

# Sample CASp Report

## Americans with Disabilities Act And Title 24 And Part 2 - California Building Code



### Sample Report

**0000 Broadway  
Pleasantville, CA 92113**

**CASp Evaluation**

***Inspection Date: 01/01/2022  
Inspector: Proactive Access LLC***

Prepared By



(619) 292 - 8455

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Sample

## Parking Lot Scope

### Finding: 1 - Parking Scope

There are approximately (287) parking stalls that could be reasonably associated with this facility.

There are (6) accessible parking stalls including (0) designated for a van.

There should be a minimum of (7) accessible stalls with a minimum of (2) being designed as van accessible.

2019 CBC 11B (CA) Section 11B-208.2

Parking spaces complying with Section 11B-502 shall be provided in accordance with Table 11B-208.2 except as required by Sections 11B-208.2.1, 11B-208.2.2, and 11B-208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.

#### Citation:

2019 CBC 11B (CA) Section: 11B-208.2

#### As Built:

6 Standard Accessible Parking Stalls Provided.

#### Recommendation:

Provide at least 7 parking stalls compliant with 11B-502. At least 2 of the 7 stalls must be Van Accessible.



Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000

## Parking Stall 1 (Van Accessible)

### Finding: 2 - Parking Sign Height

The parking sign is located in an accessible route and mounted too low.

Each parking space reserved for persons with disabilities shall be identified by a reflectorized sign permanently posted immediately adjacent to or within the projected parking space width at the head end of the parking space. The sign must be visible from each stall or space, and consist of the International Symbol of Accessibility in white on a dark blue background. The sign shall not be smaller than 70 square inches in area and shall be posted at a minimum height of 80 inches from the bottom of the sign to the ground.

*2019 CBC 11B (CA) Section 11B-502.6 Exception:*

*Signs located within a circulation path shall be a minimum of 80 inches (2032 mm) above the finish floor or ground surface measured to the bottom of the sign.*

#### Citation:

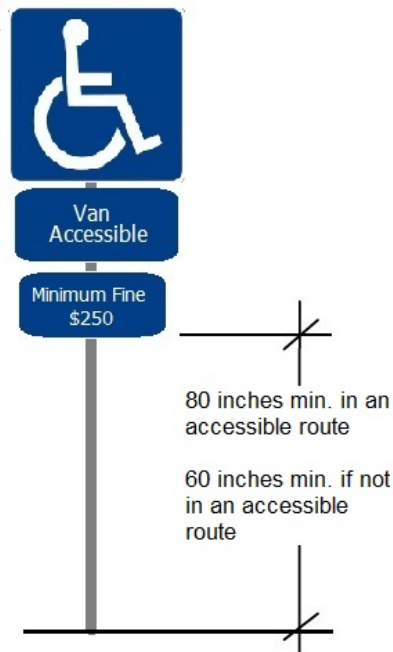
2019 CBC 11B (CA) Section: 11B-502.6  
Exception:

#### As Built:

78.75"

#### Recommendation:

Increase the sign height to 80" minimum measured from the bottom of the sign to the ground surface below.



## Parking Stall 1 (Van Accessible)

### Finding: 3 - Parking Surface Slope

The cross slopes (narrow dimension) and/or running slopes (long dimension) of the accessible stall and/or access aisle exceeds 2%.

The running slope and the cross slope in an accessible parking stall and the access aisle must not exceed 2%.

2019 CBC 11B (CA) Section 11B-502.4

Parking spaces and access aisles serving them shall comply with Section 11B-302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted.

