ADA Guide for Facilities Managers at Public Universities and Colleges

The effective use of funds allocated for compliance with Titles I, II and III of the 2010 ADA/ABA Standards

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1.Introduction

There is much confusion at our universities and colleges about the Americans with Disabilities Act(ADA). How do universities adequately provide program accessibility for their campuses?

This guide will help facility management staff and ADA campus committees understand the school's responsibilities under Title I and II of the ADA. Title I has specific protections for employees of government agencies and Title II covers the accessibility rights to all programs offered by Government-Owned institutions and agencies. Those rules are often implemented by using Title III, the physical design guidelines for the various required elements.

2. Covered Institutions

This guide covers requirements for public schools of higher learning (government-owned) and also federally funded programs at private institutions.¹

Note: Some state accessibility codes are more stringent than the ADA/Architectural Barriers Act(ABA) and have additional requirements for schools owned by religious organizations.

It was the intent of the ADA that existing and publicly owned universities and colleges, which are usually owned by state and local governments, are not shut down as a result of the passage of the 1991 ADA Accessibility Guidelines(ADAAG) Standards. Unlike Title III, which called for Readily Achievable Barrier Removal to be accomplished by certain target dates, Title II requires programs, services or activities to be readily accessible when viewed in their entirety. This subtle difference allows publicly owned colleges and universities to make programs and activities available to HC students without extensive retrofitting of their existing buildings by offering programs through alternative methods. The most common alternative method has been relocating the program to an accessible classroom in an accessible building. This practice is commonly referred to as "reasonable accommodation".

Existing Facilities note from 2010 Standards passed July 23, 2010:

The ADA and ABA guidelines cover new construction and planned alterations and generally do not apply to existing facilities, except where altered. Facilities built or altered according to earlier versions of the ADA or ABA standards will not necessarily have to meet the updated version, except where they are subsequently altered or renovated. The Department of Justice, which regulates requirements

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¹ For private schools that do not receive federal funding, see 28 CFR part 36 Subparts A-F and Appendix A. For schools solely owned by a church or religious organization, see 28 CFR part 36 section 36.102(e).

for existing facilities under the ADA, intends to address coverage of facilities built or altered according to the original ADA standards in its rulemaking to update the standards. It will also address facilities retrofitted under ADA provisions for existing facilities, such as the requirement for barrier removal in places of public accommodation. With respect to ABA facilities, the Board has clarified in the guidelines that facilities built to earlier ABA standards are subject to the new requirements only in relation to planned alterations.

The note above establishes how the 2010 standard deals with existing buildings and elements either built before July 26, 1990 or built and altered before the 2010 standard was issued. The wording is very clear and implies that nothing has to be done to update existing buildings unless they are being altered.

To put this document in its proper perspective, the user must understand that it is written for the sole purpose of guiding the college on how to properly spend grant monies or other allocations that were earmarked specifically for campus ADA upgrades. When spent wisely, the funding helps bring buildings currently not complying with the Program Accessibility rules of Titles I and II into usability for all students and faculty. This means no longer having to change classrooms because you have disabled students or faculty in the program.

If remediation funds are not available, the school may put its remediation efforts on <u>hold</u> until more funds become available. An established remediation plan runs on the school's timeline and is usually based on available funding. The important thing is <u>to have a plan!</u>

If an existing building where classes are held has non-accessible parking spaces, curb ramps, entrances, drinking fountains and toilet rooms then Title II will not let the university hold programs in

that building. However, ADA does not mandate changes to the out-of-compliance elements. Instead, when physically disabled students or faculty need accommodation the rules allow the school to relocate the class to an accessible building or floor. This option is spelled out in the reasonable accommodation rules of Title II.

For a history about how the Title II rules were misunderstood back in the 90's see Appendix A of this document.

FACT: SCHOOLS ARE NOT REQUIRED TO BRING THEIR BUILDINGS INTO ADA COMPLIANCE, BUT IF THEY DO NOT, THEY MAY NOT OFFER PROGRAMS THAT ENROLL DISABLED STUDENTS IN THOSE BUILDINGS.

Twenty years after the passage of the Americans with Disabilities Act, we find still classroom buildings that are not accessible, but are being used to serve disabled students and faculty. These are the buildings that are most likely to be the source of ADA litigation. To help States bring selected buildings that existed prior to January 26, 1992 into compliance the federal government provides grants for ongoing accessibility remediation projects on older campuses.

