Checklist for Existing Facilities version 2.1





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Introduction

Title III of the **Americans with Disabilities Act** requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from our country's businesses and services, and to afford our businesses and services the opportunity to benefit from the patronage of all Americans.

The regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is **readily achievable**—in other words, easily accomplished and able to be carried out without much difficulty or expense. Public accommodations that must meet the barrier removal requirement include a broad range of establishments (both for-profit and nonprofit)—such as hotels, restaurants, theaters, museums, retail stores, private schools, banks, doctors' offices, and other places that serve the public. People who own, lease, lease out, or operate places of public accommodation in existing buildings are responsible for complying with the barrier removal requirement.

The removal of barriers can often be achieved by making simple changes to the physical environment. However, the regulations do not define exactly how much effort and expense are required for a facility to meet its obligation. This judgment must be made on a case-by-case basis, taking into consideration such factors as the size, type, and overall financial resources of the facility, and the nature and cost of the access improvements needed. These factors are described in more detail in the ADA regulations issued by the Department of Justice.

The process of determining what changes are readily achievable is not a one-time effort; access should be re-evaluated annually. Barrier removal that might be difficult to carry out now may be readily achievable later. Tax incentives are available to help absorb costs over several years.

Purpose of This Checklist

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This checklist will help you identify accessibility problems and solutions in existing facilities in order to meet your obligations under the ADA. The goal of the survey process is to plan how to make an existing facility more usable for people with disabilities. The Department of Justice (DOJ) recommends the development of an Implementation Plan, specifying what improvements you will make to remove barriers and when each solution will be carried out: "...Such a plan...could serve as evidence of a good faith effort to comply...."

Technical Requirements

This checklist details some of the requirements found in the ADA Standards for Accessible Design (Standards). The ADA Accessibility Guidelines (ADAAG), when adopted by DOJ, became the Standards. The Standards are part of the Department of Justice Title III Regulations, 28 CFR Part 36 (*Nondiscrimination on the basis of disability... Final Rule*). Section 36.304 of this regulation, which covers barrier removal, should be reviewed before this survey is conducted.

However, keep in mind that full compliance with the Standards is required only for new construction and alterations. The requirements are presented here as a guide to help you determine what may be readily achievable barrier removal for existing facilities. The Standards should be followed for all barrier removal unless doing so is not readily achievable. If complying with the Standards is not readily achievable, you may undertake a modification that does not fully comply, as long as it poses no health or safety risk.

In addition to the technical specifications, each item has a scoping provision, which can be found under Section 4.1 in the Standards. This section clarifies when access is required and what the exceptions may be.

Each state has its own regulations regarding accessibility. To ensure compliance with all codes, know your state and local codes and use the more stringent technical requirement for every modification you make; that is, the requirement that provides greater access for individuals with disabilities. The barrier removal requirement for existing facilities is new under the ADA and supersedes less stringent local or state codes.

What This Checklist is Not

This checklist does not cover all of the requirements of the Standards; therefore, it is **not** for facilities undergoing new construction or alterations. In addition, it does not attempt to illustrate all possible barriers or propose all possible barrier removal solutions. The Standards should be consulted for guidance in situations not covered here.

The Title III regulation covers more than barrier removal, but this checklist does **not** cover Title III's requirements for nondiscriminatory policies and practices and for the provision of auxiliary communication aids and services. The communication features covered are those that are **structural** in nature.

Priorities

This checklist is based on the four priorities recommended by the Title III regulations for planning readily achievable barrier removal projects:

Priority 1: Accessible approach and entrance

- Priority 2: Access to goods and services
- Priority 3: Access to rest rooms

Priority 4: Any other measures necessary

Note that the references to ADAAG throughout the checklist refer to the Standards for Accessible Design.

How to Use This Checklist

✓ **Get Organized:** Establish a time frame for completing the survey. Determine how many copies of the checklist you will need to survey the whole facility. Decide who will conduct the survey. It is strongly recommended that you invite two or three additional people, including people with various disabilities and accessibility expertise, to assist in identifying barriers, developing solutions for removing these barriers, and setting priorities for implementing improvements.

✓ **Obtain Floor Plans:** It is very helpful to have the building floor plans with you while you survey. If plans are not available, use graph paper to sketch the layout of all interior and exterior spaces used by your organization. Make notes on the sketch or plan while you are surveying.

