

CODE INTERPRETATIONS					UPDATED: 5/13/16
	Issue	Agreement	Code Section	Source	Publication / Notes
1	Speciman Pass-Through	New Construction: Request parallel approach 48" high maximum reach range to highest operable part. Diagonal approach is ok, allowing knees and toes to encroach under lavatory. In existing facilities: Equivalent facilitation is acceptable by providing a shelf in an accessible location within the restroom.		March 2013 Code Call	
2	Lockers	ISA not required on accessible locker. Lock mechanism measured by force <5#, no grasping, pinching, twisting etc. Personal padlocks are exempt.		May 2013 Code Call	
3	Airblade hand dryers	Considered noncompliant due to being problematic when installed at 34 1/2" max for wheelchair users. 3PRs will ask for a compliant paper towel dispenser to meet accessibility requirements.		June 2013 Code Call	
4	Shower in single accommodation toilet room floor slope too flat to drain and water accumulates	Recommend shower design with water supply on short wall to avoid overspray into center of toilet room.	Figure 11B-608.2.3	June 2013 Code Call	
5	Curtain installed at accessible toilet stall when the partition door would not fit	Curtain is not acceptable in lieu of toilet partition door.		July 2013 Code Call	
6	Faucet valves- must remain open for a minimum of 10 seconds	Controls for faucets shall comply with Section 11B-309. Hand-operated metering faucets shall remain open for 10 seconds minimum. The water must stay on for a minimum of 10 seconds while one's hands are under the faucet. Sutter's preference is that the sensors need to work efficiently, and one should not have a problem activating the sensor.	11B-606.4	February 2014 Code Call	
7	Lavatory- floor clearance center vs. offset	Due to the code not specifically stating that the clear floor space must be provided center of the lavatory, Sutter's preference is that the offset can be up to 3".	606.2 Clear Floor Space. A clear floor space complying with 305, positioned for a forward approach, and knee and toe clearance complying with 306 shall be provided. 1115B.4.3 Accessible lavatories. Lavatories required to be accessible shall comply with this subsection. The requirements of this subsection shall apply to lavatory fixtures, vanities and built-in lavatories.	February 2014 Code Call	BIN 1
8	Tactile signage on a Hospital corridor	Crash guards do not conflict with accessible signage (18" x 18" clearances), as long as they don't protrude more than 4".		February 2014 Code Call	

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9	Multiple Passenger Loading Zones (because the overall length of PLZ space provided exceeds 100'). If more than one accessible PLZ is required at a hospital, are all accessible PLZs required to be covered?	No, only one needs to be covered.	11B-206.4.10 Medical Care and Long-Term Care Facilities. Weather protection by a canopy or roof overhang shall be provided at a minimum of one accessible entrance to licensed medical care and licensed long-term care facilities where the period of stay may exceed twenty-four hours. The area of weather protection shall include the passenger loading zone complying with 11B-209.3 (Medical Care and Long-Term Care Facilities) and the accessible route from the passenger loading zone to the accessible entrance it serves.	March 2014 Code Call	
10	Alternate roll in shower compartments	Alternate roll-in type shower compartments shall be 36 inches (915 mm) wide and 60 inches (1525 mm) deep. 36" is an absolute dimension, therefore tolerances apply. The tolerance would be based on industry standards (depending on material).	11B-608.3.3	March 2014 Code Call	
11	Toilet controls centered atop of the tank	Functionally a bad solution, but could be accepted as a readily achievable solution (vs. doing nothing). Project teams should stay away from this type of flush mechanism toilet, especially in new construction.		March 2014 Code Call	
12	Toilet Room accessories outside of toilet rooms (other than dressing rooms)	The 40" requirement doesn't exist in the ADA, it does in the CBC. Elements outside of a toilet room do NOT need to conform to the 40". Mirrors should match toilet room requirements, however are not required to.		March 2014 Code Call	