The States distribute these monies among their schools and other institutions. In order to spend this money wisely and within the intent of the law I recommend a series of steps for facility staff or the ADA committee to take while planning for the best use of available funding.

3. Steps Toward a Smart Remediation Plan

The college must first seek a comprehensive site audit followed by a building by building audit of non-compliant elements, that is, those that need correction to qualify a selected building for program accessibility. Coming up with a long term ADA remediation plan most often involves the following steps:

A. The Site

- 1. The Facilities/Planning Department (FPD), working with the campus ADA Committee, will contract for a survey of the campus site to discover which elements comprise the accessible arrival points and accessible paths and which of these are non-compliant with the relevant ADA Code(s). The surveyor firm should normally be a licensed and insured accessibility specialist.
- 2. After the survey is completed, the FPD will determine which projects or elements they can correct in-house with plant maintenance staff and which projects require outside designers and contractors. They will then work these items into projects for which existing funding or future funding may be available and then arrange for the execution of the work.

The survey should show the FPD Staff all non-compliant elements along the accessible paths, but staff should note that as long as directional signage is employed, only one accessible path is required to the accessible entrance of each building. The path to the entrance must lead to/from an accessible connector path that links all the buildings and accessible elements (such as parking) on the campus. In order to be accessible an entrance must be on an accessible path that connects all areas of the building on the same floor.

When more than one entrance is needed to connect all areas of a building, each path to each accessible entrance must be on an accessible connector path. The campus can choose to bring only one floor or one area of a building into compliance to provide program accessibility for a specific program, but the remediated area must be on an accessible path that provides accessible restrooms and drinking fountains, etc. for the area being used for program accessibility. Reference the Program Accessibility Considerations section below for specific information.²

The 1991 and 2010 standards both require that all buildings on the campus used by the public and students be connected to one another by accessible paths.

Here is an exception to the accessible connector path rules: On some campuses, remote sites and buildings may be served only by arrival points for cars. These arrival points must include accessible parking plus an accessible path from parking to the accessible entrance. If the building has a Passenger Loading Zone(s) (PLZ) then at least one PLZ must be accessible and also must have an accessible path into the building.

This arrival point exception may <u>not</u> be employed unless a vehicular route is the <u>only</u> way all persons can get to this site or building from the main campus area. Obviously, ablebodied people can walk nearly anywhere, but the laws for

building. This example shows a creative approach to providing program accessibility without having to remediate the entire building. The designer was instructed to provide on accessible lab of each type in the building.

² I have seen science lab buildings where the accessible labs were updated for program accessibility only on the main floor or on one end of the main floor instead of the entire building. Remediation efforts addressed accessible routes that provided accessible toilets and drinking fountains and lecture halls. The second floor was not remediated due to cost considerations (no elevator access). This meant classes on those floors would have to be moved to the main floor if a HC student enrolled in them but would still be able to be conducted in the science

connector paths come into play whenever an accommodation is provided like a sidewalk to a building or a shuttle or outdoor benches. In those cases accessible paths for wheelchair bound persons must be provided.

B. The Campus Buildings

- 1. The staff and committee should identify and prioritize types of buildings using the following categories:
 - a. Classrooms buildings used for teaching, the primary function of a college or university. This may include theater /performing arts buildings when used for teaching.
 - b. Student/public common use support buildings (i.e. student center, health clinic, guidance center, testing areas, gymnasiums, planetarium, student fitness center, and campus security/police office).
 - c. Student/public use buildings and facilities <u>not specifically</u> <u>designed for teaching</u> (i.e. performance halls, sports arenas, sports fields, picnic areas, walking trails, swimming pools).
 - d. Dormitories, student housing facilities, food courts, work out centers and similar are considered support facilities and not primary function elements of a college or university. ADA remediation monies should not be spent directly on these buildings unless the grants are from a housing agency or specifically spell out that purpose. This does not mean that such buildings do not have to be accessible. Renovations automatically trigger requirements of the ADA code such as accessible parking, accessible path and entrance upgrades.

e. Auxiliary support buildings, such as maintenance and facility shops, office areas, and warehouse/campus supply buildings or physical plants where public access is limited to vendors and staff. These buildings are lowest priority for spending ADA remediation monies unless students work in these buildings or the work in the building is part of an offered educational program. An example of an offered program that must be accessible to disabled students would be a technical college air conditioning or building maintenance class where the students actually work on campus equipment such as electrical or HVAC systems.

