Commercial Restroom Products & ADA Compliance



Presenters



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Agenda

This webinar covers:

- Americans with Disabilities Act (ADA) overview
 - History
 - Scope
 - Enforcement
- Impact of ADA in the commercial restroom
 - Design
 - Product implications
 - Updated Access Board guidance
- Review by product type
- Where to get more information





What is ADA?

The Americans with Disabilities Act (ADA):

- Prohibits discrimination
- Guarantees that people with disabilities have the same opportunities as everyone else
- Modeled after the Civil Rights Act of 1964 prohibiting discrimination on the basis of race, color, religion, sex, or national origin
- Is an "equal opportunity" law for people with disabilities

To be protected by the ADA one must:

- Have a disability, which is defined by the ADA as a physical or mental impairment that substantially limits one or more major life activities
- Be a person who has a history or record of such an impairment
- Be a person who is perceived by others as having such an impairment

The ADA does not specifically name all of the impairments that are covered.





Who Makes & Enforces ADA Rules?

The United States Access Board and the US Department of Justice

History

1968 – Architectural Barriers Act (ABA) makes federal facilities accessible to people with disabilities

1973 – The United States Access Board created as an **independent federal agency** to develop and enforce accessibility standards

1982 – The Access Board publishes the first comprehensive "Minimum Guidelines for Accessible Design"

1990 – The ADA expands the responsibilities of the Access Board beyond federal facilities to include airports, bus and rail stations, and many other public and private facilities – not just those funded by the government. Electronics, information technology, and medical diagnostic equipment added later





ADA Applicability

Standards

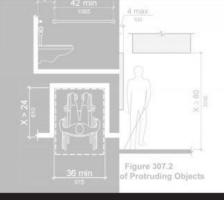
2010 - The Americans with Disabilities Act was revised to adopt regulation for enforceable accessibility standards called the <u>2010 ADA Standards for Accessible</u> <u>Design</u>

The 2010 Standard was required for:

- New construction
- Alterations
- Program accessibility
- Barrier removal

Applicability

- Title II All services, programs, and activities provided or made available by public entities
- Title III Public accommodation, commercial facility, or private entity that offers examinations or courses related to applications, licensing, certification, or credentialing for secondary or postsecondary education, professional, or trade purposes





Guidance on the 2010 ADA Standards for Accessible Design



Businesses that provide goods or services to the public are called "public accommodations"



ADA Enforcement & Penalties

Identification of Non-compliance

- AHJ (Authority Having Jurisdiction)
- Inspectors
- Citizen or Employee Complaint alleging disability discrimination

Enforcement

- US Department of Justice civil lawsuit
- Private lawsuits
- Mediation

Penalties

- \$75,000 for 1st violation
- \$150,000 for subsequent violations
- Lawsuits



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ADA Obligations to Comply & Common Misconceptions

Who is obligated to comply?

- Manufacturer is responsible for product design
- Contractor / Installer is responsible for installation
- Architect / Engineer is responsible for spatial design
- Building Owner is responsible for maintenance

Common ADA misconceptions

- "ADA lawsuits are flooding the courts"
- "No disabled persons will use this space"
- "It's close enough"
- "I can fix it after someone complains"



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ADA Enforcement Examples



USDOJ vs CT Dept. of Transportation

Train Station required to make toilet rooms accessible

USDOJ vs CT Hotel

Adjustment of paper towel, soap and feminine products dispensers in lobby restrooms to ADA height

USDOJ vs CT Hotel

18 months to completely renovate lobby toilets

USDOJ vs CT Hotel

30 days to submit plans for compliant public restroom doors, grab bars, toilet height, stall space, door pulls, urinal height, lavatory heights and clearances, towel dispensers, and signs



Our Objective

To provide you with Sloan product-related information that will help you be ADAcompliant.