13	Nurse call devices	If the cover plate sticks out from the face of the surrounding wall no more than 1/4" than it would not be considered an issue (some manufactures do not make flush devices, therefore the 3PR must confirm). If the coverplate does stick out more than 1/4", the device must be 12" clear above the grab bar so as to not interfere with the use of the grab bar. The lanyard may project into the area of the grab bar and is viewed as a safety requirement.		April 2014 Code Call	
14	Locking mechanisms	Just 5% of the lockers need to have an accessible locking mechanism. As long as the manufacture offers an accessible key (ex. large paddle key), there does not need to be a special lock. US Access Board has said keys are exempt.		April 2014 Code Call	
15	Vendor provided equipment	There could be two different scenarios: 1. The space is owned and operated by Sutter- the space and machine must comply. We ask that the 3PRs ask for cutsheets of the vending machines to verify compliance. 2. The space is leased by a third party- Sutter will look at the agreements with the vending machine companies. The 3PRs ask the question as to if the space will be owned and operated by Sutter. If the space is leased, we can handle this internally.		April 2014 Code Call	

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16	Forcing the city to fix sidewalks	For barrier removal - project teams are to submit notification to the city and the teams are to track responses on their notifying the owner log. New construction-the team must define the accessible route to the public right of way.		April 2014 Code Call	
17	Exterior paths of travel to the public sidewalks	Only one exterior path of travel to the public sidewalk is required per project.		April 2014 Code Call	
18	Door maneuvering clearances within an accessible toilet stall	Everyone agreed that grab bars can overlap into the door maneuvering clearances. The door is permitted to swing over hatched portion of maneuvering clearance.		May 2014 Code Call	
19	Gender signs	Everyone agreed that gender signs are not required on doors to toilet rooms in patient and procedure rooms.		May 2014 Code Call	
20	Tactile Signage: Clear - 18" x 18" Box	An 18" x 18" box is required to be out of the way of a door within 45 degrees of open. Sutter's preference is to not allow objects that interfere with physically reading the Braille.	11B-703.4.2- Signs containing tactile Characters shall be located so that a clear floor space of 18 inches minimum by 18 inches minimum, centered on the tactile Characters, is provided beyond the arc of any door swing between the closed position and 45 degree open position.	June 2014 Code Call	
21	Drinking Fountains: Hi Low	In existing buildings, where it is technically infeasible to provide a high and low drinking fountain, equivalent facilitation would be to provide a paper cup dispenser. Project teams can't do this in a new buildings or new construction. A cup dispenser could also work for readily achievable fixes in barrier removal projects.	The 2013 CBC and 2010 ADA clearly require separate high and low, and do not have language regarding 'other means'.	June 2014 Code Call	
22	Computer Stations – Protruding Object issue & Accessible Routes	If the computer station is observed during the APR in a circulation path-the 3PR should ask for them to be moved. Recommend putting them in back of exam room. 3PR will not accept the team having a policy in place to fold up the computer station after each use. Cane detectable elements underneath may resolve the stations as being a protruding object. ADDITIONALLY (as of 2/11/16) : until further notice, for Sutter purposes, we will honor the 12" cane detection requirement rather than 4" at standpipes.		June 2014 Code Call / Feb 2016 Call (additional detail)	
23	Detectable Warnings	Ambulance Entry - Detectable warnings are not required, as long as the area in question is not a public access point.		June 2014 Code Call	
24	White Boards	Agreed that a practical application of the 48" reach-range requirement would have approximately 1/3 of the board below the 48" maximum reach range (acknowledging that extending a writing surface below 30" is not usable by most people) and Staff-only white boards and chalk boards are essentially exempt from the reach range requirements.		October 2014 Code Call	
25	Path of Travel- Interior Stairs	Stairs should not typically be a part of Alteration 'Path of Travel' work.	ii. CBC 11B-202.4 and 'Path of Travel' definition	October 2014 Code Call	

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26	Toilet Rooms 'Serving the Area' of Alteration	Sutter requires a single toilet room (of each type, male/female, staff, patient, visitor) that serves the area of alteration to be made compliant.		November 2014 Code Call	