#### Citation:

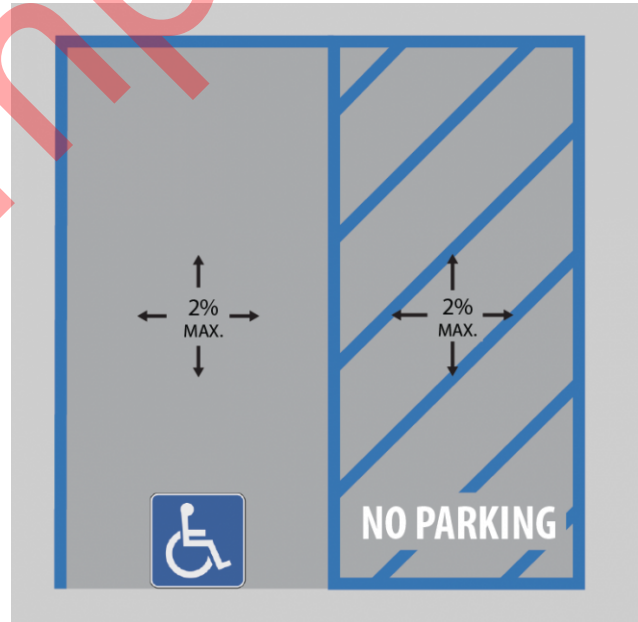
2019 CBC 11B (CA) Section: 11B-502.4

#### As Built:

3.4%

#### Recommendation:

Reduce the slope to 2% maximum.



## Parking Stall 1 (Van Accessible)

### Finding: 4 - Access Aisle Width

The access aisle is not a minimum 8 feet wide.

Van Accessible parking stalls' access aisle must be a minimum of 8 feet wide, measured from centerline to centerline and a minimum 18 feet long. Alternatively, the stall can be 12 feet wide and the access aisle may be 5 feet wide.

Where parking spaces or access aisles are not adjacent to another parking space or access aisle, measurements shall be permitted to include the full width of the line defining the parking space or access aisle.

2019 CBC 11B (CA) Section 11B-502.2

Car and van parking spaces shall be 216 inches (5486 mm) long minimum. Car parking spaces shall be 108 inches (2743 mm) wide minimum and van parking spaces shall be 144 inches (3658 mm) wide minimum, shall be marked to define the width, and shall have an adjacent access aisle complying with Section 11B-502.3.

#### Citation:

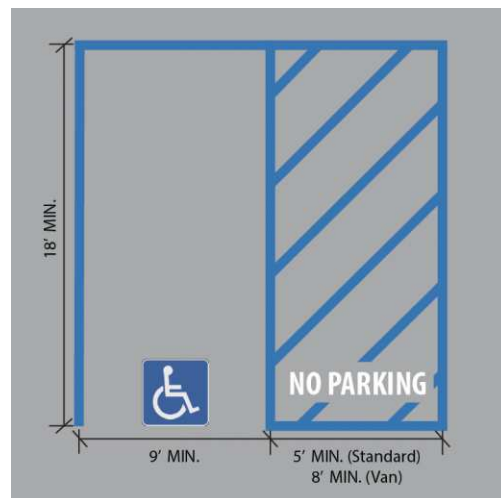
2019 CBC 11B (CA) Section: 11B-502.2

#### As Built:

56" access aisle width measured from centerline to centerline. (The parking stall width is 9' wide).

#### Recommendation:

Increase the width of the van accessible access aisle to 8 feet minimum.



## Parking Stall 1 (Van Accessible)

### Finding: 5 - No Parking Text (Dilapidated)

The required "No Parking" text located in the access aisle is not easily readable because the old text underneath is still visible.

The words "NO PARKING" shall be painted on the ground within each loading and unloading access aisle. This notice shall be painted in white letters no less than 12 inches high and located so that it is visible to traffic enforcement officials.

2019 CBC 11B (CA) Section 11B-502.3.3

Access aisles shall be marked with a blue painted borderline around their perimeter. The area within the blue borderlines shall be marked with hatched lines a maximum of 36 inches (914 mm) on center in a color contrasting with that of the aisle surface, preferably blue or white. The words "NO PARKING" shall be painted on the surface within each access aisle in white letters a minimum of 12 inches (305 mm) in height and located to be visible from the adjacent vehicular way. Access aisle markings may extend beyond the minimum required length.

