

# Path of Travel Requirements § 35.151(b)(4)

The 2010 American's With Disabilities Act

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# 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



What the ADA says...

§35.151(b)(4) 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***

# KEY TERMS: Alteration



§106.5 What is a “**Alteration**” per ADA?

# KEY TERMS: Alteration



§106.5 What is a “**Alteration**” per ADA?

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.

# KEY TERMS: Affecting Usability



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.

# KEY TERMS: Primary Function



§35.151(b)(4)(i) What is a “**Primary Function**”?

# KEY TERMS:

## Primary Function



§35.151(b)(4)(i)

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)



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

# KEY TERMS:

## 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.



# KEY TERMS: Disproportionality



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

# KEY TERMS: 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



§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”.*

**Above that 20% would make the additional cost of making the Path of Travel disproportionate to the value of the alteration.**

# 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.

# 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.

# 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. 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

# Is this Project PoT applicable?



## 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

$$\begin{array}{ccccc} \text{TOTAL} & & & & \text{Net} \\ \text{Construction} & - & \text{Allowable} & = & \text{Construction} \\ \text{Cost (L+M)} & & \text{Deductions} & & \text{Cost} \end{array}$$

# Calculating Path of Travel Obligation



## Allowable Deductions from the TOTAL Construction Cost:

§35.151(b)(4)(i)(B)

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.

# Calculating Path of Travel Obligation



## Allowable Deductions from the TOTAL Construction Cost:

§35.151(b)(4)(i)(B)

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

# Calculating Path of Travel Obligation



## Allowable Deductions from the TOTAL Construction Cost:

§106.5

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

# Calculating Path of Travel Obligation



## Allowable Deductions from the TOTAL Construction Cost:

§106.5

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.**

# Calculating Path of Travel Obligation



## **Allowable Deductions from the TOTAL Construction Cost:**

3. Deduct items that do not affect usability.

# Calculating Path of Travel Obligation



## **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

$$\begin{array}{c} \textit{Net} \\ \textit{Construction} \\ \textit{Cost} \end{array} \times \begin{array}{c} 20\% \\ \text{(Disproportionality)} \end{array} = \begin{array}{c} \textit{Required} \\ \textit{PoT} \\ \textit{Expenditure} \end{array}$$



# Calculating Path of Travel Obligation



## Required PoT Expenditure

$$\begin{array}{l} \text{Net} \\ \text{Construction} \\ \text{Cost} \end{array} \times \begin{array}{l} 20\% \\ \text{(Disproportionality)} \end{array} = \begin{array}{l} \text{Required} \\ \text{PoT} \\ \text{Expenditure} \end{array}$$

## Project PoT Obligation

$$\begin{array}{l} \text{Required PoT} \\ \text{Expenditure} \end{array} - \begin{array}{l} \text{Deductible} \\ \text{Alteration} \\ \text{Expenditures} \end{array} = \begin{array}{l} \text{Project} \\ \text{PoT} \\ \text{Obligation} \end{array}$$

# 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.



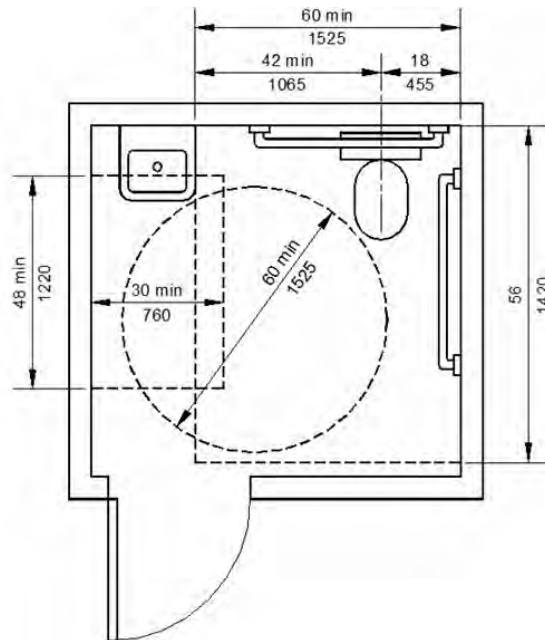
**Project costs associated with providing an accessible entrance and an accessible route to the altered area, for example, the cost of widening doorways or installing ramps.**