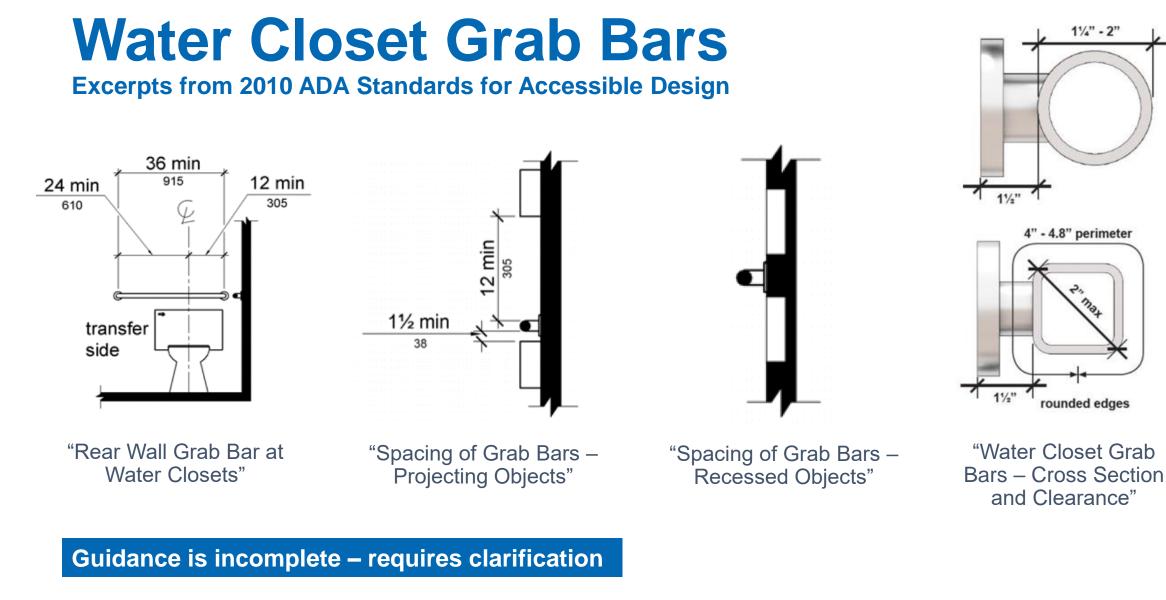
Dr. Anthony Fauci, Director, National Institute of Allergy and Infectious Diseases washes his hands in the White House using a <u>Sloan EBF85 Automatic Sensor Faucet</u>



Toilets & Grab Bars



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ш. 54" min

42" min

"Side Wall Grab Bar"

33"-36"

to top of

gripping surface

"Rear Wall Grab Bar"

36" min

.12" min !

24" min

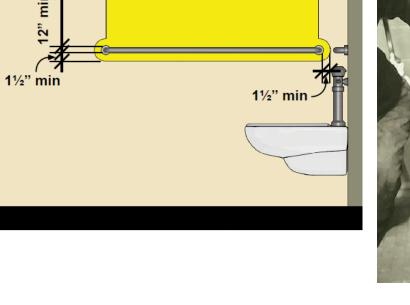
33"-36"

to top of gripping surface 12

"...so that reach and use of grab bars is not impeded"



"Minimum Clearance"





Water Closet Grab Bars

Updated US Access Board Guidance for Flushometer Toilets





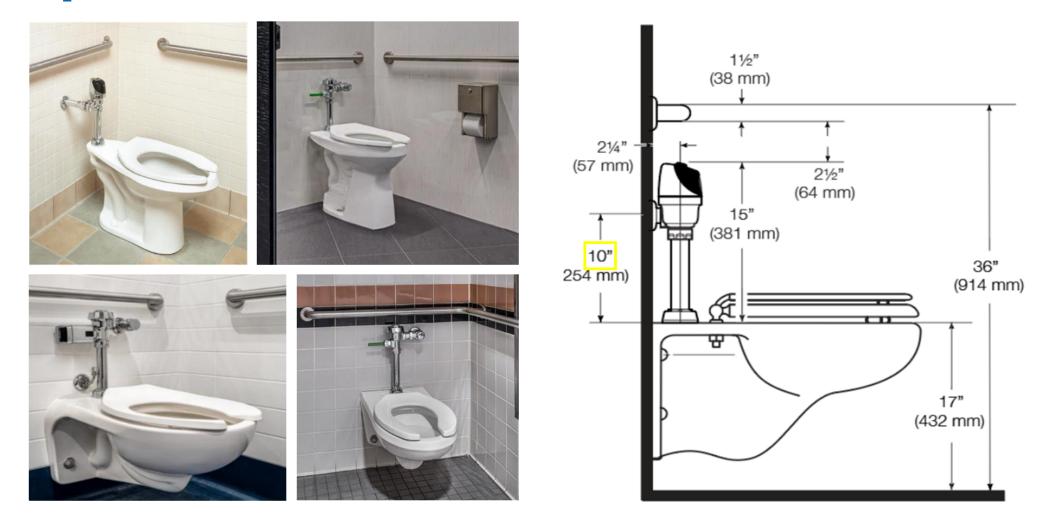
Some Considerations before We Get Started...

