



U.S. General Services Administration

presented by

Rex Pace
GSA National Accessibility
Officer

David Anthon
GSA Region 2 Accessibility and
Historic Preservation Officer

Ray Bloomer,
Accessibility Specialist,
National Park Service



An Overview of the ABAAS and Historic Facilities

You must have misspelled,
ADA not **ABA**?

The “**ABAAS**”?, what do you mean
the ADA Standards don't Apply to
Federal Government's Buildings?

ABA – Architectural Barriers Act

ABAAS - ABA Accessibility
Standards

Important Terms for Today

- **“Exception”** – embedded in an ABAAS requirement
- **“Wavier” and “Modification”** – process defined by the ABA Statue, determined case-by case, and requires review by leadership
- **“Equivalent Facilitation”** – unlike the ADA Standards, it is not in the ABAAS
- **“Program Access”** – obligation under the Rehabilitation Act of 1973

Federal Facilities Covered by ABA

1) Intended for use by the public **or** may result in the employment or residence therein of individuals with physical disabilities;



2) Which were, on behalf of the United States :

(a) constructed or altered

(b) leased, in whole or in part, or

(c) financed in whole or in part by a grant or loan



after August 12, 1968 (date of enactment).



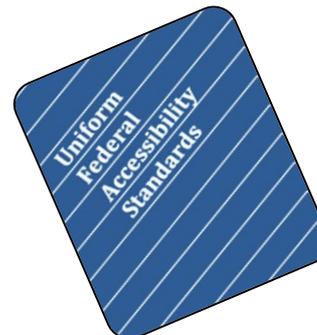
(the ABA also applies to Washington DC's Metro)

ABA Standard Setting Agencies

Architectural Barriers Act Accessibility Standard (ABAAS) as specified in:

- **General Services Administration Federal Management Regulation**
- **US Postal Service notice**
- **Department of Defense policy memorandum**

