Path of Travel Requirements  § 35.151(b)(4)
The 2010 American’s With Disabilities Act

November 16, 2018

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Senior Director, Accessibility Planning & Compliance
Today’s Goals

- Overview of Path of Travel Requirements (Title II)
- How to Identify Path of Travel Applicable Projects
- Calculating Path of Travel Obligation
- New Path of Travel Report
- Path of Travel Additional Recommended Item
- Path of travel Scoping Guideline
Path of Travel

§35.151(b)(4)

What the ADA says...

An *alteration* that affects or could affect the *usability* of or access to an area of a facility that contains a *primary function* shall be made so as to ensure that, to the maximum extent feasible, the *path of travel* to the altered area and the restrooms, telephones and drinking fountains serving the altered area are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is *disproportionate* to the cost of the overall alteration.
Path of Travel

What it means...

§35.151(b)(4)

When you alter a **Primary Function Area** in a building, and that **alteration** affects **usability**, an accessible **Path of Travel** is required to that area, up to the point it is not **disproportionate**.
KEY TERMS

• Alteration
  • Affecting Usability
    • Primary Function (PFA)
      • Path of Travel (PoT)
        • Disproportionality
What is a “Alteration” per ADA?
What is a “Alteration” per ADA?

§106.5

An Alteration is a change to a building or facility that affects or could affect the usability of the building or facility or portion thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, reroofing, painting or wallpapering, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility.
What is a “affecting usability”? 

KEY TERMS: 
Affecting Usability
What is a “affecting usability”?

As per US Access Board; the term affecting usability often means the work (even if it is maintenance) involving elements or spaces covered by the standards. For example, if you’re installing a new HVAC system; that wouldn’t necessarily require compliance with the standards. However, if the new HVAC system involves installing new thermostats, then the new thermostats will need to comply.
What is a “Primary Function”?
What is a "Primary Function"?

A Primary Function is a major activity for which the facility is intended. Areas that contain a primary function include, but are not limited to, the dining area of a cafeteria, the meeting rooms in a conference center, as well as offices and other work areas in which the activities of the public entity using the facility are carried out.
Primary Function

What is a Primary Function in a School?
Primary Function Areas (PFA)

- Typical and Specialized Classrooms
- Auditoriums / Gymatoriums
- Gymnasiums, including Student Locker Rooms
- Athletic Fields, Field houses, including Bleachers and Student Locker Rooms
- Playgrounds, Greenhouses and other outdoor Educational Spaces
- Libraries
- Cafeterias
- Offices and other work areas in which educational activities of the school are undertaken
- Swimming Pools
- Rooftop Educational Spaces
- Nurses Office and Health Clinics
Not a Primary Function Area (PFA)

- Mechanical / Electrical Rooms, Boiler Rooms and other MEP areas
- Supply Storage Rooms
- OSFNS Kitchens
- Employee Lounges or Employee Locker Rooms
- Janitorial Closets
- Circulation Paths, including Entrances, Lobbies and Corridors
- Restrooms (unless included as part of a Student Locker Room)
KEY TERMS: Path of Travel (PoT)

What is a “Path of Travel (PoT)”?

§35.151(b)(4)
What is a “Path of Travel (PoT)”?

A Path of Travel is an unobstructed way of pedestrian passage by means of which the altered area may be approached, entered, and exited, and which connects the altered area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility, and other parts of the facility.

An accessible path of travel may consist of walks and sidewalks, curb ramps and other interior or exterior pedestrian ramps; clear floor paths through lobbies, corridors, rooms, and other improved areas; parking access aisles; elevators and lifts; or a combination of these elements.

The term "path of travel" also includes the restrooms, telephones, and drinking fountains serving the altered area.
What is a “Disproportionality”?

§35.151(b)(4)(iii)(A)
What is a “Disproportionality”?  

“Alterations made to provide an accessible path of travel to the altered area will be deemed disproportionate to the overall alteration when the cost exceeds 20% of the cost of the alteration to the primary function area”.
KEY TERMS:
Disproportionality

What is a “Disproportionality”?

“Alterations made to provide an accessible path of travel to the altered area will be deemed disproportionate to the overall alteration when the cost exceeds 20% of the cost of the alteration to the primary function area”.

Above that 20% would make the additional cost of making the Path of Travel disproportionate to the value of the alteration.
3 SIMPLE QUESTIONS TO ASK:

1. Does the project include work that affects the usability of, or access to a PFA?
   If yes, continue. If NO, do not continue.
Is this Project PoT applicable?

3 SIMPLE QUESTIONS TO ASK:

1. Does the project include work that affects the usability of, or access to a PFA?
   If yes, continue. If NO, do not continue.

2. Is the project for a purpose other than specifically Program Accessibility (ADA §35.150).
   If yes, continue. If NO, do not continue.
3 SIMPLE QUESTIONS TO ASK:

1. Does the project include work that affects the usability of, or access to a PFA?  
   If yes, continue. If NO, do not continue.

2. Is the project for a purpose other than specifically Program Accessibility (ADA §35.150).  
   If yes, continue. If NO, do not continue.

3. Does the Alteration (per ADA) affect, or could it affect, the usability of the facility or building or portion thereof?  
   If yes, continue. If NO, do not continue.
Is this Project PoT applicable?