When students work in a building as student staff, most campuses address the needs of a disabled student on a case by case basis instead of spending capital improvement monies to make the area fully accessible. This would be covered under Title I.

Under Title I – Faculty and staff offices must be located on an accessible path served by accessible toilets, conference rooms, break rooms, and all other services provided to able-bodied faculty or staff (i.e. faculty workout room or day care center).

Under Title II (Program Accessibility) ADA monies should be spent first to bring sites and buildings most directly connected to the primary function of the college into compliance with the ADA (see category "a" above).

Then under both Titles II and III, spend next available remediation funds on support or common use public buildings that see a lot of traffic such as outlined in categories "b" and "c" above. Some buildings will fall into several categories so the nature of the programs taught in these buildings and the specific parts of the building used for the program should be considered.

An example of such a building would be a performing arts building where the theater arts are taught. Monies would first be spent in the building to make sure students with disabilities had full access to the program and support facilities such as toilets etc. A good example of providing program accessibility for students (and also the public) in such a building would be installing a wheelchair lift to provide access to the stage.

Only after the program needs are provided would the box office or accessible public seating be considered for ADA upgrades with Title II remediation funds. Even if the funds are for general ADA remediation, correcting the program issues first is appropriate and sensible.

Note: Under Title III, some accommodation is required in order to offer <u>public</u> performances in the building. Often, a school will receive specific Title III grants to bring the public areas of such a building into compliance with the ADA. In such cases it is permissible to spend these monies for the purposes outlined in the grant. Since all schools have multiple sources of funding for remodeling and capital improvements, remediation planners should consider the cost savings of bringing an entire building or area up to full accessibility when funds are available.

- 2. After categorizing the buildings the FPD should identify buildings that will be razed or replaced during the next 5 years. These buildings should not be part of your remediation plan spending except for low budget items such as fixing a broken ramp, putting up directional signage or raising the height of a lavatory or mirror.
- 3. After buildings to be replaced have been identified and removed from the ADA master building inventory, an ADA consultant can be hired to begin inspecting the buildings chosen for ADA remediation. The consultant should make

recommendations about which elements must be changed or installed to provide full accessibility for the programs being offered in that building. This may be done one building at a time or campus wide.³

At schools where an active campus ADA committee is in place but staff makes the initial recommendations, the results from the steps out lined in the previous headings 4 and 5 should always be brought before the ADA committee for a discussion of specific program needs.

An example might be a science lab building in which none of the labs are accessible. The consultant would advise about options to make at least one of each type of lab and the support facilities (toilets, drinking fountains) accessible. An experienced consultant will not only advise the school about elements that do not comply with the current law but also discuss alternatives to full compliance when appropriate.

The staff and ADA committee should analyze buildings that get a great deal of student traffic but are not fully accessible. Managers should seek information from disabled students and staff to discover accessibility issues that are less obvious to others.

A great question would be: "Is there a building or area that you have had a difficult time accessing?" This often will be a ramp or door that is very difficult for students on wheelchairs to use. Your disabled students will know the problem areas and these items should be on the top of any priority list for spending available remediation monies on a building or site.

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³ A campus built in the 70's had narrow toilet room doors in every building that needed widening for wheelchairs. The best use of the ADA funding was to make the toilet room door corrections to all buildings at once rather than one building at a time. The campus-wide door remediation project produced significant cost savings for the facility managers.

I have found that campuses and systems that seek input and work with their HC students and faculty generally have lower rates on litigation than those who don't.

4. Program Accessibility Considerations

This section looks at prioritizing your campus remediation plan.

The site audit report your accessibility consultant prepared includes compliance issue comments and recommended actions for the site. The key maps in the audit binder show the locations of the problem areas. This report gives the university a basis for scheduling the ADA remediation program with funds that become available from any source. A CD copy of Title II is provided as a reference with this report. See Subpart D of Title II for an in-depth understanding of the law as it relates to universities and program accessibility. The building assessments will be done as requested by the University after the campus site remediation work has been completed and as funds are available.

The university will be wise to follow a prescribed method for accessibility related remediation of the site and buildings based on the following priority sequence:

A. Issues related to site access and accessible path (AP) must be dealt with first to ensure program accessibility is met for the campus in general. There can be some reasonable accommodation provided related to the site but in general the university should make the campus as accessible as possible so disabled students can readily access the buildings and services provided. The term "campus program accessibility" describes this effort.