27	Does the allowed overlap apply only to the 'clearance'? Or to both 'clearance' and 'maneuvering space'?	The 'Maneuvering space' is not part of the 'Overlap' section 11B-604.3.2 and is not necessarily handled the same. Trash cans not ok. Accessories to the toilet area are allowed in the 'maneuvering space'.	11B-604.3.1	December 2014 Code Call	
28	Accessible Shower Controls - Does the entire 360 degree operation need to be within the 'control area' defined in 11B-608.5.2 ?	Both the diverter and the water controls should be within the 19-21 inches range from back wall including operable parts.	11B-608.5.2	January 2015 Code Call	
29	Does the 'Path of Travel' obligation require that vision panels in doors be corrected to comply with current code (43" maximum height)?	Yes, per the CBC, no per the ADA.		January 2015 Code Call	
30	If the existing vision panel is at 45", is this a good candidate for 'Equivalent Facilitation'?	The best approach would be to ask for hardship exemption.		January 2015 Code Call	
31	Exterior Walking Surface Tolerances - What if the situation slightly exceeds the guidance provided in the Access Board report? Can our 3PR's accept the surface as compliant in their 'professional opinion' due to issues of practicality / reasonableness?	Yes.		February 2015 Code Call	
32	Door and gate opening force exception- Where does this exception apply?	Only as a voluntary decision by design team to utilize the exception: At EXTERIOR doors, when multiple doors, if one is a powered door, others can have force to open up to 8.5 lbs. Then requires high-low etc.	11B-404.2.9	February 2015 Code Call	
33	Doors – Force to Open – Unlatching-What is the appropriate requirement?	Unlatching is NOT limited to 5 lb. of force. Code and ADA text could be clearer. Marsha Mazz at Access Board previously noted unintended language that appeared to be saying that unlatching is limited to 5 lbs, but it is not. Maximum allowed force required to unlatch is not clear.		February 2015 Code Call	
34	Door Hardware Location - Is it ok for an extra-long door pull to extend beyond the range specified?	It is OK. If it extends beyond the required range. To be acceptable (compliant) it must be 'Useable'. Factors to consider when determining if the hardware is 'Useable': Force to operate, profile, friction, size, height, how much in range?, material, size etc. There is no closed fist requirement.	11B-309.4	March 2015 Code Call	
35	When a shower with a bench is provided next to the shower area, would this require that 'Dressing Room' requirements of 11B-803 be enforced?	Yes. It was noted that sometimes that makes the facility take out the bench entirely.		March 2015 Code Call	BIN 7

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36	REVISED: Is a Paper Towel Dispenser allowed in 60" x 56" 'clearance'?	In April 2015 it was determined that this condition was Not allowed. Also, considered as a 'bad practice', that should be discouraged. On a case-by-case basis, 3PR may allowed as an 'equivalent facilitation'. REVISED CONSENSUS: It was agreed that the code does NOT clearly specify that a PTD is not an allowed as 'associated' element, and therefore, on Sutter projects we will assume that they are allowed, with the understanding that the bottom must be set at least 36" AFF and that close to 40" is preferred. Each Access Specialist will determine compliance. This effectively changes the Sutter position previously taken.	11B-604.3.2	April 2015 Code Call / REVISED DECISION - Jan 2016 Code call	
37	Is a free-standing or semi-recessed trash can allowed in 60" x 56" 'clearance'?	Not Allowed		April 2015 Code Call	
38	Does the Blue Key Turner satisfy the requirement for 'not require tight grasping, pinching, or twisting of the wrist'?	Yes. Noted that the elbow hinge allows a lever of sorts.	11B-811.4 and 11B-309	June 2015 Code Call	
39	Over-sized locker keys – How do we determine minimum allowed size? See second picture below.	Case-by-case judgment-call of 3PR	11B-811.4 and 11B-309	June 2015 Code Call	
40	How do we determine when a thumb-turn lock is big enough to be ok at a single-user toilet room?	Use the door-force push-tool to unlatch, if it works, then it should be considered as compliant	11B-811.4 and 11B-309	June 2015 Code Call	
