

CHAPTER SIX: Program and Facility Access

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One Stop Centers must ensure that programs and activities – the aid, benefits, services, and training that are offered to the public – are accessible to and usable by individuals with disabilities. A significant factor in program accessibility is the facilities in which programs and activities are conducted. Accessible facilities is the topic of this chapter.

This section begins with a discussion of the concept of "program accessibility." Next, it reviews the general ADA Title II and Section 504 requirements for providing access in existing facilities, presenting examples of the many methods of compliance that may be acceptable under the regulations. It also discusses other significant requirements pertinent to program accessibility in existing facilities: providing access to historic properties and historic preservation programs, providing access in leased space, and developing barrier removal plans to make programs accessible. The "fundamental alteration/undue burden" exception, as it applies to facilities, is explained. Next, the chapter reviews both Title II and Section 504 requirements for new construction and alterations. Finally, it discusses the importance of planning for the maintenance of accessible features.

At the end of the chapter, a practical guide to conducting the program facility accessibility portion of the self-assessment is presented. Worksheets are provided that can be used to conduct the self-assessment and serve as the basis for planning modifications. One-Stop systems may use them as they are or adapt them, to help identify areas in which nonstructural or structural modifications may be needed in order to be in compliance.

PROGRAM ACCESSIBILITY

Ensuring program accessibility is an important aspect of enhancing opportunity for persons with disabilities. Both Title II of the ADA and Section 504 prohibit One-Stops from denying people with disabilities equal opportunity to participate in programs and activities because their facilities are inaccessible to, or unusable by, them [28 CFR §35.149 and 34 CFR §104.21]. Both regulations contain two standards to be used in determining whether a covered

28 CFR §35.149

Discrimination prohibited.

Except as otherwise provided in §35.150, no qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

entity's programs and activities are accessible to individuals with disabilities. One standard deals with "existing" facilities; the other deals with new construction and alterations.

For existing facilities, Title II and Section 504 require covered entities to operate each program so that, when viewed in its entirety, the program is readily accessible to and usable by people with disabilities [28 CFR §35.150(a) and 34 CFR §104.22(a)]. This is known as the “**program accessibility**” standard. A covered entity must make its programs and activities accessible unless it can demonstrate that required modifications would result in a fundamental alteration of the program or in undue financial and administrative burdens. The concept of program accessibility must be understood because it will serve as a guideline in assessing existing facilities and in formulating structural and nonstructural solutions to any physical access problems found in them.

Both Title II and Section 504 require that a new or altered facility (or the part that is new or altered) be readily accessible to and usable by individuals with disabilities [28 CFR §35.151 and 34 CFR §104.23]. The new construction and alterations requirements focus on providing physical access to buildings and facilities rather than on providing access to programs and services. There is no fundamental alteration or undue burden limitation on the new construction and alterations requirements.

It is important to note that many people associate the concept of program accessibility primarily with individuals with mobility impairments. This is a mistaken association that may limit one's consciousness of the full range of persons with disabilities. There are less than one million individuals who use wheelchairs in the United States. Four times as many individuals have serious vision impairments; twenty-four times as many individuals have hearing impairments. One Stop officials must ensure that their programs and activities are accessible to qualified individuals with many different types of disability. To meet this obligation, One Stop officials should ensure that, when they conduct the program accessibility portion of the self-assessment, they consider such issues as providing accessible building signage, providing alarms with visible signals, and providing accessible public telephones.

What is a Program or Activity?

28 CFR §37

Preamble, Section 37.3

The requirement of program accessibility means that when viewed in its entirety, the program or activity provided by the recipient must be readily accessible to qualified individuals with disabilities. 29 CFR 32.27. The recipient must ensure that participants with various physical and mental disabilities will have access to the program or activity. This obligation to make the program or activity accessible in advance exists independent of a request for a particular accommodation by a specific individual. Therefore, even if an individual with a disability requests an accommodation that would impose an undue hardship on the recipient, the recipient still has an overall

obligation to make the program or activity accessible.

28 CFR §37.4
WIA Title I-funded program or activity means:

(1) A program or activity, operated by a recipient and funded, in whole or in part, under Title I of WIA, that provides either:

(i) Any aid, benefits, services, or training to individuals; or

(ii) Facilities for furnishing any aid, benefits, services, or training to individuals.

(2) Aid, benefits, services, or training provided in facilities that are being or were constructed with the aid of Federal financial assistance program accessibility obligations under WIA Title I, or

(3) Aid, benefits, services, or training provided with the aid of any non-WIA Title I funds, property, or other resources that are required to be expended or made available in order for the program to meet matching requirements or other conditions which must be met in order to receive the WIA Title I financial assistance.

See the definition of "aid, benefits, services, or training" in this section.

As was discussed in Chapter One, the Section 188 regulations define a WIA Title I-funded program or activity as 1) any aid, benefits, services, or training to individuals that is operated by a recipient and funded, in whole or in part, under Title I of WIA. WIA Title I-funded programs and activities also include 2) the facilities where the aid, benefits, services, or training are furnished, 3) any other aid, benefits, services, or training conducted in facilities that were constructed with the aid of WIA Title I financial assistance; as well as 4) any aid, benefits, services, or training that are funded by a source other than WIA Title I, but required to meet matching requirements under WIA Title I [29 CFR §37.4]. The definition specifies facilities in two cases: any facilities where WIA Title I-funded aid, benefits, services, or training are conducted; and all of the activities that are conducted at facilities that are themselves constructed with the aid of WIA Title I financial assistance. The common theme is WIA Title I financial assistance. Whether the program is operated, or the facility constructed with the assistance of WIA Title I funds, it is considered subject to the accessibility provisions covering WIA Title I-funded programs and activities.

The Civil Rights Restoration Act of 1987 included an amendment to Section 504 of the Rehabilitation Act of 1973, which clarified the entities that must comply. Included are 1) state and local governmental entities of virtually all types; 2) educational institutions and school systems; 3) corporations, partnerships, private organizations, or sole proprietorships whose business is to provide education, health care, housing, social services, or parks and recreation; 4) the entire plant or facility to which federal financial assistance is extended; and 5) any other entity established by partnerships of any of the other covered entities that receives federal financial assistance. The intention of the act was to “restore the broad scope of coverage” of several civil rights laws. Though taking a different approach, the resulting breadth of coverage is similar to that achieved in the Section 188 definition of “recipient” that was discussed in Chapter One.

Under federal regulations, the term "program or activity" embraces the programs, activities, and services offered by a recipient entity in fulfillment of its mission. It spans all offerings open to any of the audiences served by a recipient. The following, though not exhaustive, are examples of programs or activities that, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities:

education and training; programs; food services; library and resource room services; health services; counseling; recreation; transportation; vocational programs; apprenticeship programs; and employer recruitment opportunities.

The Entire Scope of Programs and Activities

Each recipient should consider the entire scope of its overall operation as one program made up of several parts or elements. The recipient should ensure that its entire program, when viewed as a whole, is readily accessible to and usable by individuals with disabilities. In order to understand more fully the concept of viewing programs or activities offered in existing facilities "**in their entirety**," the following discussion presents the application of the program accessibility for existing facilities standard to programs and activities at One-Stop buildings and support facilities.

With respect to existing facilities, One-Stop systems should provide for access to persons with disabilities at centers or training facilities dispersed throughout their service area so that persons with disabilities can attend programs at locations comparable in convenience to those available to persons without disabilities. A One-Stop system does not have to make all of its existing satellite and training facilities accessible to persons with disabilities, provided that all programs offered in inaccessible buildings are also available at other accessible sites in the service area, and that the accessible buildings are comparable in convenience to those available to persons without disabilities. It is important to note that One-Stops may not make only one facility or part of a facility accessible if the result is to segregate persons with disabilities in a single setting.

In looking at programs in their entirety, Title II and Section 504 take a much broader view of support facilities such as rest rooms, water fountains, and parking spaces in existing facilities. Sufficient numbers of these accessible elements should exist that are reasonably convenient, usable in inclement weather, and appropriate to the use of a facility. Usage of a building is an important factor in addressing program accessibility concerns such as the number of rest rooms and drinking fountains required. Buildings in which an individual may spend extended periods of time should meet a higher degree of

accessibility than those in which an individual spends relatively short periods of time.

PROGRAM ACCESS IN EXISTING FACILITIES

Under Title II, an “existing facility” includes facilities that were already constructed, or for which ground-breaking had begun, prior to the effective date of the Title II regulation (January 26, 1992). Under the Section 504 regulation for federally assisted programs, an existing facility is defined as any facility that was already constructed, or for which ground-breaking had begun, prior to the effective date of the Section 504 regulation (June 3, 1977).

Depending on the date of construction, some facilities may be existing facilities for purposes of Title II but also constitute new construction under the Section 504 regulation. These include buildings constructed on or after June 3, 1977, but before January 26, 1992. In these cases, One Stops required to comply with both the Title II and the Section 504 regulations must meet not only the standards for existing facilities under Title II, but also the applicable facility accessibility standards for new construction and alterations under Section 504.

As mentioned earlier in the chapter, both Title II and Section 504 require covered entities to operate each program or activity located in an existing facility in such a way that the programs and activities -- and under Title II, also “services” -- when viewed in their entirety, are readily accessible to and usable by individuals with disabilities [28 CFR §35.150(a) and 34 CFR §104.22(a)]. Under both regulations, accessibility to existing structures is defined functionally. Neither regulation requires public entities or recipients to make all existing facilities, or every part of the existing facility, accessible to and usable by individuals with disabilities, as long as the program viewed as a whole is accessible.

Existing Facilities and Architectural Accessibility Standards

It is important to understand that whether a particular program or activity is accessible is determined not by compliance with an architectural accessibility standard but by considering whether the program or activity, when viewed in its entirety, is readily

28 CFR §35.150

Existing facilities.

(a) *General.* A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities. This paragraph does not- (1) Necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities.