Typical issues on the site are:

- 1. The AP (Accessible Path) from all <u>site arrival points</u> to AP connector path. Site arrival points include designated public transportation stops, passenger loading zones, accessible parking spaces.
- 2. The AP connecting all buildings which offer programs to the public (students) and or support services.

Note: One accessible entrance, located on an accessible path, per building is the minimum required to hold readily accessible programs in a building or at sports fields, gymnasiums etc.

Examples of programs areas include labs, studio spaces, lecture halls, etc. Support services associated with these areas include student common use computer rooms, locker rooms, toilet rooms, bathing areas, lounges, dining areas and food service, work out rooms for common use by all students, and similar. Performance halls and libraries can be considered both common use areas and support areas.

- 3. Accessible building and directional signage per ADAAG 4.1.2 (7).
- 4. Accessible Parking per ADAAG 4.1.2 (5) regarding the number of required accessible spaces and van spaces. The location of parking in close proximity to building entrances and the dimensions of parking spaces signs are also important.
 - See also Section 4 above for additional comments about site requirements.
- B. <u>Specific buildings and outdoor program areas</u>: After the university has provided an accessible path and an accessible entrance to all buildings, sites and support

facilities where programs are provided then the next step is to look at existing buildings and the outdoor program areas to assess the <u>program accessibility</u> of each.

Growth-driven additions and renovations to the campus site and buildings are often the best opportunity for accessibility upgrades.

The site audit report with recommendations gives you the information about areas that are not compliant. The considerations in this section of the audit give you the approaches you may take for wisely spending funds provided for ADA upgrades and remediation.

A university may continue the practice of moving classes, offices, etc. to provide a reasonable accommodation to disabled students and faculty in lieu of retrofitting but I highly recommend the ADA committee craft a long term action plan for upgrading the entire facility to full accessibility.

When looking over the key maps for non-compliant elements inside the buildings the following checklist should be considered:

- 1. AP (including vertical accessible path) to all rooms where programs are offered. See examples at 1b above (in this Section 6).
- 2. AP to student support facilities in the building. These include in order:
 - a. In order to provide program accessibility you must provide a minimum of one accessible toilet per gender per floor OR, in places where a compliant elevator exists, then you may elect to provide one accessible toilet per gender for the building area

served by the elevator. If toilet rooms are being altered then ADAAG 4.1.6 (3e) must be used.

If a new unisex toilet room is installed to provide the program accessibility, use both ADAAG 4.1.3 and 4.1.6(3e) and ADAAG 4.22 and the 2010 ADA/ABA Standard, Section 213.2.1

- b. In sports facilities or places where students or staff change clothes and shower the following ADAAG sections shall be used for altering such rules to provide program accessibility:
 - 1. For locker dressing rooms use ADAAG 4.1.6 (h) and the 2010 ADA/ABA Standard, Section F222.
 - 2. For shower bathing facilities use ADAAG 4.1.6 (e.iii) and the 2010 ADA/ABA Standard, Section 213.
 - 3. When single occupancy unisex shower/bathing rooms are installed to provide program accessibility for either students or staff then use ADAAG 4.1.3 (11), 4.22, 4.23 and the 2010 ADA/ABA Standard, Section 213.2 & 213.2.1 for new construction requirements.
- c. Accessible drinking fountains Since adjusting existing drinking fountains to accessible heights is not covered under ADAAG 4.1.6 then adjusting the drink fountain (DF) height as part of program accessibility can only be recommended, not required. Of course, on floors where you already have two existing fountains it would be easy to adjust the

- heights to accommodate the hi/lo rule found at ADAAG 4.1.3 (10). If and when DF are replaced then program accessibility necessitates full accessibility under the rules for new construction at ADAAG 4.1.3.
- d. All other support facilities such as common use computer labs, libraries, food service areas, staff offices, common use work out rooms and even spa areas should use ADAAG 4.1.6 and 2010 Standard Section F2.02. Note that most of the support services areas are NOT considered primary function areas covered by ADAAG 4.1.6 (2) and the 2010 ADA/ABA Standard, Section F2.02.4, unless specifically used as part of a program. For instance: a common use computer lab is only a primary function of a specific program when it is used in support of computer classes.
- e. In existing buildings primary path rules come into play when the building is altered for any reason including altering for the purpose of providing program accessibility in a facility. So any toilet room that serves the path to an accessible program must also be accessible (ADAAG 4.1.6 (2)).
- 3. Program requirements also extend to campus facilities and those leased by the college that provide services and activities. These may include but are not limited to: gymnasiums and performance halls including the team locker room areas and bathing facilities, dressing rooms, smoking areas, outdoor picnic areas, art viewing areas, arenas, sports fields and shuttle services. In order to provide programs in these facilities the area must be on an accessible path and must provide accessibility for any elements that are necessary for full participation.