✓ **Conduct the Survey:** Bring copies of this checklist, a clipboard, a pencil or pen, and a flexible steel

tape measure. With three people surveying, one person numbers key items on the floor plan to match with the field notes, taken by a second person, while the third takes measurements. *Be sure to record all dimensions!* As a reminder, questions that require a dimension to be measured and recorded are marked with the ruler symbol. Think about each space from the perspective of people with physical, hearing, visual, and cognitive disabilities, noting areas that need improvement.

✓ **Summarize Barriers and Solutions:** List barriers found and ideas for their removal. Consider the solutions listed beside each question, and add your own ideas. Consult with building contractors and equipment suppliers to estimate the costs for making the proposed modifications.

✓ Make Decisions and Set Priorities: Review the summary with decision makers and advisors. Decide which solutions will best eliminate barriers at a reasonable cost. Prioritize the items you decide upon and make a timeline for carrying them out. Where the removal of barriers is not readily achievable, you must consider whether there are **alternative methods** for providing access that *are* readily achievable.

✓ **Maintain Documentation:** Keep your survey, notes, summary, record of work completed, and plans for alternative methods on file.

✓ Make Changes: Implement changes as planned. Always refer directly to the Standards and your state and local codes for complete technical requirements before making any access improvement. References to the applicable sections of the Standards are listed at the beginning of each group of questions. If you need help understanding the federal, state, or local requirements, contact your Disability and Business Technical Assistance Center.

✓ **Follow Up:** Review your Implementation Plan each year to re-evaluate whether more improvements have become readily achievable.

To obtain a copy of the Title III regulations and the Standards or other technical information, call the U.S. Dept. of Justice ADA Information Line at (800) 514-0301 Voice, (202) 514-0381 TDD, or (800) 514-0383 TDD. For questions about ADAAG, contact the Architectural and Transportation Barriers Compliance Board at (800) USA-ABLE.

POSSIBLE SOLUTIONS



Ramps, continued

Do all ramps longer than 6 feet have railings on both sides?

Are railings sturdy, and between 34 and 38 inches high?

Is the width between railings or curbs at least 36 inches?

Are ramps non-slip?

Is there a 5-foot-long level landing at every 30-foot horizontal length of ramp, at the top and bottom of ramps and at switchbacks?

Does the ramp rise no more than 30 inches between landings?

Parking and Drop-Off Areas (ADAAG 4.6)

Are an adequate number of accessible parking spaces available (8 feet wide for car plus 5-foot access aisle)? For guidance in determining the appropriate number to designate, the table below gives the ADAAG requirements for new construction and alterations (for lots with more than 100 spaces, refer to ADAAG):

Total spaces	Accessible
1 to 25	1 space
26 to 50	2 spaces
51 to 75	3 spaces
76 to 100	4 spaces

Are 8-foot-wide spaces, with minimum 8-footwide access aisles, and 98 inches of vertical clearance, available for lift-equipped vans?

At least one of every 8 accessible spaces must be van-accessible (with a minimum of one van-accessible space in all cases).

Yes	No

\Box Add railings.

- Adjust height of railing if not between 30 and 38 inches.Secure handrails in fixtures.
- Relocate the railings.Widen the ramp.
- ☐ Add non-slip surface material.
- □ Remodel or relocate ramp.

□ Remodel or relocate ramp.

□ Reconfigure a reasonable number

of spaces by repainting stripes.



vertical

clearance





rise





number of accessible spaces

Note widths of existing accessible spaces:



width

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QUESTIONS		POSSIBLE SOLUTIONS
Parking and Drop-Off Areas, continued Are the access aisles part of the accessible route to the accessible entrance?	Yes No	 Add curb ramps. Reconstruct sidewalk.
Are the accessible spaces closest to the accessible entrance?		□ Reconfigure spaces.
Are accessible spaces marked with the Interna- tional Symbol of Accessibility? Are there signs reading "Van Accessible" at van spaces?		Add signs, placed so that they are not obstructed by cars.
Is there an enforcement procedure to ensure that accessible parking is used only by those who need it?		Implement a policy to check peri- odically for violators and report them to the proper authorities.
 Entrance (ADAAG 4.13, 4.14, 4.5) If there are stairs at the main entrance, is there also a ramp or lift, or is there an alternative accessible entrance? Do not use a service entrance as the accessible entrance unless there is no other option. 		If it is not possible to make the main entrance accessible, create a dignified alternate accessible entrance. If parking is provided, make sure there is accessible parking near all accessible entrances.
Do all inaccessible entrances have signs indicating the location of the nearest accessible entrance?		Install signs before inaccessible entrances so that people do not have to retrace the approach.
Can the alternate accessible entrance be used independently?		Eliminate as much as possible the need for assistance—to answer a doorbell, to operate a lift, or to put down a temporary ramp, for example.
Does the entrance door have at least 32 inches clear opening (for a double door, at least one 32-inch leaf)?	clear opening	 Widen the door to 32 inches clear. If technically infeasible, widen to 31-3/8 inches minimum. Install offset (swing-clear) hinges.
 Is there at least 18 inches of clear wall space on the pull side of the door, next to the handle? A person using a wheelchair or crutches needs this space to get close enough to open the door. 	clear space	 Remove or relocate furnishings, partitions, or other obstructions. Move door. Add power-assisted or automatic door opener.