28 CFR §35.150

Existing facilities.

(b) *Methods. (1) General ...*
A public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section . . . In choosing among available methods for meeting the requirements of this section, a public entity shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

accessible to and usable by individuals with disabilities. However, in an assessment of program accessibility in existing facilities, architectural accessibility standards such as the Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (ADAAG) or the Uniform Federal Accessibility Standards (UFAS) may be used as a guide to understanding whether individuals with disabilities can participate in the program, activity, or service. ADAAG and UFAS are the architectural standards that constitute compliance with the Title II requirements for new construction and alterations; UFAS also constitutes compliance with the Section 504 requirements for new construction and alterations.

At the end of this chapter, a Facility Checklist is provided that One-Stops can use to assist in identifying architectural barriers, as well as communication barriers that are structural in nature. The Checklist is based on ADAAG.

Methods of Compliance

Although the program accessibility standard is a rigorous one, both the Title II and Section 504 regulations permit considerable flexibility in how the standard can be met. Both structural and nonstructural methods of achieving program accessibility are acceptable.

Although nonstructural methods of achieving program accessibility are acceptable, nonstructural solutions should not have the effect of segregating people with disabilities or compromising their dignity and independence. Priority consideration must be given to offering programs or activities in the most integrated setting appropriate [28 CFR §35.150(b)(1) and 34 CFR §104.22(b)]. The principle of the “**most integrated setting**” is reiterated in the WIA Section 188 regulations [29 CFR §37.7 (d)].

29 CFR §37.7 (d)

(d) A recipient must administer WIA Title I--financially assisted programs and activities in the most integrated setting appropriate to the needs of qualified individuals with disabilities.

If no effective nonstructural alternatives can be provided to achieve program accessibility, One Stop centers must make the necessary structural changes [28 CFR §35.150(b)(1) and 34 CFR §104.22(b)]. These changes must conform to standards for new construction and alterations.

Some acceptable methods of making programs accessible are discussed below.

1. Reassignment of services to an accessible location.

The relocation of programs and activities to accessible locations is one method of making programs and activities accessible.

2. Purchase, redesign, or relocation of equipment. Other methods of making programs accessible include the purchase, redesign, or relocation of equipment [28 CFR §35.150(b)(1) and 34 CFR §104.22(b)]. "Equipment" includes items that generally make the building functional as well as items that are integral to participation in specific programs, activities, or services, such as work stations, study carrels, and machinery. In many cases, equipment can simply be relocated or raised or lowered to make it usable by an individual with disabilities; in other cases, redesign may be necessary. Redesign of equipment may be a fairly simple and inexpensive process, such as relocating a control panel, replacing grip/twist devices (e.g., doorknobs and drinking fountain faucets) with levers, altering door closure devices, and providing audible or visual signals for individuals with visual or hearing impairments.

It is important to note that the effectiveness of various alternatives should be considered before undertaking the redesign of equipment. For example, a fire alarm that has not been wired to give a visual as well as an audible signal does not automatically violate the Section 504 or Title II regulations. If other methods of communicating danger to individuals with hearing disabilities are provided and are effective in emergency situations, visual signals are not required. In training facilities, cafeterias, and meeting areas, there are generally sufficient numbers of people who would be aware of danger that risk to a person with a hearing disability would be minimal. However, there are situations in which such activity could not be perceived and oral communication would be ineffective. Such situations might include resource rooms or other relatively isolated areas. In such cases, redesign of equipment may be the only effective means of communicating danger to individuals with hearing disabilities.

3. Assignment of aides. In some circumstances, aides may be assigned to perform certain tasks that will enable persons with disabilities to participate in programs [28 CFR §35.150(b)(1) and 34 CFR §104.22(b)]. For example, aides may be required to ensure that persons with disabilities are able to exit safely from program areas in the event of an

emergency. If equipment in a training room is inaccessible to a person with a disability, in order to meet the program accessibility requirements of Title II and Section 504, a human aide may be assigned to assist the trainee in the training room. Aides or assistants may retrieve books and other materials for people with mobility impairments if portions of the resource center are inaccessible, and readers may be used to assist resource center patrons who have visual impairments. The aides must be available during the operating hours of the center.

4. Structural changes to eliminate barriers. Although structural changes to make existing facilities accessible are not required as a matter of course, they must be undertaken if there is no alternative means to achieve program accessibility [28 CFR §35.150(b)(1) and 34 CFR §104.22(b)]. Structural changes include such alterations as installing a ramp, widening a doorway, or lowering a toilet. As mentioned earlier, structural changes must conform to standards for new construction and alterations [28 CFR §35.150(b)(1) and 34 CFR §104.22(b)].

It is important to keep in mind that structural changes include not only those required in order to provide access to persons with mobility impairments, but also those required to render the program accessible to persons with other disabilities. For example, people with hearing impairments may require assistive listening systems. The full range of disabilities should be kept in mind as program accessibility is considered. Some One-Stops, faced with severe accessibility problems, have considered the use of back doors and freight elevators to satisfy the program accessibility requirement. Such measures are acceptable only as a last resort and only if the arrangement provides accessibility comparable to that provided to persons without disabilities. If the back door in question is ordinarily locked and can be accessed only by loud knocking that the maintenance crew may or may not hear, then a plan to provide access by means of the back door is not acceptable. A back door is acceptable only if it is kept unlocked during the same hours the front door remains unlocked; if the passageway to and from the floor is accessible, well-lit, and neat and clean; and if the individual with a mobility impairment does not have to travel excessive distances or through such non-public areas as kitchens and storage rooms to gain access. A freight elevator would be acceptable if it were upgraded so as to be usable by

passengers generally and if the passageways leading to and from the elevator are well-lit and neat and clean.

In considering such means of access, One-Stops should bear in mind the security requirements of persons with disabilities. Persons with disabilities should not be required to use poorly lighted entrances or otherwise take undue personal security risks compared to other participants.

Questions are occasionally raised regarding whether carrying an individual with a disability is an acceptable method of providing program access. Carrying is contrary to the goal of providing accessible programs, which is to foster independence. Carrying a person with a disability is *not* permitted as an alternative to structural modifications such as installation of a ramp or a chairlift. Carrying a person with a disability to achieve program accessibility is acceptable only in manifestly exceptional cases.[28 CFR §35.150(b)(1) (Preamble)].

In the very limited situations in which carrying is permitted, carriers must be instructed on the safest and most dignified means of carrying and the service must be provided in a reliable manner [28 CFR §35.150(b)(1) (Preamble)]. Liability issues may be relevant when this option is being considered. LWIA representatives are encouraged to consult with persons with disabilities on the most acceptable method of providing access.

Fundamental Alterations and Undue Burdens

As in the WIA Section 188 regulation [29 CFR §§37.8 (a); (b)], the Title II regulation does not require a public entity to take any action that would result in a fundamental alteration in the nature of its service, program, or activity or in undue financial and administrative burdens [28 CFR 35.150(a)(3)]. This provision codifies case law interpreting the Section 504 regulation for federally assisted programs.

Compliance with the Title II program accessibility provisions will not generally result in an undue financial or administrative burden [28 CFR §35.150(a)(3) (Preamble)]. Individuals with disabilities should have access to public entities' programs in all but the most unusual situations. When a recipient does justify noncompliance by claiming that compliance would result in a "fundamental alteration" to its program or constitute an "undue

28 CFR §35.150

Existing facilities.

(a) *General ...* (3) ...In those circumstances where personnel of the public entity believe that the proposed action would fundamentally alter the service, program, or activity or would result in undue financial and administrative burdens, a public entity has the burden of proving that compliance with 35.150(a) of this part would result in such alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the head of a public entity or his or her designee after considering all resources available for use in the funding and operation of the service, program, or activity, and must be accompanied by a written statement of the reasons for reaching that conclusion. If an action would result in such an alteration or such burdens, a public entity shall take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity.

burden," both the Section 188 and the Title II regulations place the burden of proof on the public entity [29 CFR §§37.8 (a)(1); (b)(1); 28 CFR §35.150(a)(3)]. Further, a decision regarding whether a burden is undue must be based on all of the recipient's resources available for use in the funding and operation of the service, program, or activity [29 CFR §§37.8 (a)(2); (b)(2); 28 CFR §35.150(a)(3)].

Although Title II does not specifically define the elements of a fundamental alteration or an undue burden, the Section 188 regulations provide extensive elaboration upon the many factors that must be considered when a WIA Title I recipient wishes to claim a fundamental alteration or an undue hardship [29 CFR §37.4].¹ Operators and their partners must consider the following factors (the same as those already enumerated in Chapters Two and Five) in determining whether an undue burden or hardship exists:

- the nature and net cost of the modification or accommodation, taking into consideration the availability of tax credits and deductions and/or outside funding for the accommodation or modification;
- the overall financial resources of the facility or facilities involved in the provision of the reasonable modification or accommodation; the number of persons aided, benefitted, served, trained by, or employed at, such facility; and the effect on expenses and resources;
- the overall financial resources of the recipient; the overall size of the recipient; the number of persons aided, benefitted, served, trained, or employed; and the number, type, and location of its facilities;
- the type of operation or operations of the recipient; including the geographic separateness and administrative or fiscal relationship of the facility or facilities in question to the recipient; and for employment-related modifications, the composition, structure, and functions of the recipient's work force;
- the impact of the accommodation or modification upon the operation of the facility; including the impact on the ability of

¹The full definition of "undue hardship" from 29 CFR §37.4, including the listing of factors that must be considered when making a claim of undue hardship, is reproduced in the previous chapter within the context of employment practices. The factors to be considered in the definition of "undue hardship" are nearly identical with the factors to be considered in determining an "undue burden" in the definition of fundamental alteration.

other participants to receive aid, benefits, services, or training, or of other employees to perform their duties; and the impact on the facility's ability to carry out its mission [29 CFR §37.4].