HUD still using UFAS



GSA Real Estate

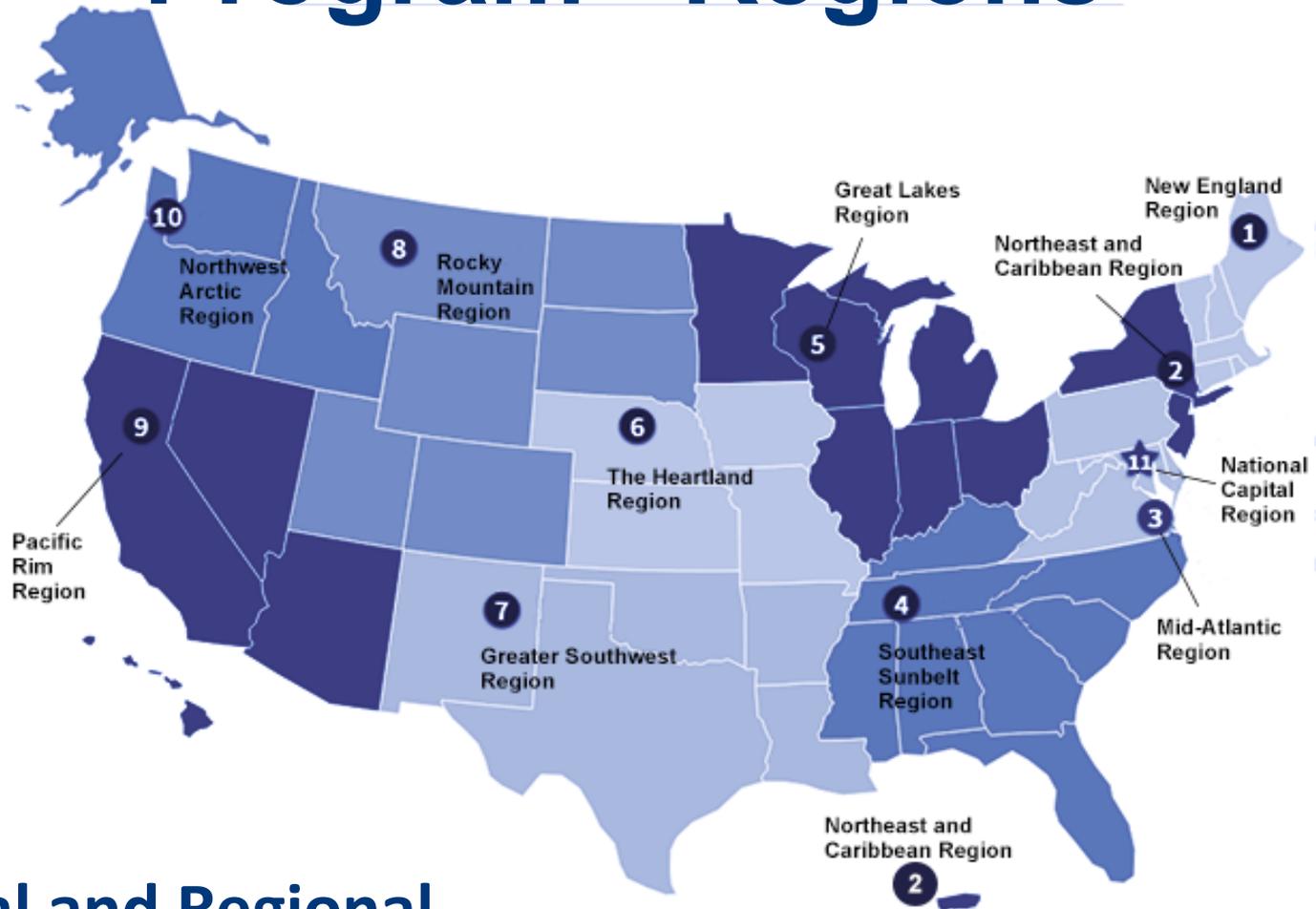


GSA owns and leases over 376.9 million square feet of space in 9,600 buildings in more than 2,200 communities nationwide.

Accessibility Program in Public Buildings Service/Office of the Chief Architect



GSA's National Accessibility Program - Regions



**National and Regional
Accessibility Officers**

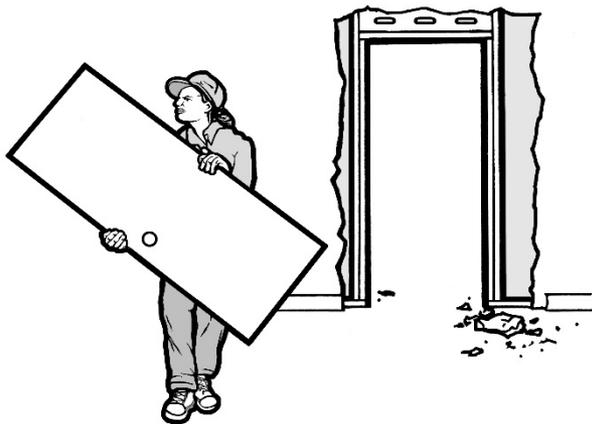
What Does An Accessibility Officer Do?



- **ABAAS compliance – reviews and site visits**
- **Resolve complaints – official Access Board matters and internal issues**
- **Provide technical assistance**
- **Promote quality accessible design**
- **Policy and guidance input**
- **Outreach and education – support other units**

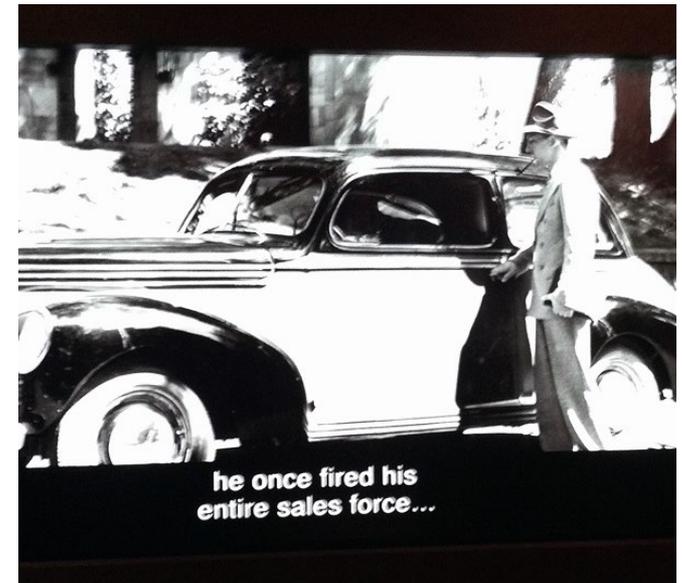
ABA-Covered Facilities

For “Pre-ABA” Federal facilities, **alterations** and **leases** undertaken after 1968 will be covered