# 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.**

# Prior Projects



§35.151(b)(4)(v)(B)(1)

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)

$$\begin{array}{l} \text{Prior Project(s)} \\ \text{PoT Obligation} \end{array} + \begin{array}{l} \text{Current Project} \\ \text{PoT Obligation} \end{array} = \textbf{\textit{Total PoT}} \\ \textbf{\textit{Obligation}}$$



# 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;

# 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;
- (2) An accessible route to the altered area;

# 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;
- (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



§35.151(b)(4)(iv)(B)

## **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

§35.151(b)(4)(iv)(B)

## 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;



# 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;
- (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?



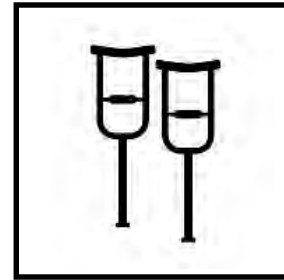
**Why is it important to provide an  
accessible Path of Travel?**



# Why?



1. **Incremental Accessibility.**
2. **Accessibility is not solely provided for wheelchair users.**





# Where to find the Standard?



**Title I** Employment

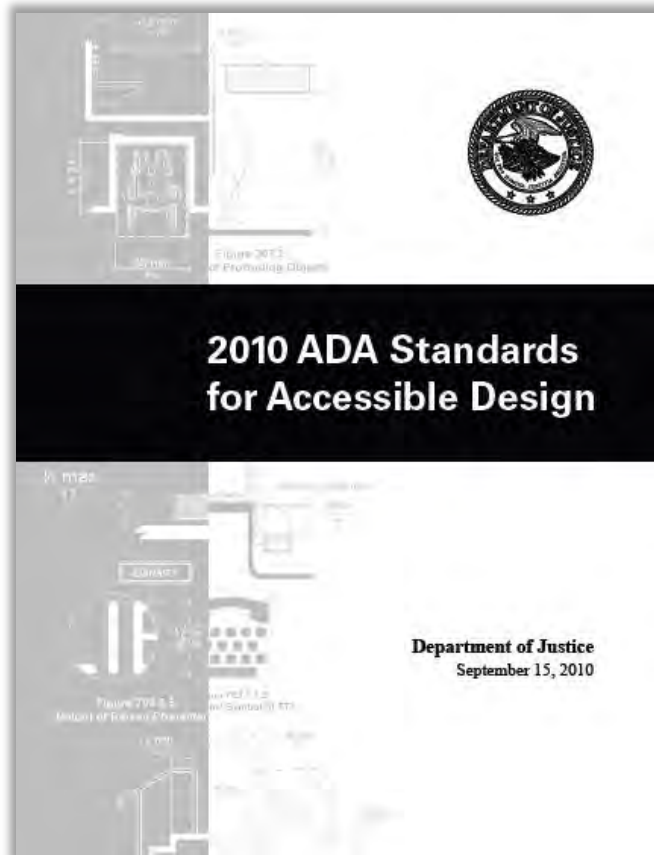
**TITLE II** **State and Local Governments**