41	EV Charging Stations - What requirements should be applied?	Governor's Office guidelines. Note that DSA has proposed requirements for the 2016 CBC, which is an alternative standard for us to use.	11B-228 and 11B-812 (2016 CBC)	June 2015 Code Call	
42	Minimum Letter size for Evacuation Maps	ADAS has a 5/8" minimum size. CBC has an exception to size requirements specifically for Evacuation Maps.	11B-703.5.5	June 2015 Code Call	Bill and Carol to follow-up
43	Employee Workstation Exemption	Trumps the 'Common Use' designation	11B-203.9	June 2015 Code Call	BIN 11
44	Specialty Exam Rooms	Noted that the aisle requirement does NOT apply at anything that is not an: Exam Table, Treatment Table, Bed or Lounge Chair. For example, an optometry chair or phlebotomy chair. The term 'specialized', is not a defined term, but rather a common-language use of the term.	'General' exam rooms are defined by OSHPD in CAN 2-11B as those that meet the definition in the CBC for an "Exam Room" (Code Section 1224.3)	July 2015 Code Call	
45	Policy: 'Home Location' for equipment / furniture	The idea of having a home location on the basis that the code-required aisle must be kept clear is supported, and should be stated more forcefully, not just as a 'preference'. Sutter wants to ensure that we are in a defensible position if challenged. Also it was noted that he has proposed to DSA to change this language for the 2016 CBC to align with the 1224 code section text which specifies the clearances do not apply to furniture or non-permanent equipment.	See Topic 5 in BIN 6	July 2015 Code Call	
46	Policy: Wall-mounted objects / aisle; treat similar to an 'Accessible Route'	We frequently encourage design teams to establish one side or the other as a non-circulation path.	See Topic 6 in BIN 6 and 11B-805.4.1	July 2015 Code Call	
47	Policy: Consult with PAC / AHJ when the aisle requirement would change the way we practice medicine'		See Topic 6 in BIN 6	July 2015 Code Call	
48	Turning Space for Patient Use	Professional medical and dental offices shall be made accessible and shall also comply with Section 1109B. This requires that 100% of all exam, diagnostic and treatment rooms must be accessible, both OSHPD and Non-OSHPD.	1105B.3.2 item 4	July 2015 Code Call	

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49	Diagnostic and treatment areas and, where applicable, at least one dressing room, sanitary facility, etc. for each unit or suite shall be made accessible	Access for the general public, requires the ability to turn-around and exit a room or space. An accessible room for the public that does not have a turning space: While it is clearly preferred, not identified as a 'code requirement'.	1109B.6	July 2015 Code Call	
50	Electronic Medical Records – Accessibility Required in Non-OSHDP Buildings	Built-in equipment consoles include recessed or wall mounted Electronic Medical Record (EMR) systems. These units must also comply with US Access Board Section 508 Standards for Electronic and Information Technology. A 30-inch by 48-inch clear floor space, in compliance with Section 11B-305, shall be centered in front of the display screen. Wall-mounted units shall comply with protrusion limits prescribed in Section 11B-307.2. Touch screen units shall be allowed to be vertically mounted with the centerline of the display screen no more than 52 inches above the floor in compliance with Section 11B-707.7.1.1. These units will need the capability of an alternate input method such as a wireless keyboard made available to those would need it.	OSHDP CAN 2-11B – Page 18 and 11B-805	July 2015 Code Call	
51	Evacuation Signage	required 5/8" minimum height for lettering		September 2015 Code Call	
52	Dimensional Tolerances for Surface Accessibility	Our 3PR's all measure with 2' smart level. DOJ and Access Board have taken the position that slope maximums do not constitute a 'high and low range', and therefore the concept of 'construction tolerances' is allowed.		September 2015 Code Call	
53	Exam Lights Height	Vertical clearance shall be 80 inches high minimum. We do not consider the light to be a protruding object because generally the lights are considered to be movable objects, they are staff operated, can be returned to a position over the cane-detectable bed/table, and are generally part of an employee work area.	11B-307.4	September 2015 Code Call	