Under Title II, the decision that compliance would result in an undue burden or fundamental alteration must be made by the head of the public entity or his or her designee [28 CFR §35.150(a)(3)]. In addition, the decision must be accompanied by a written statement of the reasons for that decision [28 CFR §35.150(a)(3); 29 CFR §§37.8 (a)(2); (b)(2)].

Finally, the undue burden/fundamental alteration defense is not absolute [28 CFR §35.150(a)(3) (Preamble)]. It does not relieve One-Stop Operators and their partners of all obligations to individuals with disabilities. One-Stop entities must still take any other steps that do not result in an undue burden or fundamental alteration but are necessary to ensure that individuals receive the benefits or services provided by the workforce development system [29 CFR §§37.8(a)(3); (b)(3); 28 CFR §35.150(a)(3)(Preamble)].

Designated Historic Buildings

Some local workforce development systems may include buildings that have a historic designation. Historic properties are properties listed or eligible for listing in the National Register of Historic Places or designated as historic under state or local law [28 CFR §35.104]. The Title II regulation provides that a public entity is not required to take any action that would threaten or destroy the historic significance of a historic property [28 CFR §35.150(a)(2)]. This provision was included in order to avoid possible conflicts between the Congressional mandate to preserve historic properties and the mandate to make all programs and activities located in existing facilities accessible to individuals with disabilities [28 CFR §35.150(b)(2) (Preamble)].

Where One-Stop entities conduct all or a portion of their programs in historic properties and the preservation and experience of the historic property itself are not primary purposes of the program, the historic property itself is not the program. Nonstructural changes that could be made to render the program accessible would include relocating all or part of the program to an accessible facility, purchasing or redesigning

equipment, or using other standard methods of program accessibility that would not threaten or destroy significant historic features of the property [28 CFR §35.150(b)(2) (Preamble)]. These changes should be made as expeditiously as possible.

Providing Access in Leased Space

Under the Title II regulation, One-Stop Operators and partners are encouraged, but not required, to lease accessible space. However, once a leased facility is occupied, the One-Stop entities must provide access to all programs, services, and activities conducted in that space [28 CFR §35.151(c) (Preamble)]. The Section 504 regulation contains a similar requirement [34 CFR §104.4(b)(6)]. Leased facilities are subject to the program accessibility requirements for existing facilities or new construction and alterations, depending upon the date that the buildings were constructed or altered [28 CFR §35.151(c) (Preamble)].

Obviously, the more accessible the space is to begin with, the fewer structural modifications will be required for particular employees whose disabilities may necessitate barrier removal as a reasonable accommodation. It will also be both easier and less costly to make programs and activities accessible to and usable by other individuals with disabilities [28 CFR §35.151(c) (Preamble)].

The Department of Justice suggests that public entities attempt to locate space that complies, at a minimum, with the federal requirements for leased buildings contained in the Minimum Guidelines and Requirements for Accessible Design published in the Architectural Barriers Act of 1968 at 36 CFR §1190.34 [28 CFR §35.151(c) (Preamble)]. These guidelines, which apply to the federal government, require that all leased buildings have: (1) an accessible route from an accessible entrance to the building to the parts of the building where the principal activities for which it was leased take place; (2) accessible rest rooms; and (3) accessible parking facilities.

Since One-Stop Operators and partners are responsible for ensuring accessibility to their programs and services that may be held off the center grounds – even those held for only one day, such as job fairs – it is recommended that the One-Stop operator notify all entities that have the authority to lease

facilities for center functions of this obligation. It is important to ensure that the appropriate individuals are fully aware of program accessibility requirements as they plan conferences, social functions, or other gatherings on behalf of the One-Stop. In addition, vendors, private foundations, and other entities that lease space from the center in order to provide services to the center should be included in the program accessibility self-assessment. As contracts are renegotiated, accessibility requirements should be addressed in the contracts.

NEW CONSTRUCTION AND ALTERATIONS

Both Title II and Section 504 require that a new or altered facility (or the part that is new or altered) be readily accessible to and usable by individuals with disabilities [28 CFR §35.151 and 34 CFR §104.23]. However, Section 504 and Title II have different relevant time frames that are applicable to new construction and alterations, as well as different architectural accessibility standards that constitute compliance with requirements for new construction and alterations. Also, unlike Section 504, Title II has requirements regarding curb ramps and alterations to historic properties.

At the present time, a public entity is free to adopt either UFAS or ADAAG in constructing each of its facilities. However, once the choice of standards has been made, the entity must consistently utilize the standard in the construction of the particular facility for which it was adopted. For example, a public entity may not follow ADAAG on one floor of a new building and then follow UFAS on the next floor [*The Americans with Disabilities Act Title II Technical Assistance Manual*, U.S. Department of Justice, November 1993, page 23].

Because it is anticipated that the Title II regulation will be amended in the near future to reference the new ADA Standards, and because compliance with ADAAG would constitute compliance with Section 504 requirements, this Guide suggests that, with respect to new construction and alterations that are in the planning and design stages, recipients adopt ADAAG when constructing or renovating the facilities.²

²On November 16, 1999, the Access Board published a proposed rule in the Federal Register to change the ADA Accessibility Guidelines (ADAAG). This is the first step of a two stage process that may

28 CFR §35.151

New construction and alterations.

(a) *Design and construction.* Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities, if the construction was commenced after January 26, 1992.

(b) *Alteration.* Each facility or part of a facility altered by, on behalf of, or for the use of a public entity in a manner that affects or could affect the

28 CFR §35.151(e) part of the facility shall, to the maximum extent feasible, be altered in such manner that the altered portion of the facility is readily accessible to and usable by individuals with disabilities, if the alteration was commenced after January 26, 1992.

28 CFR §35.151(e) part of the facility shall, to the maximum extent feasible, be altered in such manner that the altered portion of the facility is readily accessible to and usable by individuals with disabilities, if the alteration was commenced after January 26, 1992. Americans with Disabilities Guidelines for Buildings and Facilities (ADAAG) (Appendix A to 28 CFR part 36) shall be deemed to comply with the requirements of this section with respect to those facilities, except that the elevator contained in 4.1.3(5) and 4.1.5(1)(j) of ADAAG shall not apply. Departures from particular requirements of either standard by the use of other methods shall be permitted when it is clearly evident that equivalent access to the facility or part of the facilities is thereby provided.

Although entities are required to adhere to the current ADAAG, the proposed Guidelines are available for review on the Access Board's website at <http://www.access-board.gov/ada-aba/guidenprm.htm>).

Coverage Under Both Title II and Section 504

As discussed earlier in the chapter, a public entity covered under both Title II and Section 504 could operate a facility that would be an *existing* facility under Title II and yet constitute *new construction* under Section 504 (e.g., where a facility was built before January 26, 1992, but on or after June 3, 1977). In these cases, public entities that are also recipients of federal financial assistance must meet the program accessibility requirements for existing facilities under Title II as well as the accessibility standards for new construction under Section 504.

ADAAG and UFAS

Both ADAAG (Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities) and UFAS (Uniform Federal Accessibility Standards) are based on model design standards generated by the American National Standards Institute and, as a result, have a similar format. However, while the requirements of ADAAG and UFAS are generally consistent, there are a number of significant differences. For example, ADAAG contains requirements for TDDs in new construction, while UFAS does not [§4.1.3(17)(c), Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (1991)]. Unlike UFAS, ADAAG requires Braille on signs designating permanent rooms and spaces (e.g., rest room signs, room numbers, exit signs) and on elevator hoistway entrances and elevator car control indicators [§§4.1.2(7), 4.1.3(16)(a), 4.30.4, 4.10.5, and 4.10.12(2), Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (1991)]. There are also differences in the requirements concerning seating and assistive listening systems in assembly areas, the number of accessible check-out aisles in mercantile facilities, and the spacing between the top

result in new ADA standards. The proposed, revised ADAAG were made available for public comment until May 15, 2000. The Access Board is currently reviewing and analyzing the comments and will deliberate on changes to the proposed guidelines based on the comments. If these proposed guidelines are finalized by the Access Board and formally adopted by the Department of Justice, they will become enforceable standards.

of handrail gripping surfaces and ramp surfaces [§§4.1.2(18), 4.33.3, 4.33.7, 7.3 and 4.8.5(5), Uniform Federal Accessibility Standards and §§4.1.3(19), 4.33.3, 4.33.7, 7.3 and 4.8.5(5), Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (1991)].

Due to the existence of a wide range of disabilities that vary in severity, it is important to understand that ADAAG and UFAS requirements are minimum accessibility requirements. However, a recipient's adherence to ADAAG or UFAS does not relieve it of its obligation under Title II and Section 504 to make its program accessible to a particular individual.

Questions are sometimes asked concerning the actions that recipients should take if neither ADAAG nor UFAS contain specific standards for a particular type of facility. In such cases, the technical requirements of the chosen standard should be applied to the extent possible. If no standard exists for particular features, those features need not comply with a particular design standard. However, the facility must still be designed and operated to meet other Title II and Section 504 requirements, including program accessibility.

Curb Ramps

Unlike Section 504, the Title II regulation requires that newly constructed or altered streets, roads, and highways contain curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street-level pedestrian walkway [28 CFR §35.151(e)(1)]. In addition, newly constructed or altered street-level pedestrian walkways must contain curb ramps or other sloped areas at intersections to streets, roads, or highways [28 CFR §35.151(e)(2)].

Alterations to Historic Properties

Title II also provides that alterations to historic properties must comply, to the maximum extent feasible, with the special access provisions for historic properties established by section 4.1.7 of UFAS or section 4.1.7 of ADAAG [28 C.F.R. §35.151(d)(1)]. Under those provisions, alterations should be done in full compliance with the alterations standards for other types of buildings. However, if following the usual standards would threaten or destroy the historic significance of a feature of the building, alternative standards may be used.