Projects that may trigger PoT requirements:

- Projects that affect PF areas
- In an Addition Project, when a PF area is altered in the existing building, for reasons other than to provide Program Accessibility
- Room conversions that affect PF areas
- Rehabilitation or renovation of PF areas
Projects that may NOT trigger PoT requirements:

- Projects that do not affect PF areas
- New Buildings
- Full Program Accessibility projects (2010 ADA §35.150)
- Projects consisting of repairs/maintenance work, unless the work affects the usability of the element or space.
- Building Envelope projects
- MEP system replacement/upgrades.
Calculating Path of Travel Obligation

Net Construction Cost

\[
\text{TOTAL Construction Cost (L+M) - Allowable Deductions} = \text{Net Construction Cost}
\]
Calculating Path of Travel Obligation

Allowable Deductions from the TOTAL Construction Cost:

1. Certain elements that the ADA does not deem alterations that affect or could affect the usability of, or access to an area containing a PF.

§35.151(b)(4)(i)(B)
Allowable Deductions from the TOTAL Construction Cost:

1. Certain elements that the ADA does not deem alterations that affect or could affect the usability of, or access to an area containing a PF.

These elements are:

- Windows,
- Hardware,
- Controls,
- Electrical Outlets, and
- Signage
Allowable Deductions from the TOTAL Construction Cost:

2. Deduct what is not considered an “Alteration” (per ADA)
Calculating Path of Travel Obligation

Allowable Deductions from the TOTAL Construction Cost:

2. Deduct what is not considered an “Alteration” (per ADA)

This includes:

– Normal Maintenance,
– Reroofing,
– Painting,
– Changes to the Mechanical or Electrical System

Unless they affect the usability of the building or facility.
Allowable Deductions from the TOTAL Construction Cost:

3. Deduct items that do not affect usability.
Allowable Deductions from the TOTAL Construction Cost:

3. Deduct items that do not affect usability.

   This may include items such as:
   
   – Demolition,
   – Ceiling Installations,
   – Firestopping,
   – Etc…
Calculating Path of Travel Obligation

Required PoT Expenditure

\[ \text{Net Construction Cost} \times 20\% \text{ (Disproportionality)} = \text{Required PoT Expenditure} \]
Calculating Path of Travel Obligation

Required PoT Expenditure

\[ \text{Net Construction Cost} \times 20\% \text{ (Disproportionality)} = \text{Required PoT Expenditure} \]

Project PoT Obligation

\[ \text{Required PoT Expenditure} - \text{Deductible Alteration Expenditures} = \text{Project PoT Obligation} \]
Calculating Path of Travel Obligation

Deductible Alteration Expenditures

These are the alterations that are already part of the project, that improve the accessible Path of Travel.
Calculating Path of Travel Obligation

**Deductible Alteration Expenditures**

These are the alterations that are already part of the project, that improve the accessible Path of Travel.

Project costs associated with providing an accessible entrance and an accessible route to the altered area, for example, the cost of widening doorways or installing ramps.
Calculating Path of Travel Obligation

Deductible Alteration Expenditures

These are the alterations that are already part of the project, that improve the accessible Path of Travel.

Project costs associated with making restrooms serving the PFA accessible, such as installing grab bars, enlarging toilet stalls, insulating pipes, or installing accessible faucet controls.
Calculating Path of Travel Obligation

**Deductible Alteration Expenditures**

These are the alterations that are already part of the project, that improve the accessible Path of Travel.

- Project costs associated with providing accessible telephones, such as relocating a telephone to an accessible height or installing amplification devices on the PoT.
Calculating Path of Travel Obligation

**Deductible Alteration Expenditures**

These are the alterations that are already part of the project, that improve the accessible Path of Travel.

Project costs associated with relocating an inaccessible drinking fountain on the PoT.
If an area containing a primary function has been altered without providing an accessible path of travel to that area, and subsequent alterations of that area, or a different area on the same path of travel, are undertaken within three years of the original alteration, the cost of alterations to the primary function areas on that path of travel during the preceding three year period shall be considered in determining whether the cost of making that path of travel accessible is disproportionate.
TOTAL PoT Obligation

TOTAL PoT Obligation (Prior and Current Project)

Prior Project(s) PoT Obligation + Current Project PoT Obligation = Total PoT Obligation
Path of Travel Priority

§35.151(b)(4)(iv)(B)

Which accessible elements should be provided?

The PRIORITY is:

(1) An accessible entrance to the building;
Which accessible elements should be provided?

The PRIORITY is:

(1) An accessible entrance to the building;
(2) An accessible route to the altered area;
Path of Travel Priority

Which accessible elements should be provided?

The PRIORITY is:

(1) An accessible entrance to the building;
(2) An accessible route to the altered area;
(3) At least one accessible restroom for each sex or a single unisex restroom on the Path of Travel;
Path of Travel Priority

Which accessible elements should be provided?

The PRIORITY is:

(1) An accessible entrance to the building;
(2) An accessible route to the altered area;
(3) At least one accessible restroom for each sex or a single unisex restroom on the Path of Travel;
(4) Accessible telephones on the Path of Travel;
Path of Travel Priority

Which accessible elements should be provided?

The PRIORITY is:

(1) An accessible entrance to the building;
(2) An accessible route to the altered area;
(3) At least one accessible restroom for each sex or a single unisex restroom on the Path of Travel;
(4) Accessible telephones on the Path of Travel;
(5) Accessible drinking fountains on the Path of Travel, and;
Which accessible elements should be provided?