54	Miscellaneous Signs	Displayed verbal, symbolic, tactile, and/or pictorial information. New or altered signs shall be provided in accordance with Section 11B-216 and shall comply with Section 11B-703. The addition or replacement of signs shall not trigger any additional path of travel requirements. Exceptions: Building directories, menus, seat and row designations in assembly areas, occupant names, building addresses, and company names and logos shall not be required to comply with Section 11B-216. Signs that provide direction to or information about interior and exterior spaces and facilities of the site shall comply with Section 11B-703.5. If a self-made sign constitutes a 'permanent room name' it would require that a compliant sign be provided.	2013 CBC Section 202, 11B-216.1, 11B-216.3 and 11B-703.5	September 2015 Code Call	
55	Solutioning – Reach-Range at Office-Building HWF	Best solution to reach range, install PTD and Soap Dispenser on a sidewall whenever possible. Side approach may be an option for existing conditions at employee areas. All new work must have forward approach. Knee and Toe space must be provided. 20" – 25" deep allowed up to 44" height 20" maximum allowed up to 48" height Lavatory – toe space is limited to 19" depth per 11B-306.2.2 Reach Range is limited to knee-toe space underneath...therefore limited to 19" maximum. Paper towel and soap dispenser reach issues: 19" maximum allowed, 25" deep counters. Awkward solutions so far ('box' on the wall to extend).	11B-308.2.2	September 2015 Code Call	

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56	Employee Area – Loading Dock Slope – 10%	Loading dock ramp required to meet accessibility requirements. If the lower area of the loading dock is vendor-used only, it would still be required to be accessible. If the lower dock is indoors, it does not benefit from an exterior work area exception. The ramp is ultimately considered to be an 'employee work area', and requires an accessible route that must be compliant.	2007 CBC / 2010 ADAS	September 2015 Code Call	
57	Non-Positive Shut-off for Handheld shower devices	This requirement comes from a plumbing concern about siphoning and backflow prevention, no apparent accessibility-specific purpose. For Sutter purposes, we will assume that the non-positive shut-off must be located on the handheld.	11B-608.6 (Shower spray unit and water)	October 2015 Code Call	
58	Non-fixed items	The regulations require accessibility, and that the standards are the logical expression of what accessibility looks like. It is appropriate to apply CBC and ADAS to non-fixed items. For Sutter purposes, we will apply CBC and ADAS to non-fixed items as a Sutter Requirement.	CBC and ADAS, Title V	October 2015 Code Call	
59	Alcoves	The consensus is that this code should apply where E Health Records stations create the 3rd side and at toilet rooms. Judgment should be exercised if the situation is a good candidate for an 'equivalent facilitation' condition.	11B-305.7	October 2015 Code Call	
60	Operable Part Reach Range at Base Cabinets	For electrical outlets the consensus would be to look for another outlet elsewhere in the room that is compliant, if so, counter outlet is not required to be accessible. Technically, the outlet is not within reach range at most of these conditions. With regards to side reach of knobs or handles, the measurement is to the CFS, not the knobs or handles furthestmost protruding point. This is also applied to break rooms, common-use work areas but not at employee work areas/work stations.	11B-308.3.2	October 2015 Code Call	
61	Shower Controls	All of the controls are subject to the reach range requirement (h/c, on/off and diverter. Partial controls inside the allowed range must be fully operable within the confines of the required reach-range box. If a control hangs partially outside of the 'box', then it must be demonstrated to be fully operable without using the portion that hangs outside of the box.		October 2015 Code Call	
62	Signage – Contrast	Per the code language, characters and background are required to be 'light' or 'dark', 'medium' characters or background is not allowed per code. The Sutter Signage Standard specifically requires compliance with the codes. The old code standard of 70% contrast (and formula) is not in the current codes, but still represents a good way to determine adequate contrast and is an allowable methodology for Sutter purposes.	11B-703.5.1	November 2015 Code Call	