The decision to use alternative standards for a particular feature must be made in consultation with the appropriate historic advisory board designated in ADAAG or UFAS, and interested persons should be invited to participate in the decision-making process.

MAINTENANCE OF ACCESSIBLE FEATURES

Under the Title II regulation, public entities must maintain in working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities under the ADA [28 CFR §35.133(a)]. Inoperable elevators, locked accessible doors, or "accessible" routes that are obstructed by furniture, filing cabinets, or potted plants are neither "accessible to" nor "usable by" individuals with disabilities [28 CFR §35.133 (Preamble)].

It should be noted that the Title II requirement regarding the maintenance of accessible features does not prohibit temporary obstructions or isolated instances of mechanical failure [28 CFR §35.133(b) (Preamble)]. Isolated or temporary interruptions in service or access due to maintenance or repairs are also not prohibited [28 CFR §35.133(b)]. However, allowing obstructions or "out of service" equipment to persist beyond a reasonable period of time would violate this requirement, as would repeated mechanical failures due to improper or inadequate maintenance [28 CFR §35.133 (Preamble)].

IMPLEMENTING THE REVIEW OF PROGRAM AND FACILITY ACCESS

Title II prohibits public entities from excluding people with disabilities from programs, services, or activities because of inaccessible facilities. In order to ensure program accessibility, it is recommended that each One-Stop conduct a program and facility access review. The findings of this review will form the basis for identifying nonstructural and structural changes needed to ensure program accessibility.

The recommended approach to conducting the program and facility access review begins with a review of programs, to evaluate the scheduling and space requirements of each program. If access teams have been thorough through previous tasks, this information will already be at hand from Resources 3-

28 CFR §35.133

Maintenance of accessible features.

(a) A Public accommodation shall maintain in operable working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities by the Act or this part.

3 and 3-4. Next, all existing facilities in which the One-Stop System operates programs are surveyed to identify the physical obstacles or barriers to the participation of people with disabilities. Findings from the program review are used in conjunction with the assessment of facilities to identify barriers to program participation.

The access team then identifies nonstructural and structural solutions for the removal of barriers and determines the best resolution of program access barriers in each situation. Both nonstructural and structural solutions to physical access problems must be implemented immediately.

An overview of this process is depicted on the flowchart on the following page. Each of these steps is discussed below. Resources designed to be utilized as part of the self-assessment process are also discussed.

Though federal regulations do not require a specific approach to the program accessibility self-assessment that is described in this Guide, the strategy suggested here is a proven, practical approach to carrying out the steps necessary for most One-Stop systems to achieve compliance.

Overview of the Program and Facility Access Review	
<i>Listed below are steps of a program and facilities access review:</i>	
1. Preparation	3. Analysis
Review or complete list of One-Stop programs and partners from Resource 3-3	Identify nonstructural and structural solutions
Compile list of facilities used for programs from Resource 3-4	Project long-term and short-term costs
Orient facilities self-assessment team to ADAAG and Resources 6-1 and 6-2	Document fundamental alteration/undue burden decisions
Identify programs and spaces to be surveyed	
Complete facility review plan, including time frames.	4. Planning
	Prepare a barrier removal plan

2. Facilities Review

Solicit comments

Identify barriers in existing buildings

Adopt and implement the final plan

Prepare to Conduct the Review

The following planning steps will help One-Stop Centers prepare to conduct a program accessibility self-assessment and develop an action plan:

- Review or complete list of One-Stop programs and partners from Resource 3-3
- Compile list of facilities used for programs from Resource 3-4
- Orient facilities self-assessment team to ADAAG and Resources 6-1 and 6-2
- Identify programs to be surveyed
- Identify spaces to be surveyed
- Complete facility review plan, including time frames.

Each of these steps will now be discussed in more detail.

1. Review or complete list of One-Stop programs and partners from Resource 3-3. During the first phase of the self-assessment process, an access team should have compiled a listing of all of the programs that are operated by recipients and sub-recipients within a One-Stop network. The team should review that list to make certain that it has been inclusive of all of the covered programs and activities of the local One-Stop system.

2. Compile the list of facilities used for programs and activities from Resource 3-4. Once again, this information should already be at hand from the first phase of the self-assessment process. Access teams should review the information that they have received and follow-up on partners, sub-recipients, or providers to secure any missing data or information about facilities that are used in connection with WIA Title I-funded programs and activities. A composite list of the facilities that must be assessed should be compiled.

3. Orient facilities assessment team to ADAAG and Resources 6-1 and 6-2. The resources provided for the facility

self-assessment are extensive and comprehensive. Resource 6-1 allows for listing programs, their requirements for space, and the buildings and locations where they are conducted. Resource 6-1 includes the ADAAG standards for ensuring access to all sorts of facility features, from meeting rooms to elevators to curb cuts from the parking lot. Team members should review the types of features that they will assess. In all cases, the process of examining a facility or some feature within a facility is fairly simple. The standards are indicated on the resources and there are blocks to check for compliance or to note any aspects of non-compliance.

4. Identify programs and spaces to be surveyed. Since the goal of the review process is to ensure access to all One-Stop programs rather than merely to all facilities, it is necessary to gather additional information on programs as well as facilities. In order to plan such nonstructural approaches to program accessibility as the reassignment or relocation of programs, the Access Team will need to know the following information:

a. The current building(s) and location within the building(s) of each program. Facility access information will not be useful without an understanding of how physical features affect program access. It is important to gather this information for each program conducted by each contractor or provider who might be funded through the One-Stop. This may require inventory of classrooms at a local school or community college or other commercial space that is utilized for One-Stop programs.

b. Program scheduling requirements. Patterns of usage are of great importance in developing accessibility solutions. For example, a program that uses an accessible facility on a limited basis may be able to share the use of the space with another program. Such a solution may be more cost-effective than making structural alterations to a second facility.

c. Program space requirements. How much space does each existing program actually need and what kind of space is required? Information about the space requirements of programs is critical as options for providing program accessibility are considered.

Resource 6-1 may be used to record information about the scheduling and space requirements of programs and the current locations of programs.

5. Identify the spaces to be surveyed. Facilities that should be included in the facility access review must be identified. The facility access survey is most efficiently conducted by looking at all facilities and their uses simultaneously. A coordinated facility access review and program review can more efficiently result in program accessibility by providing the information to enable problem solving across program lines.

All facilities that contain programs operated by or for a One-Stop Center must be reviewed. This includes buildings owned or leased by the Center, as well as outdoor areas, walkways, parking areas and any other facilities used in the operation of programs. This information should be complete from previous steps 2 and 4.

6. Complete facility review plan, including time frames. It has been assumed throughout this Guide that most One-Stop operations will be assessed by a single access team surveying program policies and practices, employment practices, facilities, and communications. Some One-Stop systems may be so large as to require subgroups or separate teams to examine the various elements of recipients' programs. When completing the plan for program and facility self-assessment the access team will assign its members various facilities or various parts of the facility assessment; or, it may assign an entire facilities group to complete the survey, and report the data on Resource 6-2. The team should develop a firm plan, including specific assignments, and dates by which surveys should be complete and reports returned to the access team.

Obviously, a Workforce Investment Area with significant resources and expertise will be able to conduct a more detailed and comprehensive facility review than one with fewer resources. Entities with more limited resources can use a comparatively "low-tech" approach - handwritten survey forms instead of computerized data bases and more limited staff involvement--and still accomplish the same objectives. Whichever approach is chosen, the facility access review should be managed by the Access Team or sub-task group.

Conduct the Facility Access Review

The access team should have the following items available when undertaking site reviews:

- a copy of the site plan showing where public programs are located;
- collated forms for each building;
- measurement guides;
- clipboards;
- pens or pencils (writing must photocopy clearly);
- measuring tape;
- a regular or digital level for measuring the degree of the slope on ramps and other slope surfaces (a hand level is especially useful for long exterior slopes);
- chalk for marking distances on surfaces;
- a fisherman's scale or other device to measure the pressure required to open doors;
- a watch;
- a camera; and
- graph paper.

The facility access review team will identify barriers in each building surveyed. The team may also note solutions to barriers based on their review of buildings.

Although the Facility Checklist that is presented in Worksheet 6-2 is based on ADAAG, it is not designed for a comprehensive evaluation of compliance with ADAAG's complete technical requirements. Rather, the survey questions that appear on the Checklist are designed to ensure that functional access is provided for persons with disabilities to most facilities. Also, some items on the Checklist require users to refer to ADAAG for particular specifications. Users of the Checklist should consult the ADAAG requirements themselves, independent of their use of this Checklist.

Although the appropriate standard for existing facilities is **program accessibility** rather than full compliance with facility standards such as ADAAG, the ADAAG standards do provide useful guidance for identifying architectural barriers. However, it is important to note that the ADAAG standards do not establish the minimum requirements for providing program access, and failure to comply with the ADAAG standards does not necessarily indicate a violation of Title II or Section 504 and does not necessarily require any corrective action. Rather, for existing facilities under Title II and Section 504, **the real**

question is whether the covered entity's programs and activities, when viewed in their entirety, are readily accessible to and usable by individuals with disabilities.

Resource 6-2, the Facility Checklist, is a modular survey tool that can be used to identify architectural barriers, as well as communication barriers, that are structural in nature and limit program access. As noted above, other survey instruments may also be used, such as the more exhaustive ADAAG Checklist.

Analyze Program Access Options

After the facility access review has been conducted and barriers have been identified at each program site, the Access Team is ready to assess findings. The team ensures that information is summarized to facilitate analysis. Summaries indicate where substantial physical barriers intersect with program operations to create barriers to access and use.

Next, team members identify potential structural and nonstructural solutions for program barriers, evaluating proposed solutions in terms of their relative cost and effectiveness in providing access. This requires a team effort, especially when programs are conducted in multiple facilities. All key persons should be involved as solutions are sought in order to avoid implementation barriers later.