**Title III** Public Accommodations

**Title IV** Telecommunications

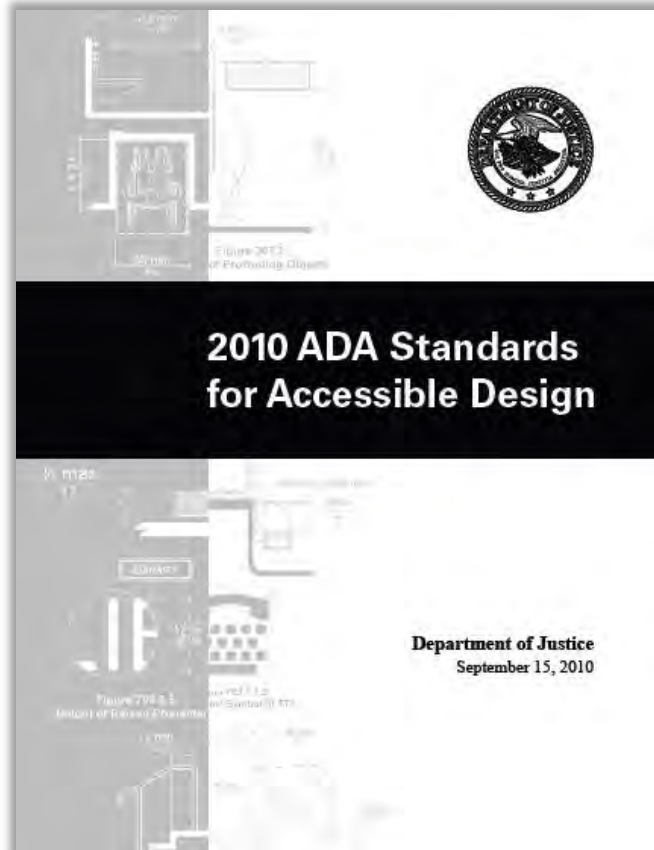
**Title V** Miscellaneous Provisions

# Where to find the Standard?

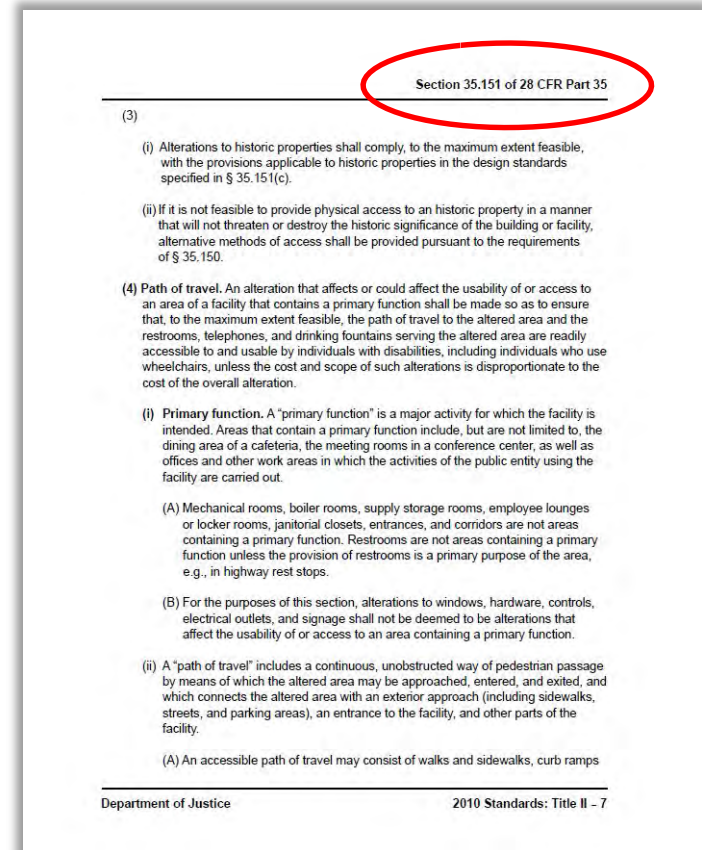


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# Where to find the Standard?



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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



**Capital Improvement Program**  
Architecture & Engineering

## 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

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

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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

## A. PROJECT INFORMATION

LLW	Description
106349	FY17 RESO A LIBRARY UPGRADES

School Address: 8-21 Bay 25 <sup>th</sup> Street, Queens, 11691		School District: 27
School Telephone: (718) 471-6934	Priority:	Inspection Date(s):
Person (s) Contacted:		
Person (s) Performing Site Inspection(s):		
Report Prepared by:		
SCA Sr. Project Officer:	SCA Design Manager:	
SCA Project Officer:	SCA Design Project Manager:	
Scope Reviewer(s):		

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

Description	Unloaded Cost (Labor and Materials)	Loaded Cost (1.46x unloaded cost)
Path of Travel Obligation Amount	\$20,072	\$29,305
SCA Path of Travel Construction Estimate	\$21,000	\$30,660

# 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

## **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 §35.151(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 be listed in Section 3 of worksheet.



