Clear Floor Space Requirements," that was submitted to the ICC/ANSI A117 Task Force on Anthropometry of Wheeled Mobility Subcommittee on Clear Floor Space Clearances.

References (See <http://www.udeworld.com/ansi-standards-review>)

Paquet, V. (2012). *Evaluation of Clear Floor Space Requirements*. A memorandum submitted to the ICC/ANSI A117 Task Force on Anthropometry of Wheeled Mobility Subcommittee on Clear Floor Space Clearances.

Steinfeld, E., Paquet, V., D'Souza, C., Joseph, C., and Maisel, J. (2010). *Final Report: Anthropometry of Wheeled Mobility Project*. Washington, DC: U.S. Access Board.

Steinfeld, E. Schroeder, S. and Bishop, M. (1979). *Accessible buildings for people with walking and reaching limitations*. Washington, DC: U.S. Department of Housing and Urban Development.

608.2.1.2-STEINFELD.doc

Committee Action

Approval as Modified

Modification

608.2.1.2 Clearance. A clearance of ~~54~~ 52 inches (1360 mm) minimum in length measured perpendicular from 12 inches beyond the seat wall, and 36 inches (915 mm) minimum in depth shall be provided adjacent to the open face of the compartment.

Committee Reason: With the increase in the clear floor space approved in Proposal 3-13-12, the clearance needs to be revised to accommodate the larger space. The result of the modification is to change the current 48 inches to 52 inches. The added 4 inches will occur 'at the toes' of the user. There was considerable debate whether the added space should be at the toes or at the back of the wheelchair or balanced. Information provided by the proponent is the location of the shoulders adjacent to the seat is the most important for this transfer.

Note: The Editorial task group should make sure that the figure clearly shows the measurement of the 12 inches be from the inside of the wall of the shower.

BALLOT COMMENTS

6-46.1

Commenter: Gene Boecker, Representing NATO
Ballot: Negative with comment:

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Comment: This should only be added to the next edition if the increase in wheelchair length is approved. Otherwise the standard will be disjointed and inconsistent.

6-46.2

Commenter: Ron Burton, Representing BOMA

Ballot: Negative with comment:

Comment: No technical substantiation was provided in the report to support this change, primarily because the report did not include any anthropometric study on transferring to and from a shower seat. The requirement has been in the standard for several cycles and should not be changed without adequate justification.

6-46.3

Commenter: David S. Collins, Representing AIA

Ballot: Negative with comment:

Comment: The work of the study group isn't finalized and the research that formed the basis for this change has not been validated.

6-46.4

Commenter: M. Bradley Gaskins, Representing NACS

Ballot: Negative with comment:

Comment: There has been no evidence presented that this is a necessary change and will be a burden on the public due to an increase in the area required. The evidence presented only addresses the wide variety of mobility devices in service today. It does not address whether the problem is in the manufacture of these mobility devices that do not conform to the current requirement or whether the built-environment needs to change to accommodate mobility devices that need a larger space and cannot be designed and manufactured in such a way as to fit within the current space. We don't continue to let automobile manufacturers build wider and wider autos to go on our roads... they must be built to standards that allow them to work with our current road system.

6-46.5

Commenter: Ronald G. Nickson, Representing NMHC

Ballot: Negative with comment:

Comment: The clearance of 48" should not be changes 54" to align with previous comments to not increase the clear floor space size.

6-46.6

Commenter: Steve Orłowski, Representing NAHB

Ballot: Negative with comment:

Comment: No technical substantiation was provided in the report to support the added requirement of 12 inches beyond the seat wall, since the report did not include any anthropometric study on transferring to and from a shower seat. The requirement has been in the standard for several cycles and should not be changed without adequate justification. Also see negative comment 3-13-12 regarding the CFS increase.

6-46.7

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: See comment to 3-6-12.

6-47- 12

608.2.1.2, 608.2.1.4(NEW), 608.2.2.2, 608.2.2.4(NEW)

Proposed Change as Submitted

Proponent: Thomas Hirsch FAIA, Hirsch Group LLC, representing Thomas Hirsch & Henry Kosarzycki

Revise as follows:

608.2.1.2 Transfer Clearance. A clearance in front of bathtubs extending the length of the bathtub and 30 inches minimum in depth shall be provided. Where a permanent seat is provided at the head end of the bathtub, the clearance shall extend 12 inches minimum beyond the wall at the head end of the bathtub.

608.2.1.4 Control Clearance. Where the controls are located within 5 inches from the approach side of the bathtub the clearance shall extend 5 inches minimum beyond the control end wall. Where the controls measured from the approach side of the bathtub are located between 5 and 9 inches from the approach side of the tub the clearance shall extend 9 inches minimum beyond the control end wall.

608.2.2.2 Transfer Clearance. A clearance in front of bathtubs extending the length of the bathtub and 30 inches minimum in depth shall be provided. Where a permanent seat is provided at the head end of the bathtub, the clearance shall extend 12 inches minimum beyond the wall at the head end of the bathtub.

608.2.2.4 Control Clearance. Where the controls are located within 5 inches from the approach side of the bathtub the clearance shall extend 5 inches minimum beyond the control end wall. Where the controls measured from the approach side of the bathtub are located between 5 and 9 inches from the approach side of the tub the clearance shall extend 9 inches minimum beyond the control end wall.

Reason: Current Reach Ranges permit controls which realistically can only be used by 15% of persons with upper body mobility (those likely to bathe without assistance). 2012 Anthropometry of Wheeled Mobility Report, page 105, and elsewhere, indicates side reach is possible for far greater numbers of persons if feet extend beyond plane of the controls ("toe space").

1. Closest valve installation is 5" from approach side to center line, and not higher than 29" AFF to avoid conflict with in-wall blocking for grab bars. (Kohler valve installation diagrams, attached)
2. For toe space at 5" if offset is 5" 58% of sample could reach; if offset is 9" then 45% of sample could reach.
3. For toe space at 9" if offset is 5" then 72% of sample could reach, and if offset is 9" then 65% of sample could reach.

608.2.1.2-HIRSCH.doc

Committee Action

Disapproved

Committee Reason: The proposal would, in concept, work for transfer showers, but it is unneeded for roll-in showers. The text of the proposal was not clear to all Committee members.

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BALLOT COMMENTS

6-47.1

Commenter: Kim Paarlberg, Representing ICC
Ballot: Affirmative with comment:

Comment: This proposal does address the idea of appropriate reach for a person in a wheelchair. However, this should be part of the coordination with the research from Dr. Steinfeld. See comments to 3-6-12.

Proponent Comment

6-47.2

Commenter: Tom Hirsch Hirsch, Group LLC, representing Thomas Hirsch & Henry Kosarzycki

We believe the Committee was correct in disapproving the provision for Roll-in showers (608.2.2) since the shower valve is required to be located on the long (rear) wall, but erred in disapproving this provision as it applies to Transfer Showers (608.2.1), for the following reasons:

- >
- > 1. Most importantly both the "building blocks" changes as well as this one are needed to make the Standard effective and truly workable; increasing clear floor spaces alone without the provision of toe space past the control end does not provide true useability.
- >
- > 2. The ergonomics of this proposal were supported by the 2012 Anthropometry of Wheeled Mobility Report, page 105, and elsewhere.

6-48– 12

608.2.1.3

Proposed Change as Submitted

Proponent: Francine Wai, Executive Director, Disability & Communication Access Board

Revise as follows:

608.2.1.3 Seat. A folding or non-folding seat complying with Section 610 shall be provided on the wall opposite the control wall.

~~**EXCEPTION:** A seat is not required to be installed in a shower for a single occupant, accessed only through a private office and not for common use or public use, provided reinforcement has been installed in walls and located so as to permit the installation of a shower seat.~~

Reason: The Department of Justice's 2010 ADA Standards do not appear to allow a transfer shower accessed only through a private office and not for common or public use to be exempt from providing a shower seat. As currently written the A117.1 exception does not comply with the 2010 ADA Standards.

For consistency and harmonization, it is recommended that the exception be deleted.