The PRIORITY is:

(1) An accessible entrance to the building;
(2) An accessible route to the altered area;
(3) At least one accessible restroom for each sex or a single unisex restroom on the Path of Travel;
(4) Accessible telephones on the Path of Travel;
(5) Accessible drinking fountains on the Path of Travel, and;
(6) When possible, additional accessible elements such as parking, storage and alarms, on the Path of Travel.
Why is it important to provide an accessible Path of Travel?
Why?

1. Incremental Accessibility.

2. Accessibility is not solely provided for wheelchair users.
Where to find the Standard?

Title I: Employment

TITLE II: State and Local Governments

Title III: Public Accommodations

Title IV: Telecommunications

Title V: Miscellaneous Provisions
Where to find the Standard?

T:\sca_stds\Codes\DOJ_ADA
Where to find the Standard?

2010 ADA Standards for Accessible Design

Department of Justice
September 15, 2010

Section 35.151 of 28 CFR Part 35

(i) Alterations to historic properties shall comply, to the maximum extent feasible, with the provisions applicable to historic properties in the design standards specified in § 35.151(c).

(ii) If it is not feasible to provide physical access to an historic property in a manner that will not threaten or destroy the historic significance of the building or facility, alternative methods of access shall be provided pursuant to the requirements of § 35.150.

(4) Path of travel. An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration.

(i) Primary function. A "primary function" is a major activity for which the facility is intended. Areas that contain a primary function include, but are not limited to, the dining area of a cafeteria, the meeting rooms in a conference center, as well as offices and other work areas in which the activities of the public entity using the facility are carried out.

(A) Mechanical rooms, boiler rooms, supply storage rooms, employee lounges or locker rooms, janitorial closets, entrances, and corridors are not areas containing a primary function. Restrooms are not areas containing a primary function unless the provision of restrooms is a primary purpose of the area, e.g., in highway rest stops.

(ii) For the purposes of this section, alterations to windows, hardware, controls, electrical outlets, and signage shall not be deemed to be alterations that affect the usability of or access to an area containing a primary function.

(ii) A "path of travel" includes a continuous, unobstructed way of pedestrian passage by means of which the altered area may be approached, entered, and exited, and which connects the altered area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility, and other parts of the facility.

(A) An accessible path of travel may consist of walks and sidewalks, curb ramps,

Department of Justice
2010 Standards: Title 8 – 7
Path of Travel Report
PATH OF TRAVEL REPORT
EXAMPLE

Design #: D017646
LLW#: 106349
Description: FY17 RESO A LIBRARY UPGRADES

M.S. 282 Queens
Building ID: Q465
School District: 27

Report Prepared by: Nicholas A. Kaminski; Director, ADA Compliance SCA
Date Prepared: October 26, 2018
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# Path of Travel Report

## A. PROJECT INFORMATION

<table>
<thead>
<tr>
<th>LLW</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>106349</td>
<td>FY17 RESO A LIBRARY UPGRADES</td>
</tr>
</tbody>
</table>

**School Address:** 8-21 Bay 25th Street, Queens, 11691  
**School District:** 27  
**School Telephone:** (718) 471-8934  
**Person(s) Contacted:**  
**Person(s) Performing Site Inspection(s):**  
**Report Prepared by:**  
**SCA Sr. Project Officer:**  
**SCA Project Officer:**  
**SCA Design Manager:**  
**SCA Design Project Manager:**  
**Scope Reviewer(s):**

## B. COST SUMMARY OF POT OBLIGATION AND COST ESTIMATE

<table>
<thead>
<tr>
<th>Description</th>
<th>Unloaded Cost (Labor and Materials)</th>
<th>Loaded Cost (1.46x unloaded cost)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Path of Travel Obligation Amount</td>
<td>$20,072</td>
<td>$29,305</td>
</tr>
<tr>
<td>SCA Path of Travel Construction Estimate</td>
<td>$21,000</td>
<td>$30,660</td>
</tr>
</tbody>
</table>
C. ALTERATIONS TO PRIMARY FUNCTION AREAS AND PATH OF TRAVEL APPLICABILITY

Per ADA, “Alterations” include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of structural parts or elements, and changes or rearrangement in the plan configuration of walls and full height partitions. Normal Maintenance, reroofing, painting, or changes to mechanical and electrical systems are not Alterations unless they affect the usability of the building or facility.

When a Primary Function Area (PFA) in an existing building is altered, such that it affects usability, accessibility beyond the project scope may be required to provide an accessible Path of Travel (PoT) to that altered area.

The PoT is a continuous, unobstructed way of passage that the altered area may be approached, entered and exited. It connects the altered area with an exterior approach and includes an entrance, route, toilet rooms, and drinking fountains.

PoT applicable projects shall provide an accessible PoT to the altered area, up to an amount that is not disproportionate to the construction cost of the altered area.

The following instructions, worksheets, and Appendix with Annotated Drawings and Recommendations document the existing conditions, barriers to accessibility, and work to be proposed to meet the PoT obligation for the project.

D. PATH OF TRAVEL WORKSHEET

1. PROJECT PoT- APPLICABILITY (Section 1 of Worksheet)

    Current Project:
    Complete Section 1, “PoT Applicability”, and check off “Current Project”.