# Path of Travel Report

NYC School Construction Authority  
PATH OF TRAVEL REPORT  
P.S. --#, Borough --, Building ID: --#--  
Design #: D--#--, LLW#(s): --/--#--

## 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)

# 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

PATH OF TRAVEL <sup>1</sup> 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 <input checked="" type="checkbox"/> Prior Project <input type="checkbox"/>
Project Description	FY17 Reso A Library Upgrade	LLW#: 106439
		D#: 017646
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 <input checked="" type="checkbox"/> No <input type="checkbox"/>
ii. Is the project for a purpose other than specifically Program Accessibility (ADA §35.150)?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
iii. Does the Alteration (per ADA) affect, or could it affect, the usability of the facility or building or portion thereof?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Is this project PoT Applicable?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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.)		\$286,210
ii. Deduct the cost of windows, hardware, controls, electrical outlets and signage [as per §35.151(b)(4)(i)(B)].		\$8,380
iii. 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).		\$131,260
iv. Deduct items that do not affect usability (such as demolition, ceilings, firestopping, etc.).		\$46,210
Net Construction Cost =		\$100,360
b. Required PoT Expenditure ("Disproportionality" § 35.151 (b)(4)(iii)(A))		
\$100,360 x 20% = Required PoT Expenditure		\$20,072
(Net Construction Cost)		(Required PoT Expenditure)

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 Design #: D017646, LLW#(s): 106349

c. Deductible Alteration Expenditures			
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.		\$0
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.		\$0
iii.	Project costs associated with providing accessible telephones, such as relocating a telephone to an accessible height or installing amplification devices on the PoT.		\$0
iv.	Project costs associated with relocating an inaccessible drinking fountain on the PoT.		\$0
<b>Total of Deductible Alteration Expenditures</b>			\$0
			(Deductible Expenditure)
d. Remaining PoT Obligation to Provide an Accessible Path of Travel			
	\$20,072	–	\$0 = \$20,072
i.	(Required PoT Expenditure)	(Total of Deductible Alteration Expenditures)	(Project PoT Obligation Amount)

# 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

PATH OF TRAVEL <sup>1</sup> 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 <input type="checkbox"/> Prior Project <input checked="" type="checkbox"/>
Project Description	LLW#:	
	D#:	
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 table in Part 3 as Not PoT applicable. 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 <input type="checkbox"/> No <input type="checkbox"/>	
ii. Is the project for a purpose other than specifically Program Accessibility (ADA § 35.150)?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
iii. Does the Alteration (per ADA) affect, or could it affect, the usability of the facility or building or portion thereof?	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Is this project PoT Applicable?		Yes <input type="checkbox"/> No <input type="checkbox"/>
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.)		
ii. Deduct the cost of windows, hardware, controls, electrical outlets and signage [as per §35.151(b)(4)(i)(B)].		
iii. 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).		
iv. Deduct items that do not affect usability (such as demolition, ceilings, fire stopping, etc.).		
Net Construction Cost =		
b. Required PoT Expenditure ("Disproportionality" § 35.151 (b)(4)(iii)(A))		
(Net Construction Cost)	× 20% = Required PoT Expenditure	(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		
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.		
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.		
iii. Project costs associated with providing accessible telephones, such as relocating a telephone to an accessible height or installing amplification devices on the PoT.		
iv. Project costs associated with relocating an inaccessible drinking fountain on the PoT.		
<b>Total of Deductible Alteration Expenditures</b>		<b>(Deductible Expenditure)</b>
<b>d. Remaining PoT Obligation to Provide an Accessible Path of Travel</b>		
<b>(Required PoT Expenditure)</b>	<b>(Total of Deductible Alteration Expenditures)</b>	<b>(Project PoT Obligation Amount)</b>

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3. PoT Obligation (Current and Prior Projects) Complete 3 and 4 once.				
Project Description	Project LLW/D#		Is the Project PoT Applicable?	Project PoT Obligation Amount
FY17 Reso A Library Upgrade	LLW: 106349	D: 017646	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	\$20,072
FY17 Reso A Technology	LLW: 105420	D: -	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
FY17 Reso A Technology	LLW: 105409	D: -	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
IP Surveillance Cameras	LLW: 104478	D: 017389	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
FY16 Reso A Technology	LLW: 103417	D: -	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
IEH PO18-Room 345	LLW: 098094	D: -	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A
	LLW:	D:	Yes <input type="checkbox"/> No <input type="checkbox"/>	
	LLW:	D:	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Total PoT Obligation (Current and Prior Projects)				\$20,072