- Grab bar heights are measured to the top of the gripping surface
- When ranges in heights are provided, attention should be given to the optimal product for compliance
- Enforcement is not always consistent but we strive to provide solutions





Exposed Flushometer Solutions





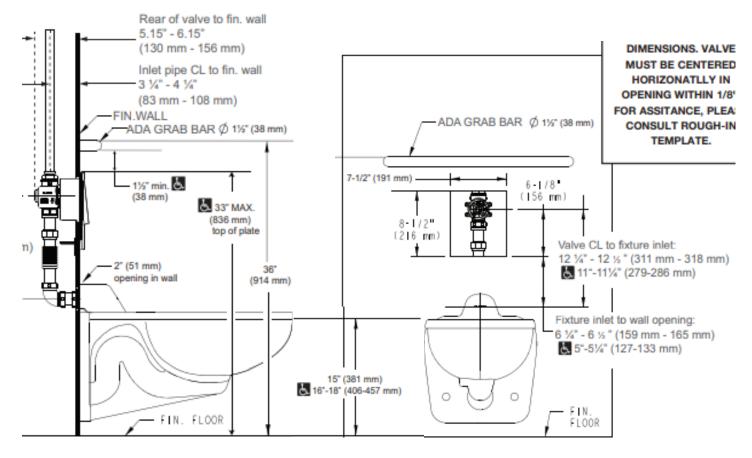
Concealed Flushometer and Sensor Solutions







CX Valve – A Complete Solution



Side View









Access Board Guidance Q&A March 2020

Q. How can conflicts between the rear grab bar and the required location of flush controls be resolved?

A. If plumbing codes require a flush control location that conflicts with the rear grab bar, the grab bar may be split or shifted to the open side. This is permitted only where applicable codes mandate flush controls in such a location.

Q. Are automatic (motion sensor) flush controls required to be on the open side of the water closet?

A. No. Motion activated flush controls are not required to be on the open side of the water closet. If a water closet has a manual flush control in addition to a motion activated one, it is recommended, but not required, that the manual control be located on the open side of the water closet. Manual flush controls, even those intended for custodian use, are helpful at water closets and urinals when the motion sensor fails to activate.

Q. Are flush controls located on valves, walls, or tanks that are centered on the fixture compliant (i.e., on the open side)?

A. Manual flush controls, including push buttons, must be usable from a point between the centerline and the open side of the fixture. A portion of the control can be outside the range if it is usable without having to reach beyond the water closet centerline from the open side.



