

## Compliance Guide



### For Title III of the Americans with Disabilities Act



The use of the term “ADA Compliant” herein is a description of a class of product designs and is not intended as a substitute for your own review of the ADA, the regulations that interpret the ADA, or the advice of counsel. The ADA does not preempt, and the use of the term “ADA Compliant” is not intended to connote compliance with any state or local laws or building codes that may require more stringent accessibility modifications.



Enacted in 1990, the Americans with Disabilities Act (ADA) is a federal civil rights law granting equal rights and access to persons with disabilities. Title III of the ADA ensures that two types of places—places of public accommodation and commercial facilities—do not create or maintain any barriers to access for individuals with disabilities.

This brochure is designed to assist you, our Georgia-Pacific customers, in your efforts to comply with Title III of the ADA. It provides an overview of the ADA requirements governing washroom systems (As published in the Title III regulations (28 CFR Part 36) issued by the U.S. Department of Justice), such as toilet tissue, paper towel and soap dispensers.

This brochure is not intended as a substitute for the ADA, the regulations that interpret the ADA, or the advice of counsel. The ADA does not preempt, and this brochure does not address state, local laws or building codes that may require more stringent accessibility modifications. This brochure is not intended to be a comprehensive guide to all ADA requirements that apply to washrooms, nor is it intended to be construed as legal advice. A complete guide to washrooms can be found at [www.ada.gov](http://www.ada.gov).

References in this brochure are to sections of the 2010 ADA Standards for Accessible Design.

New construction or alterations that occur after March 15, 2012 (as measured by the date the last application for a building permit or extension is certified or received by an approving government agency, or the start of physical construction where no permit is required), a place must be in compliance with the 2010 Standards for Accessible Design, comprised of the requirements in 28 CFR Part 36, subpart D plus the 2004 ADAAG at 36 CFR part 1191, appendices B and D. Prior to that date, the 1991 standards or the 2010 standards may be used.

In addition to the standards described here, other requirements, including state and local rules, may apply. Users of this brochure should consult with counsel in making determinations about compliance with all relevant laws.



## General Information About Title III of the ADA

Title III of the ADA requires that new facilities be constructed so that they are accessible to disabled individuals. Places of public accommodation are buildings operated by private entities whose operations will affect commerce, and include most facilities open to the general public. Commercial facilities are buildings intended for non-residential use by private entities whose operations will affect commerce, and include most places where employment occurs. It is possible for part of a building to be classified as a commercial facility while other parts of the same building are classified as places of public accommodation.

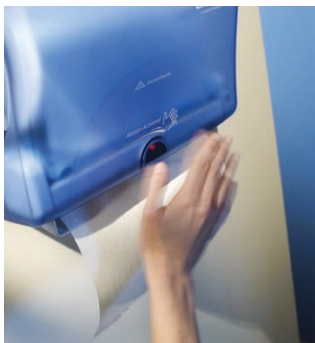
Listed below are examples of:

### **Places of Public Accommodation**

- Entertainment Facilities
- Food Establishments
- Lodging Establishments
- Places of Education
- Places of Public Display
- Places of Public Gathering
- Recreational or Exercise Facilities
- Sales/Rental Establishments
- Service Establishments
- Social Service Centers
- Stations used for Public Transportation

### **Commercial Facilities**

- Factories
- Office Buildings
- Warehouses



## Understanding Washroom System Requirements

Understanding where washroom systems should be placed and knowing the technical requirement for these systems will assist you in complying with the Americans with Disabilities Act (ADA) and with the Americans with Disabilities Act Accessibility Guidelines (ADAAG).

Excerpts from ADAAG along with diagrams are provided below:

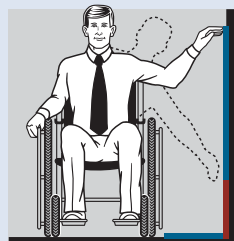
### Controls and Dispensers

In general, ADAAG requires that toilet facilities comply with the requirement found in ADAAG Section 603. ADAAG Section 603.2 requires that controls, dispensers, receptacles or other equipment must be located on an accessible route and comply with the requirements of ADAAG Sections 603 and 309.