Rehabilitation Act of 1973

- §504 of the Act covers federally conducted/funded programs & covers existing as well as altered/new facilities
- “Program access requirements” may cover furniture and equipment
- Act also addresses employment discrimination on basis of disability and reasonable accommodations
- Use ABAAS to assess and justify design choices



ABAAS Definition (F106.5)

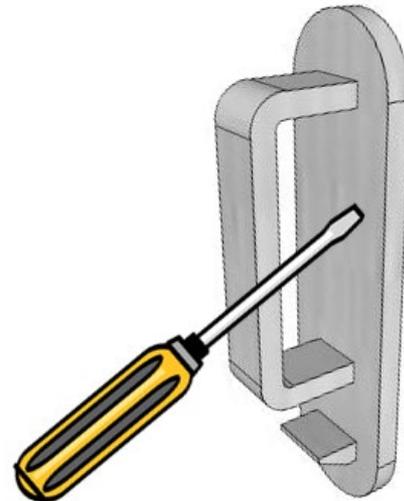
Qualified Historic Building or Facility:

“A building or facility that is listed in or eligible for listing in the National Register of Historic Places, or designated as historic under an appropriate State or local law.”



Alterations

- Includes: remodeling, renovation, rehabilitation/reconstruction, historic restoration, resurfacing, etc.
- Not alterations (unless usability affected): normal maintenance, reroofing, painting, wallpapering, work to mech./electrical systems



Alteration Application & Scoping (F202.3 - 5)

Determined by:

- **Scope of work**
- **Primary function areas**
- **Technically infeasible changes**
- **Qualified historic facilities**

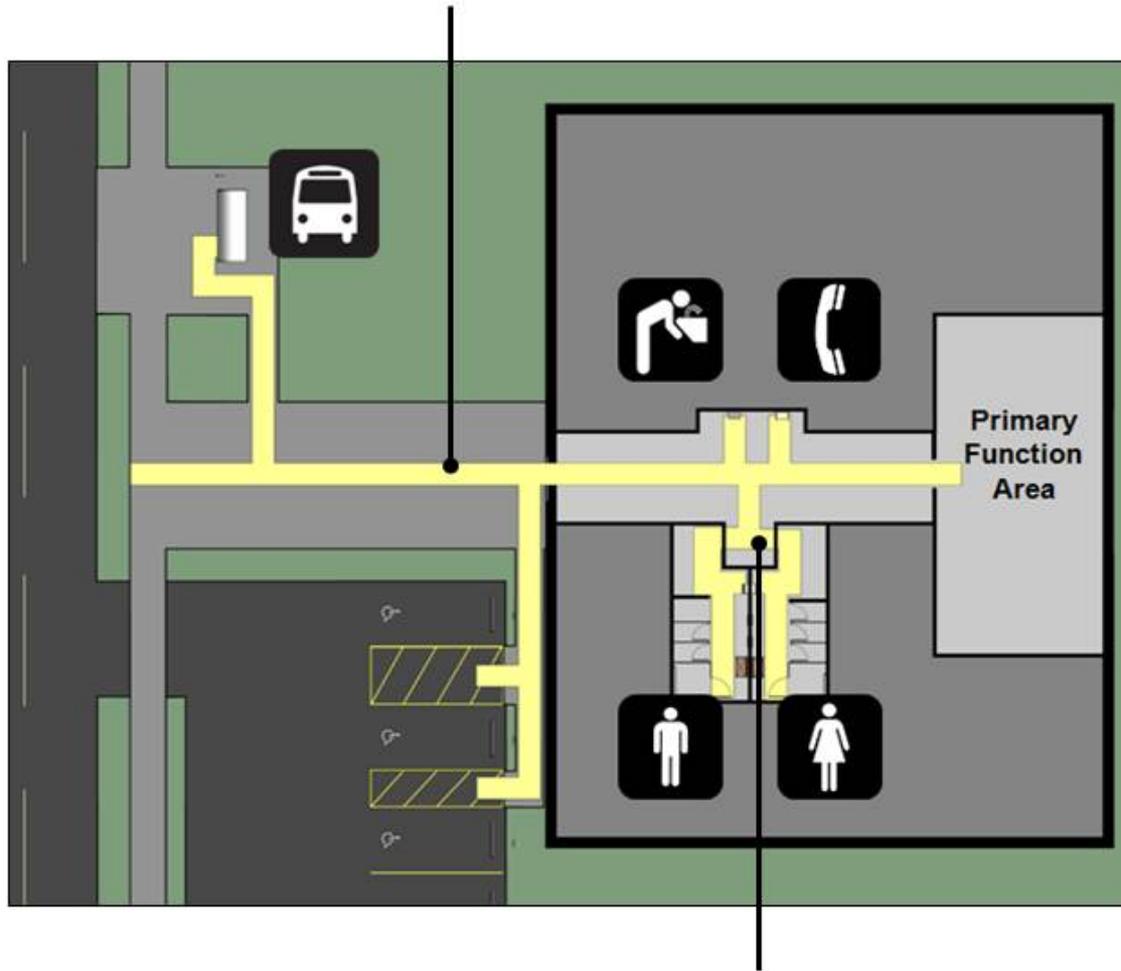
Primary Function Areas (§F202.4)

