

MEMORANDUM

TO: Record

FROM: Heather Graham Lewis, AIA 
Lead Architect, Facilities Planning and Development

DATE: UPDATED March 15, 2019

SUBJECT: Employee work area accessibility

Background:

A question often arises about what areas are required to fully comply with barrier free codes in UMHC Facilities. This memo is to confirm applicable codes, and the application thereof.

All fixtures and items intended for use by patients and visitors, and common areas such as employee break rooms, must comply with barrier free code for accessibility.

All areas that patients and visitors enter must have an accessible route to, and through, the space. Fixtures and equipment in these areas that patients and visitors are not expected to use, such as cabinetry and staff handwashing sinks are not necessarily required to meet barrier free codes for accessibility.

Application:

While it is always desirable to make areas fully accessible, there are times when a conflict exists between barrier free requirements and functional requirements for able-bodied staff. One such example is counter height: Counter heights per barrier free requirements are 34" maximum. This is often uncomfortably low for able-bodied staff, and 36" is often the preferred height. As the attached documentation illustrates, 36" is acceptable for staff-only use in certain specific applications. However, if a particular staff member needs their workspace to be fully barrier free, then appropriate accommodations must be made to accommodate this person's abilities.

Applicable Codes and Reference Material:

MBC 2015

ICC A117.1/2009

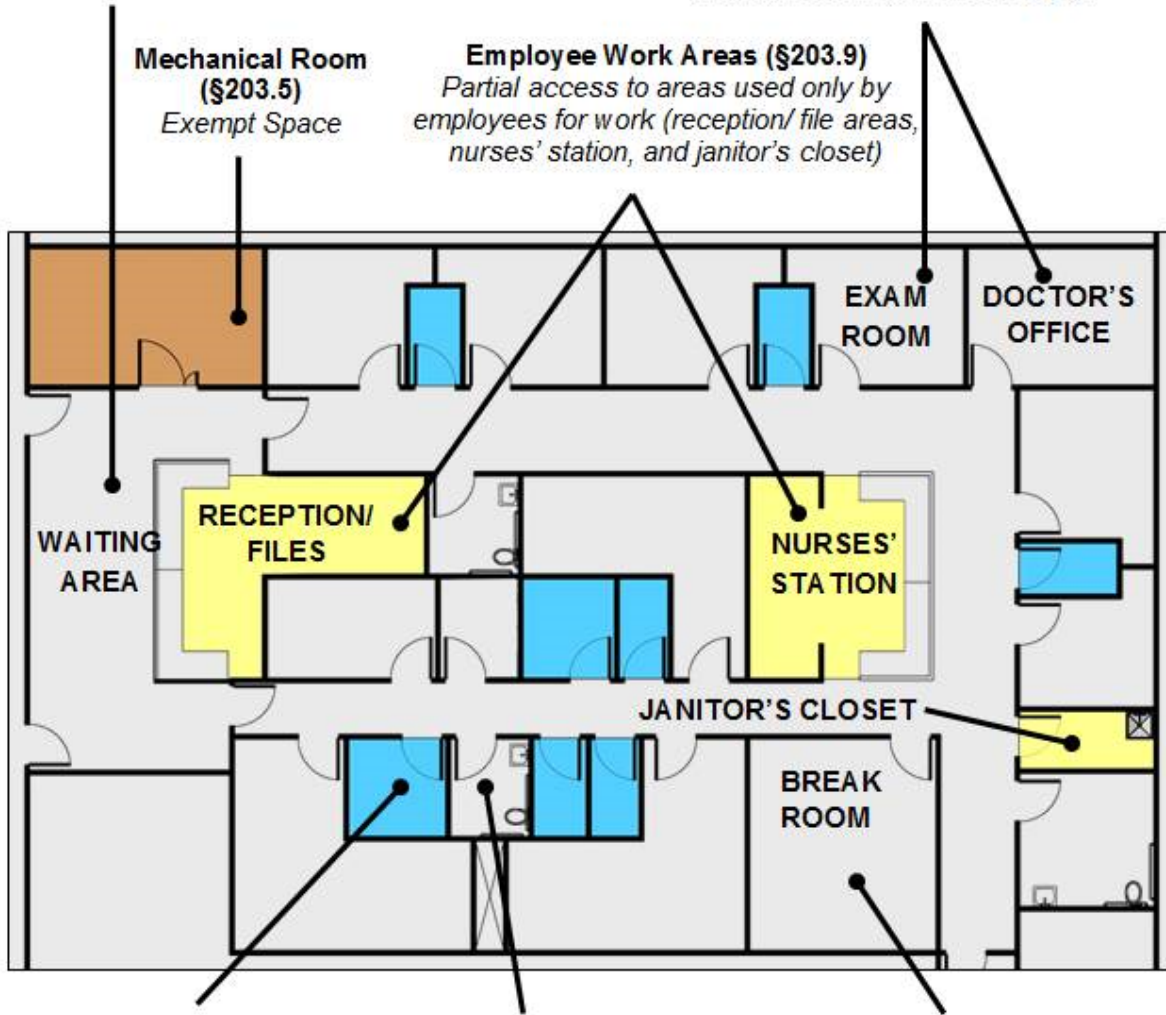
The ADA Standards for Accessible Design 2010

