

Facility & Property Services

Physical Access Compliance Program



PAC –PROCESS #3

To: All Sutter Health Personnel and Outside Consultants responsible for requesting Monitoring Services for new construction projects and/or architectural barrier removal.

From: FPS Physical Access Compliance ([visit FPS Physical Access Compliance](#))

Re: Barrier Prevention Program – Monitoring Process for new construction projects and barrier removal per Architectural Barrier Removal Plan

Monitoring for New Construction Projects:

Scope: Any projects regardless of size and budget in areas serving patients and/or public must be field reviewed. The monitoring process ensures that all construction is in compliance with current federal and state regulations. Monitoring occurs after completion of construction and installation of all accessories, furniture and equipment but before project completion. Air balance must be complete so that door operating forces can be properly measured. The Project Team may have preliminary monitoring services performed to minimize rework at final monitoring.

For projects using the Alternate Compliance Method (ACM), monitoring is included in the ACM process. See PAC Process #8 ([view PAC Process #8 pdf](#)).

Cost: The cost to provide monitoring services is to be covered by the project budget. The cost to remove barriers identified in monitoring is to be covered by the project budget or removed as part of the punch list process at no additional cost.

Schedule: The Project Team is responsible to track the monitoring process with the project's schedule.

Steps:

1. The Project Team informs FPS PAC when the project is ready for monitoring and provides as-built drawings to FPS PAC.
2. FPS PAC defines the initial monitoring percentage which is dependent on the Accessibility Plan Review (APR) process and FPS PAC's discretion:
 - a. 5% of APR Report items when the APR Process was completed prior construction start.
 - b. 25% of APR Report items when the APR Process was completed after construction start.
 - c. 25% of APR Report approved items and 100% of unresolved items when the APR Process was not completed after construction completes.

- d. 100% of project when the APR process was never started or there is no response to the APR Report's initial comments.
3. FPS PAC notifies the Project Team when the intake process is complete and an Access Specialist is assigned.
4. FPS PAC sends the as-built drawings and initial monitoring percentage to the Access Specialist for a fee proposal. If the initial monitoring percentage is 5%, the Access Specialist's proposal includes fee amounts for three different levels of monitoring (5%, 15%, and 25%) due to Step #5. FPS PAC sends the proposal to the Project Team. The Project Team must approve the proposal and execute a contract agreement before PAC can authorize the Access Specialist to begin.
5. When the initial monitoring percentage is less than the maximum 25%, the Access Specialist is allowed to increase the percentage during monitoring if they find more than 20% of the selected comments are out of compliance. For example, if the initial monitoring percentage is 5%, the following percentage increase could happen:
 - a. If more than 20% of the selected comments are out of compliance, then the Access Specialist will increase the monitoring percentage to 15% of the APR Report.
 - b. If again more than 20% of the selected comments are out of compliance, then the Access Specialist will increase the monitoring percentage to maximum 25% of the APR Report.
6. Upon completing the field monitoring, the Access Specialist issues items out of compliance on a monitoring report to the Project Team through FPS PAC requesting correction.
7. The Project Team coordinates the removal of barriers. If a change order is required to remove barriers identified from the monitoring report, then the Project Team must submit that change order for the Access Specialist to review and approve. This change order does not need to follow the APR process because the scope will be documented in the monitoring report of the original project.
8. The Project Team submits responses on the monitoring report through FPS PAC for review by the Access Specialist. The Access Specialist performs a final visit to confirm compliance.
9. The monitoring report may include additional barrier items that were identified by the Access Specialist but not part of the APR comments. The Project Team is to respond to the additional barrier items in the same manner as the final percentage monitored.
10. Once all comments are resolved, monitoring is complete. FPS PAC submits the approved completed Monitoring Report to Class Counsel via Office of General Counsel while the Project Team archives the monitoring report in the project files for record. See Attachment A for example of an approved Project Monitoring Report.

Monitoring for Barrier Removal per Architectural Barrier Removal Plan (ABRP):

Scope: Work to remove barriers per the Architectural Barrier Removal Plan. The monitoring process ensures that all construction is in compliance with current federal and state regulations. Monitoring occurs after completion of construction and installation of all accessories, furniture and equipment but before project completion.

Cost: The cost to provide monitoring services for barrier removal work is to be covered by the Affiliate.

The ABRP budget will not be increased to remove barriers that were previously noted as being completed but were found to be deficient during monitoring. Such costs are to be covered by warranties or contingencies within original funding amount.

Steps:

1. FPS PAC establishes from semi-annual progress reports a list of barriers removed within each calendar year. List of removed barriers is used to select 5% of the barriers for monitoring.
2. FPS PAC will dispatch Access Specialists on a yearly basis to monitor completed work. The initial monitoring percentage will start at 5%. Refer to Step #5 under **Monitoring for New Construction Projects** above for percentage increases during monitoring.
3. Upon completing the field monitoring, the Access Specialist issues items out of compliance on a monitoring report to FPS PAC. These barriers get incorporated back into the ABRP and a new completion date must be provided.
4. The Affiliate submits responses on the monitoring report through FPS PAC for review by the Access Specialist. The Access Specialist performs a final visit to confirm compliance.
5. The monitoring report may include additional barrier items that were identified by the Access Specialist but not part of the APR comments. The Affiliate is to respond to the additional barrier items in the same manner as the final percentage monitored.
6. Once all comments are resolved, monitoring is complete. FPS PAC submits the approved completed Monitoring Report to Class Counsel via Office of General Counsel while the Affiliate archives the monitoring report in the project files for record.