    Prior Projects:
    Were there any prior projects at this building that have an NTP date within three years of the current project’s projected NTP date? (Y/N) Yes☐ No☐

    Did any of these prior projects alter the subject PFA, or a different PFA on the same PoT, without providing an accessible PoT to that area? (Y/N) Yes☐ No☐

    If any of the answers are no, no further information or listing of previous project(s) is required in the worksheet. If both answers are yes, complete Section 1, “PoT Applicability” as per §351 151(b)(4)(v)(B)(1) for each previous project to determine if project is PoT applicable and check off “Previous Project” in Section 1. If the project(s) is determined to not be PoT applicable, do not fill in Section 2 of worksheet, but project is still listed in Section 3 of worksheet.
2. **Path of Travel Obligation** (Section 2 of the worksheet)

Section 2 will yield the “PoT Obligation” for the current project and each prior project. For each prior project, the cost shall be based on the estimate at time of Design Completion. Designer shall clearly mark-up a copy of the related estimate to indicate the cost of Alteration to the PFA. The PoT Obligation worksheet will indicate, for each applicable project:

- a. Net Construction Cost of the altered PFA
- b. Required POT Expenditure (Net Cost x 20%)
- c. Total Deductible Alteration Expenditures
- d. PoT Obligation amount for the project

3. **“Total PoT Obligation”** (Section 3)

Fill in each current and all prior project(s) for which Section 1 of the worksheet was filled out, and for PoT applicable projects fill in the PoT obligation amount. The sum total will be the unloaded construction estimate for the obligation (not inclusive of general conditions, overhead and profit, etc.).

4. **Improvement to PoT** (Section 4)

In the Appendix, provide details as to the work that would be required for each priority listed in Section 4 of the Worksheet. After determining the work required within the PoT obligation in the Appendix, provide a brief description of the work that would be required for each priority in Section 4 and indicate if it is feasible or not feasible. There may be only partial work of one priority, or could be work of two priorities that may fit in the PoT Obligation. For feasible priority(ies), provide the estimated cost for the PoT improvement work in the cost column, with the total unloaded cost needing to be greater than or equal to the Total PoT Obligation indicated in Section 3 of the worksheet. Place the total estimated construction cost of PoT improvements and total PoT Obligation in the appropriate spaces in Part 5.

5. **PoT Validation** (Section 5)
NYC School Construction Authority  
PATH OF TRAVEL ADDITIONAL RECOMMENDED ITEM  
M.S. 282, Borough: Queens, Building ID: Q465  
Design #: D017646, LLW#: 106439

### PATH OF TRAVEL WORKSHEET (Fill this out for each applicable project)
Complete Sections 1 & 2 for each applicable project. Add additional Sections 1 & 2 for each additional prior project if needed. Section 3 & 4 should be completed only once.

#### 1. PoT Applicability (Check One)
- Current Project ☑  
- Prior Project ☐

<table>
<thead>
<tr>
<th>Project Description</th>
<th>FY17 Reso A Library Upgrade</th>
<th>LLW#: 106439</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>D#: 017646</td>
<td></td>
</tr>
</tbody>
</table>

If any answer below is NO, do not continue past Section 1, as it is not a PoT applicable project. If all of the answers below are YES, this project is PoT applicable.

- i. Does the project include work that affects the usability of, or access to a PFA?  
  - Yes ☑  
  - No ☐

- ii. Is the project for a purpose other than specifically Program Accessibility (ADA §35.150)?  
  - Yes ☐  
  - No ☑

- iii. Does the Alteration (per ADA) affect, or could it affect, the usability of the facility or building or portion thereof?  
  - Yes ☐  
  - No ☑

Is this project PoT Applicable?  
- Yes ☑  
- No ☐

#### 2. Path of Travel Obligation

**a. Net Construction Cost of Project Affecting The PFA**

- i. Construction cost of altered PFA. This is the TOTAL labor + material cost of the construction work to the PFA (including electrical, mechanical, maintenance, repairs, etc.)  
  - $266,210

- ii. Deduct the cost of windows, hardware, controls, electrical outlets and signage [as per §35.151(b)(4)(C)].  
  - $8,360

- iii. Deduct what is not considered an alteration (per ADA definition §108.5) such as normal maintenance, re roofing, painting or changes to the mechanical and electrical systems (unless they affect the usability).  
  - $131,260

- iv. Deduct items that do not affect usability (such as demolition, ceilings, finishstopping, etc.).  
  - $46,210

**Net Construction Cost = $100,360**

**b. Required PoT Expenditure ("Disproportionality" § 35.151 (b)(4)(iii)(A))**

\[
\text{Required PoT Expenditure} = \left(\frac{\text{Net Construction Cost}}{0.02}\right)
\]

\[
\text{Required PoT Expenditure} = \left(\frac{100,360}{0.02}\right) = 20,072
\]

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## Path of Travel Report

**NYC School Construction Authority**  
**PATH OF TRAVEL ADDITIONAL RECOMMENDED ITEM**  
**M.S. 282, Borough: Queens, Building ID: Q465**  
**Design #: D017646, LLW#(s): 106349**

