

EMPLOYEE AREAS						BIN 11
Author:	Bill Zellmer AIA, CASp	Issue Date:	January 9, 2015	Sutter Health - Physical Access Compliance		
	Sutter PAC Group	Revisions:	March 7, 2022	Barrier Interpretation Notice (BIN)		
Topic No.	Topic Name	Brief Description	2019 CBC - Code Text:	2010 ADA Standards - Text:	Sutter Guidance	Additional Information
1	<b>Code Text: Accessibility</b>	Accessibility is required for all areas of all new construction projects, unless the code specifically exempts a room or space.	<b>CBC Section 11B-201.1 Scope.</b> All areas of newly designed and newly constructed buildings and facilities and altered portions of existing buildings and facilities shall comply with these requirements.	<b>Same.</b> Additionally, see advisory comment from the US Department of Justice on Detail Page11.1 of this document.	It is understood that all areas of new construction must meet accessibility requirements unless specifically exempted.	See Detail Page 11.1
2	<b>Code Text: Employee Exemption</b>	Employee Work Areas are exempted from most accessibility requirements.	<b>CBC Section 11B-203.9 Employee workstations.</b> Employee workstations shall be on an accessible route complying with Division 4. Spaces and elements within employee workstations shall only be required to comply with Sections 11B-207.1, 11B-215.3, 11B-302, 11B-303, 11B-308.1.1, 11B-308.1.2 and 11B-404.2.3 unless exempted by other parts of this code. Common use circulation paths within employee workstations shall comply with Section 11B206.2.8. <b>Exception:</b> Receptacles, controls, and switches that are an integral part of workstation furnishings, fixtures, and equipment shall not be required to comply with Sections 11B-308.1.1 and 11B-308.1.2.	<b>Same.</b> Additionally, see advisory comment from the US Department of Justice on Detail Page11.1 of this document.	The building code provides a <b>broad exception for employee work areas.</b> However, as noted in item number 5 below, Code section <b>11B-805 supercedes this exemption</b> and provides a higher degree of accessibility in healthcare facilities.	See Detail Page 11.1
3	<b>Code Amendment</b>	The employee 'work area' exception is revised in the new CBC amendment which becomes effective on July 1, 2015, to exempt ' <b>employee workstations</b> '.	<b>CBC Section 11B-203.9 Employee workstations.</b> Employee <u>workstations</u> shall be on an accessible route complying with Division 4. Spaces and elements within employee workstations shall only be required to comply with Sections 11B-207.1 (accessible means of egress), 11B-215.3 (fire alarm systems), 11B-302 (floor surfaces), 11B-303 (Changes of level), 11B-308.1.1 and 11B-308.1.2 (reach ranges)and 11B-404.2.3 (clear width at doors). Common use circulation paths within employee workstations shall comply with Section 11B-206.2.8. (accessible routes).	N/A	<b>Starting 7-1-15:</b> Employee <b>Workstation</b> will generally replace the term "employee work area" as a space that is exempt from most access requirements. However, as noted in item number 5 below, Code section <b>11B-805 supercedes this exemption</b> and provides a higher degree of accessibility in healthcare facilities.	See Detail Page 11.1
4	<b>Definitions: Work Area and Work Station</b>	The subtle difference between employee work areas and employee workstations is a matter of subjective application to a smaller, more specific area, defined by an <b>employee work-duty task</b> .	<b>CBC Section 202 Definitions.</b> <b>Employee Work Area:</b> All or any portion of a space used only by employees and only for work. Corridors, toilet rooms, kitchenettes and break rooms are not employee work areas. <b>Workstation (DSA-AC):</b> An area defined by equipment and/or work surfaces intended for use by employees only, and generally for one or a small number of employees at a time. Examples include ticket booths; the employee side of grocery store checkstands; the bartender area behind a bar; the employee side of snack bars; sales counters and public counters; guardhouses; toll booths; kiosk vending stands; lifeguard stations; maintenance equipment closets; counter and equipment areas in restaurant kitchens; file rooms; storage areas; etc.		Employee workstations are generally defined by the location of a <b>specific employee task</b> , while the employee work area usually describes a larger employee area that frequently includes multiple workstations within it.	See Detail Page 11.2 thru 11.5

