



Common ADA Errors and Omissions Found in Educational Facilities

Introduction

The ADA requires that new construction and alterations to existing facilities comply with the ADA Standards for Accessible Design¹ (Standards). ADA requirements for new construction and alterations include detailed provisions for elements, spaces, and facilities. Successful accessibility is often measured in inches, so attention to detail can make the difference between achieving access and excluding or injuring someone. When the ADA's minimum requirements are not met, the results can limit or exclude a person with a disability and can be dangerous. For example, when a curb ramp extends into an access aisle at an accessible parking space, a person using a wheelchair may not be able to get out of the car or van. When the slope of a sidewalk that is an accessible route becomes steeper than 1 to 20, railings and edge protection are required for safe use. Objects that project into circulation spaces from the side or that do not provide at least 80 inches of head clearance can be extremely hazardous to people who are blind or who have low vision.

This document lists a sampling of common accessibility errors or omissions that have been identified through the ADA Compliance Division ongoing enforcement efforts. The specific requirement of the Standards that has not been met follows each error/omission. All references to figures can be found in the Standards. The list of errors/omissions provides examples of common deficiencies. It is not intended to be comprehensive or exhaustive. Any failure to comply with the Standards violates the ADA.

For additional information about the design and construction requirements of the Americans with Disabilities Act (ADA), contact the Department of Justice ADA Information Line. This free service provides answers to general and technical questions about ADA requirements and is a source for free ADA materials including the ADA Standards for Accessible Design. You may reach the ADA Information Line at: 800 - 514 - 0301 (voice) or 800 - 514 - 0383 (TTY).

ADA information is also available on the Department's ADA Home Page on the World Wide Web at (<http://www.usdoj.gov/crt/ada/adahom1.htm>).

Footnote 1 State and local governments currently have the option to choose the Standards or the Uniform Federal Accessibility Standard (UFAS).

Parking

Error/Omission:

The built-up curb ramp projects into the access aisle.

The accessible parking space and access aisle is not level in all directions.

Result:

When an access aisle has a sloped surface, a wheelchair may roll away from a car or van preventing the wheelchair user from getting out of the vehicle. The sloped surface also prevents a van-mounted wheelchair lift from being fully-lowered to the access aisle surface.

Requirement:

502.4 Floor or Ground Surfaces (Parking Spaces)...Parking spaces and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions. Access aisles shall be at the same level as the parking spaces they serve. (**Quick Sheet**)

Error/Omission:

There is no accessible route from accessible parking to an accessible entrance.

Result:

A person using a wheelchair, scooter, or walker has no way of getting from the accessible parking space to the building entrance.

Requirement:

502.3 Access Aisle (Parking Spaces)...Access aisles shall adjoin an accessible route to the building or facility entrance.

Error/Omission:

No van accessible spaces are provided in the parking area.

Result:

A person who uses a van equipped with a wheelchair lift has inadequate space to lower the wheelchair lift and get out of the vehicle.

Requirement:

208.2.4 Van Parking Spaces. For every eight or fraction of eight accessible parking spaces required by 208.2, 208.2.1 and 208.2.3, at least one shall be a van accessible parking space complying with 502. The van accessible spaces shall be served by an access aisle 96 inches wide minimum and shall be designated "van accessible" as required by 208.4. The vertical clearance at such spaces shall comply with 502.5. (**Quick Sheet**)

Error/Omission:

The pedestrian routes on a site from public transportation stops, accessible parking spaces, passenger loading zones, and public streets and sidewalks to the accessible entrance(s) are not accessible.

Result:

People with disabilities cannot travel from the site entry points to the accessible entrance(s). In some cases, people must use vehicular routes, which can be dangerous.

Requirement:

206.2.1 Site Arrival Points. Accessible routes shall be provided within the boundary of the site from public transportation stops, accessible parking spaces, passenger loading zones, and public streets or sidewalks, to the accessible building or facility entrance they serve.

Error/Omission:

The doors at the designated accessible entrance are locked.

Result:

People with disabilities cannot access the building.

Requirement:

206.5.1 Accessible Entrances. Each accessible entrance to a building of facility shall have at least one accessible door or doorway. Call buttons shall be installed and comply with 308 & 407.2.2

Error/Omission:

No signage directing traffic to the accessible entrance at inaccessible entrances.

