Chapter Five:

REQUIREMENT 5

Light Switches, Electrical Outlets, Thermostats, and Other Environmental Controls in Accessible Locations



...covered multifamily dwellings with a building entrance on an accessible route shall be designed and constructed in such a manner that all premises within covered multifamily dwelling units contain light switches, electrical outlets, thermostats and other environmental controls in accessible locations. Fair Housing Act Regulations, 24 CFR 100.205



All Covered Switches, Outlets, and Controls Operated on a Frequent Basis Must be in Accessible Locations

INTRODUCTION

The ANSI specifications for accessible controls and operating mechanisms require a clear floor space to allow an approach by a person using a wheelchair, specify the height of the operable portion of the control, and require little or no force be exerted to operate the control. The Fair Housing Accessibility Guidelines (the Guidelines) do not require controls to be fully accessible but specify that light switches, electrical outlets, thermostats and other environmental controls, which are operated on a regular or frequent basis in the daily use of a dwelling unit, be in accessible locations.

The Guidelines' specifications for accessible locations, based on the ANSI (A117.1 - 1986) Standard, address where to position controls and outlets to be within the reach range of a seated user. Force and type of motion required to operate controls are not covered by the Guidelines.

CONTROLS AND OUTLETS SUBJECT TO THE REQUIREMENTS OF THE GUIDELINES

Environmental controls such as thermostats and other heating, air-conditioning, and ventilation mechanisms including ceiling fans and electrically operated skylights must be positioned in accessible locations, as must **light switches** and **electrical outlets** for each room. All these covered controls and outlets must be in accessible locations, with a few exceptions.

The Guidelines allow, for example, controls or outlets that do not satisfy the requirements, if comparable controls or outlets in accessible locations are provided within the same area. Comparable controls or outlets are those that perform the same function. For example, floor outlets (which are inaccessible) or outlets mounted in the corner of kitchen counters are permitted under the Guidelines, provided other outlets are available to serve the same space or area.

Controls and outlets not covered by the Guidelines include circuit breakers or electrical outlets dedicated to individual appliances such as refrigerators, built-in microwave ovens, washing machines, and dryers because neither circuit breakers nor these outlets are accessed frequently by residents. Appliance controls are not required to be in accessible locations because the Fair Housing Act is not intended to regulate the design of appliances.

Thus, when appliance controls are built into or are located on the appliance itself, they are not considered to be covered controls. Range or washing machine controls need not be within the reach range of seated users, although certainly it is preferred that such controls be within reach. Range hood fan and light controls, when mounted on the hood, are part of an appliance and are, therefore, not covered. However, if the range hood fan and light are wired to a separate switch on a wall or any location other than on the hood, range, or cooktop, then the control must be in an accessible location.

Garbage disposals do not fall under any of the categories of covered controls. The operating switch for a garbage disposal is not mounted on the appliance itself but is wired to another location. Although not a covered control, since garbage disposals are used frequently and since it is relatively simple to place operating switches for garbage disposals in accessible locations, it is recommended that it be done.

Emergency interrupt switches to mechanical systems such as furnaces or hot water heaters also are not covered by the Guidelines. However, it is recommended that such switches be in locations that can be reached from a seated position. Even when the mechanical system is located behind a narrow door in a small closet dedicated specifically to that purpose, it is recommended that the interrupt switch be positioned so it can be reached from outside the closet by a person using a wheelchair.

Switches, Outlets, and Controls Covered by the Guidelines

Covered

- light switches for controlling all room lights
- electrical outlets
- environmental controls
 - thermostats and controls for other heating, air-conditioning, and ventilation systems

Not Covered

- circuit breakers
- appliance controls
- outlets dedicated for specific appliances

Accessible Locations

The Guidelines contain height specifications for wall-mounted controls and outlets based upon the reach ranges of seated people given in the ANSI Standard. Typically ANSI and other accessibility standards present reach ranges for both forward and side reaches: **1**. where the user must reach over an obstruction, and **2**. where the user's approach is not restricted by an obstruction. One of these positions, a side reach from a parallel position without an obstruction, requires a 48-inch long clear floor space parallel and close to the wall so a user can get close enough to reach controls and switches. Once a dwelling unit is furnished, sufficient room to execute such a parallel approach usually is not available; thus this specification was omitted from the Guidelines.

To accommodate all users in situations where there may or may not be a built-in counter, base cabinet, or other obstruction to interfere with reach, the Guidelines include specific requirements for mounting controls and switches so a person using a wheelchair can execute: **1**. a forward reach with no obstruction, **2**. a forward reach over an obstruction, and **3**. a side reach over an obstruction.



