

CODE APPLICATION NOTICE**FILE NO.:** 2-1109B.3**Subject:** 18 Inch Strike Zone for Accessibility**EFFECTIVE:** 06/19/08**CODE SECTION:** Section 1109B.3, 2007 California Building Code (CBC)

1109B.3 Patient Bedrooms and Toilet Rooms. *Patient bedrooms and associated toilet facilities shall be made accessible as follows:*

1. *Long-term-care facilities, including skilled nursing facilities, intermediate care facilities, bed and care, and nursing homes shall have at least 50 percent of patient bedrooms and toilet rooms, and all public-use and common-use areas, accessible.*
2. *General-purpose hospitals, psychiatric facilities, and detoxification facilities shall have at least 10 percent of patient bedrooms and toilets, and all public-use and common use areas, accessible.*
3. *Hospitals and rehabilitation facilities that specialize in treating conditions that affect mobility, or units within either that specialize in treating conditions that affect mobility, shall have all patient bedrooms and toilets and all public-use and common-use areas accessible.*

PURPOSE:

To clarify accessibility requirements at patient room doors. Section 1114B suggests that all doors used by the public must meet all accessibility requirements. However, to place accessibility requirements on all patient room and associated toilet room doors would in essence be requiring 100 percent patient room accessibility. This is clearly not the intent of the code. If it had been the intent, the specific percentages and associated modifications would not have been given.

Further, an accessible route of travel, as discussed in Section 1114B.1, 2007 CBC must by definition (See Section 1102B, 2007 CBC) connect all accessible elements and spaces. Therefore, an accessible route of travel need only connect the accessible patient bedrooms and toilets not all patient bedrooms and toilets.

INTERPRETATION:

The **scoping** portion of chapter 1109B, 2007 CBC is found in sections 1109B.1 through 1109B.8 of the 2007 CBC, and specifically includes the 1109B.3 language as printed above. The scoping sections are intended to define **which areas** of an "I" occupancy must be made accessible.

The **technical requirements** that must be applied to accessible facilities are provided in section 1114B, 2007 CBC "Facility Accessibility", but are **only** required in the areas that must be made accessible. Therefore, the technical requirements of section 1114B **do not** apply to areas of a facility that are not required to be made accessible.

Specifically, section 1114B.1.1 notes that doors shall comply with the requirements of 1133B.2 which further requires an 18" side strike clearance per 1133B.2.4.3, 2007 CBC. These requirements **do not** apply to doors that are not required to be accessible.

This interpretation is consistent with the Division of the State Architect Access Policy #98-04 (Accessibility Requirements in Group I Occupancies) effective October 15, 1998, revised April 5, 2000.

<u>Original Signed</u>	<u>06/19/08</u>
John D. Gillengerten	Date