Result:

Due to the lack of signage, people in wheelchairs end up having to back track looking for the accessible entrance.

Requirement:

206.4.8. Signs. Where not all entrances are accessible, accessible entrances shall be identified by the International Symbol of Accessibility complying with 703.7 and directional signage indicating the location of the nearest accessible entrance shall be provided at inaccessible entrances. Directional signage shall comply 703.4.

Ramps

Error/Omission:

Landing areas where ramps change direction (e.g., switchbacks or 90° turns) are too small.

Result:

Wheelchair users are unable to go up or down the ramp because there is not enough space to turn on a level surface. This makes the ramp unusable.

Requirement:

405.7.4 Change in Direction. Ramps that change direction between runs at landings shall have a 60-inch minimum by 60 inch minimum landing.

Error/Omission:

Parts of an accessible route with slopes that exceed 1:20 lack required features including handrails and edge protection.

Result:

When a walkway or other pedestrian surface has a slope greater than 1:20, it is more difficult to maintain control of a wheelchair. Wheelchair users may also not be able to climb up the sloped route without railings. Lack of edge protection may result in injury if a wheelchair user rolls off the side of the route. People who use a mobility device such as crutches, a cane, or a walker

may lose their balance or fall while using a sloped section that does not have handrails or edge protection.

Requirement:

405.8 Walking Surfaces. Any part of an accessible route with a slope greater than 1:20 shall be considered a ramp and shall comply with 405.8.

Stairs

Error/Omission:

Handrail extensions are not provided at the top and bottom risers.

Result:

People who use crutches or a cane or who have limited balance may fall at the top or bottom of the stairs because they have no railing to hold onto as they make the transition from the steps to the landing.

Requirement:

505.10 Handrail Extensions. Handrails shall extend beyond stair runs and ramp runs in accordance with 505.10.

Doors

Error/Omission:

Adequate maneuvering clearance is not provided at doors, including doors to accessible toilet stalls.

Result:

A person using a wheelchair cannot open the door without the proper maneuvering clearance.

Requirement:

404.2.4.1. Maneuvering Clearances at Doors. Approaches to swinging doors shall have a maneuvering clearance of 18 inches minimum beyond the latch on the pull side.

604.8.1.2 Doors. Toilet compartment doors, including door hardware, shall comply with 404 except that 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 a minimum of 42 inches (1065 mm). The door shall be

hinged 4 inches (100 mm) maximum from the side wall or partition farthest from the water closet. The door shall be self-closing. A door pull complying with 404.2.7 shall be placed on both sides of the door.

Error/Omission:

The shape of the door hardware requires tight grasping, pinching, and twisting of the wrist to use.

Result:

The door cannot be opened if the user cannot operate the latch or handle.

Requirement:

309.4 Operation. Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 lb (22.2 N) maximum.

Circulation Paths

Error/Omission:

Objects protrude into circulation paths from the side or from posts.

Objects that overhang circulation paths do not provide clear headroom.

Result:

People who are blind or who have low vision can be seriously injured when they cannot detect an object by using the sweep of their cane.

Requirement:

307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

Toilet Rooms and Bathrooms

Error/Omission:

Toilet rooms with 6 or more toilet stalls lack a 36" wide "ambulatory" toilet stall.

Result:

Too few accessible stalls are provided for people with mobility disabilities. People who walk with crutches, a cane, a walker, or who have limited balance generally find it easier and safer to use a stall that has parallel grab bars.

Requirement:

213.3.1 Toilet Compartments. Where toilet compartments are provided, at least one shall be a wheelchair accessible compartment complying with 604.8.1. Where six or more toilet compartments are provided, a non-wheelchair accessible compartment complying with 604.8.2 shall be provided in addition to the compartment complying with 604.8.1. Water closets in such compartments shall comply with 604.

604.8.2.1 Size. Non- wheelchair accessible compartments shall be 60 inches (1525 mm) deep minimum and 36 inches (915 mm) wide.

Error/Omission:

Toilet paper dispensers are usually mounted in the wrong location.

Result:

People with back problems might have difficulty bending to reach the dispenser.