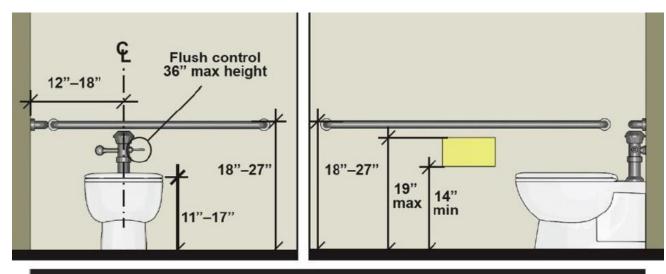


Children's Toilets & Grab Bars



Children's Toilet Requirement

Current ADA Guideline



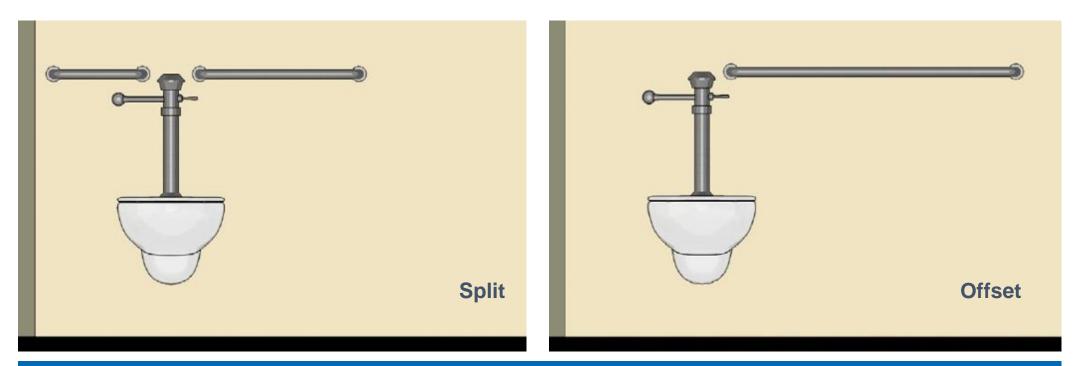
| Advisory (Non-Mandatory) Specifications by Age Group | | | |
|--|-----------|-------------|--------------|
| | 3 & 4 | 5 through 8 | 9 through 12 |
| Water Closet Centerline | 12" | 12" – 15" | 15" –18" |
| Toilet Seat Height | 11" – 12" | 12" – 15" | 15" – 17" |
| Grab Bar Height | 18" – 20" | 20" – 25" | 25" – 27" |
| Dispenser Height | 14" | 14" – 17" | 17" – 19" |

- This table has never been implemented
- There are no products available to meet these specific heights
- Split and offset grab bars are the only options