Steps that must be accomplished include:

- identifying nonstructural and structural solutions,
- projecting long-term and short-term costs, and
- documenting fundamental alteration/undue burden decisions

1. Identify nonstructural and structural solutions. Where the program and facility access review identify programs and facilities as inaccessible, the recipient or other responsible entity must take steps to make the programs accessible. Bear in mind that Congress did not intend that public entities expend large sums of money to retrofit buildings and facilities where other effective means of achieving equal opportunity to participate are available. If they can create program accessibility, nonstructural methods are equally acceptable and should be considered before structural changes. The Department of Justice and the Department of Labor encourage innovation and creativity in eliminating barriers--as long as the means used provide people with disabilities equal opportunity

to participate in and benefit from the Workforce Investment Act programs.

For each program or service identified as inaccessible, the access team should create a list of the possible solutions to afford program access, such as the following:

- reassigning programs, activities and services within the facility,
- reassigning programs, activities and services to another facility,
- redesigning or relocating equipment,
- providing or assigning human aides,
- altering facilities,
- constructing new facilities, or
- other options.

The team should develop a list of criteria to help members compare and choose among options. Some of the criteria that are important to consider include:

- **Integration.** Integration is a fundamental principle of federal disability regulations. Priority should be given to methods supporting the integration of people with disabilities into programs and activities that provide interaction with people who do not have disabilities.
- **Preferences.** As discussed throughout this Guide, listening to and incorporating the ideas and concerns of people with disabilities is very important to creating successful programmatic and structural access solutions.
- **Capital planning information.** As the team develops recommended solutions, it should seek to obtain information regarding planned alterations, the planned closing of a facility, or other plans for each facility. Information regarding available land, planned new construction, and vacant or under-utilized facilities is also helpful in developing accessibility options.

2. Project long-term and short-term costs. As desired options are analyzed, the team should consider both the short- and long-term costs of each option as well as the sources of funds. The recipient may have funds available for operations but not for capital improvements or vice versa. Existing capital or

alteration plans should be considered in estimating costs. Making structural changes may be less difficult than anticipated when considered in the context of capital or alteration plans that are already scheduled or in process. Some structural solutions may be small in scale and able to be accomplished through operations budgets.

3. Document fundamental alteration/undue burden decisions. If there are any situations in which barriers will not ever be removed because to do so would constitute a fundamental alteration in the nature of the program, service, or activity, or impose undue financial or administrative burdens-- justification must be documented. ***The fundamental alteration/undue burden determination must be made by the head of the public entity or his or her designee*** [28 CFR §35.150(a)(3)].

Develop an Action Plan

The development of an action plan may occur in a three-step sequence:

- Prepare a draft action plan.
- Solicit comments on the draft action plan.
- Adopt and implement the final action plan.

1. Prepare a barrier removal plan. A draft Action Plan should be prepared that proposes remedy for each of the situations of inaccessibility that were documented in the survey. The draft should be circulated for review and comment to individuals from a broad range of perspectives.

An important component of the action plan is the timetable for structural modifications. Longer-term recipients and operators may have had experience with the “transition period” allowed under Title II of the ADA. That was a decade ago, and the assumption is that entities have lived with nondiscrimination regulations long enough to be in compliance. There is no similar allowance of a transition period or window under Section 188. Recipients must make plans to swiftly comply with accessibility standards so as to avoid violations that could lead to CRC inquiry or sanctions.

2. Solicit comments on the draft action plan. Interested persons, including individuals with disabilities or organizations

representing individuals with disabilities, must be given an opportunity to comment on the proposed plan. Many times, a public meeting is an effective way of providing people with disabilities, organizations representing individuals with disabilities, and other interested parties an opportunity to comment on and discuss the action plan. An actively involved advisory group comprised of individuals with disabilities is another way to get participation in the development of the action plan.

3. Adopt and implement final plan. To complete the action plan, revise the draft as necessary in response to comments, attach a copy of Resource 6-2 and any other supporting documentation as appendices, secure approval as necessary within the LWIA, and have the official responsible for implementation sign the final action plan. The approved plan should be put into effect immediately. Be sure to clarify who is responsible for monitoring the plan as it is implemented and ensuring that deadlines are met.

Resource 6-2: Facility Checklist

PARKING

<i>General Area/Building:</i>				<i>Reviewer:</i>	<i>Date:</i>
Questions	In Compliance?			Dimensions/ Comments	ADAAG
	Y	N	NA		
Is there an adequate number of accessible parking spaces available?					4.1.2(5)(a); 4.6.1.
For guidance in determining the appropriate number of accessible space to provide, the table below gives the ADAAG requirements for new construction and alterations (for lots with more than 100 space, refer to ADAAG 4.1.2(5)(a)):				Total spaces: 1 to 25 26 to 50 51 to 75 76 to 100	Accessible: 1 space 2 spaces 3 spaces 4 spaces
Are accessible parking spaces at least 8 feet wide, with a 5-foot access aisle (two spaces can share an access aisle)?					4.6.3; 4.1.2(5)(a)
Is one in every 8 spaces, but at least one, van-accessible with a 96-inch wide access aisle, and 98 inches of vertical clearance?					4.1.2(5)(b); 4.6.5
Are the access aisle part of the accessible route to an accessible entrance?					4.6.3; 4.3
Are the accessible spaces the ones closest to an accessible entrance?					4.6.2
Is the slope of the accessible parking area and access aisle no more than 1:50?					4.6.3
Are accessible spaces marked with a vertical sign showing the international symbol of accessibility? In addition, are there signs reading "Van Accessible" at van spaces?					4.6.4; 4.30.7

PASSENGER LOADING ZONES

Is there an access aisle 60 inches wide by 20 feet long adjacent and parallel to the vehicle pull-up space?					4.1.2(5)(c); 4.6.6.
Is the slope of the access aisle and the pull-up space no more than 1:50?					4.6.6
If there is a curb between the access aisle and the vehicle pull-up space, is there a curb ramp?					4.6.6; 4.7
If a walkway crosses or adjoins the driveway and there is no curb, does the walkway edge have a detectable warning surface?					4.29.5
Is there at least 114 inches of vertical clearance provided to the accessible passenger loading zones and along at least one vehicle access route to it?					4.6.5

Is there a sign displaying the international symbol of accessibility at the accessible loading zone?					4.1.2(7)(b)
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Resource 6-2: Facility Checklist

EXTERIOR ROUTE OF TRAVEL

<i>General Area/Building:</i>				<i>Reviewer:</i>	<i>Date:</i>
Questions	In Compliance?			Dimensions/ Comments	ADAAG
	Y	N	NA		
Is there at least one accessible route of travel from public transportation stops, accessible parking spaces, accessible passenger loading zones, public streets, and sidewalks to the accessible entrance?					4.1.2(1); 4.3.2(1)
Is there at least one accessible route that connects accessible buildings, facilities, elements, and spaces that are on the same site?					4.1.2(2); 4.3.2(2)
Is the accessible route(s) stable, firm and slip-resistant?					4.3.6; 4.5.1
Is the accessible route at least 36 inches wide?					4.3.3
If the accessible route(s) is less than 60 inches wide, are there passing spaces at least 60 inches by 60 inches, or T-intersections of corridors, located at reasonable intervals but not more than 200 feet apart?					4.3.4, Fig. 3
Is there at least 80 inches of clear head room on every route? If an area adjoining an accessible route has less than 80 inches of clear head room, is a barrier to warn persons with visual impairments provided?					4.3.5; 4.4.2, Fig. 8
Are all obstacles along routes of travel cane-detectable (located within 27 inches of the ground or higher than 80 inches, or protruding no more than 4 inches into the route of travel)?					4.4.1, Fig. 8
If gratings are located in walking surfaces, are the openings of the grating no greater than 1/2 inch wide in one direction? Are the long dimensions of rectangular openings placed perpendicular to the dominant direction of travel?					4.5.4
Is the cross-slope of the accessible route(s) no greater than 1:50?					4.3.7
Is the running slope of the accessible route no greater than 1:20, or is there an accessible ramp if the slope is greater than 1:20 (use ramp survey)?					4.3.7
Are walkway level changes no more than 1/4 inch, or if they are between 1/4 inch and 1/2 inch, are they beveled with a slope no greater than 1:2?					4.3.8; 4.5.2
Are there curb cuts, ramps, platform lifts, or elevators where there is a change in level greater than 1/2 inch?					4.3.8; 4.5.2

Is there a curb cut wherever an accessible route crosses a curb?					4.7.1
Is the slope of the curb ramp no greater than 1:12? If there is not enough space to use a 1:12 slope or less, is the slope of the curb ramp no greater than 1:10 for a maximum rise of 6 inches, or 1:8 for a maximum rise of 3 inches?					4.7.2; 4.1.6(3)(a)
Resource 6-2: Facility Checklist					
EXTERIOR ROUTE OF TRAVEL, cont.					
General Area/Building:				Reviewer:	Date:
Questions	In Compliance? Y N NA			Dimensions/ Comments	ADAAG
Are maximum slopes of adjoining gutters, immediately adjacent road surface, or accessible route no greater than 1:20? Is the transition from the curb ramp to adjoining surfaces flush and free of abrupt changes?					4.72
If a curb ramp is located where pedestrians must walk across the ramp, or where it is not protected by handrails or guardrails, does it have flared sides with a maximum slope 1:10?					4.7.5
Is the width of the curb ramp, not including the flared sides, no less than 36 inches?					4.7.3
Is the surface of the curb ramp stable, firm and slip-resistant?					4.5.1; 4.7.4
RAMPS					
Are the slopes of ramps no greater than 1:12?					4.8.2
Is the rise of each ramp run (vertical distance between landings) no greater than 30 inches?					4.8.2
Is the cross slope no greater than 1:50?					4.8.6
Do all ramps longer than 6 feet or with more than 6 inches rise, have railings on both sides?					4.8.5
Are railings continuous, sturdy, and between 34 and 38 inches high?					4.8.5
Is the width between railings and curbs at least 36 inches?					4.8.3
Are ramps stable, firm, and slip-resistant?					4.8.6; 4.5.1
Is there a 5-foot-long level landing at every 30-foot horizontal length of ramp, at the top and bottom of every ramp and where the ramp changes direction?					4.8.4