Requirement:

604.7 Dispensers. Toilet paper dispensers shall comply with 309.4 and shall be 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front of the water closet measured to the centerline of the dispenser. The outlet of the dispenser shall be 15 inches (380 mm) minimum and 48 inches (1220 mm) maximum above the floor. There shall be a clearance of 1 1/2 inches (38 mm) minimum below and 12 inches (305 mm) minimum above the grab bar. Dispensers shall not be of a type that control delivery or that do not allow continuous paper flow. **(Quick Sheet)**

Error/Omission:

Sinks are located next to the water closet in single-use toilets.

Result:

People with disabilities need side clearance next to water closet in order to transfer over to the seat.

Requirement:

604.3.1 Clearance. Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall. No other fixtures or obstructions shall be located within the required water closet clearance. **(Quick Sheet)**

Error/Omission:

Mirrors, paper towel and soap dispensers are mounted to high in the restrooms.

Result:

People with disabilities need mirrors and other toilet fixtures lowered to within their reach and sight range.

Requirement:

603.3 Mirrors. Mirrors shall be installed with the bottom edge of the reflecting surface 40 inches (1015mm) maximum above the finish floor. **(Quick Sheet)**

308.2.1 Unobstructed. Where a clear floor or ground space allows only a forward approach to an object and is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the floor or ground. **(Quick Sheet)**

Error/Omission:

When a transfer shower is used, it is often larger than the required 36" x 36" size.

Result:

People with disabilities may be injured when using a transfer shower that is too large. Users may slide off the seat and fall onto the floor of the shower while reaching for the shower controls and hand-held showerhead.

Requirement:

608.2.1 Transfer Type Shower Compartments. Transfer-type shower compartments shall be 36 inches (915 mm) by 36 inches (915 mm) inside finished dimension measured at the center point of opposing sides and shall have a minimum 36-inch (915 mm) wide entry on the face of the shower compartment. Clear floor space of 36 inches (915 mm) wide minimum by 48 inches (1220 mm) long minimum measured from the control wall shall be provided. **(Quick Sheet)**

Signage

Error/Omission:

Where permanent room identification signage is provided, it is mounted in the wrong location or there is no signage at all.

Result:

People who are blind or visually impaired are trained to look in a consistent location for tactile signs. They cannot find the sign if it is not mounted in the correct location.

Requirement:

703.2.6 Mounting Height. Characters shall be located 48 inches (1220 mm) minimum and 60 inches (1525 mm) maximum above the adjacent floor or ground surface measured from the baseline of the characters. **(Quick Sheet)**

703.2.7 Mounting Location. Where a sign containing tactile characters is provided at a door, the sign shall be located alongside the door at the latch side. Where a tactile sign is provided at double doors, the sign shall be located to the right of the right hand door. Where there is no wall space at the latch side of a single door or to the right side of double doors, signs shall be located on the nearest adjacent wall. Signs containing tactile characters shall be located so that a clear floor space of 18 inches (455 mm) minimum by 18 inches (455 mm) minimum, centered on the sign, is provided beyond the arc of any door swing between the closed position and 45 degree open position.

Visual Alarms

Error/Omission:

No visual alarms are provided although an audible alarm system is installed.

Result:

People who are deaf have no way of knowing that a building emergency has been declared while others who can hear are alerted by the audible alarm. This is especially true of toilet rooms, and study carrel areas where occupants cannot observe others leaving the facility.

Requirement:

215.1 Fire Alarms. Where fire alarm systems are provided in public use or common use areas, the alarm shall provide a system with both audible and visual signals complying with 702.

Error/Omission:

Wheelchair-accessible rooms are not equipped with visual alarms and notification devices.

Result:

People who are deaf or hard of hearing and who also need to use a guest room with accessible features have no accommodation.

Requirement:

Advisory 215.1. Unlike audible alarms, visual alarms must be located within the space they serve so that the signal is visible.

Drinking Fountains

Error/Omission:

All drinking fountains are mounted with the spout at 36" A.F.F.

Result:

People who have difficulty stooping or bending over are not able to get a drink from the accessible 36" high drinking fountain.

Requirement:

211.1.1 Single Installation. Only one drinking fountain or water cooler shall not be permitted on a site, on a floor, or within a secured area.

EXCEPTION: Hi-lo drinking fountains or water coolers complying with 602 shall be permitted.