63	Forward Reach – Beyond Toes	It may be possible to consider an angled approach to allow a side-reach. Strict forward approach, and strict reading of the code would not allow reach beyond the toes. PAC is comfortable allowing an interpretation that would consider this arrangement as compliant, either based on an angled approach or other.	11B-308.2.1	November 2015 Code Call	
64	Location of Exit Signage at Vestibules w/ Glass doors / Glass walls	Where a tactile sign is provided at double doors with two active leaves, the sign shall be located to the right of the right hand door. Look to Chapter 10 of CBC for required wording (Exit, Exit Route)	11B-703.4.2	November 2015 Code Call	
65	Location of Exit Signage at Stairs	Signs that identify exits shall be located on the approach side of the door as one exits the room or space. Look to Chapter 10 of CBC for required wording (Exit, Exit Route, etc.). Accessibility compliance will need to defer to fire / life safety compliance requirements as articulated by building officials.	11B-703.4.2	November 2015 Code Call	

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66	I-Pad Conference Room Signage	It is unlikely that these will fall under the new (July 1, 2015 supplement) CBC requirements as 'Variable Message Signs' per 11B-703.8. NOTE: See 11B-216.14 scoping, which appears to require only at Transportation or Shelter facilities. 'Temporary' signage is not subject to building accessible requirements, but the facility has an obligation under the ADA to provide accessible communication. The permanent room identification must remain as compliant, including Braille. Otherwise, these types of room reservation devices are not considered as 'signage'.		November 2015 Code Call	
67	Braille	Braille in Sutter projects are required to comply with the CBC Braille requirements, which are very specific and detailed. 'Spot checking', of Braille is a reasonable means of performing monitoring efforts for Sutter. However, if non-compliance is found, then the access specialist should conduct more thorough surveying of signage. Domes that are too wide and overly truncated will be considered not compliant.		November 2015 Code Call	
68	Accessible Routes	The language in both the CBC and the ADA suggest ALL 'Site Arrival Points' must be accessible, but that is unreasonable, and must be interpreted in the context of practical access implications. For Sutter purposes we will require compliant accessible routes from all major/significant site arrival points, and each 3PR will interpret the requirements for accessibility on a project-specific basis for situations that may be either unclear or unusual.	1114B.1.2, 11B-206.2, 11B-206.2.1 and 11B-206.2.2	December 2015 Code Call	
69	Slope of Paving – Beyond Accessible Parking Stalls	There is no limitation of slope beyond the parking stall and access aisle. The code does not restrict or otherwise regulate the use of an automobile drive-aisle for use also as an accessible route, however, it is an obvious hazard and risk. Sutter will need to consider risks in leasing property with these sorts of liabilities.	11B-502.4	December 2015 Code Call	
70	Conference Rooms – Assistive Listening	There is concurrence that for projects that are both small (under 50) and have no sound amplification, it is not likely that assistive listening is required. Depending on the applicable codes / code cycle, the wording for application changes somewhat. In the proposed 2016 CBC there will be an exception for conference and meeting rooms that serve staff only. Caution in educational facilities / application for students even when it is 'staff only'. For 'staff only' applications there should be consideration given to Sutter policies and procedures to provide access to the hearing impaired.	1104B	December 2015 Code Call	
71	Detectable Warnings – Placement at Staff-only areas	Under the pre-2013 codes, the detectable warnings (DW) may be omitted as requested by architect, based on the definition of walk and 'public' area.	1133B.8.5, 1116A.5	December 2015 Code Call	
72	Shower - Depth – (Not Width)	The code does not limit the length of the 'Alternative' shower stall, however, it is widely understood to be poor design and to be strongly discouraged.	11B-608.2.3	December 2015 Code Call	
73	Uneven Toilet Grab Bars	The code does not prohibit setting grab bars in toilet rooms at different heights.	11B-604.5 and 11B-609	December 2015 Code Call	
74	Curtains in clearance areas	Stacking of curtains within the required door maneuvering space is not allowed. It is understood that curtains may traverse the required door maneuvering areas as long as there is a location where they 'stack' that is NOT within the required maneuvering area.		December 2015 Code Call	