Many architects dislike split grab bars

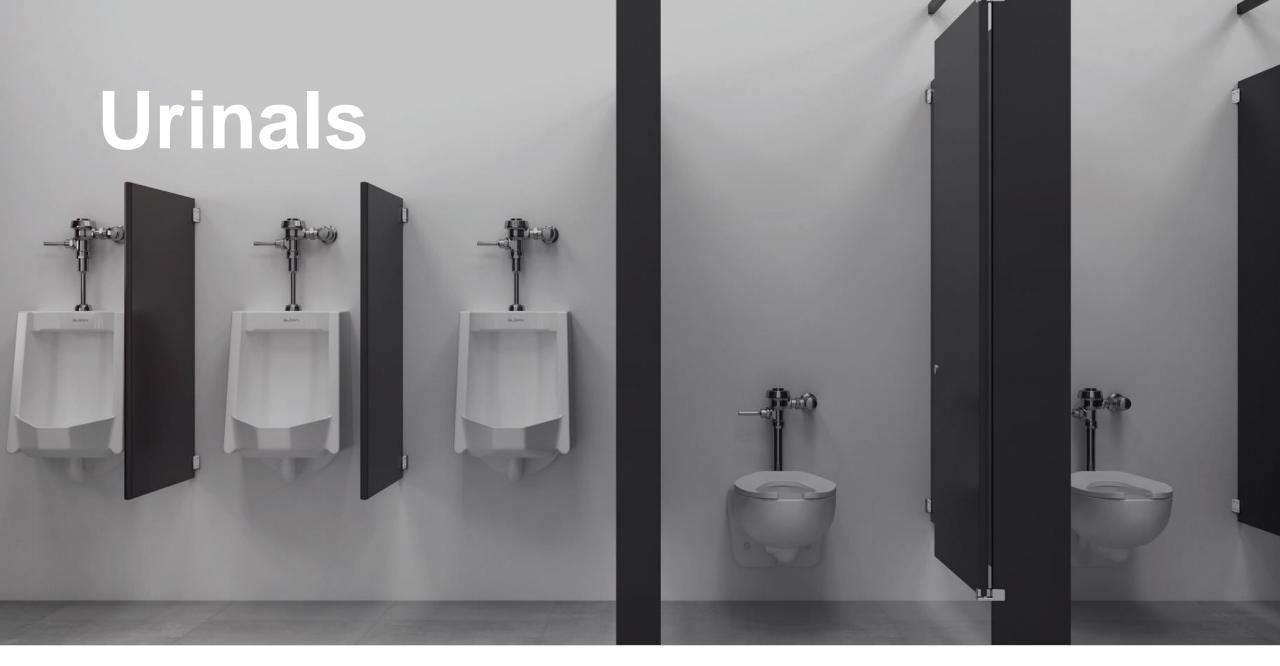


Split and Offset Grab Bars



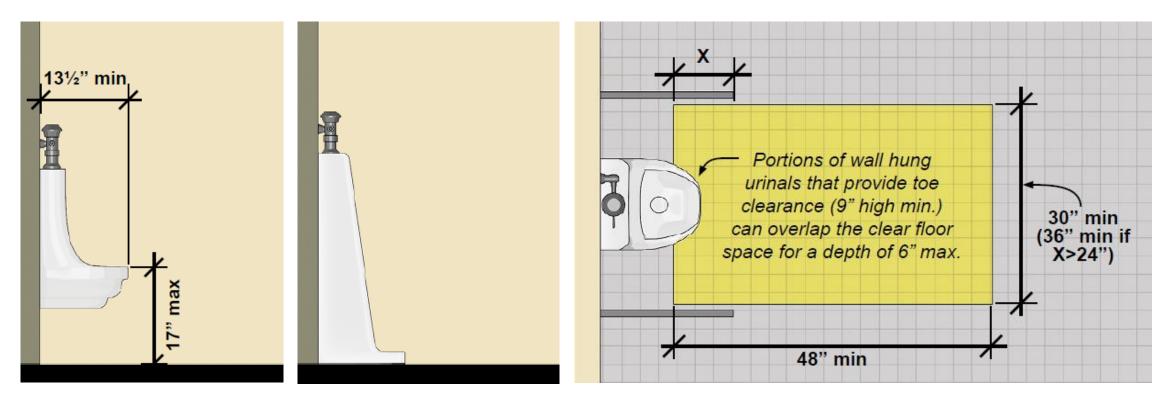
Where an administrative authority requires flush controls for flush valves to be located in a position that conflicts with the location of the rear grab bar, that grab bar **shall be permitted** to be split or shifted to the open side of the toilet area. - US Access Board







ADA Urinals



Max. 17" from floor; any rim height less than 17" is in full compliance. Must project at least 13.5" from wall. Older stall-type urinals installed in floor comply

Overlap



Lavatories & Sinks



ADA Lavatories & Sinks



- Wheelchair clear floor space directly in front of fixture at least 30" wide and 48" long
- Clear floor space underneath lavatory no less than 17" and no greater than 25"
- Lavatory or counter surface not more than 34" above finished floor
- Fixture must include knee/toe clearances
- · Insulated or covered exposed pipes to prevent injury



Exposed Pipes & Surfaces

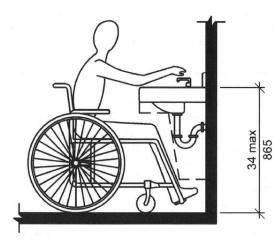
- Water supply and drain pipes under lavatories and sinks should be insulated or otherwise configured to protect against contact
- There should be no sharp or abrasive surfaces
 under lavatories and sinks
- If angle brackets are used for mounting, the design must include a cover or element of insulation around the P trap and water stops
- Most designers will meet this requirement by including an enclosure (stainless steel or cabinet style)





ADA Restroom Lavatory & Accessory Height & Reach

510-635



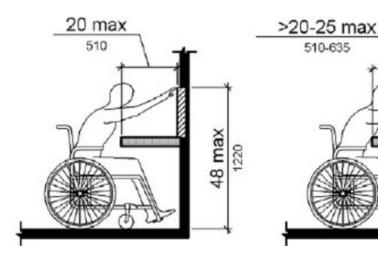
Height of Lavatories and Sinks

Wheelchair-accessible lavatories must be less than 7" thick

Lavatory or counter surface mounted max 34" above finished floor

Allows for 27" knee clearance

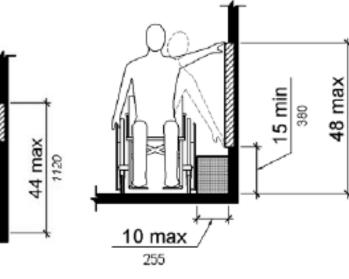




Obstructed High Forward Reach

Mounting heights for restroom accessories should be not more than 44" to 48" depending on counter depth