Additional requirements for alterations that affect usability of *areas containing a primary function* (i.e., major activity for which the facility is intended)



Path of Travel – up to 20% Cost

The accessible path of travel extends from the altered primary function area to site arrival points (public sidewalks, parking, passenger loading zones, public transit stops located on the site).



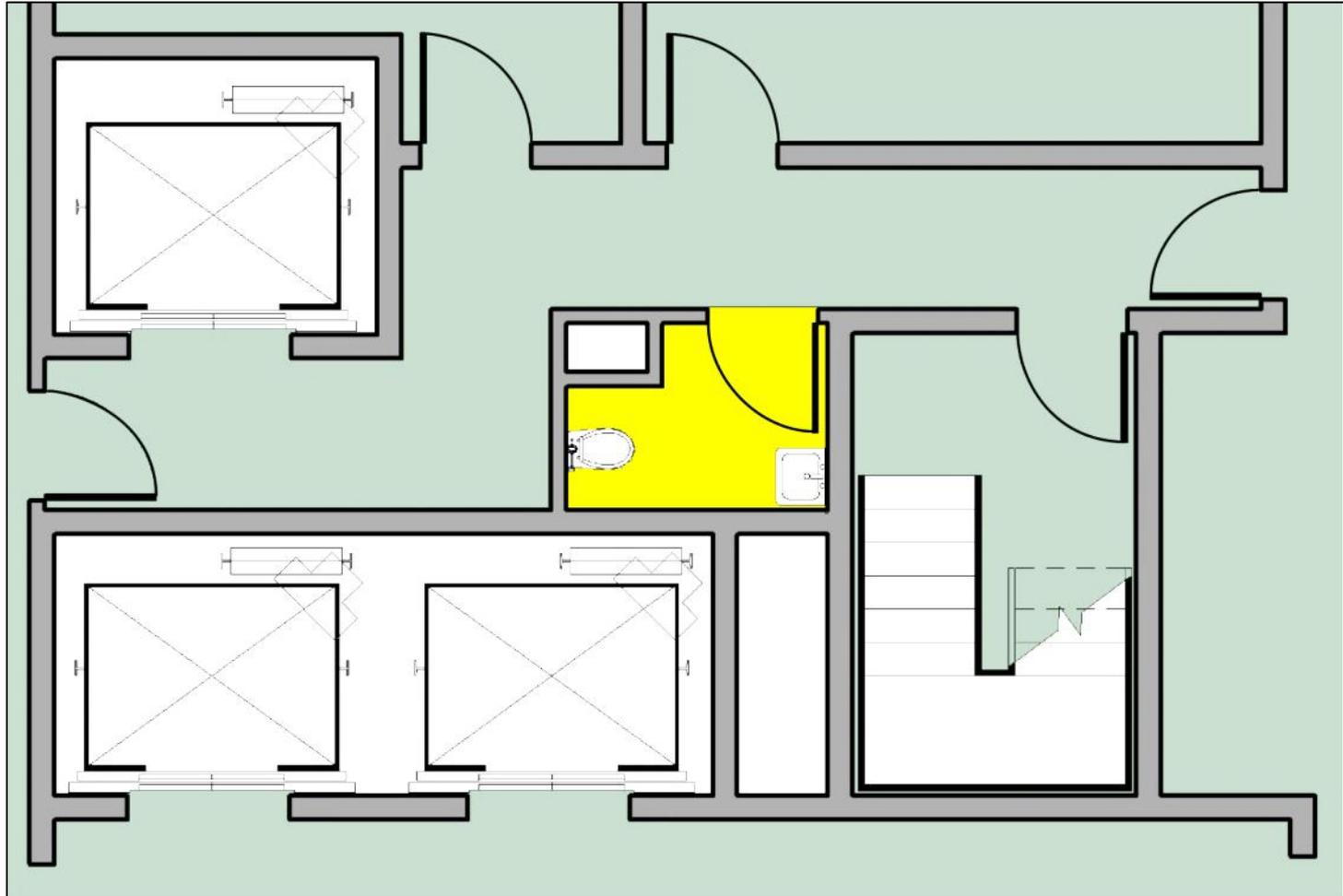
The path of travel also includes an accessible restroom (for each sex unless only unisex restrooms are provided), telephone, and drinking fountain serving the primary function area, where such elements are provided.

