

Florida Building Code, Accessibility (FBCA) Summary of Requirements for Existing Buildings and Facilities

The Americans with Disabilities Act (ADA) requires that buildings be accessible to people with disabilities. When you submit plans to alter an existing building, they are reviewed for compliance with ADA. At the same time, the Florida Building Code limits the amount of money you must spend to make your existing building accessible. You need spend no more than 20 percent of the cost of your remodeling on accessibility improvements. Access related costs which exceed 20 percent of the total project cost are considered "disproportionate."

Additions to existing buildings and facilities are required to comply with the requirement for new construction as required in Section 202.2, FBCA; Alterations where existing elements, spaces or common areas are altered, each altered element, space or area shall comply with the applicable requirements of Chapter 2 and Section 201.1.1 for vertical accessibility and Section 208 for existing parking.

Completion of an "Accessibility Analysis Disproportionality Worksheet" will assist with describing the work scopes, areas and costs estimated for determining required accessibility improvements and will document any disproportionate costs if applicable. The worksheet should be submitted along with your construction plans to assist the plan examiner with determining if the proposed improvements meet the accessibility requirements of the local, state and federal codes. In some cases, you may need to submit more detailed graphic or written information, such as a path of travel accessibility analysis/plan or other information as deemed necessary by the code compliance reviewer.

The plans examiner will consider the following when determining if the proposed improvements meet the minimum accessibility requirements for local and state regulations. Additional Federal guidelines and/or other regulations may also apply. In some cases it may be necessary to obtain the services of an expert in building construction and building codes, such as a Florida Registered Architect or Professional Engineer, for assistance with determining how to bring your building into compliance with accessibility requirements.

Determination of Spaces

Does the alteration involve the usability of a "primary function" space? All spaces are considered primary function areas unless they are mechanical rooms, supply storage rooms, employee lounges or locker rooms, janitorial closets, corridors, entrances or toilet rooms. For a more comprehensive list, refer to the FBCA (Chapter 1 – Definitions). Example: While toilet rooms are not typically defined as a "primary function" space, when "alterations" are made to toilet room spaces, compliance with accessibility within the space, as well as the usability of the paths of travel/accessible routes through other primary function areas for accessibility to the altered area may require upgrades or accessibility improvements in addition to the work scopes involved with the altered space.

Alteration Area and Accessible Routes

What is the "path of travel" or "route" to the altered area? A path of travel is an accessible route to the altered area from anywhere inside the property line, and the bathrooms, telephones, and drinking fountains that serve that area. When altering a primary function area, the path of travel to that area must also be made accessible (unless the cost to do so is deemed "disproportionate").

Accessibility Costs / Disproportionate Costs

What is the cost of each item required to make the path of travel accessible? The Accessibility Analysis Disproportionality Worksheet is used to identify and document all related costs for accessibility improvements. **If the cost of upgrading the path of travel exceeds 20% of the cost of the proposed alteration work, it is considered "disproportionate" to the alteration costs.** If your project costs are deemed "disproportionate" the "Accessibility Analysis Disproportionality Worksheet" must clearly reflect and document the details associated with and in support of the proposed improvements and disproportionate determination.

Large projects may require a complete graphic or written analysis of the building and the site to describe the path of travel and the related accessibility improvements. You can obtain a comprehensive checklist to assist you with this task by contacting your regional Disability and Business Technical Assistance Center at 1-800-949-4ADA. It is highly recommended that the accessibility analysis be completed by someone who has a current working knowledge of the local, state and federal codes, including ADAAG, to best safeguard against any potential legal actions which may arise in relation to ADA non-compliance. You can view the FBCA at: <https://codes.iccsafe.org/public/collections/Florida>

ACCESSIBILITY ANALYSIS DISPROPORTIONALITY WORKSHEET
 City of Dunedin, Florida ♦ Planning & Development Department
 737 Loudon Avenue ♦ Dunedin, FL 34698 ♦ 727-298-3210 ♦ www.dunedingov.com

| | | | |
|------------------------------|-----------------------------|-------|-----|
| Permit Application No: | Date of Permit Application: | | |
| Job Address: | City | State | Zip |
| Owner's Name & Address: | City | State | Zip |
| Contractor's Name & Address: | City | State | Zip |

Use Sections A, B and C of this worksheet to estimate the cost to create an accessible path of travel. If the cost of accessibility improvements exceeds 20% of the cost of the alteration project, fill out section D to indicate which accessibility improvements will be undertaken. Please submit this worksheet along with your construction plans and permitting documents.

| | | |
|---|------------------------------|-----------------|
| | Total Cost of Project | \$ _____ |
| A. Total cost of alteration to primary function area: <i>(Do not include path of travel costs)</i> | | \$ _____ |
| B. 20% of cost in "A": | | \$ _____ |
| C. Costs to provide accessible path of travel: | | \$ _____ |
| List in order of priority: | | |
| 1. Provide an accessible entrance | | \$ _____ |
| 2. Provide an accessible route to the altered area | | \$ _____ |
| 3. Provide accessible toilet rooms (i.e., install grab bars, enlarge toilet stalls, insulate pipes, install accessible faucet controls, etc.) | | \$ _____ |
| 4. Provide accessible telephones (i.e. lower the phone to an accessible height; install a TTY device or an amplification device) | | \$ _____ |
| 5. Provide an accessible drinking fountain | | \$ _____ |
| 6. Provide accessible elements (i.e. parking, storage, or alarm) | | \$ _____ |
| Total Cost to Provide Accessible Path of Travel | | \$ _____ |

FILL OUT THIS SECTION IF "C" EXCEEDS "B" ABOVE

D. Accessible items to be provided: (List each item from "C" that you will be providing, along with its cost.)

| Description | Cost |
|-----------------------------------|-----------------|
| | \$ _____ |
| | \$ _____ |
| | \$ _____ |
| | \$ _____ |
| Total Path of Travel Costs | \$ _____ |

Prepared by: _____

| | | |
|-----------|--------------|------|
| Signature | Printed Name | Date |
|-----------|--------------|------|