

Lodging and the ADA

Standards and Best Practices

Background

- The ADA was passed June 26th, 1990
- Three major titles:

Title I- Employment

Title II- Public Entities

Title III- Private Sector (this one covers you)

What Does Title III Cover?

1. Facility Access

2010 Standards for Accessible Design, Readily Achievable

2. Access to Goods and Services

FACILITY ACCESS

New
Construction



All new construction
must comply with the
2010 Standards for
Accessible Design

Renovations



Renovated area must be
made to comply with the
2010 Standards for
Accessible Design



20% Rule for
Renovations

Existing
Facilities



Existing facilities are required
to make accessibility changes
that are “readily achievable”



Safe Harbor
Rule

20% Rule for Renovation

- Up to 20% of the renovation budget is required to be used toward bringing existing barriers into compliance.
- Example: Hotel Z is doing a \$50,000 renovation. An additional \$10,000 must be spent on necessary changes to bring the rest of the building into compliance. Hotel Y is also doing a \$50,000 renovation, but is already almost completely compliant with the 2010 Standards. Hotel Y only needs \$2,000 to be fully compliant, so they are not required to spend more than \$2,000.

Safe Harbor Rule

If an existing facility has features such as an accessible entrance or bathroom that meets the previous 1991 ADA Standards, the facility does not have to upgrade to the 2010 ADA Standards unless there is a renovation, remodel or addition. This is known as “safe harbor”, not to be confused with a grandfather clause, which does not exist in the ADA. No building is “grandfathered in”.

Readily Achievable

- Definition: Easily accomplishable and able to be carried out without much difficulty or expense
- Determining what is readily achievable is based on the overall operating budget, not just funds allocated for a specific project.
- Factors to consider: Financial burden, impact on operations, and technical feasibility.
- What is considered readily achievable is always determined case-by-case

Readily Achievable Examples

A hotel has several steps leading to the front entrance and sits only a few feet back from a city street. There is just not enough space to provide a safe and compliant ramp to the front entrance. Providing the ramp is not readily achievable. However, the hotel should look at all other possible accessible entrances and provide directional signage to the alternative entrance.

Readily Achievable Examples

An Inn has 26" doorways. The 2010 ADA Standards require 32" doorways. The Inn wants to improve access. They can widen the doorways to 30", but widening to 32" would require extensive alteration to the building. In this case, widening the doorways to 30" would be viewed as working to meet their readily achievable obligations.

Developing a Plan

- Priority 1: Getting through the door
- Priority 2: Access to Goods and Services
- Priority 3: Restrooms
- Priority 4: Remaining Barriers

Customize the plan: These priorities are only guidelines. Create a plan based on your needs and abilities. Where do you have the most access issues? Have you received complaints? What can you fix right now?

A Brief Overview

2010 STANDARDS HIGHLIGHTS

Doorways

All Doors within all guestrooms must be accessible. A width of 32" and 18" of clear floor space on the pull side are required. (224.1.2 Guest Rooms and Doorways.)

404.2.9 Door and Gate Opening Force.

"The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 pounds (22.2 N) Maximum. 2. Sliding or folding doors: 5 pounds (22.2 N) maximum."

Beds

- 17"-23"
- Frames should not prevent direct side approach
- Two Bed Access
- Avoid Memory Foam (consider topper)



Bathrooms

608.5.2 Standard Roll-In Type Shower Compartments.

In standard roll-in type shower compartments, the controls, faucets, and shower spray unit shall be located above the grab bar, but no higher than 48 inches (1220 mm) above the shower floor.



Bathrooms

610.2 Bathtub Seats.

The top of bathtub seats shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the bathroom finish floor. The depth of a removable in-tub seat shall be 15 inches (380 mm) minimum and 16 inches (405 mm) maximum. The seat shall be capable of secure placement. Permanent seats at the head end of the bathtub shall be 15 inches (380 mm) deep minimum and shall extend from the back wall to or beyond the outer edge of the bathtub.

Requirements for fixed benches in roll-in showers are very similar. (reminder: surveys show the vast majority of guest prefer to shower!)