Examples of elements are seating in the gymnasium or arena, accessible hearing devices, wheelchair spaces that provide multiple view possibilities, and similar.

A common program accessibility option is to provide minimum one team and common use locker/shower area for disabled participants OR one single-occupant unisex toilet/shower/change room for disabled students and coaches.

As part of the reasonable accommodation strategy Tennessee State University found that relocating their football programs to the accessible Titan's Stadium was a better choice than retrofitting or building a new stadium.

C. Codes: Accessibility Remediation must comply with Title II requirements for new construction and alterations. Title II 35.151 establishes two standards for design, construction or alterations. They are UFAS –Uniform Federal Accessibility Standards and ADAAG (28 CFR part 36). Under the 2010 ADA/ABA Standard, UFAS will no longer be referenced

Currently, the Tennessee Board of Regents uses IBC 2006/ANSI 2003 or ADAAG (when more stringent) for buildings with accessible programs and UFAS for dormitories and housing. The scoping in the 2010 ADA/ABA Standard must be used when planning for program accessibility upgrades.

This information is important when initiating remediation either in house with plant maintenance personnel or with outside consultants and contractors.

D. While under contract with TBR as accessibility consultant, PDS America is available to answer any questions that arise. Barry Bonifay with PDS America can be reached at 615-335-2336

E. Facility management personnel should establish and maintain records of all proposed and completed remediation efforts, minutes of meetings etc. and consultant reviews and recommendations for use if the college is ever party to a ADA complaint made with the U.S. Department of Justice.

5. The New 2010 ADA & ABA Standards

The documents for Title II and Title III updates (both below) show the following formula for enacting the legislation signed by the Attorney General. THIS IS A FRAGMENT THAT DOES NOT RELATE TO ANYTHING ELSE.

Current - ADAAG will be referred to as the 1991 Standards ADA ABA 2004 will be referred to as 2010 Standards THIS INFORMATION SHOULD BE PRESENTED AT THE VERY BEGINNING OF THIS DOCUMENT. "2010 Standard" is not a descriptive name.

The new 2010 Standard was originally published as the 2004 ADA/ABA and is identical to that document. Since the new standard is not yet published we will refer to the published document in this following discussion. The paragraph and section numbering is identical in both codes.

Chapter 2 covers scoping, and is subdivided into ADA and ABA sections. The ABA section covers Title II - Government Facilities and the ADA section covers Title III - Public Accommodations. The following chapters 3-10 provide the technical design information element by element (accessible benches, reach ranges, Clear Floor Spaces and countless others).

If you have the 2004 ADA/ABA, then you have the 2010 Standard. I recommend you also print out the Title II and III links below because they give background to many of the changes.

Here are the two links to the 2004 ADA/ABA which will change in name only to the 2010 Standard. The links provide both text and figures.

http://www.access-board.gov/ada-aba/final.cfm

http://www.access-board.gov/ada-aba/index.htm

6. Appendix A

During the first decade after the passage of the original 1992 ADAAG, many schools made attempts to remove "barriers to accessibility". They put up grab bars in toilet stalls that were not accessible; they installed striping and signage to make accessible parking in lots with steep slopes. This was due primarily to staff members unwittingly using the Title III – 28 CFR part 36 which in subpart 36.304 called for "barrier removal" instead of the "program accessibility" requirements of 28 CFR part 35.

Accessibility law is very confusing. Barrier removal is not required under Title II. Today Facility Managers in campuses all across the nation believe their buildings are accessible because they used the barrier removal guideline in 28 CFR part 36. Those rules only required removal of barriers in existing buildings if the correction was "readily achievable", that is, easily accomplished and relatively inexpensive. The Title III barrier removal rules were

intended for use by public accommodations such as businesses, not for government facilities such as universities.

