BUILT-IN CABINETS AND WORK SURFACES - CBC SECTION 11B-805.7		BIN 8

Author: Bill Zellmer AIA, CASp	Issue Date: January 9, 2015	Sutter Health - Physical Access Compliance
Sutter PAC Group	Revisions: March 7, 2022	Barrier Interpretation Notice (BIN)

Topic No.	Topic Name	Brief Description	2019 CBC - Code Text:	2010 ADA Standards - Text:	Sutter Guidance	Additional Information
1	**Built-in Cabinets and Work Surfaces: Code Text**	This code section applies to built-in cabinets and work surfaces.	**CBC Section 11B-805.7 Built-in Cabinets and Work Surfaces.** Built-in cabinets, counters and work surfaces shall be accessible, including: patient wardrobes, nurse's stations, administrative centers, reception desks, medicine preparation areas, laboratory work stations, equipment consoles, clean and soiled utility cabinets, and storage areas; and shall comply with Sections 11B-225 and 11B-902. **Exceptions:** 1. Non-accessible patient bedrooms - See Detail Page 8.1 2. Clinical laboratories - See Detail Page 8.1	None.	This section of code applies to Built-in Cabinets, counters and Work Surfaces at medical facilities. This code section does not apply to any issues beyond 'Built-in cabinets, counters, and work surfaces'.	See Detail Page 8.1
2	**Applicable Room Types**	The code citation includes a list of rooms, but this is not intended to be a comprehensive list.	**Same.**	None.	This code section applies to virtually all room types that are found in medical facilities. The list of rooms provided in the code citation is not a limited list.	See Detail Page 8.1
3	**Storage - Scoping**	5%, minimum of one of each type shall be accessible.	**11B-225 Storage.** **11B-225.1 General.** Storage facilities shall comply with Section 11B-225. **11B-225.2 Storage.** Where storage is provided in accessible spaces, at least one of each type, shall comply with Section 11B-811. **11B-225.3 Lockers.** Where lockers are provided, at least 5 percent, but no fewer than one of each type, shall comply with Section 11B-811.	N/A	Per 11B-225 at least 5% but no fewer than one of each type of storage must be accessible.	See Detail Page 8.2

Topic No.	Topic Name	Brief Description	2019 CBC - Code Text:	2010 ADA Standards - Text:	Sutter Guidance	Additional Information
4	Work Surfaces - Scoping	Minimum of 5% of each type of work surface shall be accessible at each location.	**11B-226 Dining surfaces and work surfaces. 11B-226.1. General.** …In addition, where <u>work surfaces</u> are provided for use by other than employees, at least 5 percent shall comply with Section 11B-902.	N/A	Minimum of 5% of each type of work surface shall be accessible at each location. While this scoping section identifies application to work surfaces provided for use '…by other than employees…' it is nonetheless applicable to employee areas in health care facilities as required by 11B-805.7	See Detail Page 8.3
5	Work Surfaces - Examples	Not all countertops should be considered as 'Work Surfaces'.	N/A	**Department of Justice Advisory:** Section 902.1: "... Examples of work surfaces include writing surfaces, study carrels, student laboratory stations, baby changing and other tables or fixtures for personal grooming, coupon counters, and where covered by the ABA scoping provisions, employee work stations."	The *Work Surface* requirement is only applicable at areas that can be defined as a 'Work Suface'.	See Detail Page 8.4

BUILT-IN CABINETS AND WORK SURFACES – CBC SECTION 11B-805.7	BIN 8
SUTTER HEALTH - BARRIER INTERPRETATION NOTICE	

Author:	Bill Zellmer	ISSUE DATE:	January 9, 2015	8.1 – Code Intent
		REVISIONS:	May 8, 2015	

A. Code Text: CBC Section 11B-805.7 Built-in Cabinets and Work Surfaces. Built-in cabinets, counters and work surfaces shall be accessible, including: patient wardrobes, nurse's stations, administrative centers, reception desks, medicine preparation areas, laboratory work stations, equipment consoles, clean and soiled utility cabinets, and storage areas; and shall comply with 11B-225 and 11B-902.

B. This code section applies to all 'medical care facilities'. This specifically includes:

1. Hospitals (OSHPD 1 Facilities)
2. Skilled Nursing (OSHPD 2 Facilities)
3. Clinics (OSHPD 3 Facilities)
4. Medical Office Buildings
5. Ambulatory Surgery Centers

For further discussion of the discussion of what qualifies as a 'medical care facility', see BIN 6, page 6.2

C. This code section applies only to 'built-in cabinets, counters and work surfaces'. It does <u>not</u> address any issues beyond these elements. It further does <u>not</u> require that other elements in these same rooms or spaces be made accessible (it is neutral regarding other elements).

D. This code section applies to virtually all <u>room types</u> that are found in medical care facilities. The list of rooms and spaces provided in the code citation is not a comprehensive list. Thus it is **<u>not</u>** just applicable at:

'...patient wardrobes, nurse's stations, administrative centers, reception desks, medicine preparation areas, laboratory work stations, equipment consoles, clean and soiled utility cabinets, and storage areas.'

E. It is understood that this code section does <u>not </u>apply at rooms or areas that are <u>exempt</u> from access requirements as:
1. 'employee work areas' / 'employee workstations' per exemptions allowed under CBC Section 11B-203.9 This may include: Housekeeping rooms, IT closets, mechanical rooms etc. For a detailed discussion of 'employee areas' and exemption from access requirements see <u>BIN 11.</u>
2. Rooms or spaces that are otherwise not required to be accessible per 11B Chapter 2 scoping limitations or exemptions.

