



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)].

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 path of travel 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 a PFA as defined below must investigate PoT requirements. Projects will not initially be assigned a node for PoT, as this will be scoped as an Additional Recommended Item in a separate report based on whether PFAs are affected by the project. If Capital Planning approves the CIP project scope, and the project is PoT applicable, they will assign an llw# for the PoT work.

2.2.1.2 Budget

There is no initial budget assigned to the PoT work, as the PoT report will determine the budgetary obligation and the required scope, and will provide an estimate for the PoT 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 Americans with Disabilities Act 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 for the referred item, and listed as an additional recommended item, with an initial construction budget based on 20% of the total cost of the LLW# for the work affecting a PFA. (Note: this is purely a budget number, not a detailed estimate.)

A separate “Path of Travel Report shall then be prepared at the beginning of design for the referred item to determine the Required “Path of Travel Obligation” and the scope of work associated with the PoT improvement(s). The Path of Travel Report includes a worksheet that summarizes the method of determining



the obligations as well as the proposed construction costs. It will include a copy of the marked-up cost estimate used as back-up that will clearly indicate the costs that are considered and the allowable deductions. The Path of Travel Report is provided to demonstrate compliance by the AEO with 2010 ADA. The "Path of Travel Worksheet" is to be revised as needed at the end of Design when the final AEO's estimate is available.

2.4 Primary Path of Travel Guidelines for Existing Buildings

2.4.1 Primary Function Area

A PFA is an area of function for which a facility is intended. The primary function of a school is to educate students, and therefore the rooms and spaces directly involved are considered PFAs.

2.4.1.1 PFAs in school buildings include, but are not limited to, the following:

- Typical and Specialized Classrooms
- Auditoriums/Gymatoriums
- Gymnasiums, including 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 PFAs 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

2.4.2 PoT Requirement for Projects that Alter a PFA

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 PFAs
- 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 PFAs



- Rehabilitation or renovation of PFAs

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 PFAs
- New Buildings
- Full Program Accessibility projects as per 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.

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 the subject PFA of the current project, or another PFA on the same path of travel, has been renovated at the subject building within the past three years, and did not include the required PoT work, the “disproportionality” amount of that prior project shall be included in the current project. Applicable previous projects shall have an NTP date within three years of the current projects NTP.

2.4.5 Deductions not Included in the Overall Alteration Cost

2.4.5.1 Deduct what is not considered an Alteration per 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 windows, hardware, controls, electrical outlets and signage (as per §35.151(b)(4)(i)(B)).

2.4.5.3 Deduct the cost of items that do not affect usability, such as ceilings, demolition, firestopping, etc.

2.4.6 PoT Priority

2.4.6.1 The PoT extends from the sidewalk at the main building entrance to the altered PFA. 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 along the PoT
- accessible drinking fountains along the PoT
- additional accessible elements, such as parking, storage and alarms, along the PoT

2.4.6.2 When the PoT funding obligation, calculated using the Path of Travel Worksheet, is not enough to cover the top priority item, the designer is 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 Worksheet to explain why, including approximate cost considerations.

3.0 Exhibits

A. Path of Travel Worksheet

End of ADA Path of Travel Compliance Scoping Guidelines



PATH OF TRAVEL¹ 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		LLW#:	
		D#:	
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 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, firestopping, etc.).			
Net Construction Cost =			
b. Required PoT Expenditure (“Disproportionality” § 35.151 (b)(4)(iii)(A))			
		x 20% = Required PoT Expenditure	
<i>(Net Construction Cost)</i>		<i>(Required PoT Expenditure)</i>	



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.		
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.		
	Total of Deductible Alteration Expenditures	
		(Deductible Expenditure)
d. Remaining PoT Obligation to Provide an Accessible Path of Travel		
i.	$\frac{\text{Required PoT Expenditure}}{\text{Total of Deductible Alteration Expenditures}} =$	
		(Project PoT Obligation Amount)



PATH OF TRAVEL¹ 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, firestopping, etc.).			
Net Construction Cost =			
b. Required PoT Expenditure (“Disproportionality” § 35.151 (b)(4)(iii)(A))			
		x 20% = Required PoT Expenditure	
<i>(Net Construction Cost)</i>		(Required PoT Expenditure)	



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.		
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.		
Total of Deductible Alteration Expenditures		
		(Deductible Expenditure)
d. Remaining PoT Obligation to Provide an Accessible Path of Travel		
_____	-	_____ =
(Required PoT Expenditure)		(Total of Deductible Alteration Expenditures)
		(Project PoT Obligation Amount)



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
	LLW:		Yes <input type="checkbox"/> No <input type="checkbox"/>	
	D:			
	LLW:		Yes <input type="checkbox"/> No <input type="checkbox"/>	
	D:			
	LLW:		Yes <input type="checkbox"/> No <input type="checkbox"/>	
	D:			
	LLW:		Yes <input type="checkbox"/> No <input type="checkbox"/>	
	D:			
	LLW:		Yes <input type="checkbox"/> No <input type="checkbox"/>	
	D:			
	LLW:		Yes <input type="checkbox"/> No <input type="checkbox"/>	
	D:			
Total PoT Obligation (Current and Prior Projects)				



4. Improvements to PoT		
Priority	Description	Cost
i. An accessible entrance		
ii. An accessible route to the altered area.		
iii. Accessible restrooms		
iv. Accessible telephones or amplification devices		
v. Accessible drinking fountains		
vi. Additional elements		
Total Cost for PoT Improvements		
5. PoT Validation		
i. _____ ≤ _____ <i>(Total PoT Obligation Amount)</i> <i>(Total Cost for PoT Improvements)</i>		