- Faucets
- Paper towel dispensers
- Soap dispensers
- Hand dryers
- Mirrors
- Waste receptacles



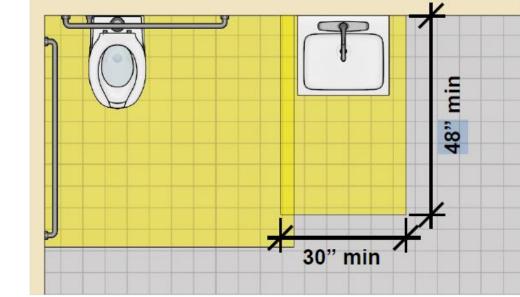
Obstructed Side Reach

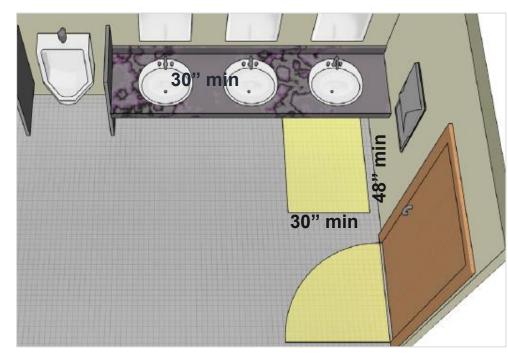
For wall or counter-mounted fixtures, how far away user is from fixture determines how high fixture can be located

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ADA Floor Space

- Wheelchair clear floor space directly in front of fixture at least 30" wide and 48" long
- The clear floor space needed by the sink can go all the way to the wall as long as there is no obstruction. This is especially critical for larger sinks
- There needs to be at least one station that has 30 inches of clear space from left to right
- Many plumbing codes require 30 inches between every station of the sink





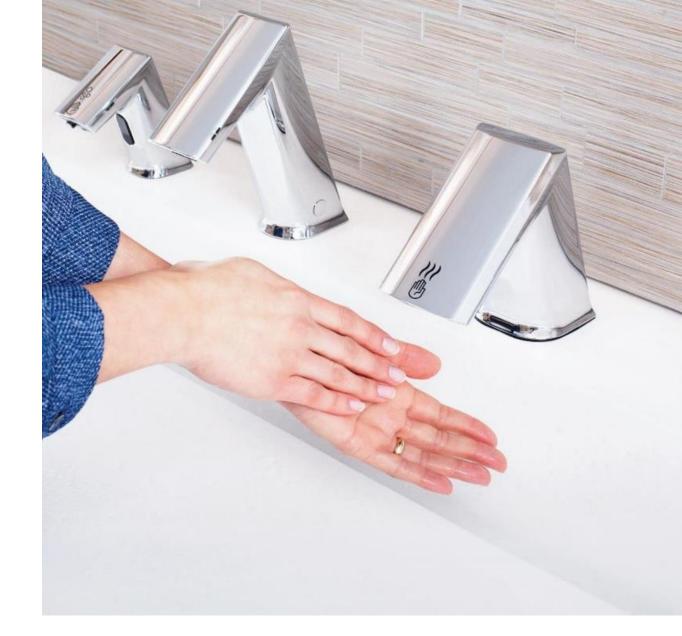


Deck-mounted Faucets, Soap Dispensers, & Hand Dryers



ADA Faucets, Soap Dispensers & Hand Dryers

- User activates without tight grasping, pinching or twisting of the wrist, and with no more than 5 lbs of pressure
- Operating components of faucet no higher than 48" from ground
- Sensor-activated faucets improve user accessibility and comply with ADA



On-deck accessibility



Wall-mounted Hand Dryers



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Wall-mounted Hand Dryer Design Considerations

Suggested mounting heights for ideal performance (from floor to bottom of dryer):

- Men: 45" (114 cm)
- Women: 43" (109 cm)
- Teenagers: 41" (104 cm)
- Children: 35" (89 cm)
- ADA: Mounting heights for restroom accessories should be not more than 44" to 48" depending on counter depth