#### Citation:

2019 CBC 11B (CA) Section: 11B-502.3.3

#### As Built:

N/A

#### Recommendation:

Remove or cover the existing text and then re-paint the white "NO PARKING" text at the bottom of the access aisle.



## Restroom 1 (Unisex)

### Finding: 6 - Mirror Height

The mirror is mounted too high.

Mirrors must have the bottom edge of the reflecting surface a maximum of 40 inches above the floor if above a sink or counter. Mirrors not located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 35 inches maximum above the finish floor or ground.

2019 CBC 11B (CA) Section 11B-603.3

Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40 inches (1016 mm) maximum above the finish floor or ground. Mirrors not located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 35 inches (889 mm) maximum above the finish floor or ground.

#### Citation:

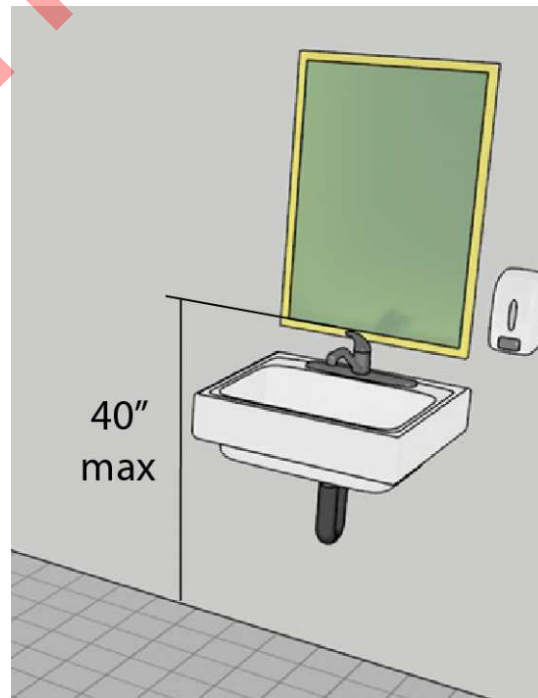
2019 CBC 11B (CA) Section: 11B-603.3

#### As Built:

44.5" measured to the bottom of the reflecting surface.

#### Recommendation:

Lower the mirror so that the bottom of the reflecting surface is 40" maximum.





## Restroom 1 (Unisex)

### Finding: 7 - Lavatory Apron Height

The apron at the sink projects too low to the floor.

**CA Requirement -** The vertical clearance measured from the bottom of the apron or the outside bottom edge of the lavatory must be 29 inches reducing to 27 inches at a point located 8 inches back from the front edge.

2019 CBC 11B (CA) Section 11B-306.3.1

Space under an element between 9 inches (229 mm) and 27 inches (686 mm) above the finish floor or ground shall be considered knee clearance and shall comply with Section 11B-306.3.

#### Citation:

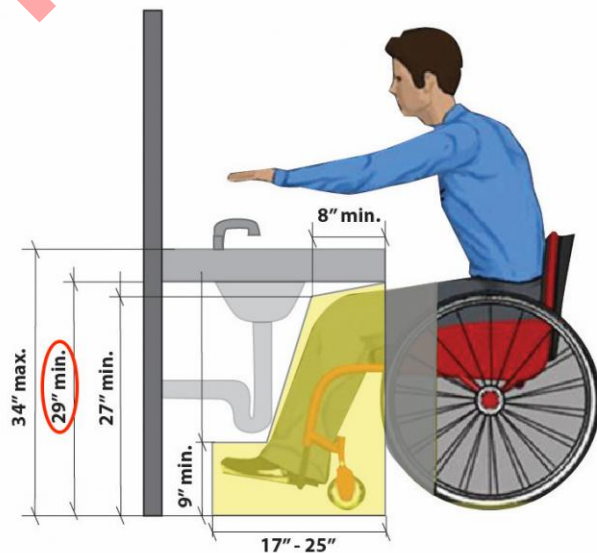
2019 CBC 11B (CA) Section: 11B-306.3.1

#### As Built:

26.75" knee height clearance measured from the bottom edge of the lavatory to the finished floor.