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75	Handrail Extensions at inside of switchback stairs. Does the handrail extension need to extend 12" + stair width on both sides?	It was agreed that the full handrail extensions are required by code on both sides of the stair. <i>Exceptions: Extensions shall not be required for continuous handrails at the inside turn of switchback or dogleg stairs and ramps</i>	11B-505.10	January 2016 Code Call	
76	Tactile Spacing at unequal height	For Sutter purposes, each 3PR will use discretion and good judgment in this code application, and that in this example, the spacing would be considered as compliant.	11B-703.2.8	January 2016 Code Call	
77	Signage Inserts	For non-temporary signage, glare is a legitimate concern and 3PRs may cite lack of glare as a code-compliance issue. It was noted that we lose control of accessibility compliance when inserts are used. And it was noted that the most common use of inserts is for 'temporary' messages, such as staff names, conference room reservation info, etc. Question remains, what constitutes 'temporary'?	11B-703.5 and 11B-703.5.1	February 2016 Code Call & March 2016 Code Call	
78	Sinks in Breakrooms	as a Sutter standard, forward approach is required	11B-606.2 Exception 1	February 2016 Code Call	
79	Urinal Rim Height	17" maximum rim height requirement is accepted even when the base of the urinal is above 17" max.	11B-605.2	February 2016 Code Call	
80	Storage Rooms – Door Maneuvering Clearance. Does revised code mean that we must provide compliant door maneuvering clear areas inside storage rooms?	For Sutter purposes, if one considers the storage room as non-common-use, then door maneuvering clearances are not required.	11B-203.9	February 2016 Code Call	
81	Dressing rooms in diagnostic, treatment and patient change areas.	For Sutter purposes, an accessible dressing room is required in these type of spaces. The scoping requirements for access is 5% of bays for dressing areas. Each bay may be considered as a 'dressing area'. 1. Some degree of 'Push-back' developed for application at 'medical office buildings' (MOB's). Issue was brought to the Sutter Planners Roundtable for discussion with Dan Conwell – Sutter Director of Design and Planning, confirmed that: A. Accessible dressing rooms are required at MOB's where a 'full-body change' is required. B. Individual Pre-op and Post-op bays will not be designed to meet accessible dressing room requirements as long as an accessible dressing room is provided to serve that area/unit. Sutter will provide accessible dressing rooms at areas where full-body changing is required (such as radiology) , in the Diagnostic and Treatment areas, but not in patient bedrooms.	1109B.6 and 11B-805.5	February 2016 Code Call & March 2016 Code Call	
82	Accessible Lavatory - 18" to Side Wall	For the purpose of Sutter projects, we will not consider base cabinets as constituting a 'side wall or partition'. Thus a 30" wide knee space at a base cabinet would be considered compliant.	11B-606.6	March 2016 Code Call	

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83	Accessible Route to a Public Way – In the Driveway	<ol style="list-style-type: none"> 1. For the purpose of Sutter projects, we will consider it to be compliant to provide an accessible route that coincides with a vehicular way, one example shown in the drawing above. 2. Detectable warnings are clearly required at the building end of the hazardous vehicular driveway (as shown above). 3. Detectable warnings are not to be provided at the street end of the hazardous vehicular driveway, unless specifically required by a building official. 4. As Sutter Policy; on NEW construction, we will always separate the pedestrian route from the driveway, so that the scenario shown above does not happen. 5. In the event that an existing pedestrian route is already separated from the driveway; then providing an accessible route as a result of ‘path of travel’ obligations must continue to provide separation of pedestrian and vehicular route. 	11B-206, 11B-206.2.1, 11B-206.3	March 2016 Code Call	
84	Reach Range at Staff Work Areas	It was agreed that employee work-duties are exempt from the application of access requirements. (Force to operate, twisting motion, reach-range heights, etc.)	11B-308.3.2, 11B-205, 11B-203, 11B-203.9	March 2016 Code Call	