#### Side Reach, Unobstructed

##### ADAAG Section 308.3 | Side Reach

As illustrated, the side reach range requirements in ADAAG Section 308.3 state that if there is unobstructed floor space available which allows a parallel approach to the dispenser by a person in a wheelchair, then the minimum low side reach range to the dispenser controls allowed is 15 inches, and the maximum high side reach range to the dispenser control allowed is 48 inches.

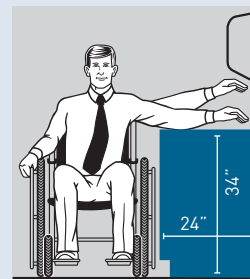


10" [25.4 cm] ↑  
Minimum clear distance from wall

←--- 48" [122 cm]  
Maximum height to controls of dispenser

←--- 15" [38.1 cm]  
Minimum height to controls of dispenser

#### Side Reach Over Obstruction



24" [61 cm] Maximum width of obstruction

←-- 46" [116.8 cm]  
Maximum height to controls of dispenser

←-- 34" [86.4 cm]  
Maximum height of obstruction

If the side reach is over an obstruction, then the height of the obstruction cannot exceed 34 inches, the depth of the obstruction cannot exceed 24 inches, and the maximum high side reach over the obstruction to the dispenser controls cannot exceed 46 inches.

##### ADAAG Section 308.2 | Forward Reach

As illustrated, the forward reach range requirements in ADAAG Section 308.2 stipulate that if unobstructed floor space only allows a forward approach to the dispenser by a person in a wheelchair, then the minimum low forward reach range to the dispenser controls allowed is 15 inches, and the maximum high forward reach is 48 inches. If the forward reach is over an obstruction, then the depth of the obstruction cannot exceed 25 inches, and the knee space under the obstruction must equal or exceed the depth of the obstruction. If the obstruction is less than 20 inches deep, then the maximum high forward reach over the obstruction to the dispenser controls cannot exceed 48 inches; if the obstruction is 20-25 inches deep, then the maximum high forward reach over the obstruction to the dispenser controls cannot exceed 44 inches.

#### Forward Reach, Unobstructed



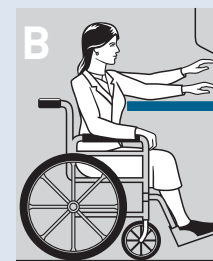
←--- 48" [122 cm]  
Maximum height to controls of dispenser

←-- 15" [38.1 cm]  
Minimum height to controls of dispenser

#### Forward Reach Over Obstruction



←--- 48" [122 cm]  
Maximum height to controls of dispenser if obstruction is less than 20" [50.8 cm] in depth



←-- 44" [111.8 cm]  
Maximum height to controls of dispenser if obstruction is more than 20" [50.8 cm] in depth



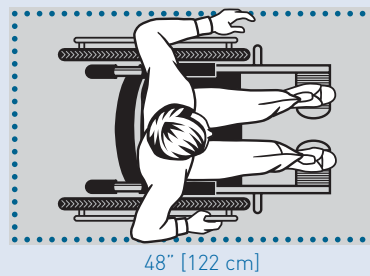


### Towel and Soap Dispenser Placement

ADAAG Section 309 contains several requirements affecting the placement of paper towel and soap dispensers. ADAAG Section 309.2 allows either a forward or parallel approach to the dispenser by a person in a wheelchair but requires that there be clear floor space for the approach measuring 30 inches by 48 inches.

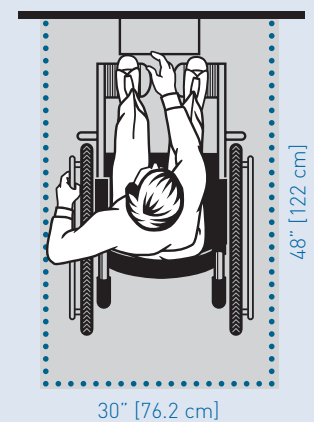
According to ADAAG Section 308, the highest operable part of a dispenser must be placed within at least one of the reach ranges specified in ADAAG Section 308.2, which governs forward (frontal) reaches, or ADAAG Section 308.3, which governs side reaches. The diagrams illustrate the side and forward reach range requirements.