<table>
<thead>
<tr>
<th>c. Deductible Alteration Expenditures</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project costs associated with providing an accessible entrance and an accessible route to the altered area, for example, the cost of widening doorways or installing ramps.</td>
</tr>
<tr>
<td>ii. Project costs associated with making restrooms serving the PFA accessible, such as installing grab bars, enlarging toilet stalls, insulating pipes, or installing accessible faucet controls.</td>
</tr>
<tr>
<td>iii. Project costs associated with providing accessible telephones, such as relocating a telephone to an accessible height or installing amplification devices on the PoT.</td>
</tr>
<tr>
<td>iv. Project costs associated with relocating an inaccessible drinking fountain on the PoT.</td>
</tr>
</tbody>
</table>

**Total of Deductible Alteration Expenditures**  
(Deductible Expenditure)  
$0

<table>
<thead>
<tr>
<th>d. Remaining PoT Obligation to Provide an Accessible Path of Travel</th>
</tr>
</thead>
<tbody>
<tr>
<td>$20,072 (Required PoT Expenditure) - $0 (Total of Deductible Alteration Expenditures) = $20,072 (Project PoT Obligation Amount)</td>
</tr>
</tbody>
</table>

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**SCA School Construction Authority**
# Path of Travel Report

### NYC School Construction Authority
**PATH OF TRAVEL ADDITIONAL RECOMMENDED ITEM**
M.S. 282, Borough: Queens, Building ID: Q465  
Design #: D017846, LLW#(s): 106349

### PATH OF TRAVEL WORKSHEET (Fill this out for each applicable project)
Complete Sections 1 & 2 for each applicable prior project. Add additional Sections 1 & 2 for each additional prior project if needed. Sections 3 & 4 should be completed only once.

#### 1. PoT Applicability (Check One)
- Current Project [ ]
- Prior Project [ ]

<table>
<thead>
<tr>
<th>Project Description</th>
<th>LLW#</th>
<th>D#</th>
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<tbody>
<tr>
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If any answer below is NO, do not fill out Section 2, as it is not a PoT applicable project, but include project in the list in Part 3 as Not PoT applicable.

**If all of the answers below are YES, this project is PoT applicable.**

1. Does the project include work that affects the usability of, or access to a PFA?
   - Yes [ ]
   - No [ ]

2. Is the project for a purpose other than specifically Program Accessibility (ADA § 5150)?
   - Yes [ ]
   - No [ ]

3. Does the Alteration (per ADA) affect, or could it affect the usability of the facility or building portion thereof?
   - Yes [ ]
   - No [ ]

**Is this project PoT Applicable?**
- Yes [ ]
- No [ ]

#### 2. Path of Travel Obligation

**a. Net Construction Cost of Project Affecting the PFA**

1. Construction cost of altered PFA. This is the TOTAL labor + material cost of the construction work to the PFA (including electrical, mechanical, maintenance, repairs, etc.)

2. Deduct the cost of windows, hardware, controls, electrical outlets and signage [as per §35.151(6)(4)(B)].

3. Deduct what is not considered an alteration (per ADA definition §106.5) such as normal maintenance, reroofing, painting or changes to the mechanical and electrical systems (unless they affect the usability).

4. Deduct items that do not affect usability (such as demolition, ceilings, firestopping, etc.).

**Net Construction Cost:**

b. Required PoT Expenditure ("Disproportionality" § 35.151 (b)(4)(iii)(A))

\[
\text{(Net Construction Cost)} \times 20\% = \text{Required PoT Expenditure}
\]

Note: (Required PoT Expenditure)
### Path of Travel Report

#### NYC School Construction Authority
**PATH OF TRAVEL ADDITIONAL RECOMMENDED ITEM**
- **M.S. 282, Borough: Queens, Building ID: Q465**
- **Design #: D017646, LLW#(s): 106349**

#### Deductible Alteration Expenditures

<table>
<thead>
<tr>
<th>Description</th>
<th>Expenditure</th>
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<tbody>
<tr>
<td>i. Project costs associated with providing an accessible entrance and</td>
<td></td>
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<tr>
<td>an accessible route to the altered area, for example, the cost of</td>
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<td>accessible, such as installing grab bars, enlarging toilet stalls,</td>
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<td></td>
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<tr>
<td>such as relocating a telephone to an accessible height or installing</td>
<td></td>
</tr>
<tr>
<td>amplification devices on the PoT.</td>
<td></td>
</tr>
<tr>
<td>iv. Project costs associated with relocating an inaccessible drinking</td>
<td></td>
</tr>
<tr>
<td>fountain on the PoT.</td>
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</table>

**Total of Deductible Alteration Expenditures**

**Required PoT Expenditure**

**Total of Deductible Alteration Expenditures**

**Project PoT Obligation Amount**

---

*Page 9 of 12*
Path of Travel Report

NYC School Construction Authority
PATH OF TRAVEL ADDITIONAL RECOMMENDED ITEM
M.S. 282, Borough: Queens, Building ID: Q465
Design #: D017646, LLW#(s): 106349