608.2.1.3-WAI.doc

Committee Action

Disapproved

Committee Reason: The Committee felt eliminating this adaptability feature would be inconsistent with the other adaption features allowed for single user facilities accessed through a private office.

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BALLOT COMMENTS

6-48.1

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-48.2

Commenter: Marsha K. Mazz, Representing Access Board

Ballot: Negative with comment:

Comment: We request the committee to APPROVE the proposal as submitted. The proponent is correct that the ADA Standards do not permit the seat in a transfer stall to be omitted.

6-49– 12

608.2.2.2

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

608.2.2.2 Clearance. A clearance of 60 inches (1525 mm) minimum in length, located adjacent to the 60-inch (1525 mm) width of the full length of the open face of the shower compartment, and with a depth of 30 inches (760 mm) minimum in depth, shall be provided.

EXCEPTION: A lavatory complying with Section 606 shall be permitted at the end of the clearance opposite the seat.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

This is to clarify the exact location of the 30x60 clearance location. Otherwise, the clearance might be parallel to but not align with the shower compartment, thus reducing accessibility into and out of the shower.

This proposal came out of the previous development cycle in response to work that the editorial task group considered. While the task group did understand the suggested wording it was viewed as being a substantive change and therefore ruled to be beyond their assigned task.

This proposed language will provide greater clarity to ensure that the 60 x 30 clear space is not offset from the 60 inch opening. The argument being that 60 x 30 space would still be "adjacent to" the opening even if it was offset some distance.

Providing more precision regarding the relationship of the clearance to the element it serves may call into question the intent of other clearance requirements. The committee may wish to discuss this issue and then determine how to proceed. If a change is made, it could be applied throughout the document. This concern for alignment or limiting offsets has been used in other places within the document (608.2.1.2, 611.2, 804.5.6, etc.)

608.2.2.2-PAARLBERG update.doc

Committee Action

Disapproved

Committee Reason: The Committee was concerned that the change would allow a reduction of the open clearance area to less than 60 inches.

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BALLOT COMMENTS

6-49.1

Commenter: Gene Boecker, Representing NATO

Ballot: Negative with comment:

Comment: Revise the existing language and add a second sentence such that the section reads:

608.2.2.2 Clearance. A clearance of 60 inches (1525 mm) minimum in length ~~adjacent to the 60-inch (1525 mm) width of the open face of the shower compartment~~ measured perpendicular to the side wall closest to the controls, and 30 inches (760 mm) minimum, shall be provided adjacent to the open face of the shower.

The text is similar to that for the transfer shower. It requires the space to be 60"x30" minimum and that the 60 inches is measured perpendicular to the side wall so it aligns with the long dimension. The text reinforces this by stating that the space is adjacent to the open side of the shower. It does two additional things: First, by removing the reference to the 60-inch width of the open face it does not imply the size of the open face, making the section applicable for larger showers. Second, the text makes the 60-inch length align with the side wall closest to the controls to address transfer concerns where a permanent seat is installed and control access where there is no permanent seat required.

6-49.2

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-49.3

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: The text is similar to that for the transfer shower. It requires the space to be 60"x30" minimum and that the 60 inches is measured perpendicular to the side wall so it aligns with the long dimension. The text reinforces this by stating that the space is adjacent to the open side of the shower. It does two additional things: First, by removing the reference to the 60-inch width of the open face it does not imply the size of the open face, making the section applicable for larger showers. Second, the text makes the 60-inch length align with the side wall closest to the controls to address transfer concerns where a permanent seat is installed and control access where there is no permanent seat required.

Replace proposal as follows:

608.2.2.2 Clearance. A clearance of 60 inches (1525 mm) minimum in length adjacent to the 60-inch (1525 mm) width of the open face of the shower compartment measured perpendicular to the side wall closest to the controls, and 30 inches (760 mm) minimum, shall be provided adjacent to the open face of the shower.

Proponent Comment

6-49.4

Commenter: Kim Paarlberg, Representing ICC

Replace the proposal with the following:

608.2.2.2 Clearance. A clearance of 60 inches (1525 mm) minimum in length adjacent to the 60-inch (1525 mm) width of the open face of the shower compartment measured perpendicular to the side wall closest to the controls, and 30 inches (760 mm) minimum, shall be provided adjacent to the open face of the shower.

Reason: This revised proposal will address the committee's concern regarding the 60" minimum dimension.

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This proposal for roll-in showers text is similar to that for the current language transfer shower. It requires the space to be 60"x30" minimum and that the 60 inches is measured perpendicular to the side wall so it aligns with the long dimension. The text reinforces this by stating that the space is adjacent to the open side of the shower.

The proposal does two additional things: First, by removing the reference to the 60-inch width of the open face it does not imply the size of the open face, making the section applicable for larger showers. Second, the text makes the 60-inch length align with the side wall closest to the controls to address transfer concerns where a permanent seat is installed and control access where there is no permanent seat required.

6-50– 12

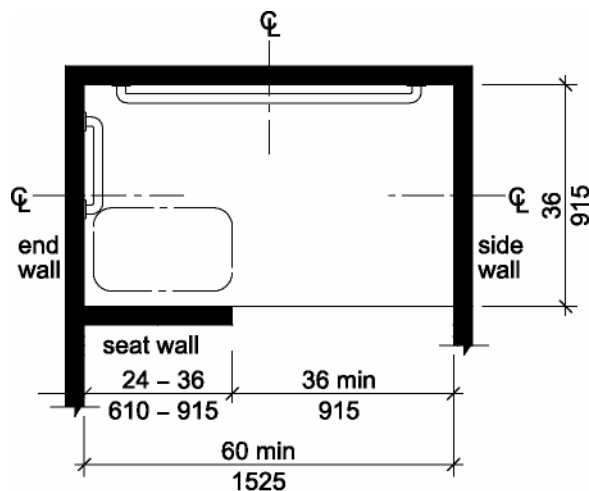
608.2.3, Figure 608.2.3, 608.2.3.1, 608.3.3, Figure 608.3.3, 608.4.3, Figure 608.4.3, 610.3

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

608.2.3 ~~Alternate Roll-in-Type~~ Combination Shower Compartments. ~~Alternate roll-in-type~~ Combination shower compartments shall comply with Section 608.2.3.



Note: inside finished dimensions measured at the center points of opposing sides

Fig. 608.2.3
~~Alternate Roll-in-Type~~ Combination Shower Compartment
Size and Clearance

608.2.3.1 Size. ~~Alternate roll-in~~ Combination shower compartments shall have a clear inside dimension of 60 inches (1525 mm) minimum in width, and 36 inches (915 mm) in depth, measured at the center point of opposing sides. An entry 36 inches (915 mm) minimum in width shall be provided at one end of the 60-inch (1525 mm) width of the compartment. A seat wall, 24 inches (610 mm) minimum and 36 inches (915 mm) maximum in length, shall be provided on the entry side of the compartment.

608.3.3 ~~Alternate Roll-in-Type~~ Combination Showers. In ~~alternate roll-in-type~~ combination showers, grab bars shall be provided on the back wall and the end wall adjacent to the seat. Grab bars shall not be provided above the seat. Grab bars shall be 6 inches (150 mm) maximum from the adjacent wall.

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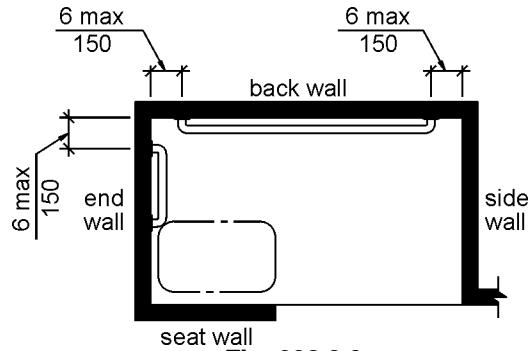


Fig. 608.3.3

Grab Bars in Alternate Roll-in-Type Combination Showers

608.4.3 Alternate Roll-in Combination Showers. In alternate roll-in combination showers, the controls and hand shower shall be located 38 inches (965 mm) minimum and 48 inches (1220 mm) maximum above the shower floor. In alternate roll-in combination showers with controls and hand shower located on the end wall adjacent to the seat, the controls and hand shower shall be 27 inches (685 mm) maximum from the seat wall. In alternate roll-in combination showers with the controls and hand shower located on the back wall opposite the seat, the controls and hand shower shall be located within 15 inches (380 mm), left or right, of the centerline of the seat.