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5	<b>11B-805 Supercedes 11B-203.9</b>	The specific requirements of 11B-805 supercede the general exceptions of 11B-203.9	<b>CBC Section 1.1.7.2 Specific provisions.</b> Where a specific provision varies from a general provision, the specific provision shall apply. <b>CBC Section 1.1.7.3 Conflicts.</b> When the requirements of this code conflict with the requirements of any other part of the California Building Standards Code, Title 24, the most restrictive standards shall prevail.	N/A	The specific requirements of Section <b>11B-805 supercede the general exceptions</b> in Section 11B-203.9 for employee areas. Note: Code Section 11B-805 is only applicable at Healthcare Facilities, as required by scoping section 11B-223, including application at hospitals, longterm care facilities, medical office buildings and clinics.	N/A
6	<b>Floor Plan Examples</b>	The interpretation of what qualifies as an 'Employee Workstation' is <b>subjective</b> . Sutter encourages interpretation based on the location of employee <b>work-duty tasks</b> . Therefore, at times the 'Employee Workstation' may be interpreted as discrete areas that are tightly drawn around a specific piece of work equipment, and at other times may be defined as an entire room.	N/A	N/A	The interpretation of what qualifies as an 'Employee Workstation' is <b>subjective</b> . Sutter encourages interpretation based on location of employee <b>work-duty tasks</b> .	See Detail Pages 11.2 thru 11.5
7	<b>Door Clearances and Turning Space</b>	When an <b>entire room</b> is classified as a 'Workstation', per 11B-203.9 (as noted in item numbers 2 and 3 above), turning space and door maneuvering clearances are not required within the 'workstation' room.	(See Codes Section <b>11B-304</b> for turning space, typically a 60" circle; and Section <b>11B-404.2.4</b> for maneuvering clearances at doors, typically requiring door width + 18" at pull side of door)	(Similar to CBC: See Section 304 for turning space and 404.2.4 for maneuvering clearances at doors)	Sutter <b>encourages</b> providing door maneuvering clearance and turning space within all habitable rooms, but will <u>not</u> make it a <b>requirement</b> for rooms that are defined as 'Employee Workstations'	See Detail Pages 11.2 thru 11.5

8	<b>Built-In Cabinets and Work Surfaces</b>	In medical facilities, the 'employee workstations' must also comply with the requirements of 11B-805.7, which primarily affects work surfaces and storage.	N/A	N/A	N/A	SEE BIN 8
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<b>Employee Areas</b>				<b>BIN 11</b>
SUTTER HEALTH - BARRIER INTERPRETATION NOTICE				
Author:	Bill Zellmer	ISSUE DATE:	January 9, 2015	<b>11.1 – Code Intent</b>
		REVISIONS:	March 7, 2022	

- A. Code Text: CBC Section 11B-201.1 Scope.** All areas of newly designed and newly constructed buildings and facilities and altered portions of existing buildings and facilities shall comply with these (accessibility) requirements.
- B. United States Department of Justice Advisory – 201.1:**  
These requirements are to be applied to all areas of a facility unless exempted, or where scoping limits the number of multiple elements required to be accessible. For example, not all medical care patient rooms are required to be accessible; those that are not required to be accessible are not required to comply with these requirements. However, common use and public use spaces such as recovery rooms, examination rooms, and cafeterias are not exempt from these requirements and must be accessible.
- C. CBC Section 11B-203.9 Employee work areas.** (Ending 7-1-2015) Spaces and elements within employee work areas shall only be required to comply with Sections 11B-206.2.8 (common use circulation paths), 11B-207.1 (accessible means of egress), and 11B-215.3 (fire alarm systems) and shall be designed and constructed so that individuals with disabilities can approach, enter and exit employee work areas.
- D. United States Department of Justice Advisory – 203.9. Employee work areas.** Although areas used exclusively by employees for work are not required to be fully accessible, consider designing such areas to include non-required turning spaces, and provide accessible elements whenever possible. Under the ADA, employees with disabilities are entitled to reasonable accommodations in the workplace; accommodations can include alterations to spaces within a facility. Designing employee work areas to be more accessible at the outset will avoid more costly retrofits when current employees become temporarily or permanently disabled, or when new employees with disabilities are hired.
- E. CBC Section 11B-203.9 Employee workstations.** (Starting 7-1-2015) Employee workstations shall be on an accessible route complying with Division 4. Spaces and elements within employee workstations shall only be required to comply with Sections 11B-207.1 (accessible means of egress), 11B-215.3 (fire alarm systems), 11B-302 (floor surfaces), 11B-303 (Changes of level), 11B-308.1.1 and 11B-308.1.2 (Reach Range) and 11B-404.2.3 (clear width at doors). Common use circulation paths within employee workstations shall comply with Section 11B-206.2.8.
- F. CBC Section 202 Definitions: Workstation** (DSA-AC): An area defined by **equipment** and/or work surfaces intended for use by employees only, and generally for one or a small number of employees at a time. Examples include ticket booths; the employee side of grocery store checkstands; the bartender area behind a bar; the employee side of snack bars; sales counters and public counters; guardhouses; toll booths; kiosk vending stands; lifeguard stations; maintenance equipment closets; counter and equipment areas in restaurant kitchens; file rooms; storage areas; etc.