Forward Reach From a Perpendicular Approach Included in Guidelines

Side Reach from a Parallel Approach Not Included in Guidelines

Forward Reach with No Obstruction

Where there are no obstructions to interfere with the reach of a person using a wheelchair, controls and outlets may be mounted in a range from 15 to 48 inches above the floor. There must be a clear floor space of 30 inches x 48 inches perpendicular to the wall, adjoining a 36-inch wide accessible route, to allow a person using a wheelchair to approach and get into position to execute a forward reach to the control or outlet. See Chapter 4: "Accessible Route into and Through the Covered Dwelling Unit."

Thermostats and other controls that must be read pose additional considerations. Even though people using wheelchairs may be able to execute a forward reach of 48 inches at a clear wall, they may have difficulty seeing the small numerals and indicators generally found on thermostats. A person using a wheelchair, when positioned perpendicular to a wall, must lean forward over his or her feet and knees making it difficult to get close enough to read small type. Therefore, it is critical that thermostats and similar controls that must be read are mounted at or lower than 48 inches above the floor.

Forward Reach Over an Obstruction

Controls and outlets may be positioned above obstructions (e.g. built-in shelves and countertops) and still be mounted in locations that are accessible. A minimum 30-inch wide clear knee space as deep as the reach distance, adjoining a 36inch wide accessible route, must be available below the counter/obstruction to allow a person using a wheelchair to pull up and execute a forward reach over the obstruction.







For obstructions extending from 0 to 20 inches from the wall the maximum height for a control or outlet over the obstruction is 48 inches above the floor. Deeper shelves, extending 20 to 25 inches from the wall, reduce the maximum mounting height of controls and outlets to 44 inches. Controls and outlets mounted over obstructions extending further than 25 inches are outside the reach range of people using wheelchairs and are not considered to be in accessible locations. However, HUD allows an industry tolerance of 1/2 inch to permit the installation of standard countertops that may project from the back wall for a maximum dimension of 25-1/2 inches.



Maximum Forward Reach (From a Perpendicular Approach) over an Obstruction

SIDE REACH OVER AN OBSTRUCTION

To reach controls and outlets mounted over base cabinets which lack knee space, a person using a wheelchair must be able to approach the cabinet from a position parallel to the cabinet and execute a side reach. This parallel position is made up of a 30-inch x 48-inch clear floor space adjoining a 36inch wide minimum accessible route. When executing a side reach over a cabinet, the upper limit of the range is reduced to 46 inches.

Cabinet depth is limited to 24 inches. HUD permits use of a standard 24-inch deep cabinet with an additional extension of 1 to 1-1/2 inches for countertops for a maximum depth of 25-1/2 inches. If a built-in shelf, cabinet, or other obstruction must be deeper than 25-1/2 inches, then any switches, outlets, and controls that must be in accessible locations are not permitted to be installed over such deep surfaces.

MOUNTING LOCATIONS FOR OUTLETS

For accessible controls and outlets, all operable parts must be within the ranges specified above. When electrical outlets are installed horizontally or vertically, duplex outlets must have both receptacles within the reach range. Measurements are made as illustrated below.



Mounting Height for Outlets

- Countertop is shown at the typical kitchen height of 36". The drawing in the Guidelines (taken from ANSI Figure 6(c)), on which this drawing is based, gives this dimension as 34". The 34" dimension shown in the Guidelines is in no way intended to dictate counter heights in covered dwelling units.



Electrical Outlets on Walls Over Cabinets Must Be a Minimum of 36" from a Corner

Recommendations for Increased Accessibility

The Guidelines do not specify that controls and switches installed in dwelling units be accessible in terms of ease of operation, but that they be in accessible locations. For anyone specifying building products and appliances and wishing to enhance the accessibility of dwelling units, the following is a brief discussion of the types of switches and controls that increase usability for people with disabilities, as well as other persons who may experience hand limitations.

The most universally usable switches are rocker switches, toggle switches, and touch type electronic switches because they can be operated by a single touch, require little force, and do not require gripping, twisting, or fine finger dexterity.

Lever controls are generally usable by people with disabilities because they do not require grasping or significant force, and in some instances, their shape may double as an integral pointer to indicate the control's position. For people with limited strength or hand dexterity, smooth round knobs are especially difficult, as are controls that must be pushed down and turned at the same time.





Switches Most People Can Operate