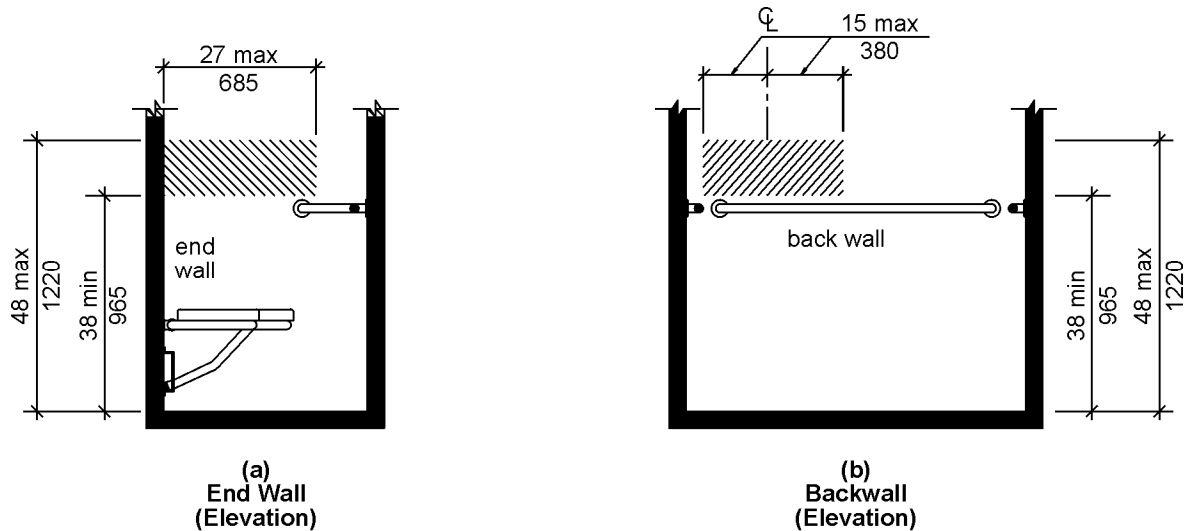


Fig. 608.4.3

Alternate Roll-in-Type Combination Shower Control and Handshower Location

610.3 Shower Compartment Seats. The height of shower compartment seats shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the bathroom floor, measured to the top of the seat. In transfer-type and alternate roll-in-type combination showers, the seat shall extend along the seat wall to a point within 3 inches (75 mm) of the compartment entry. In standard roll-in-type showers, the seat shall extend from the control wall to a point within 3 inches (75 mm) of the compartment entry. Seats shall comply with Section 610.3.1 or 610.3.2.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and

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3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

This change (or something similar) may be more appropriate in the scoping documents, but providing the revision in the A117.1 standard will help to clarify that there are truly three separate types of showers within the standard and provide further distinction between a standard roll-in shower and an alternate roll-in shower.

Table 1107.6.1.1 of the *International Building Code* and Table 224.2 of the federal *2010 Standards for Accessible Design* require that a certain number Accessible dwelling or sleeping units be provided with roll-in showers and a certain number units are "without roll-in showers." This leads to the question of whether an alternate roll-in shower is allowed in the units "without roll-in showers" or not. While it may ultimately be better if these scoping documents clarify the types of bathing fixtures that are acceptable in these units "without roll-in showers" the A117 committee has the opportunity to make its position known and show through the technical requirements that the alternate roll-in shower does offer a variety of options which make it different from a standard roll-in shower.

Because the "alternate roll-in shower" does provide the user a choice of options (roll-in or transfer) they should be acceptable in the units required to be "without roll-in showers". Since the real intent of that requirement is to provide some units which have a bathtub or a transfer shower, the alternate roll-in shower should also be acceptable since it may be used in a variety of ways and it will allow for a transfer which is comparable to that of a transfer shower.

I do not hold any strong feelings for the terminology "combination shower" and if the committee can determine a more appropriate term it should feel free to make a change.

I have included a portion of Table 224.2 from the 2010 Standards for Accessible Design so the scoping language can be seen.

Table 224.2 Guest Rooms with Mobility Features

Total Number of Guest Rooms Provided	Minimum Number of Required Rooms Without Roll-in Showers	Minimum Number of Required Rooms With Roll-in Showers	Total Number of Required Rooms
1 to 25	1	0	1
26 to 50	2	0	2
51 to 75	3	1	4
76 to 100	4	1	5

608.2.3-PAARLBERG.doc

Committee Action

Disapproved

Committee Reason: Changing this term in Standard would cause confusion with the ADA 2010 which uses the 'Alternate' language.

BALLOT COMMENTS

6-50.1

Commenter: Gene Boecker, Representing NATO

Ballot: Negative with comment:

Comment: If the committee thinks that the term "combination" better reflects the designation of the shower type; and, that it removes confusion about whether the design is allowed or whether it must be treated as an alternate design according to Section 103 which also uses the term "Alternate." If this is appropriate, then whether it causes the text to be different than the 2010 ADA should be the secondary consideration. The committee should act on what is right.

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6-50.2

Commenter: Hope Reed, Representing NMGCD
Ballot: Negative with comment:

Comment: "Combination shower" is a better description than "alternative shower."

6-51– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-52– 12

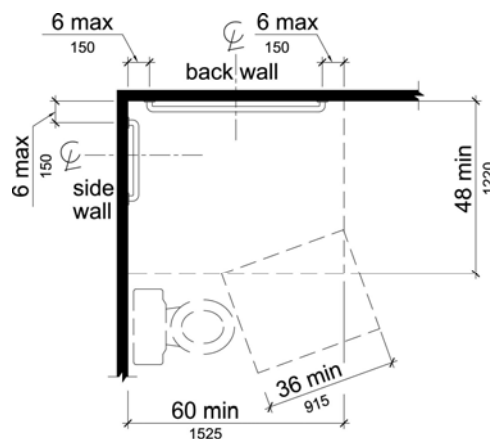
608.2.4 (New), Figure 608.2.4 (New)

Proposed Change as Submitted

Proponent: Terri Stewart, The American Institute of Architects, representing The Task Force on Aging

Add new text as follows:

608.2.4 Alternate Roll-In Type Shower Compartments for Elder Use. Roll-in type shower compartments for elder use shall be 48 inches (1220 mm) wide and 60 inches (1525 mm) deep minimum clear inside dimensions measured at center points of opposing sides. A 36 inch (915 mm) wide minimum entry shall be provided at one end of the long side of the compartment. A grab bar shall be provided on the back wall beginning at 6 inches (150 mm) maximum from the adjacent wall. The back wall grab bar shall extend the length of the wall but shall not be required to exceed 48 inches (1220 mm) in length. A grab bar shall be provided on the side wall. The side wall grab bar shall extend the length of the wall beginning at 6 inches (150 mm) maximum from the adjacent back wall but shall not be required to exceed 30 inches (760 mm) in length.



Note: inside finished dimensions measured at the center points of opposing sides

Fig. 608.2.4
Alternate Roll-In Shower
Compartment Size and Clearance

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Reason: Provides equivalent size and clearance as Section 608.2.3 without seat and front wall for assistance in bathing. Also provides shower overlap for toilet clearance. Also, see White Paper of April 22, 2012.

608.2.4 (New)-STEWART.doc

Committee Action

Disapproved

Committee Reason: Consistent with the action to disapprove Proposal 6-31-12.

BALLOT COMMENTS

6-52.1

Commenter: Kim Paarlberg, Representing ICC

Ballot: Affirmative with comment:

Comment: I believe that some specific criteria for assisted use in the Type B units would be acceptable to ICC A117.1 and not conflict with ADA. This idea should continue to be investigated.

