Chapter Four:

REQUIREMENT 4

Accessible Route into and Through the Covered Unit



...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 an accessible route into and through the covered dwelling unit.

Fair Housing Act Regulations, 24 CFR 100.205

Definitions from the Guidelines

Loft. An intermediate level between the floor and ceiling of any story, located within a room or rooms of a dwelling.

Multistory dwelling unit. A dwelling unit with finished living space located on one floor and the floor or floors immediately above or below it.

Single-story dwelling unit. A dwelling unit with all finished living space located on one floor.

Story. That portion of a dwelling unit between the upper surface of any floor and the upper surface of the floor next above, or the roof of the unit. Within the context of dwelling units, the terms "story" and "floor" are synonymous.

INTRODUCTION

The Fair Housing Accessibility Guidelines (the Guidelines) specify that an accessible route be provided into and throughout the entire covered dwelling unit. The accessible route must pass through the main entry door, continue through all rooms in the unit, adjoin required clear floor spaces at all kitchen appliances and all bathroom fixtures, and connect with all secondary exterior doors.

Unlike public and common use areas, where a fully accessible route that complies with ANSI A117.1 - 1986, or an equal or more strict accessibility standard is required, the Guidelines designate specific elements of an accessible route that must be provided. The accessible route must be **1**. sufficiently wide and **2**. lacking in abrupt changes in level so residents with disabilities (and/ or their guests with disabilities) can safely use all rooms and spaces, including storage areas and, under most circumstances, exterior balconies and patios that may be part of their dwelling unit. See page 4.11 for exception at balconies and patios constructed of impervious materials.

An accessible route is not required into a basement or garage. However, doors from the interior of the dwelling unit to an unfinished basement or a garage attached to a single-story dwelling unit must be "usable"; see Chapter 3: "Usable Doors." Providing an accessible route and a usable door in these circumstances will allow a resident to make later modifications, such as installing a ramp from the dwelling unit into the garage, thereby increasing usability of the unit.



Accessible Route

WIDTH

The 36-inch wide fully accessible route as described in Chapters 1 and 2 must connect with the clear floor space outside the primary entry door of each covered dwelling unit. As the accessible route passes into the unit it may be reduced to 32 inches minimum clear width at the door. Throughout the unit the accessible route must be 36 inches wide or wider, except as it passes through passage doors, where it may be reduced to 32 inches nominal clear width. See Chapter 3: "Usable Doors."

When specifications for accessible routes are presented in most accessibility standards they contain provisions for minimum height or headroom. The Guidelines, with respect to the interiors of dwelling units, do not include a specification for headroom. Protruding objects also are not addressed within the interior of the dwelling unit, but they should be avoided in all cases.



Minimum Width of Accessible Route

CHANGES IN LEVEL

Within single-story dwelling units (and on the primary entry level of multistory dwelling units in buildings with elevators) the maximum vertical floor level change is 1/4 inch, except when a tapered threshold is used, the maximum height is 1/2 inch. Even small abrupt changes of level in the surface of an accessible route pose a tripping hazard for many people and can be a significant obstacle for people using wheelchairs. People who walk wearing braces and/or who have difficulty maintaining balance are particularly susceptible to catching their toes on small changes in level. Small abrupt changes in level occur most frequently at floor material changes and at door thresholds. Within the interior of the dwelling unit, thresholds should not be used or they should be thin and installed flush with the flooring surface. If a threshold must be used, it must not have a level change more than 1/4 inch without being beveled or tapered. When a tapered threshold is used, the level change may be a maximum of 1/2 inch. If an interior door threshold represents a change in level greater than 1/2 inch, it must be ramped and must slope at 1 inch in 12 inches maximum (1:12). Thresholds at exterior doors are addressed on page 4.12.



Small Changes in Level Along Accessible Routes

Special Design Features

Single-story dwelling units are not prohibited from having specific design features, such as a split-level entry, a sunken living room, or a loft area; but the Guidelines do contain restrictions for each of these. Where a single-story dwelling unit has such a design feature, all portions of the unit, except the loft or the sunken or raised area, must be on an accessible route, i.e., the accessible route must be continuous throughout the dwelling unit and not be interrupted by the design feature.