#### Recommendation:

Provide a minimum vertical clearance of 29" below the bottom edge of the lavatory.



## Restroom 1 (Unisex)

### Finding: 8 - Side Grab Bar Length

The side grab bar is not long enough.

The side wall grab bar shall be 42 inches long minimum, located 12 inches maximum from the rear wall and extending 54 inches minimum from the rear wall with the front end positioned 24 inches minimum in front of the water closet.

Grab bars shall be installed in a horizontal position, 33 inches minimum and 36 inches maximum above the finish floor measured to the top of the gripping surface.

2019 CBC 11B (CA) Section 11B-604.5.1

The side wall grab bar shall be 42 inches (1067 mm) long minimum, located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1372 mm) minimum from the rear wall with the front end positioned 24 inches (610 mm) minimum in front of the water closet.

#### Citation:

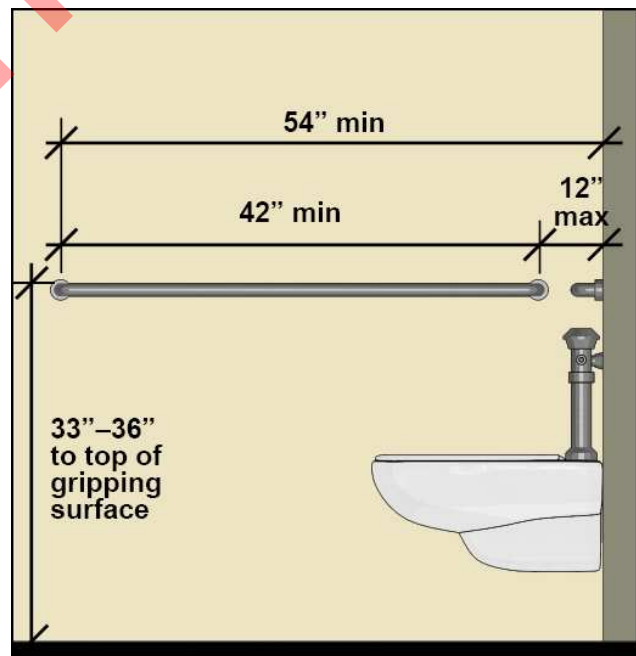
2019 CBC 11B (CA) Section: 11B-604.5.1

#### As Built:

32"

#### Recommendation:

Provide a side grab bar with a minimum length of 42".



**Estimated Time-Line for Barrier Removal**  
(Please complete and return page/s to be inserted in report)

**Parking Lot Scope** **Estimated Completion Date**  
Finding: 1 There are approximately (287) parking stalls that could be \_\_\_\_/\_\_\_\_/\_\_\_\_

**Parking Stall 1 (Van Accessible)** **Estimated Completion Date**  
Finding: 2 The parking sign is located in an accessible route and mounted \_\_\_\_/\_\_\_\_/\_\_\_\_  
Finding: 3 The cross slopes (narrow dimension) and/or running slopes (long \_\_\_\_/\_\_\_\_/\_\_\_\_  
Finding: 4 The access aisle is not a minimum 8 feet wide. Van Accessible \_\_\_\_/\_\_\_\_/\_\_\_\_  
Finding: 5 The required "No Parking" text located in the access aisle is \_\_\_\_/\_\_\_\_/\_\_\_\_

**Restroom 1 (Unisex)** **Estimated Completion Date**  
Finding: 6 The mirror is mounted too high. Mirrors must have the bottom \_\_\_\_/\_\_\_\_/\_\_\_\_  
Finding: 7 The apron at the sink projects too low to the floor. CA \_\_\_\_/\_\_\_\_/\_\_\_\_  
Finding: 8 The side grab bar is not long enough. The side wall grab bar \_\_\_\_/\_\_\_\_/\_\_\_\_

Completed By:

Print Name: \_\_\_\_\_ Title: \_\_\_\_\_

Phone: \_\_\_\_\_ Date: \_\_\_\_\_

**Please Mail to:**  
Proactive Access, LLC  
6977 Navajo Rd Ste #190  
San Diego, CA 92119



## Expanding Your Market



More than fifty million Americans with disabilities make up a huge, nearly untapped market for businesses of all types and sizes. To help businesses welcome customers with disabilities, the IRS offers two tax incentives to remove access barriers.