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Entrance, continued

of 1/2-inch high?

Is the threshold edge 1/4-inch high or less, or if beveled edge, no more than 3/4-inch high?

If provided, are carpeting or mats a maximum

Yes No

height

If there is a single step with a rise of 6 inches or less, add a short ramp.
 If there is a threshold greater

than 3/4-inch high, remove it or modify it to be a ramp.



□ Secure carpeting or mats at edges.

- Lower handle.
- □ Replace inaccessible knob with a lever or loop handle.
- Retrofit with an add-on lever extension.



height

- □ Adjust the door closers and oil the hinges.
- □ Install power-assisted or automatic door openers.
- □ Install lighter doors.
- force

□ Adjust door closer.



Is the door handle no higher than 48 inches and operable with a closed fist?

The "closed fist" test for handles and controls: Try opening the door or operating the control using only one hand, held in a fist. If you can do it, so can a person who has limited use of his or her hands.

Can doors be opened without too much force (exterior doors reserved; maximum is 5 lbf for *interior* doors)?

You can use an inexpensive force meter or a fish scale to measure the force required to open a door. Attach the hook end to the doorknob or handle. Pull on the ring end until the door opens, and read off the amount of force required. If you do not have a force meter or a fish scale, you will need to judge subjectively whether the door is easy enough to open.

If the door has a closer, does it take at least 3 seconds to close?



	QUESTIONS		POSSIBLE SOLUTIONS
Priority 2	Access to Goods and Services Ideally, the layout of the building should allow people with disabilities to obtain materials or services without assistance.	Yes No	
	Horizontal Circulation (ADAAG 4.3) Does the accessible entrance provide direct access to the main floor, lobby, or elevator?		Add ramps or lifts.Make another entrance accessible.
	Are all public spaces on an accessible route of travel?		Provide access to all public spaces along an accessible route of travel.
THE	Is the accessible route to all public spaces at least 36 inches wide?	width	Move furnishings such as tables, chairs, display racks, vending machines, and counters to make more room.
-	Is there a 5-foot circle or a T-shaped space for a person using a wheelchair to reverse direction?	width	Rearrange furnishings, displays, and equipment.
HTT	Doors (ADAAG 4.13) Do doors into public spaces have at least a 32-inch clear opening?	clear opening	☐ Install offset (swing-clear) hinges. ☐ Widen doors.
	On the pull side of doors, next to the handle, is there at least 18 inches of clear wall space so that a person using a wheelchair or crutches can get near to open the door?	clear space	 Reverse the door swing if it is safe to do so. Move or remove obstructing partitions.
T	Can doors be opened without too much force (5 lbf maximum for interior doors)?	force	 Adjust or replace closers. Install lighter doors. Install power-assisted or automatic door openers.
EFE	Are door handles 48 inches high or less and operable with a closed fist?	height	 Lower handles. Replace inaccessible knobs or latches with lever or loop handles. Retrofit with add-on levers. Install power-assisted or automatic door openers.
EEEE	Are all threshold edges 1/4-inch high or less, or if beveled edge, no more than 3/4-inch high?	height	 If there is a threshold greater than 3/4-inch high, remove it or modify it to be a ramp. If between 1/4- aand 3/4-inch high, add bevels to both sides.