Definition (F106.5)

Technically Infeasible:

“...has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements.”

Technical Infeasibility



Space limitation Example

Alterations - Summary

Technically Infeasible:

- **case-by-case determination**
- **based on existing constraints/conditions and scope of work**
- **compliance required to the *maximum extent feasible***

Historic Facility Alterations Scoping (F202.5)

EXCEPTION:

“Where the State Historic Preservation Officer or Advisory Council on Historic Preservation determines that compliance with the requirements for accessible routes, entrances, or toilet facilities would threaten or destroy the historic significance of the building or facility, the exceptions for alterations to qualified historic buildings or facilities for that element shall be permitted to apply.”

Historic Facility Exceptions

F206.2.1 Site Arrival Points

(exception 1) - As few as one accessible route from a site arrival point to an accessible entrance.

F206.2.3 Multi-Story Buildings and Facilities

(exception 6) – an accessible route is not required to stories located above or below the accessible story

F206.4 Entrances

(exception 2) – as few as one accessible public entrance is permitted, possible to use a non-public entrance and be locked if have a notification system/remote monitoring

F213.2 Toilet Rooms and Bathing Rooms

(exception 2) – as few as one accessible toilet room for each sex complying or one accessible unisex toilet room permitted

F206.2.1 Site Arrival Points



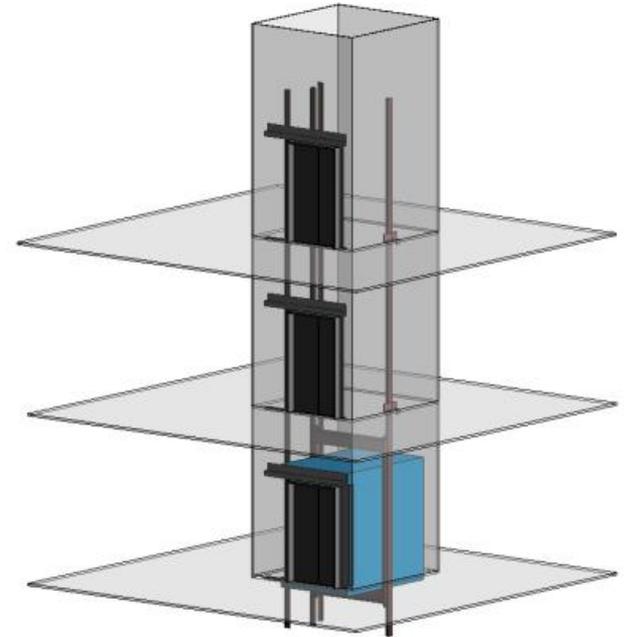
F206.2.1 Site Arrival Points (exception 1)
no more than one accessible route from a
site arrival point to an accessible entrance
is required

Site Arrival Points



Utilized earth berm and walk with shallow slope instead of ramp with handrails

F206.2.3 Multi-Story Buildings



F206.2.3 Multi-Story Buildings and Facilities (exception 6) – an accessible route is not be required to stories located above or below the accessible story

Mount Vernon



Access to tour 1st level possible with alternated experience for those who cannot use stairs (photos and virtual environment on computer provided)



Multi-Story Buildings



Martin Luther King Jr. National Historic Site

utilized sloped
driveway to rear
platform lift and
accessible entries



program
necessitated
2nd level
access

F206.4 Entrances



F206.4 Entrances (exception 2) – as few as one complying public entrance is permitted, possible to use a non-public entrance and to be locked if have a notification system or remote monitoring



