

TAKEN TO ACCESS



Question of the month:

Q. We have submitted a Patient Lift Installation project to OSHPD for plan review. We are installing a total of eight lifts. OSHPD is requiring that a total of six toilet rooms be upgraded as part of the project. Is this reasonable?

R. FPS PAC cannot determine the reasonableness of a code requirement or the interpretation of a building official. However, we can confirm that new renovation projects are subject to accessibility compliance consistent with all Division I- Provisions for new buildings except as modified by Chapter 1134B. Under 1134B.2.1 requirements, sanitary facilities serving the area are required to comply. In certain instances, separate sanitary facilities are provided to serve patients, staff and the public. If these are single occupancy facilities, OSHPD's interpretation is that they all must be upgraded as they serve different populations and genders.

Announcements:

For all applicable accessibility requirements in renovations projects reference 2010 ADA as well as 2010 CBC Chapter 1134B. Note that in 2013 CBC, there is no longer chapter 1134B. Instead, reference section 11B-202.

WITCH IS RIGHT?!

Over the last few months, FPS PAC has received several inquiries about the type of renovation projects that trigger Path of Travel (POT) improvements. While most teams understand POT requirements, many are still unaware that projects such as medical equipment replacements, patient lift installations and e-HR implementations trigger these requirements.

The surprise may come from old thinking that equipment installation or infrastructure improvements projects are exempt from POT upgrades. However they are not. Per 2010 CBC 1134B.2.1 Exception 4 only "*Projects which consist only of heating, ventilation, air conditioning, reroofing, electrical work not involving placement of switches and receptacles, cosmetic work that does not affect items regulated by this code, such as painting, equipment not considered to be a part of the architecture of the building or area, such as computer terminals, office equipment, etc., are not considered alteration projects for the purposes of accessibility for persons with disabilities and shall not be subject to this code unless they affect the usability of the building or facility.*"

Also, many teams have assumed that these types of projects aren't required to comply with the Consent Decree Accessibility Plan Review (APR) obligation and as such they have missed the opportunity to have Access Specialists check for full compliance prior to submitting for AHJ's review and approval. This results in significantly larger project scope identified late during the permitting phase, longer schedule durations and inadequate budgets. While in a few instances system ADA funding for barrier removal can be made available to subsidize POT costs, the subsidies are usually a fraction of what is needed.

When initiating a new project, it's best to engage FPS PAC staff for a complete understanding of all requirements, to confirm and verify scope and determine if an APR is required. Also, per an agreement with Class Counsel we can offer in-house review on specific types of projects:

- Electrical outlet installations that would only require an electrical permit and no structural changes made to the space.
- Equipment replacement projects such as omnicell, pyxis, blanket warmer, sterilizer, vending machine or ATM installations.
- Minor barrier removal modifications such as lowering counter heights, changing swing of doors to provide adequate maneuvering clearances and automatic door installations.
- Barrier removal signage modification projects where the scope is limited to signage only and where the project is not associated with a larger separate project.
- Exam room remodels where the number of exam rooms being remodeled does not exceed five rooms.

Additionally, projects not mandated by the Consent Decree to undergo accessibility plan review such as staff area only remodels can be submitted for FPS PAC in-house review and input. To request a review, simply complete the APR application and submit to Michelle Austin at AustinM@sutterhealth.org.

While it may be clear which renovation projects trigger POT improvements, there are some who aren't sure about the distinction between Path of Travel and an Accessible Route of Travel. We will address the definition and applicability of an Accessible Route in future publications. For now, remember that Path of Travel requirements are specific to renovation projects only. See 2010 CBC Section 1102B for a complete definition.

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