The Guidelines specify that kitchens and all bathrooms, including powder rooms, must be

on an accessible route; therefore, no part of kitchens or bathrooms may be located in a raised or sunken area unless an accessible route can be provided to that area. However, a wet bar on a loft or in a sunken area that is not equipped with an accessible route is permissible since the wet bar is not a part of a kitchen. The combination of both a loft and a sunken area within the same dwelling unit prohibits residents with mobility impairments from using a significant percentage of their units and is thus not permitted under the Guidelines.

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SPLIT-LEVEL ENTRIES

A split-level entry foyer, where the foyer is on one level and the remainder of the unit is down a few steps, does not exempt the unit from coverage by the Fair Housing Act. The entry is critical to providing an accessible route into and through the dwelling unit; therefore, an accessible route to the lower area must be provided by a ramp with a maximum slope of 1:12 or other means of access. It is recommended that the ramp comply with the other ramp requirements of ANSI A117.1 - 1986 or an equal or more strict accessibility standard. See ANSI 4.8.



LOFTS

Dwelling units containing a loft are distinguished from multistory units in that a loft is open to the surrounding space and does not exceed 33-1/3 percent of the floor area of the room in which it is located. Each story (or floor) in a multistory unit is enclosed and contains finished living space with its own ceiling and floor. See "Accessible Routes in Multistory Dwelling Units" on page 4.9. Because a loft is an intermediate level between the floor and ceiling of the unit, it is not considered a second story. Therefore, a dwelling unit with a loft is a single-story unit covered by the Guidelines. Since all primary or functional living spaces must be on an accessible route, secondary living spaces, such as a den, play area, or an additional bedroom are the only spaces that can be on a loft unless an accessible route can be taken to the loft.



RAISED OR SUNKEN AREAS

A raised or sunken area is usually limited to a few steps maximum and has less of a change in level than a loft. These "special design features" may not contain a functional space in its entirety. For example, the entire living room must not be sunken; however, an auxiliary feature such as a second sitting area could have several steps down to that level that is not served by an accessible route.



Living/Dining Room with Sunken Area

Accessible Routes in Multistory Dwelling Units

"Multistory dwelling unit" is defined in the Guidelines as a unit "with finished living space located on one floor and the floor or floors immediately above or below it." Multistory dwelling units in buildings without one or more elevators are not covered by the Fair Housing Act; however, when multistory dwelling units are in buildings with elevators, the dwelling unit is covered and the story that is served by the building elevator must be the primary entry to the unit and must meet the requirements of the Guidelines. Where the primary entry level of a covered multistory dwelling unit contains either a raised or sunken area, that floor level is subject to the same requirements as discussed at "Lofts" and "Raised and Sunken Areas."

Even though many people with significant mobility impairments may choose not to live in such a unit, multistory units, where the primary entry level meets the Guidelines, allow people with disabilities to visit with friends and relatives who may choose to live in a unit with more than one floor. A resident with a disability may choose to live in such a unit and add a lift at his or her own expense. In multistory units the story that is served by the elevator must:

I. be the primary entry to the unit,

2. comply with Requirements 3 through 7 of the Guidelines for all rooms located on the entry floor level, and

3. contain a usable bathroom or powder room.

If there is both a bathroom and a powder room on the entry level of a multistory unit, then the bathroom must meet Requirement 7 of the Guidelines and the powder room needs to meet only Requirements 3, 4, and 5 of the Guidelines. In cases where only a powder room is provided on the entry level, it is treated as a bathroom and must: I. be on the accessible route, 2. have a door with a 32-inch nominal clear width, 3. meet the maneuvering and clear floor space requirements at toilets and lavatories, 4. allow the user to enter the room, close the door, use the facilities, and reopen the door to exit, 5. have reinforcing around the toilet for future installation of grab bars, and 6. have switches, outlets, and controls in accessible locations. See page 7.38 and powder room plans starting on page 7.81.