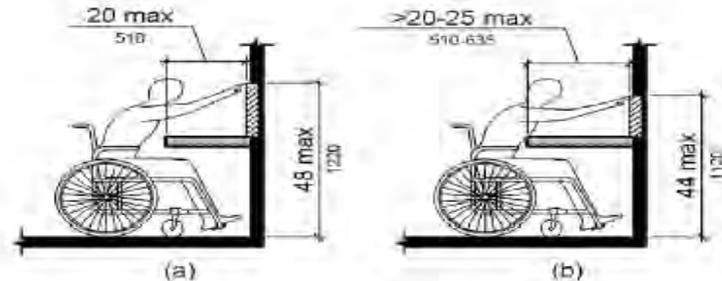
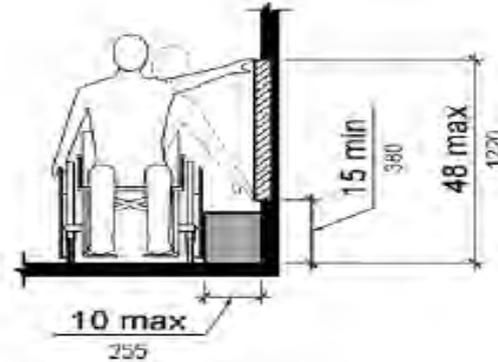
Operable Parts

Operable parts of all fixtures and devices must be within reach range.

Can you operate the part with a closed fist? Starting at the front entrance, see what you are able to do in your hotel using a closed fist.

309 Operable Parts.

Clear floor space shall be provided. Operable parts shall be placed within one or more of the reach ranges specified in 308. Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds maximum.



Dining and Work Surfaces

902 Dining Surfaces and Work Surfaces. 902.2 Clear Floor or Ground Space.

A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided. (17" min. depth)

902.3 Height. *The tops of dining surfaces and work surfaces shall be 28 inches minimum and 34 inches maximum above the finish floor or ground.*



Amenities

- Amenities available to guest need to be accessible
- Is there enough space between exercise equipment?
- Is the the printer within reach range?



Pool Lifts

1009.2.1 Pool Lift Location.

Pool lifts shall be located where the water level does not exceed 48 inches.

1009.2.7 Operation.

The lift shall be capable of unassisted operation from both the deck and water levels.

Advisory- This will permit a person to call the pool lift when the pool lift is in the opposite position. It is extremely important for a person who is swimming alone to be able to call the pool lift when it is in the up positions so he or she will not be stranded in the water for extended periods of time awaiting assistance. The requirement for a pool lift to be independently operable does not preclude assistance from being provided.



Transportation

- **Transportation and hotel vans:** If transportation services are provided accessible transportation must be provided. Vans of 15 passengers or larger are required to have a lift. If you have smaller vans then you must contract with a company for use as needed.
- If hotel transportation is provided without an additional fee, no fee can be charged for accessible transportation by the hotel or the contracted service.
- Train staff on your accessible transportation services and provide information on your website.



Highlights

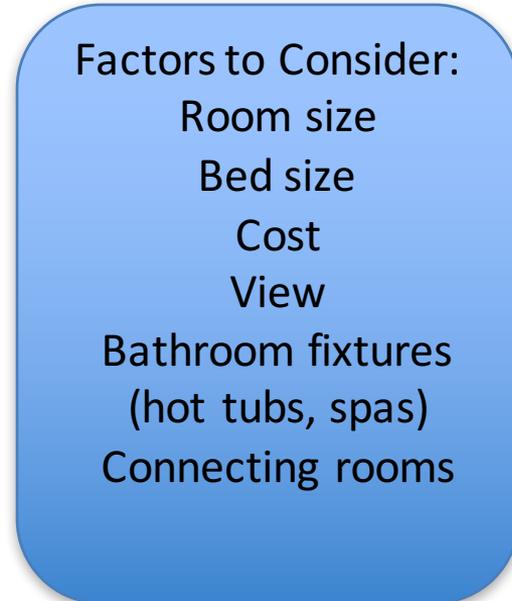
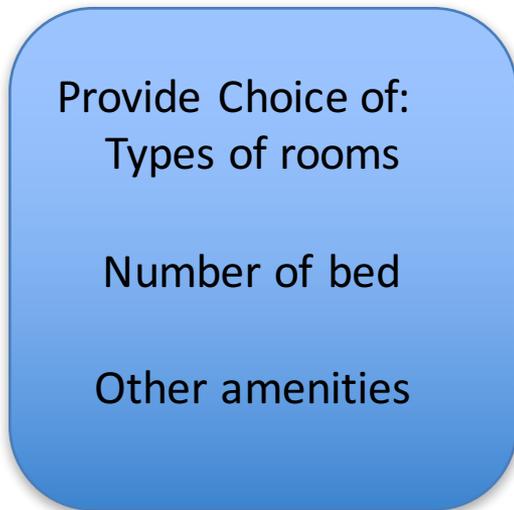
ACCESS TO SERVICES