Solomon Federal Building and Courthouse



New entry and ramp that coincides
with route used by general public

Controlled Entrance



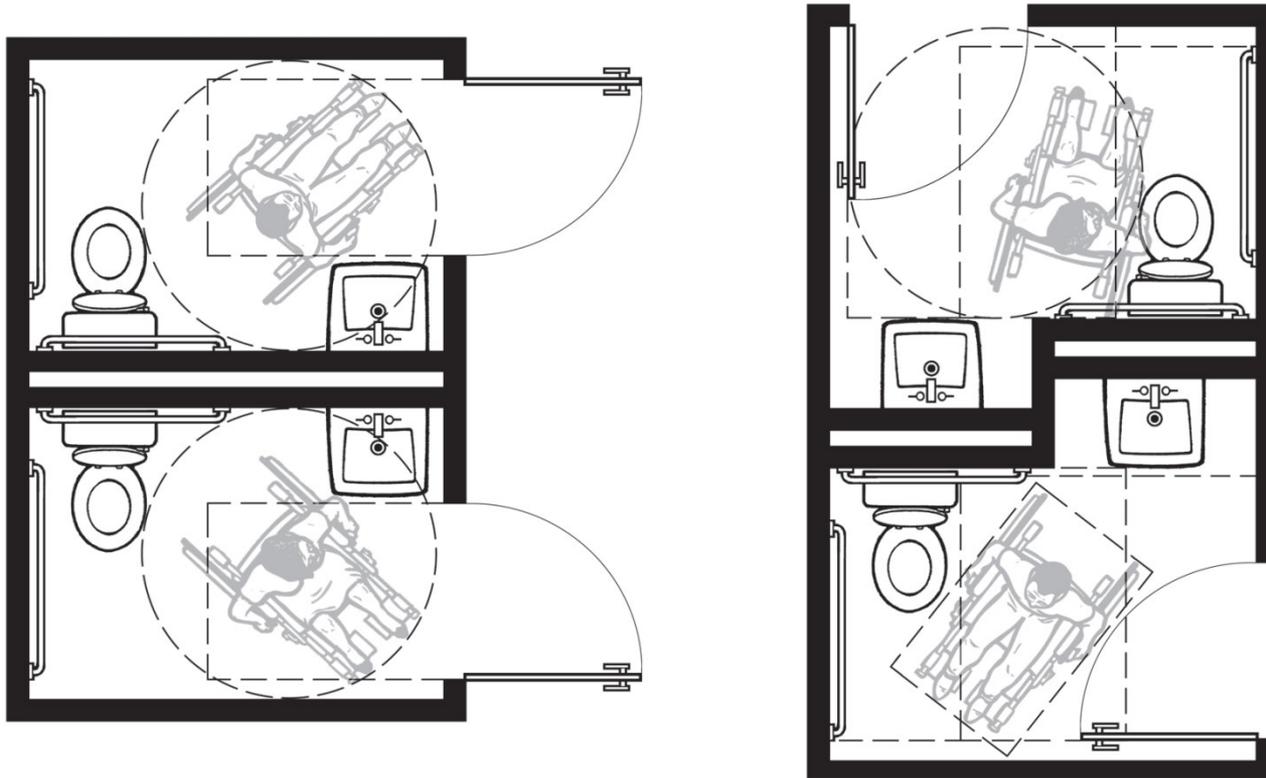
