

Taken to Access

FPS
Physical Access
Compliance Program

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Question of the month:

Q. Is the option of completely removing a walk off mat an acceptable solution? Or must they be replaced as suggested in the ABRP? And would the same logic apply to other items such as baby changing stations?

R. Walk off mats that are too loose create potential hazards for people with disabilities. Wheelchair users may have difficulty transitioning over them if not securely attached. Mats can catch on crutch tips, walkers, and other mobility aids. While removing the mat reduces the risk of tripping or falling by a person with mobility disabilities other factors should be considered. During the raining season, walk off mats provide a safe transition from an exterior wet surface to a potential slippery-when-wet interior surface. To simply remove the mat could create a different safety problem. Hence the surveyors recommendation to replace with stiffer mats versus removing all together. The same logic applies to other elements. We've had instances where coat hooks and baby changing stations were removed only to be reinstalled after receiving complaints from our patients, visitors and providers.

WALK OFF MATS

Walk off mats have consistently showed up as barriers in existing facilities and the suggested solution is to replace them with stiffer mats capable of passing the "kick test", i.e., mats which will not roll up or fold over when the edges are kicked.

A few weeks ago FPS PAC received an inquiry regarding the applicable code section for walk off mat accessibility requirements. Consistent with the code section offered in the architectural barrier surveys, we referenced 2013 CBC sections 11B-302.1 for general floor or ground surfaces requirements and section 11B-302.2 for carpet requirements. However, inquisitive minds have challenged whether section 11B-302.2 is relevant and have argued that in fact this section would prohibit the use of walk off mats as they are by their very nature loose and the code section referenced clearly states that carpet shall be securely attached. Furthermore, we were challenged to provide the code section that would define the criteria for weight and a clear definition of kick test. While there is no definition for "kick test" or criteria for weight in the CBC, we did find that the 2013 CBC advisory manual under section 302.2 contains DSA commentary specific to walk off mats: "The accessibility provisions of the California Building Code apply only to the design, alteration, and new construction of buildings and facilities, not to movable floor mats. However, if floor mats are built-in as part of new construction or alterations, and are part of an accessible route, they must comply with the accessibility provision of this section and Section 11B-302.1 which requires firm, stable and slip-resistant surfaces along accessible routes. However, in addition to circumstances in which the California Building Code applies to built-in floor mats, there may also be circumstances in which ADA requirements apply to floor mats that are not built in. If movable floor mats impede access for people with disabilities, they may need to be moved or removed under Section 36.304 of the ADA Title III Regulations. That section requires that a public accommodation remove barriers in existing facilities where removing them is "readily achievable," that is, easily accomplishable and able to be carried out without much difficulty or expense. Even though the requirements of this chapter would not apply to the mats themselves, the ADA regulations can provide helpful guidance in ensuring that mats do not constitute barriers."

Announcements:

Burnette Allen has joined FPS PAC and is assisting in the Accessibility Plan Review and Monitoring Processes. In the next couple of weeks, Burnette will be reaching out to project teams with outstanding accessibility comments. For inquiries please contact her at:

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