Single-Story Units and the Primary Entry Level of Multistory Units in Buildings with One or More Elevators Are Covered

THRESHOLDS AND ACCESSIBLE Routes at Exterior Doors

The Guidelines allow the change in level between the interior floor level of the dwelling unit and an outside surface or platform to vary somewhat, depending upon I. whether the door is a primary or secondary door and 2. the construction material of the outside landing surface. If the primary entry door to a dwelling unit has direct exterior access, the landing surface outside the door, as part of the accessible route, must be level with the interior floor, unless the landing is constructed of an impervious material, such as concrete; in which case, the landing may be up to 1/2 inch (but no more than 1/2 inch) below the interior floor of the dwelling unit. However, to prevent water damage, the finished surface outside the primary entry door may be sloped at a maximum of 1/8 inch for every 12 inches.

When a secondary exterior door exits onto decks, patios, or balcony surfaces constructed of impervious materials, the accessible route may be interrupted. In this case, the outside landing surface may be dropped a maximum of 4 inches below the floor level of the interior of the dwelling unit (or lower if required by local building code) to prevent water infiltration at door sills. If the exterior surface is constructed of pervious material, such as a wood deck that will drain adequately, that surface must be maintained to within 1/2 inch of the interior floor level. Note: When measuring the distance between the floor inside and the outside surface, the interior floor level must be calculated from the finished floor and not from the subfloor. If carpet is to be installed, the measurement should be calculated with a fully compressed carpet and, if present, the pad. In addition to the above changes in floor level, the Guidelines specify the maximum height for the door threshold, which is discussed on page 4.12.

Maximum Allowable Height Difference Between Interior Floor Level and Exterior Floor Level	
level difference 0''	at primary entry door pervious construction (e.g., wood decking with spaces)
1/2"	impervious construction (e.g., concrete, brick, or flagstone)
level difference I/2"	at secondary door pervious construction
4''	impervious construction

THRESHOLDS AT EXTERIOR DOORS

The concept of an accessible route is intended to ensure the maintenance of a continuous path of travel with no abrupt changes in level so people with disabilities who use wheelchairs or scooters and those who walk are not impeded. However, changes in level are inevitable at exterior doors because thresholds and changes in level are needed to control and/or prevent water infiltration.

The Guidelines allow limited changes in levels at exterior doors along accessible routes. In addition to the change in floor level between the interior floor and exterior landing discussed on page 4.11, the Guidelines specify that thresholds at these exterior doors, including sliding door tracks, shall be no higher than 3/4 inch. The Guidelines further state that changes in level at these locations must be beveled with a slope no greater than 1:2.

In the case of primary entry doors where the exterior landing surface is impervious, the exterior landing surface is permitted to be below the finish floor level by 1/2 inch. Therefore, the Guidelines allow an overall change in level of 1-1/4 inch on the exterior side of the primary entry door. Note, however, as already stated, these changes in level must be beveled with a slope no greater than 1:2. See the first illustration below.

Exterior door thresholds of 3/4 inch, even when beveled, can be extremely difficult to navigate for some persons who use wheelchairs, and the additional change in level when outside landing surfaces are impervious adds to this difficulty. Because of this, it is recommended that other solutions be considered which both provide for less of a change in level at the door threshold and also are designed to prevent water infiltration. One such solution is to use a threshold that rises a maximum of 1/4 inch on the inside and drops 3/4inch at a slope of 1:2 at the exterior. See illustration two below. An even better solution is to bring the exterior surface up to the same level as the interior floor using an interlocking threshold. See illustration 3.

The illustrations on pages 4.13 through 4.14 offer design details of door thresholds that meet the requirements of the Guidelines as well as recommended door thresholds that provide for lesser changes in level while still preventing water infiltration to the dwelling unit.



Swinging Primary Entry Door at Concrete Landing

showing allowable changes in level at primary entry doors with direct exterior access onto concrete or other impervious landing surface where 1/2-inch maximum changes in level are permitted.



Swinging Secondary Door at Concrete Landing

showing allowable changes in level at exterior swinging doors onto concrete or other impervious landing surface where 4-inch changes in level are permitted.



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Accessible Route onto Balcony Constructed of Concrete, Brick, or Flagstone May Be Interrupted by a 4-Inch Step



Accessible Route onto Balcony Created with the Addition of a Raised Platform (Added by the Resident) Notes in italic type are recommendations only and are not required by ANSI or the Guidelines.

wooden platform to raise floor level of balcony to level of interior of dwelling unit (not required at initial construction but is a later resident modification)