## Employee Areas

## BIN 11

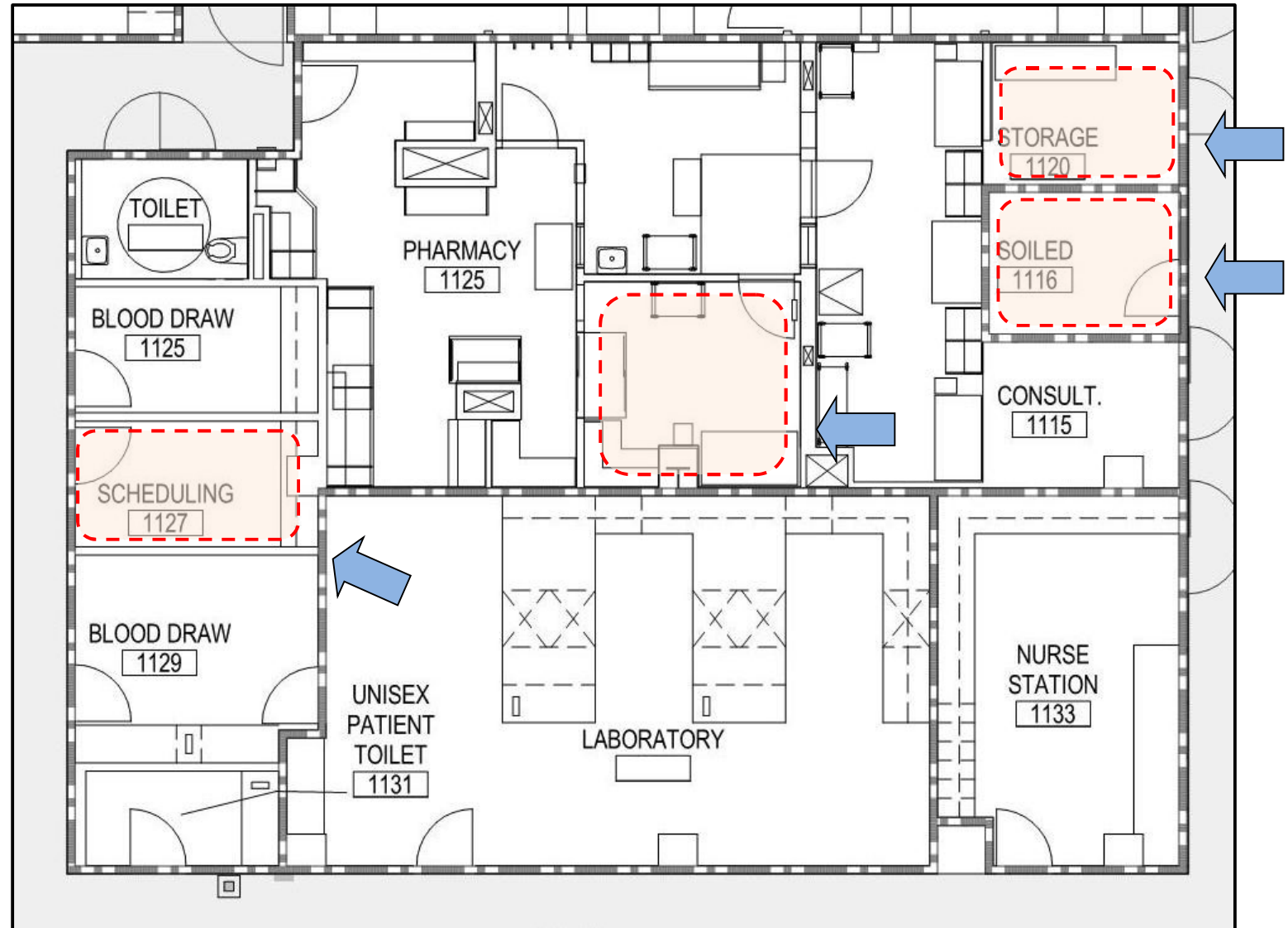
### SUTTER HEALTH - BARRIER INTERPRETATION NOTICE

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### 11.3 – Floor Plan Examples

When the nature of the room is that it is used by one employee at a time, it is possible that the entire room may be considered as the ‘employee workstation’.

