



# Accessibility in Alterations

## *Building Division Interpretation*

<b>Index Number:</b>	IEBC-2023-002
<b>Issue Date:</b>	5/10/2023
<b>Code:</b>	2018 IEBC
<b>Section:</b>	305

### Background

Section 305 of the 2018 International Existing Building Code (IEBC) provides the code requirements for accessibility in existing buildings. While additions need to fully comply with provisions for new construction, the requirements for alterations are less clear.

IEBC 305.6 requires that, “a facility that is altered shall comply with the applicable provisions in Chapter 11 of the International Building Code (IBC), unless technically infeasible.” The IEBC definition for “facility” indicates that it can relate to all or any portion of a building or structure. With this in consideration, this policy provides guidance on which elements of an altered building are required to have improvements made for accessibility.

Requests for exemptions due to a Technically Infeasibility are to be made through the COB request form ([Link](#)) and submitted for plan review for approval by COB. Final determination of a Technical Infeasibility is to be made by City staff.

### Un-Altered Elements

In general, existing portions of the facility that are not included in the scope of an alteration and are not altered are not required to be brought up to compliance with IBC Chapter 11. Some exceptions that would require accessible upgrades include:

- Alterations that decrease the level of accessibility in any way.
- Alterations affecting an area containing a primary function (See section below)

Where a portion of the facility being altered contains existing elements or fixtures that are unaltered, these elements are not required to be made accessible unless required by other portions of the code. Access to the non-conforming elements is required to the maximum extent possible, including but not limited to, accessible path, clear floor space, and turning space.

Where an existing element is temporarily removed to facilitate repair work or replacement of finishes, that element shall be considered as existing if it is re-installed in the same location and the work does not decrease the level of accessibility. **A pre-construction meeting is required so that the field inspector can verify the existing level of accessibility is accurately shown on the approved plans.** Failure to request a preconstruction meeting prior to altering existing areas may result in additional requirements where existing conditions cannot be adequately determined.

### Alterations Affecting an Area of Primary Function

Where the alteration affects or contains an area of primary function, as defined in the IEBC, the route to that area is required to be made accessible. IEBC 305.7 indicates that the value of the accessibility improvements need not exceed 20% of the cost of the alteration. While the code does not dictate the priority of where the improvements to the route are to be made, the City recommends the following progression starting with the most important: Site Access, Exterior Routes, Accessible Entrances, Access Throughout the Facility, Restroom Facilities, and finally Drinking Fountains. The designer should indicate which elements of the accessible route are fully accessible, which are to be improved, and which non-accessible elements are to remain.

### Alterations of Toilet Rooms

IEBC Section 305.6 requires all altered or added elements to be fully accessible, unless technically infeasible. Where it is technically infeasible to alter an existing restroom to be accessible, 305.8.10 requires a separate fully accessible single-user or family restroom be provided on the same floor. This section would apply if the restroom itself is altered, or if required to be altered as a part of the alteration to the area of primary function. The IEBC does not allow for this additional restroom to be omitted due to technical infeasibility.

Work limited to only the repair or replacement of finishes and/or fixtures will not be considered an alteration that requires compliance with this section. Changes to the restroom layout, replacement of toilet compartments, or the moving of fixtures are all examples that would be alterations and must comply with this section. **A pre-construction meeting is required so that the field inspector can verify the existing level of accessibility is accurately shown on the approved plans.** Failure to request a preconstruction meeting prior to altering existing areas may result in additional requirements where existing conditions cannot be adequately determined.

Signature Gregg Schrader Date: 05/09/2023  
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Attachments  Supersedes: None