Do ramps and landings with drop-offs have walls, railings, projecting surfaces, or curbs at least two inches high to prevent people from slipping off the ramp?					4.8.7
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Resource 6-2: Facility Checklist					
STAIRS					
<i>General Area/Building:</i>			<i>Reviewer:</i>		<i>Date:</i>
Questions	In Compliance?			Dimensions/ Comments	ADAAG
	Y	N	NA		
Do stairs have closed risers?					4.9.2
Are stair treads no less than 11 inches?					4.9.2
Do stairs have continuous handrails on both sides, with extensions beyond the top and bottom stairs?					4.9.4
Do nosings project no more than 1-1/2 inches?					4.9.3
LIFTS					
If platform lifts are used, can a person using a wheelchair enter, operate, and exit the lift without assistance?					4.11.3
Is the platform lift at least 30 by 48 inches?					4.11.2; 4.2.4
Is there at least 30 by 48 inches of clear space for a person using a wheelchair to approach to reach the controls and use the lift?					4.11.2; 4.2.4
If there is a door on the lift, is the door accessible?					4.13
Are controls between 15 and 48 inches high (up to 54 inches if a side approach is possible)?					4.11.2; 4.2.5; 4.2.6
Are the controls operable with one hand, and without tight grasping, pinching, or twisting of the wrist?					4.11.2; 4.27.4

Resource 6-2: Facility Checklist

ENTRANCES

<i>General Area/Building:</i>				<i>Reviewer:</i>	<i>Date:</i>
Questions	In Compliance?			Dimensions/ Comments	ADAAG
	Y	N	NA		
Are at least 50% of all public entrances accessible? Is at least one accessible entrance a ground floor entrance?					4.1.3(8)(a)(1)
Do all inaccessible entrances have signs indicating the location of the nearest accessible entrance?					4.1.3(8)(d); 4.30
If not all entrances are accessible, are the accessible entrances identified by the international symbol of accessibility?					4.1.2(7)(c); 4.30
Does at least one door at each accessible entrance have at least 32 inches clear opening (for a double door, at least one 32-inch leaf)?					4.1.3(7)(a); 4.13.4; 4.13.5
Are appropriate maneuvering clearances provided at accessible doors?					4.13.6, Fig. 25
Is the threshold level (less than 1/4 inch high) or beveled with a slope no greater than 1:2 up to 1/2 inch high (3/4" maximum for exterior sliding doors)?					4.13.8
Are door handles at accessible entrances no higher than 48 inches and operable with one hand and without tight grasping, pinching or twisting of the wrist?					4.13.9
If there is a revolving door or turnstile at an entrance, is there an accessible door or gate next to it?					4.13.2
On sliding doors, is the operating hardware exposed and usable from both sides when the doors are fully open?					4.13.9
Can accessible doors be opened without too much force (maximum of 5 lbf for interior doors)?					4.13.11
If the accessible doors have closers, do they take at least 3 seconds to close to a point 3 inches from the latch?					4.13.10

Resource 6-2: Facility Checklist

LOBBIES AND CORRIDORS

<i>General Area/Building:</i>			<i>Reviewer:</i>	<i>Date:</i>	
Questions	Compliance?			Dimensions/ Comments	ADAAG
	Y	N	NA		
Does the accessible entrance connect with all accessible elements and spaces in the building?					4.1.3(1); 4.3.2(3)
Is the accessible route to all public spaces at least 36 inches wide? If the accessible route turns around an obstruction less than 48 inches wide, is the route at least 42 inches wide on the approach to and exit from the turn at least 48 inches wide at the base of the turn?					4.3.3, Fig. 7
Is the cross-slope of the accessible route no steeper than 1:50?					4.3.7
If the accessible route is less than 5 feet wide, are there passing spaces 5 feet by 5 feet or T-intersecting corridors located at reasonable intervals no more than 200 feet apart?					4.3.4; Fig. 3
Is there at least 80 inches of clear head room on every route? If an area adjoining an accessible route has less than 80 inches of clear head room, is a barrier to warn persons with visual impairments provided?					4.3.5, 4.4.2, Fig. 8
Are floors on an accessible route stable, firm, and slip-resistant?					4.5.1
Is the slope no more than 1:20, or is there a ramp when the slope is greater than 1:20?					4.3.7
If objects mounted to the wall have leading edges between 27 and 80 inches from the floor, do they project no more than 4 inches into the route of travel?					4.4.1
Are walkway level changes less than 1/4 inch, or, if they are between 1/4 inch and 1/2 inch, are they beveled with a slope no greater than 1:2?					4.3.8, 4.5.2
Are ramps provided for changes in level greater than 1/2 inch?					4.5.2
Does at least one door into each public space have at least a 32-inch clear opening?					4.1.3(7)(b), 4.13.5
Are appropriate maneuvering clearances provided at accessible doors?					4.13.6, Fig. 25
Can doors be opened without too much force (5 lbf maximum for interior doors)?					4.13.11
Are door handles 48 inches high or less and operable without tight grasping, pinching, or twisting of the wrist?					4.13.9
Are all thresholds level (less than 1/4 inch), or beveled with a slope no greater than 1:2, up to 1/2 inch high?					4.13.8

Do signs which provide direction to, or information about, functional spaces of the building, comply with the appropriate requirements for directional signage?				4.1.3(16)(b); 4.30
Resource 6-2: Facility Checklist				
LOBBIES AND CORRIDORS, cont.				
General Area/Building:			Reviewer:	Date:
Questions	Compliance? Y N NA		Dimensions/ Comments	ADAAG
Do signs designating rooms and spaces, such as rest rooms, signs at exit doors, and room numbers, comply with the appropriate requirements for tactile signage? Do all signs meet legibility requirements regarding contrast and character proportion?				4.1.3(16)(a), 4.30
Do alarms have both visible and audible signals?				4.1.3(14), 4.28
ELEVATORS				
Does the elevator have automatic operation and self-leveling features?				4.10.2
Are there both visible and verbal or audible door opening/clos-ing and floor indicators (one tone = up, two tones = down)?				4.10.4
Are the call buttons in the hallway at least 3/4 inches wide and centered at 42 inches?				4.10.3.
Do hall call buttons have visual signals to indicate when each call is registered and answered?				4.10.3
Is there a sign on the jamb at each floor identifying the floor in raised and Braille letters?				4.10.5, 4.30.4
Is the door opening at least 36 inches wide?				4.10.9
For a centered opening, is the minimum inside dimension of elevator cars 51 inches by 80 inches?				4.10.9
For an off-center opening, is the minimum inside dimension of elevator cars 51 inches by 68 inches?				4.10.9
Are car control buttons no higher than 48 inches for forward reach and 54 inches for side reach?				4.10.12(3)
Do the controls inside the cab have raised and Braille lettering?				4.10.12(2), 4.30.4
Are the emergency controls grouped at the bottom of the control panel and centered no less than 35 inches above the floor?				4.10.12(3)
If an emergency intercom is provided, is it usable without voice communication?				4.10.14

Is the emergency intercom identified in Braille and raised letters and a raised symbol?					4.10.14, 4.30.4
If the communication system is in a closed compartment, is the hardware on the compartment operable without tight grasping, pinching, or twisting of the wrist?					4.10.14

Resource 6-2: Facility Checklist

ROOMS AND SPACES

<i>General Area/Building:</i>				<i>Reviewer:</i>	<i>Date:</i>
Questions	Compliance?			Dimensions Comments	ADAAG
	Y	N	NA		
Are all aisles and pathways to materials and services at least 36 inches wide?					4.3.3
If aisles between fixed furniture are less than 5 feet wide, are there passing spaces 5 feet by 5 feet or intersecting aisles at reasonable intervals not exceeding 200 feet maximum?					4.3.4
Are floors stable, firm, and slip-resistant?					4.5.1
Is carpeting low-pile, tightly woven, and securely attached?					4.5.3.
In routes through public areas, are all obstacles cane-detectable (located within 27 inches of the floor or higher than 80 inches, or protruding no more than 4 inches from the wall)?					4.4.1, Fig. 8
Is there at least 80 inches of clear head room on every route? If an area adjoining an accessible route has less than 80 inches of clear head room, is a barrier to warn persons with visual impairments provided?					4.3.5, 4.4.2, Fig. 8
Does at least one door into each public space have at least a 32-inch clear opening?					4.13.5, 4.1.3(7)(b)
Are appropriate maneuvering clearances provided at accessible doors?					4.13.6, Fig. 25
Can doors be opened without too much force (5 lbf maximum for interior doors)?					4.13.11
Are door handles 48 inches high or less and operable without tight grasping, pinching or twisting of the wrist?					4.13.9
Are all thresholds level (less than 1/4 inch), or beveled, with a slope no greater than 1:2 up to 1/2 inch high?					4.13.8
If there are sliding doors, is the operating hardware exposed and usable from both sides when the doors are fully open?					4.13.9
Do signs designating permanent rooms and spaces (rest room signs, signs at exit doors, and room numbers) comply with the appropriate requirements for signage? Do all signs meet legibility requirements regarding contrast and character proportion?					4.1.3(16)(a), 4.30