<table>
<thead>
<tr>
<th>Project Description</th>
<th>Project LLW/D#:</th>
<th>Is the Project PoT Applicable?</th>
<th>Project PoT Obligation Amount</th>
</tr>
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<tbody>
<tr>
<td>FY17 Reso A Library Upgrade</td>
<td>LLW 105349</td>
<td>Yes ☑ No ☐</td>
<td>$20,072</td>
</tr>
<tr>
<td>FY17 Reso A Technology</td>
<td>LLW 105420</td>
<td>Yes ☑ No ☐</td>
<td>N/A</td>
</tr>
<tr>
<td>FY17 Reso A Technology</td>
<td>LLW 105429</td>
<td>Yes ☑ No ☐</td>
<td>N/A</td>
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<tr>
<td>IP Surveillance Cameras</td>
<td>LLW 103478</td>
<td>Yes ☑ No ☐</td>
<td>N/A</td>
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<tr>
<td>FY16 Reso A Technology</td>
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<td>Yes ☑ No ☐</td>
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<tr>
<td>IEH PO18-Room 345</td>
<td>LLW 098064</td>
<td>Yes ☑ No ☐</td>
<td>N/A</td>
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</table>

Total PoT Obligation (Current and Prior Projects) $20,072
### Path of Travel Report

#### NYC School Construction Authority
**PATH OF TRAVEL ADDITIONAL RECOMMENDED ITEM**  
M.S. 282, Borough: Queens, Building ID: Q465  
Design #: D017646, LLH#(s): 106349

<table>
<thead>
<tr>
<th>Priority</th>
<th>Description</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>i.</td>
<td>An accessible entrance</td>
<td>$0</td>
</tr>
<tr>
<td>ii.</td>
<td>An accessible route to the altered area</td>
<td>$0</td>
</tr>
<tr>
<td>iii.</td>
<td>Accessible restrooms</td>
<td>$0</td>
</tr>
<tr>
<td>iv.</td>
<td>Accessible telephones or amplification devices</td>
<td>$0</td>
</tr>
<tr>
<td>v.</td>
<td>Accessible drinking fountains</td>
<td>$21,000</td>
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<tr>
<td>vi.</td>
<td>Additional elements</td>
<td>N/A</td>
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**Total Cost for PoT Improvements**

<table>
<thead>
<tr>
<th>PoT Validation</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Total PoT Obligation Amount</td>
<td>Total Cost for PoT Improvements</td>
</tr>
<tr>
<td>$20,072</td>
<td>$21,000</td>
</tr>
</tbody>
</table>

---

E. Appendix

Annotated Drawings

1. Show the location of the altered PFA(s) for this project, as well as for prior projects identified in Section B. Previous PFA(s) and PoT shall be indicated as 'Prior Project'.
2. Show the PoT, from the sidewalk (or parking lot, if provided), to the altered PFA(s). If the PoT requires an elevator or route that does not exist, indicate the projected location of such elements.
3. Indicate the location of accessible/non-accessible toilet rooms and drinking fountains serving the altered PFA(s).
4. Indicate any accessibility-related deficiencies along the PoT to the altered PFA.
Path of Travel Report

NYC School Construction Authority
PATH OF TRAVEL ADDITIONAL RECOMMENDED ITEM
M.S. 282, Borough: Queens, Building ID: Q465
Design #: D017646, LLW#(s): 106349

Description of Work

[Note to preparer: For each priority listed in Section 4 of the Worksheet, describe the work required to meet the priority and the barriers to completion. For the work in each priority, provide an order of magnitude cost.]

Priority:

Findings/Solutions/Feasibility:

[Note to preparer: For the priority(ies), or portion thereof, that are deemed feasible and within the PoT Obligation, fill out the detailed findings and recommendations and prepare a detailed Estimate.]

Recommended Priority:
Findings:

Recommendations

F. Cost Estimate

1. Current Project marked up estimate determining the PoT Obligation amount
**Path of Travel Report**

### ASBESTOS ABATEMENT

<table>
<thead>
<tr>
<th>Item Description</th>
<th>Units</th>
<th>Quantity</th>
<th>Unit Cost</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Selective demolition and removals</td>
<td>LS</td>
<td>-</td>
<td>-</td>
<td>16,050</td>
</tr>
<tr>
<td>Apply self-leveling compound</td>
<td>SF</td>
<td>3,700</td>
<td>.75</td>
<td>13,875</td>
</tr>
<tr>
<td>Ceiling Suspension</td>
<td>SF</td>
<td>700</td>
<td>.75</td>
<td>4,025</td>
</tr>
<tr>
<td>Provide new custom millwork Librarian Station</td>
<td>EA</td>
<td>1</td>
<td>14,500</td>
<td>14,500</td>
</tr>
<tr>
<td>Provide new custom wood IT tables</td>
<td>EA</td>
<td>18</td>
<td>3,900</td>
<td>72,000</td>
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<tr>
<td>Fire-stopping related to Electrical Work</td>
<td>EA</td>
<td>6</td>
<td>500</td>
<td>3,000</td>
</tr>
<tr>
<td>New-finish hardware</td>
<td>EA</td>
<td>6</td>
<td>400</td>
<td>2,400</td>
</tr>
<tr>
<td>Patch-and-repair wall-plaster</td>
<td>SF</td>
<td>300</td>
<td>6.50</td>
<td>1,950</td>
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<tr>
<td>Prime,-point-plaster related to Electrical Work</td>
<td>SF</td>
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<tr>
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<td>SF</td>
<td>3,700</td>
<td>7.80</td>
<td>28,880</td>
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<tr>
<td>Provide new vinyl cove base</td>
<td>LF</td>
<td>200</td>
<td>3.00</td>
<td>600</td>
</tr>
<tr>
<td>GVB-furring</td>
<td>LF</td>
<td>80</td>
<td>10.25</td>
<td>820</td>
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<tr>
<td>GVB-coiling-and-soffits</td>
<td>SF</td>
<td>700</td>
<td>11.20</td>
<td>7,840</td>
</tr>
<tr>
<td>Sand,-Ripinish,-Seal,-Varnish Existing Wood-Millwork</td>
<td>SF</td>
<td>2,650</td>
<td>9.60</td>
<td>25,560</td>
</tr>
<tr>
<td>Sand,-Ripinish,-Seal,-Varnish Existing Wood-Doors</td>
<td>SF</td>
<td>340</td>
<td>6.25</td>
<td>2,125</td>
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<tr>
<td>Prime,-point-ceilings-and-soffits</td>
<td>SF</td>
<td>3,700</td>
<td>2.25</td>
<td>8,610</td>
</tr>
<tr>
<td>Prime,-point-walls</td>
<td>SF</td>
<td>4,300</td>
<td>3.75</td>
<td>15,975</td>
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**SUBTOTAL ASBESTOS ABATEMENT COSTS**