The diagram on the following page is an easy to read summary from the US Access Board Website.

**Exam Rooms and Offices
(§201 and §203.9)**

All exam rooms and offices used by the public must be accessible, but elements within these rooms that are used only by employees for work are not required to comply.

Public Use Spaces (§201)
Full access to public use areas, including waiting areas and corridors



Dressing Rooms (§222)
Access is required to at least 5% (but no less than 1) of each type of use in each cluster.

Toilet Rooms (§213)
Access is required to all public and employee toilet rooms (or no more than 50% of single user toilet rooms for each use at each cluster).

Common Use (Non-Work) Areas (§201)
Full access to break rooms and to other employee areas not used for work purposes

<https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/guide-to-the-ada-standards/chapter-2-new-construction>

Michigan Building Code 2015, which references the **ICC A117.1/2009**.

202 Definitions

EMPLOYEE WORK AREA. All or any portion of a space used only by employees and only for work. Corridors, toilet rooms, kitchenettes and break rooms are not employee work areas.

1103.2.2 Employee work areas. Spaces and elements within employee work areas shall only be required to comply with Sections 907.5.2.3.2, 1007 and 1104.3.1 and shall be designed and constructed so that individuals with disabilities can approach, enter and exit the work area. Work areas, or portions of work areas, other than raised courtroom stations in accordance with Section 1108.4.1.4, that are less than 300 square feet (30 m²) in area and located 7 inches (178 mm) or more above or below the ground or finished floor where the change in elevation is essential to the function of the space shall be exempt from all requirements.

907.5.2.3.1 Public use areas and common use areas. Visible alarm notification appliances shall be provided in public use areas and common use areas.

Exception: Where employee work areas have audible alarm coverage, the notification appliance circuits serving the employee work areas shall be initially designed with not less than 20-percent spare capacity to account for the potential of adding visible notification appliances in the future to accommodate hearing-impaired employee(s).

1104.3.1 Employee work areas. Common use circulation paths within employee work areas shall be accessible routes.

Exceptions:

1. Common use circulation paths, located within employee work areas that are less than 1,000 square feet (93 m²) in size and defined by permanently installed partitions, counters, casework or furnishings, shall not be required to be accessible routes.
2. Common use circulation paths, located within employee work areas, that are an integral component of equipment, shall not be required to be accessible routes.
3. Common use circulation paths, located within exterior employee work areas that are fully exposed to the weather, shall not be required to be accessible routes.

1009.1 Accessible means of egress required. Accessible means of egress shall comply with this section. Accessible spaces shall be provided with not less than one accessible means of egress. Where more than one means of egress are required by Section 1006.2 or 1006.3 from any accessible space, each accessible portion of the space shall be served by not less than two accessible means of egress

Exceptions:

1. Accessible means of egress are not required in alterations to existing buildings.
2. One accessible means of egress is required from an accessible mezzanine level in accordance with Section 1009.3, 1009.4 or 1009.5.
3. In assembly areas with ramped aisles or stepped aisles, one accessible means of egress is permitted where the common path of egress travel is accessible and meets the requirements in Section 1029.8.

(Note: Section 1009 continues through 10011.11 and is not copied in its entirety here)