Do signs which provide direction to, or information about, functional spaces of the building comply with the appropriate requirements for directional signage?					4.1.3(16)(b), 4.30
Are all controls that are available for use by the public (including electrical, mechanical, cabinet, game, and self-service controls) located between 15 and 48 inches for forward reach and between 9 and 54 inches for side reach?					4.2.5, 4.2.6
Are they operable without tight grasping, pinching, or twisting of the wrist?					4.27.4
Do alarms have both visible and audible signals?					4.1.3(14), 4.28
If fixed or built-in seating or tables are provided in accessible public or common use areas, do at least 5%, but not less than one, of the fixed or built-in seating areas or tables provide 30 inches by 48 inches of clear floor space?					4.1.3(18), 4.32.2
Are the aisles between fixed seating at least 36 inches wide?					4.3.3
Are the tops of at least 5% of fixed tables or counters between 28 and 34 inches high?					4.32.4
Are knee spaces at accessible fixed tables at least 27 inches high, 30 inches wide, and 19 inches deep?					4.32.3
Are at least 50% of drinking fountains, but at least one, on each floor accessible?					4.1.3(10), 4.15
Do the accessible wall- and post-mounted cantilevered units have clear knee space 27 inches high, 30 inches wide and 17 to 19 inches deep? Do these units have a minimum clear floor space 30 inches by 48 inches to allow a person who uses a wheelchair to approach the unit facing forward?					4.15.5(1)
Do the accessible free-standing or built-in drinking fountains not having clear space under them have clear floor space of at least 30 by 48 inches in front to allow a parallel approach to the unit?					4.15.5(2)
Do accessible drinking fountains have spouts no higher than 36"					4.15.2
Are controls on accessible drinking fountains mounted on the front or on the side near the front edge, and operable without tight grasping, pinching, or twisting of the wrist?					4.15.4, 4.27.4
If pay or public-use phones are provided, is there clear floor space of at least 30 by 48 inches in front of at least one in each bank, that allows a parallel or perpendicular approach by a person using a wheelchair?					4.13(17)(a), 4.31.2
Are the operable parts of the accessible phone(s) 15 to 48 inches high (9 to 54 inches if a side approach is possible)?					4.31.3, 4.2.5, 4.2.6
Do the accessible phones have push-button controls?					4.31.6
Are the accessible phones hearing-aid compatible?					4.31.5(1)

Are the accessible phones adapted with volume control? In addition, do 25%, but not less than one, of all other public phones have volume control?					4.1.3(17)(b), 4.31.5(2)
Are the accessible phones and all the phones with volume control identified with appropriate signage?					4.1.3(17)(b), 4.30
If there are four or more public phones in the building, is one of the phones equipped with a text telephone (TT or TDD)?					4.1.3(17)(c)
Is the location of the text telephone identified by accessible signage bearing the international TDD symbol?					4.30.7(3)
When a bank of telephones has 3 or more public pay phones, is at least one public pay phone equipped with a shelf and outlet?					4.1.3(17), 4.31.9(2)
Do all banks of telephones that do not contain a text telephone have appropriate directional signage placed adjacent to them indicating the location of the text telephone? If the facility has no banks of telephones, is there appropriate directional signage provided at the entrance?					4.30.7(3)

Resource 6-2: Facility Checklist

TOILET ROOMS

<i>General Area/Building:</i>				<i>Reviewer:</i>	<i>Date:</i>
Questions	Compliance?			Dimensions/ Comments	ADAAG
	Y	N	NA		
If rest rooms are available to the public, is at least one rest room on each floor that has public rest rooms (either one for each sex, or unisex) on an accessible route and fully accessible?					4.1.2(6), 4.1.3(11), 4.1.6(3)(e), 4.22, Fig. 30
Are there signs at inaccessible rest rooms that give directions to accessible ones?					4.1.6(3)(e)(iii) , 4.30
When not all toilet facilities are accessible, are accessible toilet rooms identified by the international symbol of accessibility?					4.1.2(7)(d)
Do doors have at least a 32-inch clear opening?					4.22.2
Are appropriate maneuvering clearances provided at doors?					4.13.6, Fig. 25
Can doors be opened without too much force (5 lbf maximum for interior doors)?					4.13.11
Are door handles 48 inches high or less and operable without tight grasping, pinching, or twisting of the wrist?					4.13.9
Are all thresholds level (less than 1/4 inch), or beveled, with a slope no greater than 1:2 up to 1/2 inch high?					4.13.8
If there are sliding doors, is the operating hardware exposed and usable from both sides when the doors are fully open?					4.13.9

Is there tactile signage identifying the rest rooms, placed on the wall at the latch side of the door, centered 60 inches above the floor?					4.1.3(16)(a), 4.30
Is there a 5-foot diameter clear space or a T-shaped space in the rest room to make turns?					4.22.3
Are all fixtures on an accessible route?					4.22.7, 4.27
Is there at least one wheelchair-accessible stall that is at least 5 feet wide, clear of the door swing, and at least 56 inches long if the toilet is wall-mounted or 59 inches long if the toilet is floor-mounted? If it is technically infeasible to provide such a standard stall, is there a stall that is either 36 by 66 inches or 48 by 66 inches if the toilet is wall-mounted or either 36 by 69 inches if the toilet is floor-mounted?					4.17.3, 4.22, Fig. 30
Can the door to the accessible toilet stall be operated without twisting or fine movement, on both the inside and outside?					4.17.5, 4.13.9
Do the accessible toilet stalls have a minimum door opening of at least 32 inches?					4.17.5, 4.13.5
Are there accessible grab bars in accessible toilet stalls?					4.17.6, 4.26, Fig. 30
Are there accessible grab bars at accessible water closets not located in stalls?					4.16.4, 4.26, Fig. 29

Resource 6-2: Facility Checklist

TOILET ROOMS, cont.

<i>General Area/Building:</i>				<i>Reviewer:</i>	<i>Date:</i>
Questions	Compliance?			Dimensions/ Comments	ADAAG
	Y	N	NA		
Are the accessible toilet seats 17 to 19 inches high?					4.16.3
Are the flush controls on accessible toilets no higher than inches and mounted on the wide side of toilet areas?					4.16.5
Is the toilet paper dispenser at least 19 inches above the floor?					4.16.6
Does one lavatory have a 30-inch-wide by 48-inch-deep clear space in front, with a maximum of 19 inches of that depth under the lavatory?					4.19.3
Is the lavatory rim no higher than 34 inches from the floor?					4.19.2
Is there at least 29 inches from the floor to the bottom of the lavatory apron?					4.19.2
Is there at least 8 inches of clearance toward the wall provided for knee clearance?					4.19.2, Fig. 31
Is there a maximum of 6 inches of clearance outward from the wall provided for toe clearance?					4.19.2, Fig. 31
Can the faucet be operated with one hand and without tight grasping, pinching, or twisting of the wrist?					4.19.5

Are hot water pipes and drain pipes insulated, or configured to avoid contact with the legs of a person using a wheelchair?					4.19.4
Are soap and other dispensers and hand dryers no higher than 48 inches for forward reach or 54 inches for side reach?					4.27.3
Can they be operated with one hand and without twisting or fine movement?					4.27.4
Is there a clear floor space of 30 by 48 inches in front of the dispensers?					4.27.2
Is the mirror mounted with the bottom edge of the reflecting surface no higher than 40 inches?					4.19.6
If alarms are provided in the rest room, do they have both visual and audible signals?					4.1.3(14), 4.28

Resource 6-2: Facility Checklist

SHOWER ROOMS

<i>General Area/Building:</i>				<i>Reviewer:</i>	<i>Date:</i>
Questions	Compliance?			Dimensions Comments	ADAAG
	Y	N	NA		
Are shower rooms on an accessible route and fully accessible?					4.1.3(11), 4.23.1
When not all shower rooms are accessible, are accessible shower rooms identified by the international symbol of accessibility?					4.1.2(7)(d)
Do doors have at least a 32-inch clear opening?					4.23.2, 4.13.5
Are appropriate maneuvering clearances provided at doors?					4.23.2; 4.13.6, Fig. 25
Can doors be opened without too much force (5 lbf maximum for interior doors)?					4.23.2, 4.13.11
Are door handles 48 inches high or less and operable with one hand and without tight grasping, pinching, or twisting of the wrist?					4.23.2, 4.13.9
Are all thresholds level (less than 1/4 inch), or beveled, with a slope no greater than 1:2 up to 1/2 inch high?					4.23.2, 4.13.8
If there are sliding doors, is the operating hardware exposed and usable from both sides when the doors are fully open?					4.23.2, 4.13.9
Is there tactile signage identifying the shower rooms, placed on the wall at the latch side of the door, centered 60 inches above the floor?					4.1.3(16)(a), 4.30
Is there a 5-foot diameter clear space or a T-shaped space in the rest room to make turns?					4.23.3
If a standard shower stall is provided, is it at least 36 inches by 36 inches?					4.21.2, Fig. 35
If a roll-in shower stall is provided, is it at least 30" x 60"?					4.21.2, Fig. 35
Is appropriate clear floor space provided at shower stalls?					4.21.2, Fig. 35
Is a seat provided in shower stalls 36 inches by 36 inches? Is it mounted between 17 and 19 inches above the shower floor on the wall opposite the controls and does it extend the full depth of the stall?					4.21.3, 4.26.3
Where a fixed seat is provided in a 30 by 60 inch minimum shower stall, is it a folding type and is it mounted on the wall adjacent to the controls?					4.21.3, 4.26
Are accessible grab bars provided in accessible shower stalls?					4.21.4, Fig. 37
Are accessible faucets and other controls that are operable with one hand and without tight grasping, pinching, or twisting of the wrist provided in accessible shower stalls?					4.21.5, 4.27.4, Fig. 37

If provided, are curbs in shower stalls 36 inches by 36 inches no higher than 1/2 inch?				4.21.7
If a 30 by 60 inch shower stall is provided, does it have no curb?				4.21.7