6-52.2

Commenter: Edward Steinfeld, Representing RESNA

Ballot: Negative with comment:

Comment: See comment on 6-31-12

6-53– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-54– 12

608.3.1.2

Proposed Change as Submitted

Proponent: Hank Falstad, Access Technologies Services, Inc., representing self

Revise as follows:

608.3.1.2 Vertical Grab Bar. Vertical grab bar 18 inches (455 mm) minimum in length shall be provided on the control end seat wall; 3 inches (75 mm) minimum and 6 inches (150 mm) maximum above the horizontal grab bar, and 4 inches (100 mm) maximum inward from the front edge of the shower.

Reason:

1. Now there is a vertical bar on both sides of the transfer shower.
2. Improved safety in making the transfer

608.3.1.2 FALSTAD Update.doc

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Committee Action

Disapproved

Committee Reason: The vertical grab bar needs to be across from the seat, not behind it, to facilitate transfer.

BALLOT COMMENTS

6-54.1

Commenter: Barbara Huelat, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

6-55– 12

This proposal was approved with modifications by the committee. No ballot or proponent comments were received. It will be included in the Public Draft.

6-56– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed

6-57– 12

608.3.2

Proposed Change as Submitted

Proponent: Hank Falstad, Access Technologies Services, Inc, representing self

Revise as follows:

608.3.2 Standard Roll-in-Type Showers. In standard roll-in type showers, a grab bar shall be provided on the back wall beginning at the edge of the seat. The grab bars shall not be provided above the seat. The back wall grab bar shall extend the length of the wall but shall not be required to exceed 48 inches (1220 mm) in length. Where a side wall is provided opposite the seat within 72 inches (1830 mm) of the seat wall, a grab bar shall be provided on the side wall opposite the seat. The side wall grab bar shall extend the length of the wall but shall not be required to exceed 30 inches (760 mm) in length. Grab bars shall be 6 inches (150 mm) maximum from the adjacent wall.

A vertical grab bar 18 inches minimum in length shall be provided on the side wall opposite of the seat 3 inches (75 mm) minimum and 6 inches (150 mm) maximum above the horizontal grab bar, and 4 inches (100 mm) maximum inward from the front edge of the shower.

Reason: Prevent slip and fall.

608.3.2 #1-FALSTAD.doc

Committee Action

Disapproved

Committee Reason: The side wall opposite the seat would seem to be at the opposite end of the roll-in shower stall and not in a location close enough to the seat to help in transfer.

BALLOT COMMENTS

6-57.1

Commenter: Barbara Huelat, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

6-58– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed

6-59– 12

608.3.3

Proposed Change as Submitted

Proponent: Hank Falstad, Access Technologies Services, Inc, representing self

Revise as follows:

608.3.3 Alternate 2-Standard Roll-in-Type Showers. In standard alternate roll-in type showers, a grab bar an L-shaped continuous grab bar with an 18 inch (455 mm) vertical shall be provided on the back end wall beginning at the edge of the seat. The Grab bars shall not be provided above the seat. The back wall grab bar shall extend the length of the wall but shall not be required to exceed 48 inches (1220 mm) in length. Where a side wall is provided opposite the seat within 72 inches (1830 mm) of the seat wall, a grab bar shall be provided on the side wall opposite the seat. The side wall grab bar shall extend the length of the wall but shall not be required to exceed 30 inches (760 mm) in length. On the seat wall an 18 inch vertical (455 mm) minimum in length grab bar shall be installed 4 inches – 6 inches above the top of the horizontal grab bars and 4 inches maximum from the entrance into the shower. Grab bars shall be 6 inches (150 mm) maximum from the adjacent wall.

Reason: Prevent slip and fall.

6-59-608.3.3-FALSTAD

Committee Action

Disapproved

Committee Reason: The proposal reduces flexibility for those designing to the Standard.

BALLOT COMMENTS

6-59.1

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-60– 12

608.4.1, 608.4.2, 608.4.3, 608.5

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

608.4.1 Transfer-Type Showers. In transfer-type showers, the controls and hand shower shall be located:

1. On the control wall opposite the seat,
2. At a height above the grab bar and of 38 inches (965 mm) minimum and 48 inches (1220 mm) maximum above the shower floor, and
3. 15 inches (380 mm) maximum, from the centerline of the control wall toward the shower opening.

608.4.2 Standard Roll-in Showers. In standard roll-in showers, the controls and hand shower shall be located:

1. On the back wall,
2. At a height above the grab bar and 48 inches (1220 mm) maximum above the shower floor, and
3. 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the end wall behind the seat.

608.4.3 Alternate Roll-in Showers. In alternate roll-in showers, the controls and hand shower shall be located:

1. ~~38 inches (965 mm) minimum and~~ At a height above the grab bar and 48 inches (1220 mm) maximum above the shower floor, and
2. In alternate roll-in showers with controls and hand shower Where located on the end wall adjacent to the seat, the controls and hand shower shall be 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the wall behind the seat wall, or
3. In alternate roll-in showers with the controls and hand shower Where located on the back wall opposite the seat, the controls and hand shower shall be located within 15 inches (380 mm) maximum, left or right, of from the centerline of the seat toward the transfer space.

608.5 Hand Showers. A hand shower with a hose 59 inches (1500 mm) minimum in length, that can be used both as a fixed shower head and as a hand shower, shall be provided. The hand shower shall have a control with a nonpositive shut-off feature. Where provided, an adjustable-height hand shower mounted on a vertical bar shall be installed so as to not obstruct the use of grab bars.

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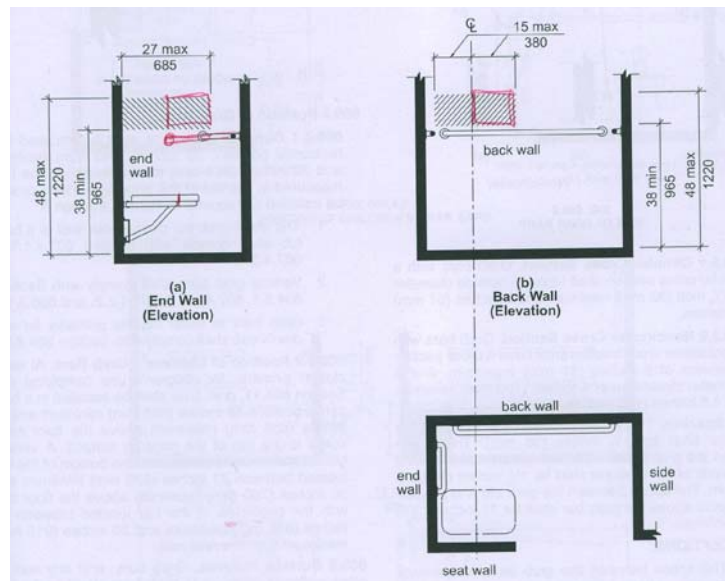
EXCEPTIONS:

1. Redundant shower head mounts shall be permitted to be installed above 48 inches above the shower floor.
2. The vertical bar for adjustable-height shower head mounts shall be permitted to extend above 48 inches maximum above the shower floor.
3. In other than Accessible units and Type A units, a fixed shower head located 48 inches (1220 mm) maximum above the shower floor shall be permitted in lieu of a hand shower.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

There are multiple reasons for this proposal.

- 1) To make the format of the controls for all three types of showers the same
- 2) Last cycle 608.4.2 has taken out the 38" minimum height as part of an ADA coordination item. The requirement to be 1-1/2 inches above the grab bar (Section 609.3 Exception 1) would set a lower height depending on what elevation the grab bar was located (33-36 height). 608.4.1 and 608.4.3 should be addressed the same.
- 3) Section 608.4.3 allows for alternate roll-in shower to locate controls over the seat (which is in conflict with the roll-in shower) or away from the transfer location (which is in conflict with the transfer shower). This proposal would match the other showers for control locations.
- 4) Section 608.4 says the hand showers have to comply with 608.4 (location) and (608.5) which says the hand showers have to work as both a fixed head and hand shower. This really means either a mount post on the wall, or a vertical bar with an adjustable mount. Many standing persons cannot shower with a head at 48 inches. For family members or for persons with mobility impairments that are standing, the shower head should be able to work for everyone. The additional exceptions would allow for redundant heights.