Again, this is a subjective interpretation that should be confirmed with the building official having jurisdiction when possible.



## Employee Areas

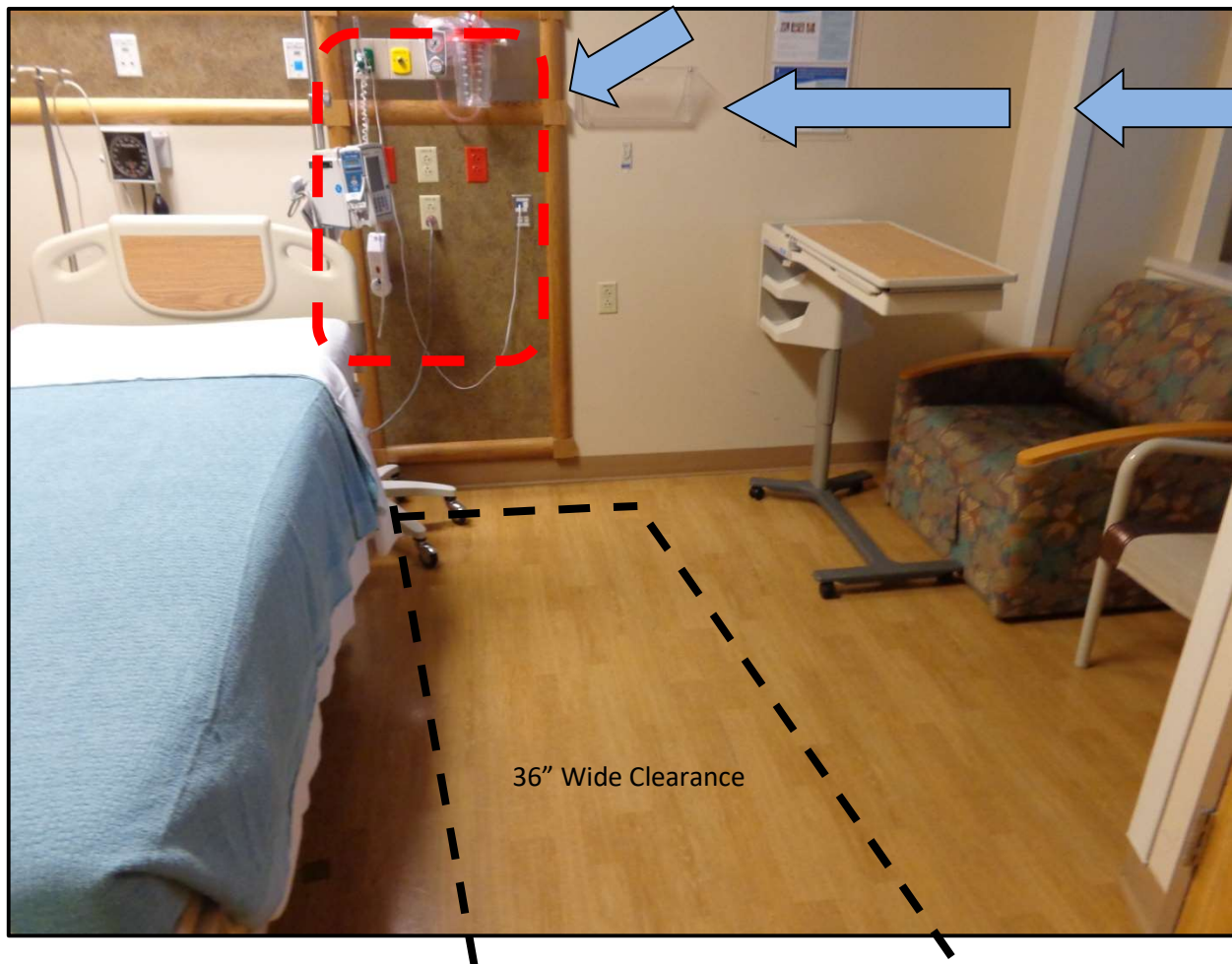
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11.4 – Examples

An 'Employee Workstation' will sometimes need to be interpreted as a discrete area that is tightly drawn around equipment that is used only by employees as part of their work-duty. This approach will allow for employee interaction with work-duty devices without imposing accessibility requirements on those devices.



The access requirements that do apply to these 'Employee Workstations' are defined in Section 11B-203.9 as follows:

1. Accessible means of egress
2. Fire alarms
3. Floor surfaces
4. Changes of level (Floor)
5. Reach Range (Forward + Side)
6. Clear width @ doors
7. Common-use circulation paths shall comply with Accessible route