Paul Rudolph Guest House



Monitored locked entry with platform lift

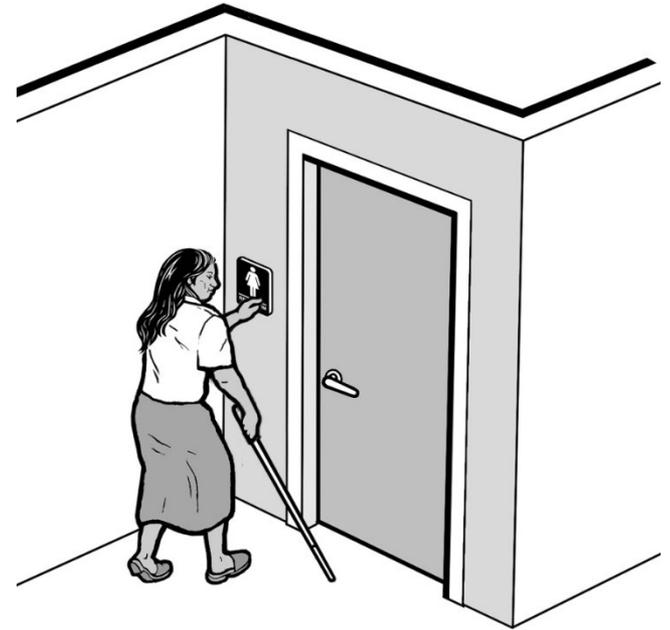
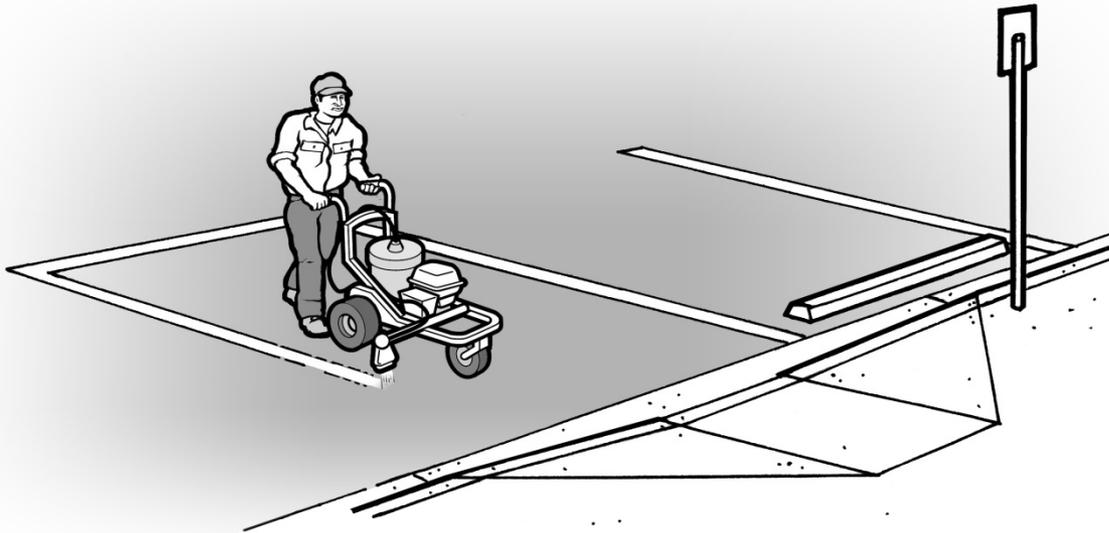
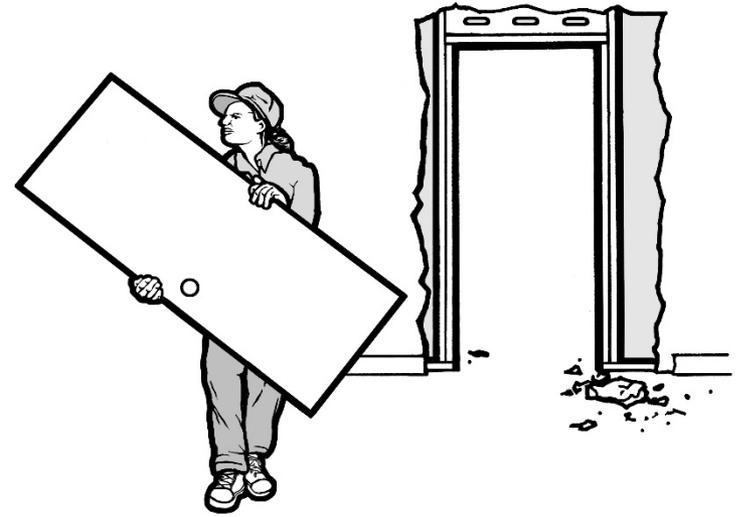