<table>
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<tr>
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<th>Unit Cost</th>
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### GENERAL CONSTRUCTION

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<tr>
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<tr>
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<td>.75</td>
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<td>04 Ceiling Suspension</td>
<td>SF</td>
<td>700</td>
<td>.75</td>
<td>4,025</td>
</tr>
<tr>
<td>05 Provide new custom millwork Librarian Station</td>
<td>EA</td>
<td>1</td>
<td>14,500</td>
<td>14,500</td>
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<tr>
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<td>EA</td>
<td>18</td>
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<td>EA</td>
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<td>3,000</td>
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<td>09 Patch-and-repair wall-plaster</td>
<td>SF</td>
<td>300</td>
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<td>1,950</td>
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<td>10 Prime,-point-plaster related to Electrical Work</td>
<td>SF</td>
<td>400</td>
<td>4.45</td>
<td>4,450</td>
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<tr>
<td>11 Prime,-point-conduits related to Electrical Work</td>
<td>LF</td>
<td>140</td>
<td>1.25</td>
<td>175</td>
</tr>
<tr>
<td>12 Provide new resilient flooring</td>
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<tr>
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<td>14 GVB-furring</td>
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<td>820</td>
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<td>15 GVB-coiling-and-soffits</td>
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<td>700</td>
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<td>16 Sand,-Ripinish,-Seal,-Varnish Existing Wood-Millwork</td>
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<td>17 Sand,-Ripinish,-Seal,-Varnish Existing Wood-Doors</td>
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<tr>
<td>18 Prime,-point-ceilings-and-soffits</td>
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<td>8,610</td>
</tr>
<tr>
<td>19 Prime,-point-walls</td>
<td>SF</td>
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**SUBTOTAL GENERAL CONSTRUCTION**

<table>
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### PLUMBING

**SUBTOTAL PLUMBING**

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### ELECTRICAL

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<tbody>
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<td></td>
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William Maxwell Vocational HS Brooklyn – KSB0 - Library Upgrade  
Design # DOV703 - LW 11/15/16 / FY 17 Res A Library Upgrade  
ESTIMATE OF PROBABLE CONSTRUCTION COSTS  
page 2 of 4
NYC School Construction Authority
PATH OF TRAVEL ADDITIONAL RECOMMENDED ITEM
M.S. 282, Borough: Queens, Building ID: Q465
Design #: D017646, LLW#(s): 106349

2. Previous Project(s) marked up estimate determining the PoT Obligation
   N/A

3. Estimate of Recommended PoT Work
Path of Travel Scoping Guidelines
Path of Travel
Scoping Guidelines

ACCESSIBILITY IN EXISTING BUILDINGS SCOPING GUIDELINES

1.0 GENERAL GUIDELINES

1.1 Introduction

The following “Scoping Guideline” is provided to give guidance on how to meet the Authority’s obligation under the Americans with Disabilities Act (ADA) and specifically “Path of Travel” (“PoT”) implementation (2010 ADA §35 151(3)(4)).

When a “Primary Function Area” (“PFA”) in an existing building is altered, accessibility modifications beyond the project scope may be required to provide an accessible PoT to that altered area.

1.2 Project Definition

2.0 ADA PATH OF TRAVEL COMPLIANCE

2.1 Introduction

2.2 Project Definition

2.2.1 Capital Improvement Projects

2.2.1.1 Plan Nodes

All CIP projects that affect PFAs as defined below, must investigate PoT requirement. Projects will not initially be assigned a node for PoT as this will be scoped as an Additional Recommended Item based on whether PFAs are affected by the project. If capital planning approves the work, it will assign an IFF for PoT work.

2.2.1.2 Budget

There is no initial budget assigned to PoT as the scope report will determine the required scope and provide an estimate for the work.

2.3 Background and Approach

2.3.1 Background

The City of New York, including the New York City School Construction Authority, is obligated to comply with Federal and Local Laws as they relate to accessibility. The ADA states that an alteration that affects or could affect the “Usability” of, or access to, a PFA shall be made so that, to the maximum extent feasible, the PoT to the altered area shall be readily accessible to and usable by individuals with disabilities.