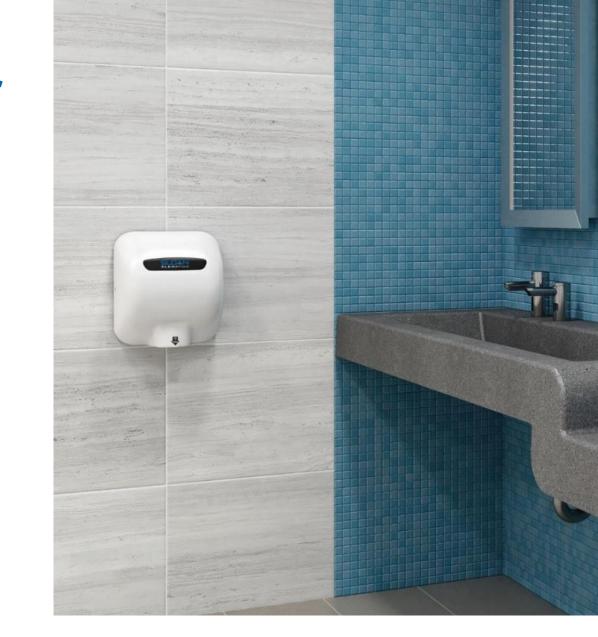
Note: When mounting for any user, ensure that it is mounted below the 48" ADA maximum

Quantity recommendations:

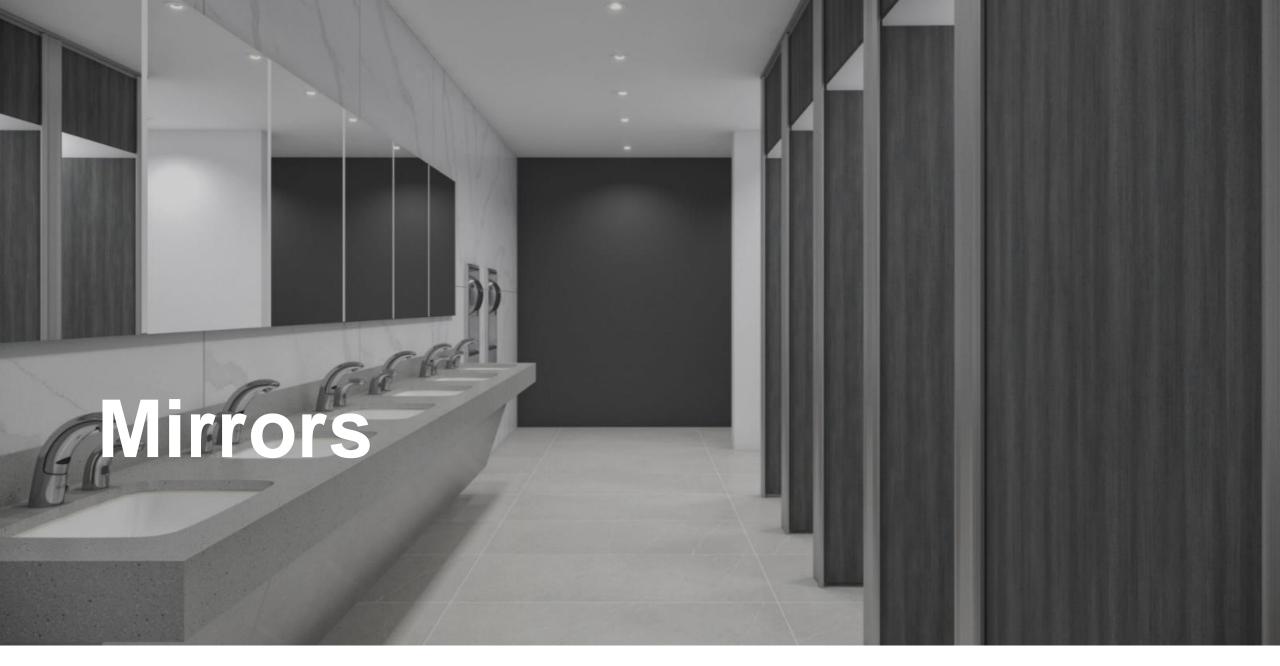
- One dryer for every two sink stations is sufficient for most applications
- For high-traffic applications, one dryer per sink station is suggested

Optional add-ons for hand dryers:

- Recess kit for ADA compliance
- Noise reduction nozzle to reduce the decibel level by 9dB (but increases dry time by approximately 3 seconds)
- Wall guards to protect walls from splashes









Access Board Guidance Q&A

Q. Can accessible mirrors be located above lavatories?

A. Accessible mirrors can be located above lavatories or countertops if the bottom of the reflecting surface is 40" max. above the finish floor (§603.3). The bottom of the reflecting surface of mirrors not located above lavatories or countertops must be 35" max. above the finish floor.