For more information about these tax incentives and the ADA, call the Department of Justice ADA Information Line at:  
800-514-0301 (voice)  
800-514-0383 (TTY)  
or visit the *ADA Business Connection* at:  
[www.ada.gov](http://www.ada.gov).

## Tax Incentives for Businesses

Businesses can take advantage of two Federal tax incentives available to help cover costs of making access improvements for customers with disabilities:

- **A tax credit for small businesses** who remove access barriers from their facilities, provide accessible services, or take other steps to improve accessibility for customers with disabilities
- **A tax deduction for businesses of all sizes** that remove access barriers in their facilities or vehicles

A business that annually incurs eligible expenses to bring itself into compliance with the ADA may use these tax incentives every year. The incentives may be applied to a variety of expenditures; however, they may not be applied to the costs of new construction. All barrier removal must comply with applicable Federal accessibility standards.

### Tax Credit

Small businesses with 30 or fewer employees or total revenues of \$1 million or less can use the Disabled Access Credit (Internal Revenue Code, Section 44). Eligible small businesses may take a credit of up to \$5,000 (half of eligible expenses up to \$10,250, with no credit for the first \$250) to offset their costs for access, including barrier removal from their facilities (e.g., widening a doorway, installing a ramp), provision of accessibility services (e.g., sign language interpreters), provision of printed material in alternate formats (e.g., large-print, audio, Braille), and provision or modification of equipment.

### Tax Deduction

Businesses of all sizes may take advantage of this tax deduction. Under Internal Revenue Code, Section 190, businesses can take a business expense deduction of up to \$15,000 per year for costs of removing barriers in facilities or vehicles.

### Tax Incentives in Combination

These two incentives can be used together by eligible businesses if the expenditures qualify under both Sections 44 and 190. If a small business' expenses exceed \$10,250 for the maximum \$5,000 tax credit, then the deduction equals the difference between the total spent and the amount of the credit claimed.

### Tax Incentives Forms and Publications

Visit the Internal Revenue Service website at [www.irs.gov](http://www.irs.gov) or call 800-829-3676 (voice); 800-829-4059 (TTY) to order the necessary business forms and publications:  
**Form 8826** (Disabled Access Credit)  
and **Publication 535 "Business Expenses"** (tax deduction).

November 2005

## Common Questions: Readily Achievable Barrier Removal

The ADA requires companies providing goods and services to the public to take certain limited steps to improve access to existing places of business. This mandate includes the obligation to remove barriers from existing buildings when it is readily achievable to do so. Readily achievable means easily accomplishable and able to be carried out without much difficulty or expense.

Many building features that are common in older facilities such as narrow doors, a step or a round door knob at an entrance door, or a crowded check-out or store aisle are barriers to access by people with disabilities. Removing barriers by ramping a curb, widening an entrance door, installing visual alarms, or designating an accessible parking space is often essential to ensure equal opportunity for people with disabilities. Because removing these and other common barriers can be simple and inexpensive in some cases and difficult and costly in others, the regulations for the ADA provide a flexible approach to compliance. This practical approach requires that barriers be removed in existing facilities only when it is readily achievable to do so. The ADA does not require existing buildings to meet the ADA's standards for newly constructed facilities.

The ADA states that individuals with disabilities may not be denied the full and equal enjoyment of the "goods, services, facilities, privileges, advantages, or accommodations" that the business provides -- in other words, whatever type of good or service a business provides to its customers or clients. A business or other private entity that serves the public must ensure equal opportunity for people with disabilities. In the following section, the US Department of Justice answers some of the most commonly asked questions about the barrier removal requirement and how it differs from those requirements that apply to new construction and alteration of buildings.