608.4.1(NEW)-PAARLBERG.doc

Committee Action

Disapproved

Committee Reason: The Committee disapproved the proposal over concerns that the next text would allow a shower head placed over the seat and the attempt to regulate extra shower heads versus simply the regulation of the single head which need to be accessible.

BALLOT COMMENTS

6-60.1

Commenter: Gene Boecker, Representing NATO

Ballot: Negative with comment:

Comment: The proposal should be approved with amendment. The committee's decision to vote for disapproval hinged on the added text in Exception #1 to Section 608.4.3 regarding "redundant shower head mounts." There were no problems with the rest of this proposal. If that language is stricken, then the proposal should be approved.

6-60.2

Commenter: Barbara Huelat, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-60.3

Commenter: Kim Paarlberg, Representing ICC

Ballot: Negative with comment:

Comment: This proposal does not do what the committee was concerned about. I will prepare three separate modifications to break this into parts to make it easier to understand.

There will be modifications for this proposal.

6-60.4

Commenter: Hope Reed, representing NMGCD

Ballot: Negative with comment:

Comment: This provides clarification for shower controls in three types of showers.

Proponent Comment

6-60.5

Commenter: Kim Paarlberg, Representing ICC

Replace the proposal with the following 3 comments. This will split the discussion by topic.

608.4.1 Transfer-Type Showers. In transfer-type showers, the controls and hand shower shall be located:

4. On the control wall opposite the seat,
5. At a height above the grab bar and of 38 inches (965 mm) minimum and 48 inches (1220 mm) maximum above the shower floor, and

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6. 15 inches (380 mm) maximum, from the centerline of the control wall toward the shower opening.

608.4.2 Standard Roll-in Showers. In standard roll-in showers, the controls and hand shower shall be located:

4. On the back wall,
5. At a height above the grab bar and 48 inches (1220 mm) maximum above the shower floor, and
6. 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the end wall behind the seat.

608.4.3 Alternate Roll-in Showers. In alternate roll-in showers, the controls and hand shower shall be located:

1. ~~38 inches (965 mm) minimum and~~ At a height above the grab bar and 48 inches (1220 mm) maximum above the shower floor, and
2. ~~In alternate roll-in showers with controls and hand shower located~~ On the end wall adjacent to the seat, the controls and hand shower shall be 27 inches (685 mm) maximum from the seat wall, or
3. ~~In alternate roll-in showers with the controls and hand shower located~~ On the back wall opposite the seat, the controls and hand shower shall be located within 15 inches (380 mm), left or right, of the centerline of the seat.

Reason: The committee felt the proposed language would either place a shower head over the seat, or require extra shower heads. That is not the case. The proposal has been split and revised so that each point can be reviewed separately.

This makes the controls addressed the same in all three types of showers. The format and control height requirements for all three shower types should be the same. Currently only the transfer shower is numbered. Last cycle the 38 inches was removed from standard roll-in shower (as ADA coordination), but not transfer and alternate roll-in. The grab bar clearance requirements will require 1-1/2" clearance above the grab bar.

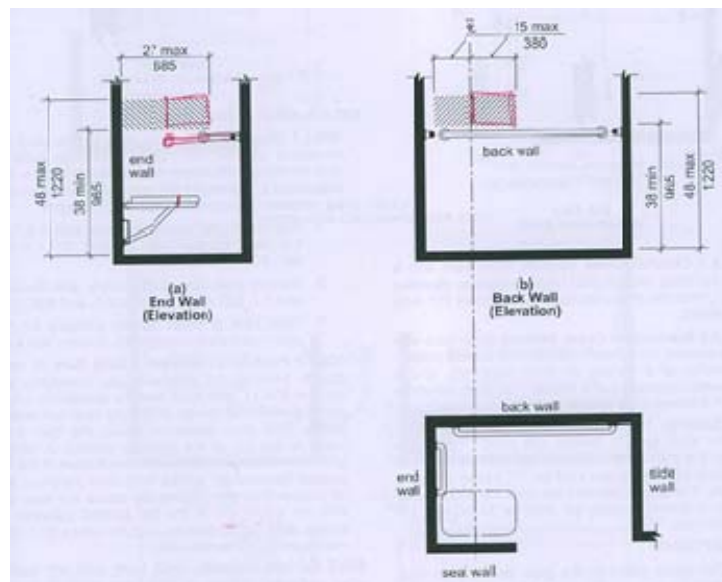
6-60.6

Commenter: Kim Paarlberg, Representing ICC

608.4.3 Alternate Roll-in Showers. In alternate roll-in showers, the controls and hand shower shall be located 38 inches (965 mm) minimum and 48 inches (1220 mm) maximum above the shower floor. In alternate roll-in showers with where the controls and hand shower are located on the end wall adjacent to the seat, the controls and hand shower shall be 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the wall behind the seat wall. In alternate roll-in showers with where the controls and hand shower are located on the back wall opposite the seat, the controls and hand shower shall be located within 15 inches (380 mm) maximum, left or right, of from the centerline of the seat toward the transfer space.

Reason: The committee felt the proposed language would either place a shower head over the seat, or require extra shower heads. That is not the case. The proposal has been split and revised so that each point can be reviewed separately.

6-62-12 AS addressed the issue of over the seat, but not to the right of the center line. Section 608.4.3 allows for alternate roll-in shower to locate controls over the seat (which is in conflict with the roll-in shower) or away from the transfer location (which is in conflict with the transfer shower). This proposal would match the other showers for control locations.



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6-60.7

Commenter: Kim Paarlberg, Representing ICC

608.5 Hand Showers. A hand shower with a hose 59 inches (1500 mm) minimum in length, that can be used both as a fixed shower head and as a hand shower, shall be provided. The hand shower shall have a control with a nonpositive shut-off feature. Where provided, an adjustable-height hand shower mounted on a vertical bar shall be installed so as to not obstruct the use of grab bars.

EXCEPTIONS:

1. The vertical bar for adjustable-height shower head mounts shall be permitted to extend above 48 inches maximum above the shower floor.
2. In other than Accessible units and Type A units, a fixed shower head located 48 inches (1220 mm) maximum above the shower floor shall be permitted in lieu of a hand shower.

Reason: The committee felt the proposed language would either place a shower head over the seat, or require extra shower heads. That is not the case. The proposal has been split and revised so that each point can be reviewed separately.

Section 608.4 says the hand showers have to comply with 608.4 (location) and (608.5) which says the hand showers have to work as both a fixed head and hand shower. This really means either a mount post on the wall, or a vertical bar with an adjustable mount. Many standing persons cannot shower with a head at 48 inches. For family members or for persons with mobility impairments that are standing, the shower head should be able to work for everyone. The additional exceptions would allow for redundant heights.

6-61– 12

608.4.2

Proposed Change as Submitted

Proponent: Hope Reed, New Mexico Governor's Commission on Disability (NMGCD)

Revise as follows:

608.4.2 Standard Roll-in Showers. In standard roll-in showers, the controls and hand shower shall be located on the back wall above the grab bar, 48 inches (1220 mm) maximum above the shower floor and 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the end wall behind the seat.

EXCEPTION: Additional controls and hand shower shall be permitted on the end wall opposite the seat wall of a standard roll-in shower.

Reason: The roll-in-type shower needs to be usable by able-bodied, ambulatory, and disabled individuals. Many people prefer the walk-in shower and grab bars to maintain a safe balance. Most able-bodied people and many ambulatory people prefer to stand when showering. Requiring the hand shower to be installed on the back wall makes it more difficult to contain water within the shower area.

The additional hand shower will allow more flexibility and usability for a greater number of people.

608.5 -REED.doc

Committee Action

Disapproved

Committee Reason: Similar to Proposal 6-60-12, this proposal is trying to regulate shower heads above the one head required to be accessible.

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BALLOT COMMENTS

6-61.1

Commenter: Rick Lupton, Representing WABO

Ballot: Affirmative with comment:

Comment: The committee's comment should refer to Proposal 6-60-12.