# Path of Travel Report

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4. Improvements to PoT		
Priority	Description	Cost
i. An accessible entrance	The primary entrance is accessible.	\$0
ii. An accessible route to the altered area.	The route to the altered area is accessible.	\$0
iii. Accessible restrooms	An accessible restroom is required on the first floor, however the cost exceeds the PoT Required Obligation and will not be included in this project.	\$0
iv. Accessible telephones or amplification devices	There are no telephones in this school. There is an assistive listening system in the auditorium.	\$0
v. Accessible drinking fountains	Accessible drinking fountains will be provided.	\$21,000
vi. Additional elements	N/A	N/A
<b>Total Cost for PoT Improvements</b>		
5. PoT Validation		
i.	$\frac{\$20,072}{\text{(Total PoT Obligation Amount)}} \leq \frac{\$21,000}{\text{(Total Cost for PoT Improvements)}}$	

<sup>1</sup> For the full text of the "Path of Travel" provisions, refer to 2010 ADA §35.151(b) at <https://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf>

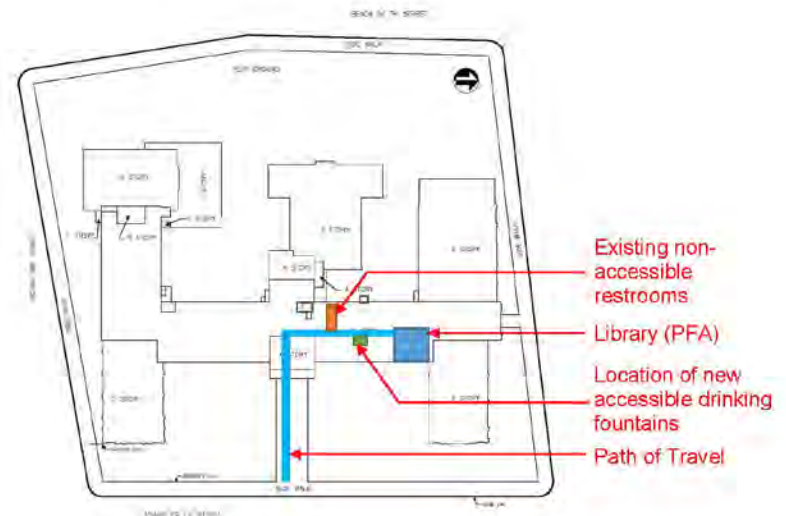
# Path of Travel Report

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## 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

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M.S. 282, Borough: Queens, Building ID: Q465  
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## 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

SUBTOTAL	ASBESTOS ABATEMENT COSTS	N/A (1998 Building)	N/A
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- GENERAL CONSTRUCTION

ITEM DESCRIPTION	UNITS	QUANTITY	UNIT COST	TOTAL COST
02 <del>Selective demolition and removals</del>	LS	-		16,050
03 <del>Apply self-leveling compound</del>	SF	3,700	3.75	13,875
05 <del>Ceiling Suspension</del>	SF	700	5.75	4,025
06 Provide new custom millwork Librarian Station	EA	1	14,500	14,500
06 Provide new custom wood IT tables	EA	15	3,800	57,000
07 <del>Fire-stopping related to Electrical Work</del>	EA	6	500	3,000
08 <del>New finish hardware</del>	EA	6	400	2,400
09 <del>Patch and repair wall plaster</del>	SF	300	6.50	1,950
09 <del>Prime, paint plaster related to Electrical Work</del>	SF	400	1.15	445
09 <del>Prime, paint conduits related to Electrical Work</del>	LF	100	1.25	125
09 Provide new resilient flooring	SF	3,700	7.80	28,860
09 <del>Provide new vinyl cove base</del>	LF	200	3.00	600
09 <del>GWB furring</del>	SF	80	10.25	820
09 <del>GWB ceiling and soffits</del>	SF	700	11.20	7,840
09 <del>Sand, Refinish, Seal, Varnish Existing Wood Millwork</del>	SF	3,650	9.60	35,040
09 <del>Sand, Refinish, Seal, Varnish Existing Wood Doors</del>	SF	285	6.25	1,780
09 <del>Prime, paint ceilings and soffits</del>	SF	3,700	2.30	8,540
09 <del>Prime, paint walls</del>	SF	1,700	2.20	3,740
12 <del>Provide new window shades</del>	SF	920	6.50	5,980
SUBTOTAL	GENERAL CONSTRUCTION			206,210

- PLUMBING

15 SUBTOTAL	PLUMBING	0
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- ELECTRICAL

16 SUBTOTAL	ELECTICAL	80,000
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# Path of Travel Report

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**2. Previous Project(s) marked up estimate determining the PoT Obligation**

N/A

**3. Estimate of Recommended PoT Work**



### ADA Path of Travel Compliance

## 2.0 ADA PATH OF TRAVEL COMPLIANCE

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.