***I own three buildings, two of which were designed and constructed prior to the enactment of the ADA. I have been told I have to make them all accessible. Is this true? Does the ADA require me to make them all accessible?***

*The ADA establishes different requirements for existing facilities and new construction. In existing facilities where retrofitting may be expensive, the requirement to provide access through barrier removal is less than it is in new construction where accessibility can be incorporated in the initial stages of design and construction without a significant increase in cost. The requirement to remove barriers in existing buildings applies only to a private entity that owns, leases, leases to or operates a "place of public accommodation." Further, barriers must be removed only where it is "readily achievable" to do so. Readily achievable means easily accomplishable and able to be carried out without much difficulty or expense.*

## Common Questions: Readily Achievable Barrier Removal

### ***Is my business required to remove barriers?***

*If your business provides goods and services to the public, you are required to remove barriers if doing so is readily achievable. Such a business is called a public accommodation because it serves the public. If your business is not open to the public but is only a place of employment like a warehouse, manufacturing facility or office building, then there is no requirement to remove barriers. Such a facility is called a commercial facility. While the operator of a commercial facility is not required to remove barriers, you must comply with the ADA Standards for Accessible Design when you alter, renovate or expand your facility.*

### ***What is a "place of public accommodation"?***

*A place of public accommodation is a facility whose operations affect commerce and fall within at least one of the following 12 categories set out in the ADA:*

- 1. Places of lodging (e.g., inns, hotels, motels) (except for owner occupied establishments renting fewer than six rooms);*
- 2. Establishments serving food or drink (e.g., restaurants and bars);*
- 3. Places of exhibition or entertainment (e.g., motion picture houses, theaters, concert halls, stadiums);*
- 4. Places of public gathering (e.g., auditoriums, convention centers, lecture halls);*
- 5. Sales or rental establishments (e.g., bakeries, grocery stores, hardware stores, shopping centers);*
- 6. Service establishments (e.g., Laundromats, dry-cleaners, banks, barber shops, beauty shops, travel services, shoe repair services, funeral parlors, gas stations, offices of accountants or lawyers, pharmacies, insurance offices, professional offices of health care providers, hospitals);*
- 7. Public transportation terminals, depots, or stations (not including facilities relating to air transportation);*
- 8. Places of public display or collection (e.g., museums, libraries, galleries);*
- 9. Places of recreation (e.g., parks, zoos, amusement parks);*
- 10. Places of education (e.g., nursery schools, elementary, secondary, undergraduate, or postgraduate private schools);*
- 11. Social service center establishments (e.g., day care centers, senior citizen centers, homeless shelters, food banks, adoption agencies); and*
- 12. Places of exercise or recreation (e.g., gymnasiums, health spas, bowling alleys, golf courses).*

## Common Questions: Readily Achievable Barrier Removal

***I operate a restaurant that opened in 1991. The city required that the restaurant comply with the local accessibility code. Is the restaurant "grandfathered" and not required to remove barriers as required by the ADA?***

*No. A restaurant is a public accommodation and a place of public accommodation must remove barriers when it is readily achievable to do so. Although the facility may be "grandfathered" according to the local building code, the ADA does not have a provision to "grandfather" a facility. While a local building authority may not require any modifications to bring a building "up to code" until a renovation or major alteration is done, the ADA requires that a place of public accommodation remove barriers that are readily achievable even when no alterations or renovations are planned.*

***Do I, as the owner, have to pay for removing barriers?***

*Yes, but tenants and management companies also have an obligation. Any private entity who owns, leases, leases to, or operates a place of public accommodation shares in the obligation to remove barriers.*