6-61.2

Commenter: Gene Boecker, Representing NATO

Ballot: Negative with comment:

Comment: Delete the exception and change the initial sentence of the section to read as follows:

608.4.2 Standard Roll-in Showers. In addition to other controls and shower spray units which may be provided, in standard roll-in showers, the controls for the hand shower and the hand shower unit shall be located. . .

Revise as follows:

The proposal seeks to focus on the manner in which this section is often misinterpreted as limiting the shower controls and shower spray unit to only that which is addressed in the standard. The revised text makes it clear that other controls and shower spray units are allowed - as the committee indicated - as long as these items are provided in the locations indicated. Note that this could also be included for other types of showers but it is in the roll-in shower where the condition most often occurs.

6-61.3

Commenter: Barbara Huelet, Representing ASID

Ballot: Negative with comment:

Comment: Agree with committee.

6-61.4

Commenter: Hope Reed, Representing NMGCD

Ballot: Negative with comment:

Comment: In the roll-in shower provide an exception for an additional shower head, opposite the fixed seat. Standing ambulatory people need this shower head and this location allows a longer spray to stay within the shower.

Proponent Comment

6-61.5

Commenter: Hope Reed, Representing NMGCD

Revise the proposal as follows:

608.4.2 Standard Roll-in Showers. In standard roll-in showers, the controls and hand shower shall comply with 608.4.2.

608.4.2.1 Roll-in Shower Controls and Hand Showers at Seat. In standard roll-in showers, the control and hand shower shall be located:

1. On the back wall above the grab bar.
2. At a height of 48 inches (1220 mm) maximum above the shower floor.
3. 16 inches (405 mm) minimum and 27 inches (685 mm) maximum from the end wall behind the seat.

608.4.2.2 Roll-in Shower Controls and Hand Showers for Ambulatory. In standard roll-in showers a second ambulatory shower control and hand shower shall be located:

1. On the end wall opposite the seat.
2. At a height of 38 in. min. to 48 in. maximum above the shower floor.

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3. 15 in. maximum from the centerline of the control wall toward the shower opening.

Reason: The roll-in-type shower needs to be usable by ambulatory and semi-ambulatory people, disabled individuals, and an able-bodied spouse or assistant. Many people with walking disabilities prefer the walk-in shower and grab bars to maintain a safe balance. Many of these ambulatory people prefer to stand when showering. Requiring the hand shower on the back wall makes it more difficult to contain water within the shower area.

The additional controls and hand shower on the end wall opposite the seat will allow more flexibility and usability for a greater range of people with disabilities.

See companion revision to #6-65 section 608.5 Hand Showers.

6-62– 12

This proposal was approved by the committee. No ballot or proponent comments were received. It will be included in the Public Draft.

6-63– 12

608.4.4 (New), Figure 608.4.4 (New)

Proposed Change as Submitted

Proponent: Terri Stewart, The American Institute of Architects, representing The Task Force on Aging

Add new text as follows:

608.4.4 Alternate Roll-In Type Shower Compartments for Elder Use. The controls and hand shower provided in a roll-in type shower compartment for elder use shall be located on the back wall above the grab bar, 48 inches (1220 mm) maximum above the shower floor and 16 inches (405 mm) minimum and 44 inches (1120 mm) maximum 33 inches (840 mm) from the side wall.

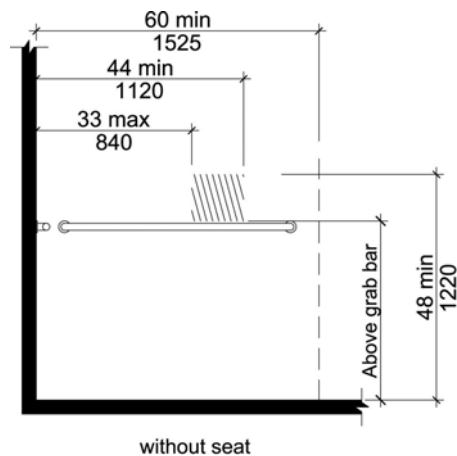


Fig. 608.4.4
Alternate Roll-In Shower
Compartment for Elder Use
Control and Hand Shower Location

Reason: Provides location for assistance in bathing. See , also White Paper, dated April 22, 2012

608.4.4 new-STEWART.doc

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Committee Action

Disapproved

Committee Reason: Consistent with the action to disapprove Proposal 6-31-12.

BALLOT COMMENTS

6-63.1

Commenter: Kim Paarlberg, Representing ICC
Ballot: Affirmative with comment:

Comment: I believe that some specific criteria for assisted use in the Type B units would be acceptable to ICC A117.1 and not conflict with ADA. This idea should continue to be investigated.

6-63.2

Commenter: Barbara Huelat, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

6-64– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-65– 12
608.5

Proposed Change as Submitted

Proponent: Hope Reed, New Mexico Governor's Commission on Disability (NMGCD)

Revise as follows:

608.5 Hand Showers. A hand shower with a hose 59 inches long (1500 mm) minimum in length, that can be used both as a fixed shower head and as a hand shower, shall be provided. The hand shower shall have a control with a nonpositive shut-off feature. Where provided, an adjustable-height hand shower mounted on a vertical bar shall be installed so as to not obstruct the use of grab bars. A hook, to hold the hand shower wand, while water is running, shall be provided above the grab bar.

EXCEPTIONS: In other than Accessible units and Type A units, a fixed shower head located 48 inches (1220 mm) maximum above the shower floor shall be permitted in lieu of a hand shower.

Reason: Many people with disabilities have to get the hotel staff to come up and unhook the hand shower. Then the hand shower hangs down. Depending on water pressure, kinks in the hose, and similar the hand shower can be difficult to grab and keep from spraying outside the shower when adjusting temperatures.

Some hotels have several hooking places at the bottom of the vertical bar or a hook on the wall to hang the hand shower wand. This keeps the hand shower at a convenient location and allows the spray to be directed back into the shower while adjusting temperatures and soaping up.

608.5-REED.doc

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Committee Action

Disapproved

Committee Reason: There was support for the concept among the members of the Committee, but the wording of the proposal was found wanting. A 'hook' is too restrictive, perhaps a 'means'. The location needs more clarity. Some wondered if this was a minimum requirement of accessibility or simply a nice convenience. The proper term may be hand shower wand.

BALLOT COMMENTS

6-65.1

Commenter: Gina Hilberry, Representing UCP
Ballot: Affirmative with comment:

Comment: Providing a means of hanging the hand shower wand within reach range during a shower is important. This proposed change appears to address this need but needs revision.

6-65.2

Commenter: Rick Lupton, Representing WABO
Ballot: Affirmative with comment:

Comment: Perhaps the term "hook" could be replaced by "device".

6-65.3

Commenter: Hope Reed, Representing NMGCD
Ballot: Negative with comment:

Comment: A "means" to hold the hand shower wand is needed while people soap up or adjust their wheelchair. People with disabilities who lose their grasp of the hand shower wand have great difficulty grabbing it again, especially with high water pressure pushing the free hanging wand around the compartment.

Proponent Comment

6-65.4

Commenter: Hope Reed, Representing NMGCD

Revise the proposal as follows:

608.5 Hand Showers. A hand shower with a hose 59 inches long (1500 mm) minimum in length, that can be used both as a fixed shower head and as a hand shower, shall be provided. The hand shower shall have a control with a nonpositive shut-off feature. Where provided, an adjustable-height hand shower mounted on a vertical bar shall be installed so as to not obstruct the use of grab bars. A means to hold the hand shower wand while in the on or off position shall be located above the grab bar and 48 in. max. above the shower finish floor.

EXCEPTIONS:

1. In other than Accessible units and Type A units, a fixed shower head located 48 inches (1220 mm) maximum above the shower floor shall be permitted in lieu of a hand shower.

Reason: Water pressure pushes the hand shower wand around and often sprays out onto the bathroom floor. Provide a means to secure the shower hand wand while a person is using both hands to soap up, shampoo their hair, grab a wash cloth, etc.. See companion revision to 608.4.2 for Roll-in Showers.

6-66– 12

This proposal was disapproved by the committee. No ballot or proponent comments were received. No further action is needed.