Author:	Bill Zellmer	ISSUE DATE:	January 9, 2015	
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A. Code Text: 11B-225 Storage.

11B-225.1 General. Storage facilities shall comply with Section 11B-225.

11B-225.2 Storage. Where storage is provided in accessible spaces, at least one of each type, shall comply with Section 11B-811.

11B-225.2.1 Lockers. Where lockers are provided, at least 5 percent, but no fewer than one of each type, shall comply with Section 11B-811.

B. The scoping requirement is: 5 % / minimum of one of each type at each location shall be accessible.
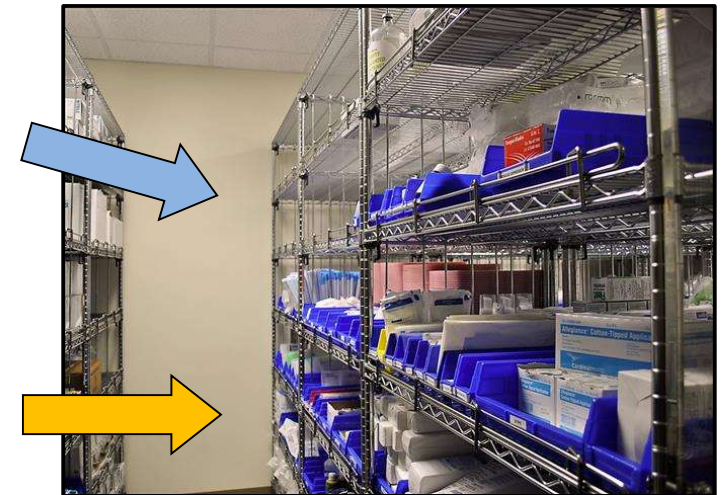
The question of 'Type' of storage is clarified in a Department of Justice advisory, which identifies the following six types of storage:

1. Closets
2. Cabinets
3. Shelves
4. Clothes Rods
5. Hooks
6. Drawers

If, upper cabinets, open shelves or other storage is provided out of accessible reach range (see blue arrows)

Then, 5% or minimum of one lower storage unit of the same type must be provided within reach range (15" to 48" above floor per 11B-308) in the same room or area. (see gold arrows)

BUILT-IN CABINETS AND WORK SURFACES – CBC SECTION 11B-805.7	BIN 8
SUTTER HEALTH - BARRIER INTERPRETATION NOTICE	8.3 – Work Surfaces - Scoping

Author:	Bill Zellmer	ISSUE DATE:	January 9, 2015	8.3 – Work Surfaces - Scoping
		REVISIONS:	March 7, 2022	

A. **Backwards Scoping:** The text of Section 11B-805.7 does not specifically identify a scoping requirement for 'work surfaces', nor does it cross-reference one (as it does for storage). In the absence of any specific reference to the contrary, it is appropriate to apply scoping section 11B-226 as shown below.

B. **Code Text: 2019 CBC Section 11B-226 Dining surfaces and work surfaces.**
11B-226.1. General. …In addition, where work surfaces are provided for use by other than employees, at least 5 percent shall comply with Section 11B-902.

C. The scoping requirement is: a minimum of 5% of each type of work surface at each location shall be accessible. Most frequently, this translates to 1 out of 20 work stations. In the vast majority of medical facilities, there will be very few locations where more than one accessible work surface is required for a given room or function.

D. The 5% requirement must be applied to each 'function' of work surface in each room or area. The establishment of different 'functions' within a room or area shall be established by reviewing floor plans, discussions with project teams, or discussion with building officials.

E. In Section 11B-226 as shown above, the text *'where work surfaces are provided for use by other than employees'* appears to indicate that it would not apply in *employee areas*; however, the text of 11B-805.7 clearly identifies *employee work areas* as in fact requiring accessible work surfaces.

A. Neither the CBC nor the ADA define what a 'work surface' is, leaving it up to individual interpretations on a case-by-case basis. A Department of Justice advisory (below) provides some guidance by way of examples.

B. **DOJ Advisory:** 902.1: "... Examples of work surfaces include:
Writing surfaces, study carrels, student laboratory stations, baby changing and other tables or fixtures for personal grooming, coupon counters …"

C. For additional guidance, the text of Section 11B-805.7 identifies areas where the 'work surface' requirement will be applied:
"…Nurse's stations, administrative centers, reception desks, medicine preparation areas, laboratory work stations, equipment consoles, clean and soiled utility cabinets…"

D. In general terms, other examples of 'work surfaces' include both:
An area that is designed for an employee to perform work at/on a counter surface while sitting
An area that is designed for an employee to perform work at/on a counter surface while standing

The application of this requirement at areas that are designed for employees to work while standing, is of particular concern to Sutter. The code intent is to require at least one accessible work surface at all work surface locations, even when the work-function will be most commonly performed by an employee while standing. By doing this, the code will provide opportunity to the disabled.

If the application of this requirement results in a particular hardship or is otherwise considered unreasonable, the Project Team should consult with the Sutter PAC staff and the appropriate building officials to determine a project-specific application.

E. Areas that would not be considered as 'work surfaces' include:
Sinks
Countertops that are not intended for employees to perform work, but happen to have a countertop