F213.2 Toilet and Bathing Rooms

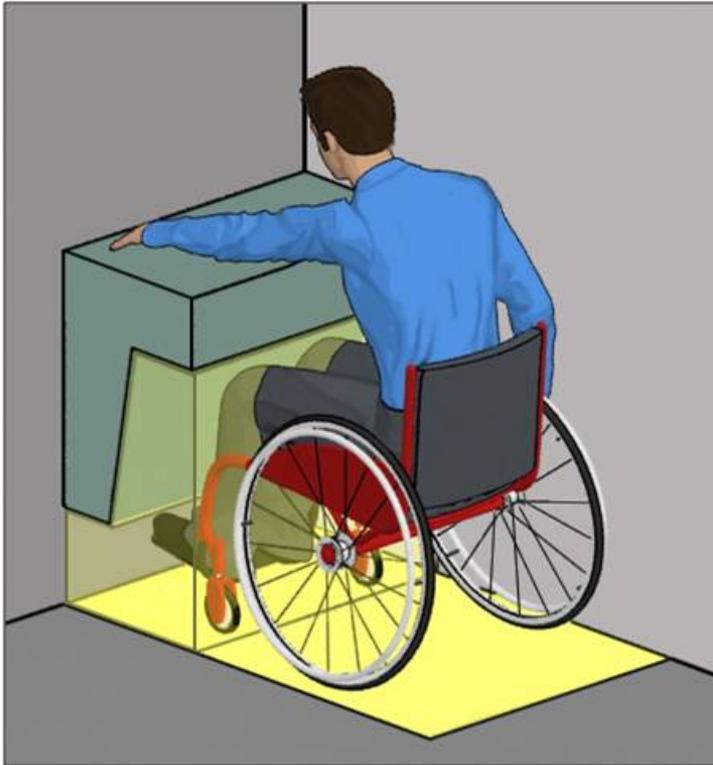


F213.2 Toilet Rooms and Bathing Rooms
(exception 2) – as few as one complying toilet room for each sex complying or one complying unisex toilet room permitted

Repairs, Upgrades, and Small Projects



Modifications and Waivers (F103)



FDA Laboratory Sink Example

Before Requesting a Waiver, Consider:

- general exceptions
- accessible route exceptions
- historic preservations exceptions
- scope of alteration
- “technically infeasible” alterations
- discuss with Regional or National Accessibility Officer
- there is **NO** “equivalent facilitation”

GSA's National Accessibility Program



- **National and Regional Accessibility Officers**
- **Accessibility Facility Design Webpage:**
www.gsa.gov/real-estate/design-construction/accessible-facility-design
- **Accessibility Desk Guide**
- **For ICT access -**
www.section508.gov

GSA Regional Accessibility Officers

Region 1 - Michael Williamson, (617) 565-6528, michael.williamson@gsa.gov

Region 2 – David Anthone, (646) 808-6069, david.anthone@gsa.gov

Region 3 - Thomas Sincavage, (215) 446-5761, thomas.sincavage@gsa.gov

Region 4 - Thomas Dragoone, (404) 526-3121, thomas.dragoone@gsa.gov

Region 5 - Richard Gee, (312) 353-0936, richard.gee@gsa.gov

Region 6 - Glen Essink, (816) 823-4904, glen.essink@gsa.gov

Region 7 - Charles Lawrence, (817) 978-4158, charles.lawrence@gsa.gov

Region 8 – Verna McCain, (303) 918-1991, verna.mccain@gsa.gov

Region 9 – Michael Foegelle, (628) 219-4334, michael.foegelle@gsa.gov

Region 10 – Brian White, (503) 806-4891, brian.white@gsa.gov

Region 11 – Bill Le Roy, (202) 704-7151, william.leroy@gsa.gov



Federal Management Regulation (FMR)

41 Code of Federal Regulations (CFR)

Part 102-76 Design and Construction

Subpart C – Architectural Barriers Act

Covers effective dates, accessible path of travel, primary function areas in leases, etc.

ABAAS On-line

Download entire document at

www.access-board.gov/attachments/article/1029/ABAstandards.pdf

Online Guidance and Animations at

www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-aba-standards/guide-to-the-aba-standards



The screenshot displays the United States Access Board website. At the top left is the logo, a stylized star with the text "UNITED STATES ACCESS BOARD" and the tagline "Advancing Full Access and Inclusion for All". To the right is a search bar with a magnifying glass icon and two radio button options: "Search ABA Guide" (selected) and "Search entire site". Below the logo is a dark red navigation bar with white text for "The Board", "Guidelines & Standards", "Training", "Enforcement", and "Research". The main content area has a breadcrumb trail: "Home > Guidelines and Standards > Buildings & Sites > About the ABA Standards > Guide to the ABA Standards". The title "Guide to the ABA Standards" is followed by a list of links: "About this Guide" (with a "Single File Version" link next to it), "Chapter 1: Application and Administration", "Using the ABA Standards", "Chapter 2: Scoping Requirements", "New Construction", "Alterations, Additions, and Leases", "Chapter 3: Building Blocks", "Floor and Ground Surfaces", "Clear Floor or Ground Space and Turning Space", "Operable Parts", and "Protruding Objects". On the right side, there is a "ABA STANDARDS" section with links for "About the ABA Standards", "ABA Standards", "Guide to the Standards", "About this Guide", "Chapter 1: Using the ABA Standards", "Chapter 2: New Construction", and "Chapter 2: Alterations, Additions, and Leases". An illustration of a person in a wheelchair is positioned in the lower center of the page.