6-67– 12

609.8.1

Proposed Change as Submitted

Proponent: Thomas Hirsch FAIA, Hirsch Group LLC, representing Thomas Hirsch & Henry Kosarzycki

Revise as follows:

609.8 Structural Strength. Allowable stresses shall not be exceeded for materials used where a vertical or horizontal force of 250 pounds is applied at any point on the grab bar, fastener mounting device, or supporting structure.

609.8.1 Bathtub and Shower Modules. Where a bathtub or shower module is installed additional blocking shall be installed between the module and supporting structure.

Reason: My experience in architectural practice is that in-wall blocking is not sufficient. In-wall blocking is useful alongside toilets and showers that are site-built, that is, have their grab bars mounted directly on the wall surfaces. However, where pre-manufactured tub or shower modules are used, however, the bars will mount on the module surface and typically there is a substantial gap between the module and the wall or wall framing behind it. The screws for the bars, therefore, have substantial unsupported length in that gap and because the modules have flexibility will tend to rock cracking the surface finish of the module and/or causing the screw to break.

608.2.4 new-HIRSCH.doc

Committee Action

Disapproved

Committee Reason: The Committee believes the proposal is unrelated to accessibility and if it belongs any place it would be in the installation instructions for the modules.

BALLOT COMMENTS

6-67.1

Commenter: Barbara Huelat, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

6-67.2

Commenter: Hope Reed, Representing NMGCD
Ballot: Negative with comment:

Comment: Improved language is needed for securing grab bars in shower modules. This is a frequent problem in the field. Providing this additional language helps us get good grab bars when installing shower modules.

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Proponent Comment

6-67.3

Commenter: Tom Hirsch FAIA, Hirsch Group LLC, representing Thomas Hirsch & Henry Kosarzycki

Reason: We believe the Committee erred in disapproving this proposal. The proposal furthers an existing section concerning structural strength of grabs' installation in 2 ways:

1. it specifies that unsupported length of fasteners is not allowed where modules are used, and
 2. the word "additional" is intended to preclude omitting in-wall blocking so that when a module is removed grounding for future grab bars is provided without the need to open up the wall.
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6-68– 12

610.2, Figure 610.2, 610.3

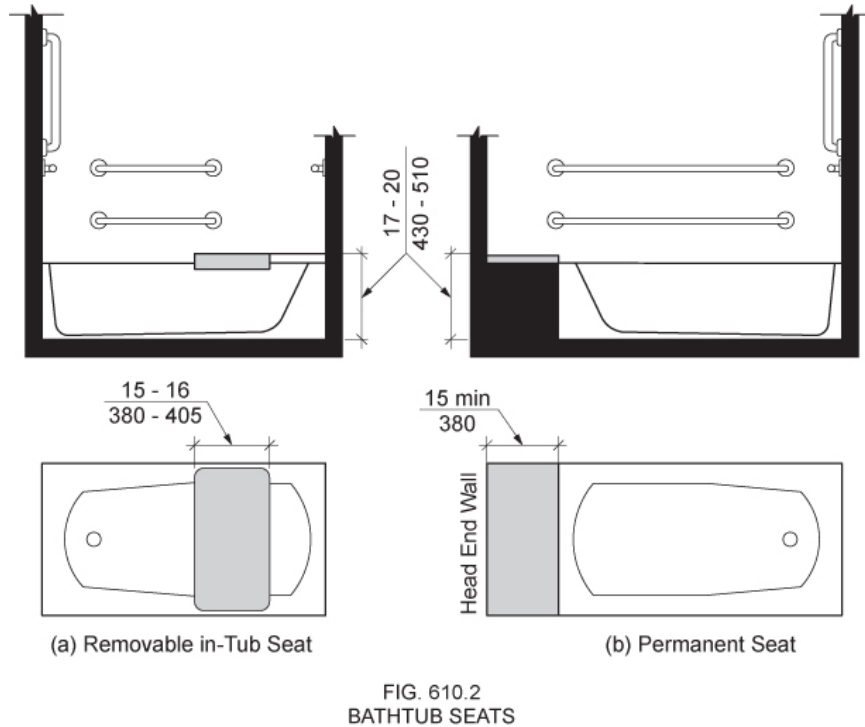
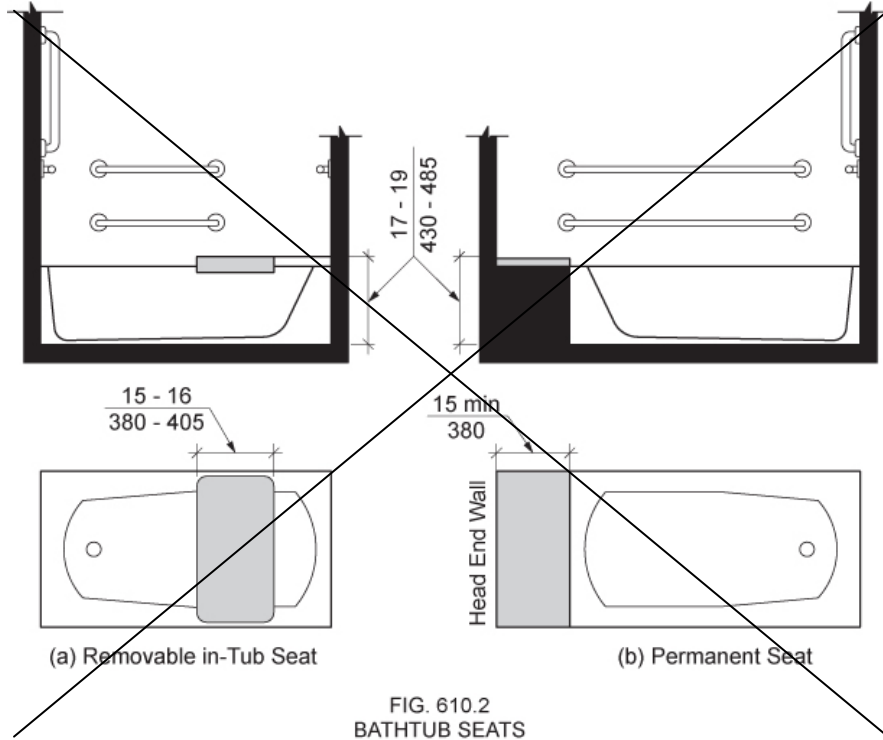
Proposed Change as Submitted

Proponent: Edward Steinfeld, IDEA Center, School of Architecture and Planning, University at Buffalo, State University of New York

Revise as follows:

610.2 Bathtub Seats. The height of bathtub seats shall be 17 inches (430 mm) minimum and ~~49~~ 20 inches (~~485~~ 510 mm) maximum above the bathroom floor, measured to the top of the seat. Removable in-tub seats shall be 15 inches (380 mm) minimum and 16 inches (405 mm) maximum in depth. Removable in-tub seats shall be capable of secure placement. Permanent seats shall be 15 inches (380 mm) minimum in depth and shall extend from the back wall to or beyond the outer edge of the bathtub. Permanent seats shall be positioned at the head end of the bathtub.

EXCEPTION: An accessible seat which is adjustable in height is permitted to provide adjustability within a range of 15 inches (380 mm) minimum to 25 inches (635 mm) maximum, provided that at least one adjustment setting provides a seat within the range specified in Section 610.2.



610.3 Shower Compartment Seats. The height of shower compartment seats shall be 17 inches (430 mm) minimum and ~~19~~ 20 inches (~~485~~ 510 mm) maximum above the bathroom floor, measured to the top of the seat. In transfer-type and alternate roll-in-type showers, the seat shall extend along the seat wall to a point within 3 inches (75 mm) of the compartment entry. In standard roll-in-type showers, the seat shall

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extend from the control wall to a point within 3 inches (75 mm) of the compartment entry. Seats shall comply with Section 610.3.1 or 610.3.2.

EXCEPTION: An accessible seat which is adjustable in height is permitted to provide adjustability within a range of 15 inches (380 mm) minimum to 25 inches (635 mm) maximum, provided that at least one adjustment setting provides a seat within the range specified in Section 610.2.