The intent of Title II, on the other hand, was to make government owned facilities meet a higher standard of accessibility since most government buildings are used by all citizens. Compounding the confusion, there was also a note directing government buildings to use the 1992 ADAAG for design standards. But there was never any intent for Title II facilities to use Title III scoping, which is what scores of colleges did back in the late 90's.

7. Dormitories and Student Housing.

USE THIS CHAPTER ONLY FOR GRANTS SPECIFICALLY EARMARKED FOR STUDENT HOUSING ADA UPGRADES.

History: The 91 Standards included dormitories under chapter 9 requirements for transient lodging. Dormitories are also scoped under the requirements of the fair housing act (<u>FHA</u>). The <u>International Building Code (IBC) 2006</u> chapter 11 points to <u>section 1107.6.2.1 – R-1</u> for hotels and <u>1107.6.2 – R-2</u> for dormitories.

From the 2010 Standard:

Definition: Transient Lodging - a building or facility containing one or more guest room(s) for sleeping that provides accommodations that are primarily short-term in nature. Transient lodging does not include residential dwelling units intended to be used as a residence, inpatient medical care facilities, licensed long-term care facilities, detention or correctional facilities, or private buildings or facilities that contain no more than five rooms for rent or hire and that are actually occupied by the proprietor as the residence of such proprietor.

Advisory 224.1 General: Certain facilities used for transient lodging, including time shares, **dormitories**, and town homes may be covered by both the 2010 Standards – section 224 and the Fair Housing Amendments Act. The Fair Housing Amendments Act (FHAA) requires that certain residential structures having four or more multi-family dwelling units - regardless of whether they are privately owned or federally assisted - include certain features of accessible and adaptable design according to guidelines established by the U.S. Department of Housing and Urban Development (HUD). This law and the appropriate regulations should be consulted before proceeding with the design and construction of residential housing.

Some campuses buy nearby dwellings to rent to students. Such a house, if rented to students as a dormitory, would fall under the 2010 Standards - Section 224. If the house was instead rented as married student housing it would NOT be required to be accessible because it would only have to comply with the less stringent FHAA rule since there would not be 4 or more multi-family units in the building. This means that for stand-alone single unit houses, the university may want to consider renting out these units to a single renter to avoid having to meet the dormitory requirements. This is an appropriate strategy for using funding because normally these units are set to be razed for future facilities expansion.

Note: States and local jurisdictions sometimes have additional or different requirements for college dormitories than the federal reuirements.

8. Implementing Title II and Title III

On Friday, July 23, 2010, Attorney General Eric Holder signed the final rule revising the Department's ADA regulations, including its ADA Standards for Accessible Design. These regulations will be

published in the Federal Register. The revised regulations will amend the Department's Title II regulation, 28 C.F.R. Part 35, and the Title III regulation, 28 C.F.R. Part 36. Appendix A to each regulation includes a section by section analysis of the rule and responses to public comments on the proposed rule. Appendix B to the Title III regulation discusses major changes in the ADA Standards for Accessible Design and responds to public comments received on the proposed rules.

In general, these final rules will take effect 6 months after the date on which they are published in the Federal Register. Compliance with the 2010 Standards for Accessible Design is permitted after that date, but not required until 18 months after the date of publication. The Department has prepared fact sheets identifying the major changes in the rules.

<u>Title II: Final Rule amending 28 CFR Part 35:</u> <u>Nondiscrimination on the Basis of Disability in State and Local Government Services -- (HTML)</u>

Text of Revised Final Title II Regulation. This revised title II regulation integrates the Department's new regulatory provision with the text of the existing title II regulation that was unchanged by the 2010 revisions. **The new language is in a bold typeface.**

Title III: Final Rule amending 28 CFR Part 36: Nondiscrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities -- (HTML)

Text of Revised Final Title III Regulation. This revised title III regulation integrates the Department's new regulatory provision with the text of the existing title III regulation that was unchanged by the 2010 revisions. **The new language is in a bold typeface.**

Appendices to Titles II and III (Click On or Copy to Browser):

Appendix B: Analysis of the 2010 ADA Standards (HTML) | PDF format

Fact Sheets (Click On or Copy to Browser):

Highlights of the Final Rule to Amend the Department of Justice's Regulation Implementing Title II of the ADA

Highlights of the Final Rule to Amend the Department of Justice's Regulation Implementing Title III of the ADA

Adoption of the 2010 Standards for Accessible Design

Questions?

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