### 2.2.1 Capital Improvement Projects

#### 2.2.1.2 Budget

### ground and Approach

### Approach

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### ADA Path of Travel Compliance

## 2.4.1 Primary Function Answer

#### 2.4.1 PVA's in an ionic liquid, as a novel electrolyte, for a fuel cell

- Mechanical ducts and doors, water flows, are over VAV boxes
- Exhaust Storage Rooms
- Gas Fit Rooms
- Large duct changes or ductless Locker Rooms
- Joints of Trunks
- Central Corridors, including Lobbies, Louvers and Corridor
- Restrooms (includes a double aspect of a double Locker Room)

#### 2.4.2 POT Requirement for projects that alter a PFA's

2.4.2.1 For applicable projects new the potential to affect the usability of, or access to a H-A, as per the US Access Board, the term usability refers to the ways people with disabilities use, or interact with, elements or systems covered by the standards.

- Projects that affect FFA's
- In an Access Project, when a PPA is added in the costing building, the results of other PPA's prior to the program Accessibility
- PPA's investments that affect FFA's
- Indirect labor or materials - 4.0%

- Effects of the residential fire
- New Buildings
- Civil Engineer Associate License (2003) ADA 266-1593

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## ADA Path of Travel Compliance Scoping Guidelines Page 2 of 4

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locust what is not considered an Allegation (as per 20FC Act definition)

24.8.2 Level the cut of alternative 1) means, within course, reduce cable and grout for the 210 A.M. 1/2 R/1000000 or less as to maximum load and cut the after the stability of area containing a "F"

24.5.2 Fixed items that do not affect the usability of the PRA. Such laws may include disallowing yellow pills for smoking.

### 2.4.6 POT Priority

2.4.5.1 The Path extends from the sidewalk (or parking area, if provided) at the building entrance to the altered play area. In a playground located on the lot, should increase accessibility between the building and the playground. Entry should be over a short element of the lot, must maintain accessibility of the lot to the building, if needed.

- An accessible entrance is the facility.
- An accessible route to the above area.
- At least one accessible restrooms with one of multiple accessible stalls.
- Accessible drinking fountains.
- Accessible seating area with, at least one of, accessible tables.

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## ADA Path of Travel Compliance Scoring Guidelines

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Instruction Authority  
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For the "FC" finding, allocation continued using the "rule of Three" (wherever there was a tie enough to cover up the priority time it is suggested to move to the next priority item in sequence until the "FC" rights has been met. Use the description on station of the "Path of Travel" and/or the "FC" finding to indicate what time will be done to the "FC" or where the work is done to one alarm over another if the priority is not followed. As an example, see the following:

### AI Compliance Worksheet

[illegible]

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#### A DO Path of Travel Compliance Scoping Guidelines

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# Path of Travel Scoping Guidelines



## ACCESSIBILITY IN EXISTING BUILDINGS SCOPING GUIDELINES

### 1.0 [GENERAL GUIDELINES](#)

### 2.0 ADA PATH OF TRAVEL COMPLIANCE

#### 2.1 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(b)(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.

#### 2.2 Project Definition

##### 2.2.1 Capital Improvement Projects

###### 2.2.1.1 Plan Nodes

All CIP projects that affect PFA's 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 PFA's are affected by the project. If capital planning approves the work, it will assign an llw# 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 costs 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 PF ("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 PFA's in school buildings include, but are not limited to, the following:

- Typical and Specialized Classrooms
- Auditoriums/Gymatoriums
- 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 Pools

#### 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** PoT 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)

# Path of Travel Scoping Guidelines



- Projects consisting of repairs/maintenance work, unless the work affects the usability of the element or space.
- Building Envelope projects
- MEP system replacement/upgrades.

## 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 §106.5), such as normal maintenance, reroofing, painting or wallpapering, 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)(i)(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.

# Path of Travel Scoping Guidelines



**School Construction Authority**

Architecture & Engineering

**AE Scoping Guidelines**

**ADA Path of Travel Compliance**

**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?