Reason: Many of the technical requirements of the ICC/ANSI A117.1 (2009) Accessible and Usable Buildings and Facilities (ICC/ANSI) designed to accommodate wheeled mobility users are based on research completed from 1974 to 1978 using a research sample that included about 60 individuals who used manual wheelchairs (Steinfeld et al., 1979).

The Center for Inclusive Design and Environmental Access (IDeA) at the University at Buffalo, SUNY recently completed an anthropometric study of 500 wheeled manual and powered mobility device users (Steinfeld, et al., 2010). Measurements of body and device size were captured in three dimensions. The functional anthropometric measurements required measuring reaching ability, grip strength and the minimum space needed for turning. It is the most extensive anthropometric study of wheeled mobility device users in the United States. Additional information about the study can be found at <http://www.udeworld.com/ansi-standards-review>. The proposed revisions are based on new anthropometric information that was generated from the database of anthropometric measurements developed as part of the study.

Analysis

In addition to the findings reported in Steinfeld, et al., 2010, the IDeA Center developed a Design Resource entitled, *Analysis of Seat Height for Wheeled Mobility Devices* that provides more detailed information about the study reported in Steinfeld, et al., 2010. *Analysis of Seat Height for Wheeled Mobility Devices* indicates that the current maximum height of 19 inches (485 mm) accommodates 51% of female manual wheelchair users, 30% of manual wheelchair users, and fewer than 20% of power and scooter users. The report indicates a seat height of 25 inches (635 mm) would accommodate over 95% of all wheeled mobility device users (D'Souza and Steinfeld, 2011, pg. 5).

Increasing the maximum seat height to 20 inches (510 mm) would allow 75% of female manual wheelchair and 53% of male manual wheelchair users (D'Souza and Steinfeld, 2011, pg. 5) to transfer comfortably. Comfort in this case is determined by how closely the height of the transfer surface matches the height of a wheelchair seat. Steinfeld, et. Al., 2010 (pg. 85) report that "keeping the height of a transfer surface close to the height of a wheelchair seat reduces the effort necessary to transfer and provides a safer environment, especially in bathing and toilet rooms."

However, a fixed seat any higher than 20 inches (510 mm) would likely disadvantage people of short stature, particularly if it was the *only* seat. Encouraging innovation would help to accommodate a greater number of wheeled mobility users without disadvantaging people of short stature. Adjustability is the best option to accommodate the widest population but in the meantime, the upper limit should be raised to 20 inches (Steinfeld, et al., 2010, pgs. 85-86).

NOTE: This change necessitates a change to Fig. 610.2 to ensure consistency. Thus, the proposed revised figure has been attached, along with the existing figure for comparison purposes.

References (See <http://www.udeworld.com/ansi-standards-review> for full text)

D'Souza, C. and Steinfeld, E. (2011). *Analysis of Seat Height for Wheeled Mobility Devices*. Buffalo, NY: University at Buffalo Center for Inclusive Design and Environmental Access.

Steinfeld, E., Paquet, V., D'Souza, C., Joseph, C., and Maisel, J. (2010). *Final Report: Anthropometry of Wheeled Mobility Project*. Washington, DC: U.S. Access Board.

Steinfeld, E. Schroeder, S. and Bishop, M. (1979). *Accessible buildings for people with walking and reaching limitations*. Washington, DC: U.S. Department of Housing and Urban Development.

610.2-STEINFELD.doc

Committee Action

Disapproved

Committee Reason: Consistent with the action to disapprove proposal 6-5-12. Concerns include the impact of raising the height on some users and the reliability and durability of adjustable height equipment. Also of concern was safety during wet conditions.

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BALLOT COMMENTS

6-68.1

Commenter: Kim Paarlberg, Representing ICC
Ballot: Affirmative with comment:

Comment: See comment to 3-6-12.

In addition, the idea of the adjustable seat has serious concerns for use, maintenance and cleanliness.

6-68.2

Commenter: Barbara Huelet, Representing ASID
Ballot: Negative with comment:

Comment: Agree with committee.

6-68.3

Commenter: Edward Steinfeld, Representing RESNA
Ballot: Abstain with reason:

Reason: Disagree with the decision but there is little hope of passage.

6-69– 12

611.3

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

611.3 Operable Parts. Operable parts, including doors, lint screens, detergent and bleach compartments, shall comply with Section 309.

EXCEPTION: The height of the obstruction can be 36 inches (915 mm).

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

You let the door for the top loader be at 36" high, but you literally do not allow for the operable parts to be located over the unit.



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Committee Action

Disapproved

Committee Reason: The Committee wanted more study information on reach ranges in order to approve this proposal. The information was not available for the Committee.

BALLOT COMMENTS

6-69.1

Commenter: Kim Paarlberg, Representing ICC
Ballot: Negative with comment:

Comment: The requirements for the washing machines and dryers should be together, not two section references away. See also 3-26.

A modification will be developed for this 3-26 and 6-69.

6-69.2

Commenter: Hope Reed, Representing NMGCD
Ballot: Negative with comment:

Comment: The height of controls for top loading washer/dryers is allowed to be 36 in. high. This exception is needed within 611.

Proponent Comment

6-69.3

Commenter: Kim Paarlberg, Representing ICC

Replace the proposal with the following:

308.3.2 Obstructed High Reach. Where a clear floor space complying with Section 305 allows a parallel approach to an element and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches (865 mm) maximum above the floor and the depth of the obstruction shall be 24 inches (610 mm) maximum. The high side reach shall be 48 inches (1220 mm) maximum above the floor for a reach depth of 10 inches (255 mm) maximum. Where the reach depth exceeds 10 inches (255 mm), the high side reach shall be 46 inches (1170 mm) maximum above the floor for a reach depth of 24 inches (610 mm) maximum.

EXCEPTION: ~~At washing machines and clothes dryers, the height of the obstruction shall be permitted to be 36 inches (915 mm) maximum above the floor.~~

611.3 Operable Parts. Operable parts, including doors, lint screens, detergent and bleach compartments, shall comply with Sections 308 and 309.

EXCEPTION: The height of the obstruction in Section 308.3.2 shall be permitted to be 36 inches (915 mm) maximum above the floor.

Reason: The allowance for washing machines and clothes dryers in Section 308.3.2 is too remote from the base requirements and the not directly associated with the Section 309 reference (which does reference Section 308). This would not be a technical change, but would be clearer.

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612.2

Proposed Change as Submitted

Proponent: Kim Paarlberg, International Code Council

Revise as follows:

612.2 Bench. Where seating is provided in saunas and steam rooms, at least one bench shall comply with Section 903. Doors shall not swing into the clear floor space required by Section 903.2.

EXCEPTION: Where the room is for individual use and a clear floor space complying with Section 305.3 is provided within the room beyond the arc of the door swing, the door shall not be required to comply with Section 612.2.

Reason: The quantity of change proposals submitted by International Code Council is reflective of three elements of our work: 1. ICC is the Secretariat for the Standard and some changes reflect inconsistencies or improvements suggested by staff; 2. ICC develops and publishes a Commentary on the standard and writing the commentary illuminates issues of the text and figures; and 3. ICC provides an interpretation service for the standard which results in the observation of provisions the users find most confusing.

This proposal is intended to coordinate with other sections of the standard which do allow a door to swing into a room or floor space if there is adequate space to maneuver away from the swing of the door. This proposed exception was copied from the toilet and bathing room requirements of Section 603.2.2 (with the section reference being revised to be Section 612.2).

If the user can maneuver away from the door, it should not be a problem for the door to swing into the space. If the committee was feeling more generous, the proposal could be modified to coordinate with the door swing requirements for dressing, fitting and locker rooms in Section 803.3. That section also allows for a door to swing into the room but it does not contain the limitation of the space being "for an individual user."

612.2-PAARLBERG.doc

Committee Action

Approved

Committee Reason: The Committee accepted the proposal as a good solution to address individual use sauna's.

BALLOT COMMENTS

6-70.1

Commenter: Edward Steinfeld, Representing RESNA

Ballot: Negative with comment:

Comment: Somebody tell me what this actually requires. Although the intent is good, as written it is incomprehensible and needs a rewrite.