Q. If a toilet room has a full-length mirror and a mirror above a countertop or lavatory, must both types comply?

A. No. The Standards require only one mirror in a toilet room to comply. If mirrors are provided above lavatories or counters and at other locations in a toilet room, it is advisable, but not required, that one of each type comply.







Showers



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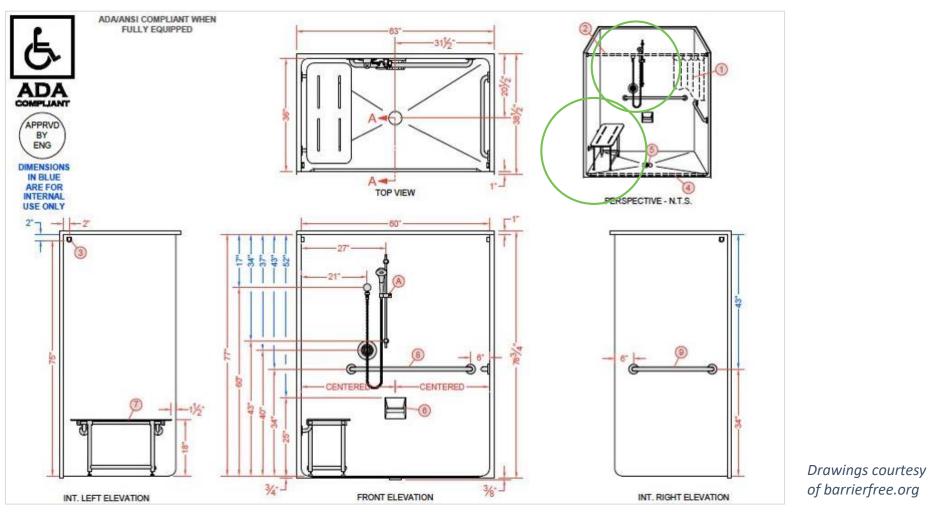
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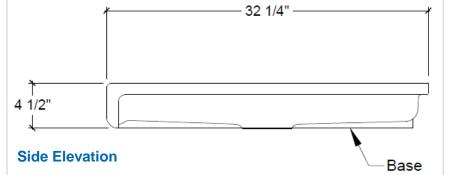
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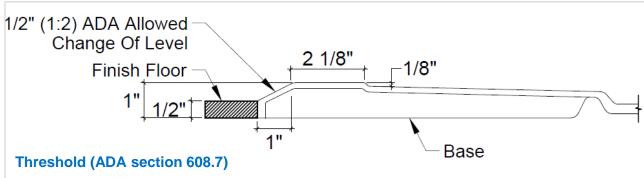
ADA Showers



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Zero Threshold Shower Pans









For More Resources

ADA Standards For Accessible Design

ADA Checklist for Existing Facilities

The United States Access Board Homepage

The United States Access Board Guidance for Toilet Rooms

Sloan CEU Courses

Sink Selection for Sustainability and Accessibility

Specifying Plumbing Fixtures for K-12 and Higher Education Facilities

Selecting Plumbing Fixtures for Commercial Restrooms in Healthcare Facilities





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Sloan Rep Locator tool

- Local code knowledge
- Familiarity with existing sites
- Product knowledge
- Available for onsite consultation

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Sloan Technical Support

P: 888.756.2614 F: 800.737.3061 techsupport@sloan.com







Questions?



Upcoming Sloan Training Webinars



July 2nd

Flushometer Care and Maintenance Part 1 – Manual Diaphragm Units



July 9th

Power Supply Options and Installation Recommendations for Sloan Sensor Faucets



July 16th

Sustainability and Sloan Commercial Restroom Products



Training Comments, Questions, or Suggestions?

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