2.3.2 Approach

The applicability of PoT compliance shall be identified by the AEoR in the scope report. If PoT compliance is required, then the “Path of Travel Compliance Worksheet” (Exhibit A) shall be completed to determine the Required “Path of Travel Expenditure” and the scope of work associated with this PoT. The Path of Travel Compliance Worksheet shall be included in the scope report and the “Required Path of Travel Expenditure” shall be shown as an additional recommended item. Include a copy of the marked up cost estimate used as back up that clearly indicates the codes that are considered allowable deductions. The ADA “Path of Travel Compliance Worksheet” is provided to demonstrate compliance by the AEoR with 2010 ADA. The “Path of Travel Compliance Worksheet” is to be revised as needed at the end of Design when the final Engineer’s Estimate is available.
Path of Travel Scoping Guidelines

2.4 POT Guidelines for Existing Buildings

2.4.1 Primary Function Areas

A PFA ("PF") is a major activity for which a facility is intended. The PF of a school is to educate students, and therefore the rooms and spaces directly involved are considered PF areas.

2.4.1.1 PFAs in school buildings include, but are not limited to, the following:
- Typical and Specialized Classrooms
- Auditoriums/Gymnasiums
- Gymnasiums, including Student Locker Rooms
- Athletic Fields and Field houses, including Bleachers and Student Locker Rooms
- Playgrounds, Greenhouses and other outdoor Educational Spaces
- Libraries
- Cafeterias
- Offices and other work areas in which educational activities of the school are undertaken
- Nurses Office and Health Clinics
- Rooftop Educational Spaces
- Swimming Pool

2.4.1.2 Spaces that are NOT PFA’s include, but are not limited to, the following:
- Mechanical/Electrical Rooms, Boiler Rooms, and other MEP areas
- Supply Storage Rooms
- OSFNS Kitchens
- Employee Lounges or Employee Locker Rooms
- Janitorial Closets
- Circulation Paths, including Entrances, Lobbies and Corridors
- Restrooms (unless included as part of a Student Locker Room)

2.4.2 POT Requirement for projects that alter a PFA’s

2.4.2.1 Potentially applicable projects have the potential to affect the “usability” of, or access to, a PFA. As per the US Access Board, “the term usability often means the work (even if it’s maintenance) involving elements or spaces covered by the standards”.

2.4.2.2 Examples of projects that may trigger POT requirements include, but are not limited to, the following:
- Projects that affect PFA’s
- In an Addition Project, when a PFA is altered in the existing building, for reasons other than to provide Program Accessibility
- Room conversions that affect PFA’s
- Rehabilitation or renovation of PFA’s

2.4.2.3 Examples of projects that typically do not trigger POT requirements include, but are not limited to, the following:
- Projects that do not affect PFA’s
- New Buildings
- Full Program Accessibility projects (2010 ADA §35.150)
2.4.3 Disproportionality

2.4.3.1 Per ADA, an accessible PoT must be provided as part of an alteration project that affects the usability of, or access to, a PFA, but only to the extent that the cost to do so is not disproportionate to the overall cost of the alteration to the PFA. This is the comparative analysis referred to as “disproportionality.” The cost of providing an accessible PoT beyond 20% of the applicable alteration cost to the PFA is considered disproportionate.

2.4.4 Prior PoT Applicable Projects that did not include PoT work

2.4.4.1 When a PFA has been previously renovated at the subject building, on the same PoT, within the past three years, and did not include the required PoT work, that “disproportionality” amount shall be included in the current “Required Path of Travel Expenditure to calculate the disproportionality. Applicable previous projects shall have an NTP date within three years of the current projects NTP.

2.4.5 Deductions not Included in the Net Alteration Cost

2.4.5.1 Deduct what is not considered an Alteration (as per 2010 ADA definition §108.6), such as normal maintenance, re roofing, painting or papering, or changes to the mechanical and electrical systems (unless they affect the usability). Assistive Listening Systems should not be deducted.

2.4.5.2 Deduct the cost of alterations to windows, hardware, controls, electrical outlets and signage (as per 2010 ADA §35.151(b)(4)(ix)(B)), as they are not deemed to be alterations that affect the usability to an area containing a PF.

2.4.5.3 Deduct items that do not affect the usability of the PFA. Such items may include, demolition work, ceilings, fire stopping, etc.

2.4.6 POT Priority

2.4.6.1 The PoT extends from the sidewalk (or parking area, if provided) at the building entrance to the altered PF area. In a playground renovation, the PoT should increase accessibility between the building and the playground. Priority should be given to those elements that will maximize accessibility along the PoT to the altered area, in order of:

- An accessible entrance to the facility,
- An accessible route to the altered area,
- At least one accessible restroom for each sex or a single unisex restroom,
- Accessible drinking fountains, and
- Additional accessible elements, such as parking, storage and alarms.
AE Scoping Guidelines

2.4.6.2 When the PoT funding obligation, calculated using the Path of Travel Compliance Worksheet, is not enough to cover the top priority item, it is suggested to move to the next priority item, in sequence, until the PoT obligation has been met. Use the description section of the Path of Travel Compliance Worksheet to indicate what work will be done to the PoT, or why priority was given to one element over another if the priority list is not followed. Include approximate cost considerations.

3.0 Exhibits

A. ADA Path of Travel Compliance Worksheet

End of ADA Path of Travel Compliance Scoping Guidelines
Thank You!

Questions?