Clear Floor Space and Parallel Approach to Dispenser



Both the Parallel and the Forward approach to the dispenser require the same clearance space of at least 30" [76.2 cm] x 48" [122 cm]

Clear Floor Space and Forward Approach to Dispenser



### Towel and Soap Dispenser Operation

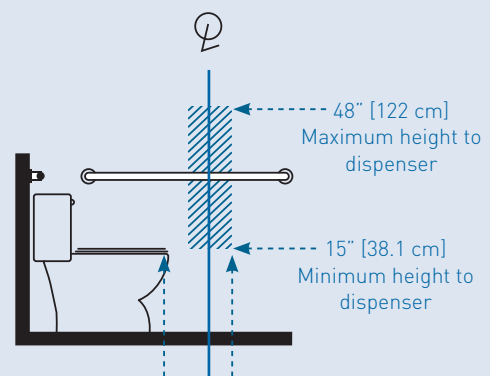
ADAAG Section 309.4 states that: "Operable parts shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate operable parts shall be no greater than 5 pounds [22.2 N] maximum."

### Toilet Tissue Dispensers

ADAAG Section 604.7 requires that toilet paper dispensers shall be installed between 7 inches minimum and 9 inches maximum in front edge of the water closet (toilet) measured to the centerline of the dispensers. The outlet of the dispensers shall be 15 inches minimum and 48 inches maximum above the finish floor and shall not be located behind grab bars. If toilet paper dispensers are installed above the side wall grab bar, the outlet of the toilet paper dispenser must be 48 inches maximum above the finish floor. Dispensers shall not be of a type that controls delivery or that does not allow continuous paper flow. *Note: Guideline changes effective 3/15/2011*

*Special note: ADAAG Section 604.9.6 Children's Specifications (ages 5 through 8 years of age) requires that toilet paper dispensers shall be between 7 inches minimum and 9 inches maximum in front edge of the water closet (toilet) measured to the centerline of the dispenser. The outlet of the dispensers shall be 14 inches minimum and 19 inches maximum above the finish floor. There shall be a clearance of 1-1/2 inches minimum below the grab bar. Dispensers shall not be of a type that controls delivery or that does not allow continuous paper flow.*

### High and Low Reach Limits



Dispenser should be mounted between 7 and 9 (on center) from the front edge of water closet (toilet)

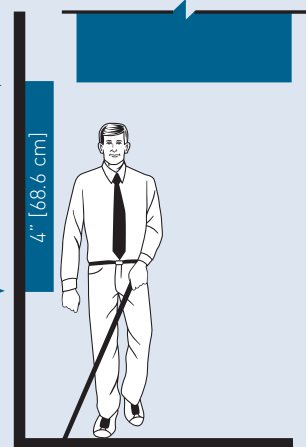
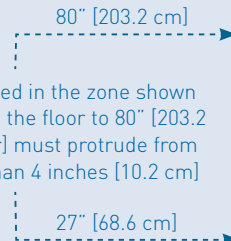


### Protruding Objects Limits

#### Protruding Objects

ADAAG Section 307.2 states that "Objects with leading edges more than 27 inches and not more than 80 inches above the finish floor or ground shall protrude 4 inches maximum horizontally into the circulation path."

Any dispenser placed in the zone shown [27" [68.6 cm] above the floor to 80" [203.2 cm] above the floor] must protrude from the wall no more than 4 inches [10.2 cm]



### ADA Washroom System Range Limits

SOAP AND TOWEL DISPENSERS	
Placement	Limits
Side reach — clear floor space	15" minimum – 48" maximum to dispenser control
Side reach over obstruction	46" maximum to dispenser control
Forward reach over obstruction under 20" deep	15" minimum – 48" maximum to dispenser control
Forward reach over obstruction 20"–25" deep	44" maximum to dispenser control
Operation of dispenser controls	Limits
Operable with one hand and cannot require tight grasping, pinching or twisting of the wrist to activate	Operable with 5 pounds (22.2 N) of force maximum

TOILET TISSUE DISPENSERS	
Placement	Limits
Near side installation	15" minimum above the floor to the center of the roll

PROTRUDING OBJECTS	
Placement	Limits
If bottom edges are between 27" and 80" above the floor and the protrusion is in a circulation path	Protrusion must be 4" or less into the circulation path