Target Areas

- Web Access
- Inclusive Experience (access to different types of rooms)
- Modification of Policies and Procedures
- Effective Communication
- Training Staff

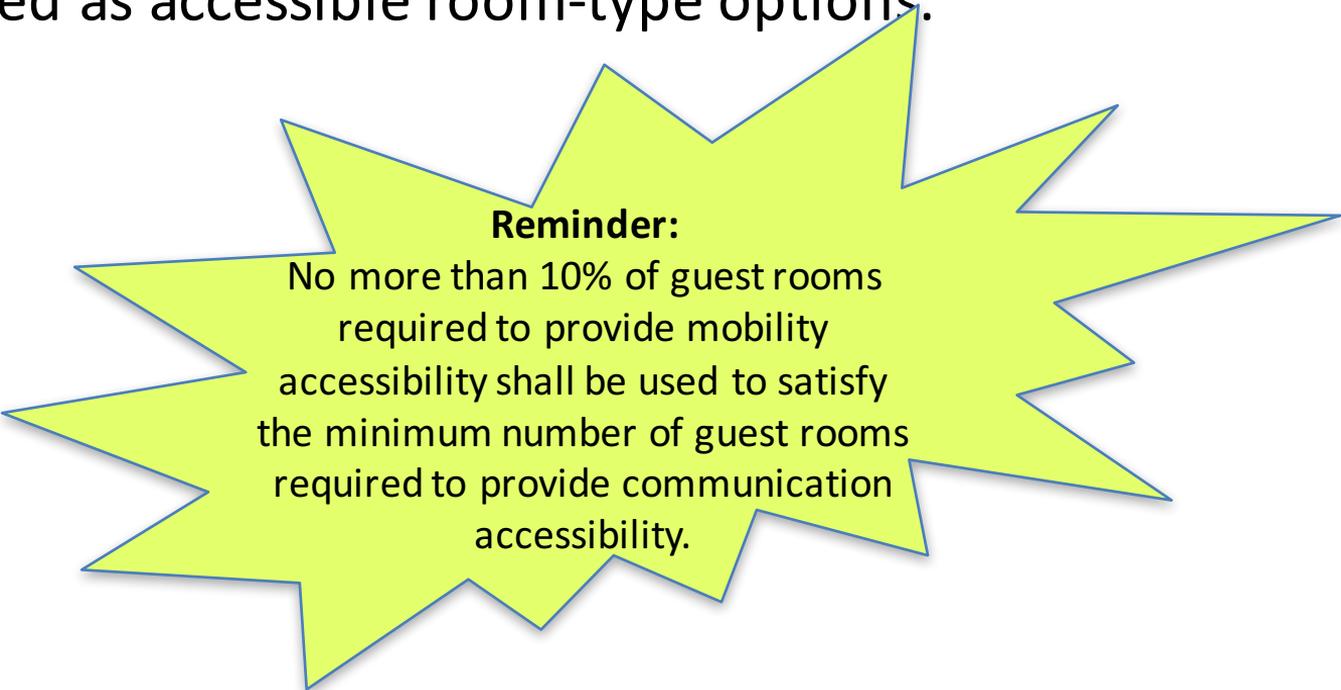
Guest Room Dispersion

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Reminder:

No more than 10% of guest rooms required to provide mobility accessibility shall be used to satisfy the minimum number of guest rooms required to provide communication accessibility.

Modification of Policies and Procedures

- Make case-by-case determinations
- Be innovative and creative (ex. Allow guest to order room service via text)
- Modification are usually small thing:

Come out from behind high counters for guest in a wheelchair

Have someone available to help with luggage (even if it's not their usual job)

Allow service animals, even when there is a no pet policy

Train Staff

Front Desk Tips

- Have a clear lowered counter, or at least provide a clipboard if needed
- Confirm that the room has accessible features and name them. (communication features, roll-in shower, etc.)
- Make sure the guest feels comfortable asking for assistance, room rearrangement, or other modifications)

Housekeeping Tips

- If a guest rearranges the room, do not relocate the furniture until checkout
- Ensure toiletries and towels are within reach range.
- Do not put towels on the grab bars
- Cleaning carts should be placed to the side of the hallway so guests using wheelchairs have space to pass

Thinking About Access

- Be Respectful
- Be Flexible
- Be Proactive
- Be Creative

In the real world accessibility is usually a matter of problem solving. The main goal should always be inclusion. You want your facility to allow for as much independence as possible, and your services to provide as many accommodations as are necessary.