85	Clear Floor Space at Urinals	It was agreed that CFS may include knee and toe space under a urinal up to 6” of depth as long as there is 9” of clear toe space height.	11B-605, 11B-605.1, 11B-605.2	March 2016 Code Call	
86	Proper Terminology for Exit Signage	It was agreed that the 3PR may make code-compliance comments regarding terminology of fire/exiting related issues. Sutter will accept the AHJ determination of appropriate terminology for signage. If the project team does not consult with the AHJ, then the 3PR should discuss with Sutter PAC / FPS for decision of next steps.	11B-216.4.1, 1011.4	April 2016 Code Call	
87	EHR / Protruding Object	It was agreed that furniture and fixtures can be used in these sort of settings to ‘cover’ a protruding object, if in the opinion of the 3PR, there is not a practical ‘protruding object’ concern.	11B-307, 11B-307.1. 11B307-.2	April 2016 Code Call	
88	Access inside of Employee Areas – Janitor Closet	Door maneuvering clearances are not required on the in-side of the janitors closet as it would be viewed as a ‘work area’/ ‘workstation’ and qualifies for an exception (11B-203.9)	11B-203.9	April 2016 Code Call	
89	Side Reach at Base Cabinets – Door Pull Issue	For Sutter purposes, it is understood that reach range is defined by the outer-most element, which in many cases is the cabinet hardware or an extended counter top. Scoping of electrical outlets is sufficiently vague in the standards, and will be interpreted by the 3PRs on a case-by-case basis for access. A minimum of one countertop outlet should be within reach range as interpreted by the 3PR. Installing one on an end wall may provide improved reach opportunities although it is best to avoid locations that can only be reached across a corner. (See 1991 ADA Standards Appendix Figure A3). We will encourage an accessible workstation in break rooms as an advisory comment, as early in the design process as possible. (This point has already been made to the Sutter design architects in the March 31st seminar).	11B-308.3.2	April 2016 Code Call	

CODE INTERPRETATIONS					UPDATED: 5/13/16
	Issue	Agreement	Code Section	Source	Publication / Notes
90	Signage – Glare at Glass	Vinyl letters on front of glass with background on backside of glass is non-compliant due to glare on background unless the glass surface has no-glare (sandblasted, etc). Each 3PR will determine what signage is subject to scoping requirements for signage. The 'Company Name' that is exempt from signage requirements is understood to include various iterations of 'Sutter Health', in this case 'Sutter Walk-in Care' is indeed the company name.	11B-216.3, 11B-703.5, 11B-703.5.1	April 2016 Code Call	
91	Signage – Height of Braille	The most recent US Access Board Webinar included a mistake regarding height of minimum Braille and maximum height of tactile letters. Fortunately for us in California, the CBC figures do correctly represent this information.	703.3.10, 703.4.5	April 2016 Code Call	
92	Signage – at Elevators	3PRs should continue to cite non-compliance with CBC Braille requirements. Elevator companies that resist compliance will be noted and usage will be re-considered.		May 2016 Code Call	
93	Mounting Soap Dispensers on mirror	Mirror must be useable, left for individual 3PR judgment-call.		May 2016 Code Call	
94	Elevator Lobby Signage	Signs that were considered in the example stated as 'visual' signage, no Braille needed, assuming that compliant jamb markings and room identification are provided as appropriate.	11B-216.2, 11B-703.2	May 2016 Code Call	
95	Protruding Objects – Inside Doorways, but Outside of Maneuvering Clearances	Sutter will accept that some 'types' of 'circulation path's are low-risk from a protruding object standpoint, and we accept that elements that protrude into these low-risk 'circulation paths' is acceptable, when reviewed and approved by a Sutter 3PR.	1133B.8.6, 11B-307.2	May 2016 Code Call	
96	Parking Structure Pay Stations	Some machines will be classified as P.O.S. and some will not. Those that are P.O.S. must comply with speech output and Display Screen requirements.	11B-707 and 11B-707.5	May 2016 Code Call	
97	Walks or Walking Surfaces - Delineated routes within parking facilities	It is understood that the definition of a 'Walk' is 'An exterior prepared surface for pedestrian use...' and includes a stripped area within a parking garage that is intended for pedestrian use.	11B-403.5.1	May 2016 Code Call	