Resource 6-2: Facility Checklist

ASSEMBLY AREAS

General Area/Building:			Reviewer:	Date:	
Questions	Compliance?			Dimensions Comments	ADAAG
	Y	N	NA		
Does at least one door into each public space have at least a 32-inch clear opening?					4.1.3(7)(b), 4.13.5
Are appropriate maneuvering clearances provided at accessible doors?					4.13.6, Fig. 25
Can doors be opened without too much force (5 lbf maximum for interior doors)?					4.13.11
Are door handles 48 inches high or less and operable without tight grasping, pinching, or twisting of the wrist?					4.13.9
Are all thresholds level (less than 1/4 inch), or beveled, with a slope no greater than 1:2 up to 1/2 inch high?					4.13.8
If there are sliding doors, is the operating hardware exposed and usable from both sides when the doors are fully open?					4.13.9
In assembly areas with fixed seating, is the required number of wheelchair locations provided (see table at 4.1.3(19)(a) of ADAAG)?					4.1.3(19)(a)
Is each wheelchair space at least 48 inches deep for approach from the front or rear, and 60 inches deep for approach from the side?					4.33.2
Do wheelchair spaces adjoin an accessible route that also serves as an accessible means of egress?					4.33.3
Is at least one companion fixed seat provided next to each wheelchair seating area?					4.33.3
Does an accessible route connect wheelchair seating locations with performing areas, including stages, arena floors, dressing rooms, locker rooms, and other spaces used by performers?					4.33.5
In assembly areas where audible communications are integral to the use of the space, are an adequate number of assistive listening systems provided?					4.1.3(19)(b)
Is there signage indicating the availability of the assistive listening devices?					4.1.3(19)(b)

Resource 6-2: Facility Checklist

CAFETERIAS

<i>General Area/Building:</i>				<i>Reviewer:</i>	<i>Date:</i>
Questions	Compliance?			Dimensions Comments	ADAAG
	Y	N	NA		
Does at least one door into each public space have at least a 32-inch clear opening?					4.1.3(7)(b), 4.13.5
Are appropriate maneuvering clearances provided at accessible doors?					4.13.6, Fig. 25
Can doors be opened without too much force (5 lbf maximum for interior doors)?					4.13.11
Are door handles 48 inches high or less and operable without tight grasping, pinching, or twisting of the wrist?					4.13.9
Are all thresholds level (less than 1/4 inch), or beveled, with a slope no greater than 1:2 up to 1/2 inch high?					4.13.8
If there are sliding doors, is the operating hardware exposed and usable from both sides when the doors are fully open?					4.13.9
Are at least 5%, but a minimum of one, of the fixed tables accessible?					4.1.3(18), 5.1
Is the knee space at accessible tables at least 27 inches high, 30 inches wide, and 19 inches deep?					4.32.3
Is the top of each accessible table or counter between 28 and 34 inches above the floor?					4.32.4
Where possible, are the accessible tables or counters distributed throughout the space?					5.1
Are all aisles between accessible fixed tables at least 36 inches wide?					5.3
Where counter service is provided, is there at least a 60 inch long portion of the main counter that is no more than 34 inches high and that has at least 27 inches of knee space below or is service available at accessible tables within the same area?					5.2
Do food service lines have at least 36 inches clear width?					5.5
Are tray slides no more than 34 inches above the floor?					5.5
Are at least 50% of self-service food service shelves 15 to 48 inches for perpendicular approach and 9 to 54 inches for parallel approach?					5.5
Are self-service shelves and dispensing devices for tableware, dishware, condiments, food, and beverages installed 15 to 48 inches for forward approach or 9 to 54 inches for parallel approach?					5.6, 4.2
Do self-service shelves and vending machines have at least a 30- by 48-inch clear floor space?					5.6, 5.8, 4.2

Are vending machines on an accessible route?					5.8, 4.2.4
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Resource 6-2: Facility Checklist					
LIBRARIES					
<i>General Area/Building:</i>				<i>Reviewer:</i>	<i>Date:</i>
Questions	Compliance?			Dimensions/ Comments	ADAAG
	Y	N	NA		
Does at least one door into each public space have at least a 32-inch clear opening?					4.1.3(7)(b), 4.13.5
Are appropriate maneuvering clearances provided at accessible doors?					4.13.6, Fig. 25
Can doors be opened without too much force (5 lbf maximum for interior doors)?					4.13.11
Are door handles 48 inches high or less and operable without tight grasping, pinching, or twisting of the wrist?					4.13.9
Are all thresholds level (less than 1/4 inch), or beveled, with a slope no greater than 1:2 up to 1/2 inch high?					4.13.8
If there are sliding doors, is the operating hardware exposed and usable from both sides when the doors are fully open?					4.13.9
If there is a turnstile or security device, is there an accessible door or gate adjacent to it?					8.3, 4.13
Is at least one lane for each check-out area accessible?					8.3
Are at least 5% (but a minimum of one) of fixed seating, tables or study carrels accessible?					8.2
Is there a clear floor space of 30 by 48 inches for wheelchair spaces at accessible tables?					8.2, 4.2
Are the tops of the accessible fixed tables between 28 and 34 inches above the floor?					8.2, 4.32.4
Is there knee space under the accessible, fixed tables at least 27 inches high, 30 inches wide and 19 inches deep?					8.2, 4.32.3
Are the aisles leading up to and between accessible tables and carrels at least 36 inches wide?					8.2, 4.2.3
Is the clear aisle space at card catalogs and magazine displays at least 36 inches wide?					8.4
Is the minimum clear aisle width between stacks at least 36 inches?					8.5
Are card catalogs between 18 and 54 inches high?					8.4

Resource 6-3: Analyzing Options

Collect the barriers that were identified and items that were found not to be in compliance with ADAAG from Resource 6-2; list these in the first column. Complete the table by listing the options that the team develops, the one option that is finally selected, and the action plan for achieving accessibility.

Barrier	Proposed Solutions	Selected Option	Action Plan	Specify Fundamental Alteration/Undue Burdens

CHAPTER SIX: Program and Facility Access

Program Accessibility	Ch. 6 Pg. 1
"program accessibility"	Ch. 6 Pg. 2
What is a Program or Activity?	Ch. 6 Pg. 3
The Entire Scope of Programs and Activities	Ch. 6 Pg. 4
"in their entirety,"	Ch. 6 Pg. 4
buildings	Ch. 6 Pg. 4
support facilities	Ch. 6 Pg. 4
Program Access in Existing Facilities	Ch. 6 Pg. 5
Existing Facilities and Architectural Accessibility Standards	Ch. 6 Pg. 6
Methods of Compliance	Ch. 6 Pg. 6
"most integrated setting"	Ch. 6 Pg. 6
1. Reassignment of services to an accessible location.	Ch. 6 Pg. 7
2. Purchase, redesign, or relocation of equipment.	Ch. 6 Pg. 7
3. Assignment of aides.	Ch. 6 Pg. 8
4. Structural changes to eliminate barriers.	Ch. 6 Pg. 8
Fundamental Alterations and Undue Burdens	Ch. 6 Pg. 10
Designated Historic Buildings	Ch. 6 Pg. 11
Providing Access in Leased Space	Ch. 6 Pg. 12
New Construction and Alterations	Ch. 6 Pg. 13
Coverage Under Both Title II and Section 504	Ch. 6 Pg. 14
ADAAG and UFAS	Ch. 6 Pg. 15
Curb Ramps	Ch. 6 Pg. 16
Alterations to Historic Properties	Ch. 6 Pg. 16
Maintenance of Accessible Features	Ch. 6 Pg. 16
Implementing the Review of Program and Facility Access	Ch. 6 Pg. 17
Overview of the Program and Facility Access Review	Ch. 6 Pg. 18
Prepare to Conduct the Review	Ch. 6 Pg. 18
1. Review or complete list of One-Stop programs and partners from Resource 6-1.	Ch. 6 Pg. 19
2. Compile the list of facilities used for programs and activities from Resource 6-4.	Ch. 6 Pg. 19
3. Orient facilities assessment team to ADAAG and Resources 6-1 and 6-2.	Ch. 6 Pg. 19
4. Identify programs and spaces to be surveyed.	Ch. 6 Pg. 19
a. The current building(s) and location within the building(s) of each program.	
b. Program scheduling requirements.	
c. Program space requirements.	
5. Identify the spaces to be surveyed.	Ch. 6 Pg. 20
6. Complete facility review plan, including time frames.	Ch. 6 Pg. 21
Conduct the Facility Access Review	Ch. 6 Pg. 21
Analyze Program Access Options	Ch. 6 Pg. 22
1. Identify nonstructural and structural solutions.	Ch. 6 Pg. 23
criteria	Ch. 6 Pg. 24
Integration.	
Preferences.	
Capital planning information.	
2. Project long-term and short-term costs.	Ch. 6 Pg. 24
3. Document fundamental alteration/undue burden decisions.	Ch. 6 Pg. 24
Develop an Action Plan	Ch. 6 Pg. 25
1. Prepare a barrier removal plan.	Ch. 6 Pg. 25
2. Solicit comments on the draft action plan.	Ch. 6 Pg. 25
3. Adopt and implement final plan.	Ch. 6 Pg. 25
Resource 6-1: Program Inventory	Ch. 6 Pg. 27
Resource 6-2: Facility Checklist	Ch. 6 Pg. 28
PARKING	Ch. 6 Pg. 28

PASSENGER LOADING ZONES	Ch. 6 Pg. 28
EXTERIOR ROUTE OF TRAVEL	Ch. 6 Pg. 29
RAMPS	Ch. 6 Pg. 30
STAIRS	Ch. 6 Pg. 31
LIFTS	Ch. 6 Pg. 31
ENTRANCES	Ch. 6 Pg. 32
LOBBIES AND CORRIDORS	Ch. 6 Pg. 33
ELEVATORS	Ch. 6 Pg. 34
ROOMS AND SPACES	Ch. 6 Pg. 35
TOILET ROOMS	Ch. 6 Pg. 37
SHOWER ROOMS	Ch. 6 Pg. 39
ASSEMBLY AREAS	Ch. 6 Pg. 40
CAFETERIAS	Ch. 6 Pg. 41
LIBRARIES	Ch. 6 Pg. 42
Resource 6-3: Analyzing Options	Ch. 6 Pg. 43