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Directional and Informational Signage The following questions apply to directional and

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Yes No

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THE	Seats, Tables, and Counters, continued At each type of cashier counter, is there a portion of the main counter that is no more than 36 inches high? Is there a portion of food-ordering counters that is no more than 36 inches high, or is there space at the side for passing items to customers who have difficulty reaching over a high counter?	Yes No	Provide a lower auxiliary counter or folding shelf. Arrange the counter and surrounding furnishings to create a space to hand items back and forth. Lower section of counter. Arrange the counter and surrounding furnishings to create a space to pass items.
	Vertical Circulation (ADAAG 4.1.3(5), 4.3) Are there ramps, lifts, or elevators to all public levels?		Install ramps or lifts. Modify a service elevator. Relocate goods or services to an accessible area.
	On each level, if there are stairs between the entrance and/or elevator and essential public areas, is there an accessible alternate route?		Post clear signs directing people along an accessible route to ramps, lifts, or elevators.
	Stairs (ADAAG 4.9) The following questions apply to stairs connecting levels <i>not</i> serviced by an elevator, ramp, or lift.		
	Do treads have a non-slip surface?		Add non-slip surface to treads.
	Do stairs have continuous rails on both sides, with extensions beyond the top and bottom stairs?		Add or replace handrails if pos- sible within existing floor plan.
	Elevators (ADAAG 4.10) Are there both visible and verbal or audible door opening/closing and floor indicators (one tone = up, two tones = down)?		Install visible and verbal or audible signals.
HEIT	Are the call buttons in the hallway no higher than 42 inches?	height	Lower call buttons. Provide a permanently attached reach stick.
	Do the controls inside the cab have raised and braille lettering?		Install raised lettering and braille next to buttons.

QUESTIONS **POSSIBLE SOLUTIONS** Yes No **Elevators**, continued Is there a sign on both door jambs at every □ Install tactile signs to identify floor numbers, at a height of floor identifying the floor in raised and braille letters? 60 inches from floor. If an emergency intercom is provided, is it □ Modify communication system. usable without voice communication? □ Add tactile identification. Is the emergency intercom identified by braille and raised letters? Lifts (ADAAG 4.2, 4.11) Can the lift be used without assistance? If not, □ At each stopping level, post clear is a call button provided? instructions for use of the lift. □ Provide a call button. Is there at least 30 by 48 inches of clear space □ Rearrange furnishings and for a person in a wheelchair to approach to equipment to clear more space. reach the controls and use the lift? clear space Are controls between 15 and 48 inches high \Box Move controls. (up to 54 inches if a side approach is possible)? height Priority **Usability of Rest Rooms** 3 When rest rooms are open to the public, they should be accessible to people with disabilities. Getting to the Rest Rooms (ADAAG 4.1) If rest rooms are available to the public, is at □ Reconfigure rest room. □ Combine rest rooms to create least one rest room (either one for each sex, or unisex) fully accessible? one unisex accessible rest room. Are there signs at inaccessible rest rooms that □ Install accessible signs. give directions to accessible ones? Doorways and Passages (ADAAG 4.2, 4.13, 4.30) Is there tactile signage identifying rest rooms? □ Add accessible signage, placed to the side of the door, Mount signs on the wall, on the latch 60 inches to centerline (not on side of the door, complying with the rethe door itself). quirements for permanent signage. Avoid using ambiguous symbols in place of text to identify rest rooms.

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QUESTIONS		POSSIBLE SOLUTIONS
Stalls, continued In the accessible stall, are there grab bars behind and on the side wall nearest to the toilet?	Yes No	 Add grab bars. Add raised seat.
Lavatories (ADAAG 4.19, 4.24) Does one lavatory have a 30-inch-wide by 48-inch-deep clear space in front? A maximum of 19 inches of the required depth may be under the lavatory.	clear space	 Rearrange furnishings. Replace lavatory. Remove or alter cabinetry to provide space underneath. Make sure hot pipes are covered. Move a partition or wall.
Is the lavatory rim no higher than 34 inches?	height	☐ Adjust or replace lavatory.
Is there at least 29 inches from the floor to the bottom of the lavatory apron (excluding pipes)?	height	☐ Adjust or replace lavatory.
Can the faucet be operated with one closed fist?		Replace with paddle handles.
Are soap and other dispensers and hand dry- ers within reach ranges (see page 7) and us- able with one closed fist?		 Lower dispensers. Replace with or provide additional accessible dispensers.
Is the mirror mounted with the bottom edge of the reflecting surface 40 inches high or lower?	height	 Lower or tilt down the mirror. Add a larger mirror anywhere in the room.
Priority		
4 Additional Access Note that this priority is for items not required for basic access in the first three priorities. When amenities such as drinking fountains and public telephones are provided, they should also be accessible to people with disabilities.		
Drinking Fountains (ADAAG 4.15) Is there at least one fountain with clear floor space of at least 30 by 48 inches in front?	clear space	Clear more room by rearrang- ing or removing furnishings.

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