***If I do remove barriers, is my business entitled to any tax benefit to help pay for the cost of compliance?***

*As amended in 1990, the Internal Revenue Code allows a deduction of up to \$15,000 per year for expenses associated with the removal of qualified architectural and transportation barriers (Section 190). The 1990 amendment also permits eligible small businesses to receive a tax credit (Section 44) for certain costs of compliance with the ADA. An eligible small business is one whose gross receipts do not exceed \$1,000,000 or whose workforce does not consist of more than 30 full-time workers. Qualifying businesses may claim a credit of up to 50 percent of eligible access expenditures that exceed \$250 but do not exceed \$10,250. Examples of eligible access expenditures include the necessary and reasonable costs of removing architectural, physical, communications, and transportation barriers; providing readers, interpreters, and other auxiliary aids; and acquiring or modifying equipment or devices.*

## Common Questions: Readily Achievable Barrier Removal

### **How do I determine what is readily achievable?**

*"Readily achievable" means easily accomplishable and able to be carried out without much difficulty or expense. Determining if barrier removal is readily achievable is, by necessity, a case-by-case judgment. Factors to consider include:*

- 1. The nature and cost of the action;*
- 2. The overall financial resources of the site or sites involved; the number of persons employed at the site; the effect on expenses and resources; legitimate safety requirements necessary for safe operation, including crime prevention measures; or any other impact of the action on the operation of the site;*
- 3. The geographic separateness, and the administrative or fiscal relationship of the site or sites in question to any parent corporation or entity;*
  - 4) If applicable, the overall financial resources of any parent corporation or entity; the overall size of the parent corporation or entity with respect to the number of its employees; the number, type, and location of its facilities; and*
  - 5) If applicable, the type of operation or operations of any parent corporation or entity, including the composition, structure, and functions of the workforce of the parent corporation or entity. If the public accommodation is a facility that is owned or operated by a parent entity that conducts operations at many different sites, you must consider the resources of both the local facility and the parent entity to determine if removal of a particular barrier is "readily achievable." The administrative and fiscal relationship between the local facility and the parent entity must also be considered in evaluating what resources are available for any particular act of barrier removal.*

### **Can you tell me what barriers it will be "readily achievable" to remove?**

*The Department's regulation contains a list of 21 examples of modifications that may be readily achievable. These include installing ramps, making curb cuts in sidewalks and at entrances, repositioning telephones, adding raised markings on elevator control buttons, installing visual alarms, widening doors, installing offset hinges to widen doorways, insulating lavatory pipes under sinks, repositioning a paper towel dispenser, installing a full-length mirror, rearranging toilet partitions to increase maneuvering space or installing an accessible toilet stall. The list is not exhaustive and is only intended to be illustrative. Each of these modifications will be readily achievable in many instances, but not in all. Whether or not any of these measures is readily achievable will have to be determined on a case-by-case basis in light of the nature and cost of the barrier removal and the resources available.*



## Common Questions: Readily Achievable Barrier Removal

***Does the ADA permit me to consider the effect of a modification on the operation on my business?***

*Yes. The ADA permits consideration of factors other than the initial cost of the physical removal of a barrier.*

*ILLUSTRATION: CDE convenience store determines that it would be inexpensive to remove shelves to provide access to wheelchair users throughout the store. However, this change would result in a significant loss of selling space that would have an adverse effect on its business. In this case, the removal of all the shelves is not readily achievable and, thus, is not required by the ADA. However, it may be readily achievable to remove some shelves.*

***If an area of my store is reachable only by a flight of steps, would I be required to add an elevator?***

*Usually no. A public accommodation generally would not be required to remove a barrier to physical access posed by a flight of steps, if removal would require extensive ramping or an elevator. The readily achievable standard does not require barrier removal that requires burdensome expense. Thus, where it is not readily achievable to do so, the ADA would not require a public accommodation to provide access to an area reachable only by a flight of stairs.*

***I have a portable ramp that we use for deliveries - can't I just use that?***

*Yes, you could, but only if the installation of a permanent ramp is not readily achievable. In order to promote safety, a portable ramp should have railings, a firm, stable, nonslip surface and the slope should not exceed one to twelve (one unit of rise for every twelve units horizontal distance). It should also be properly secured and staff should be trained in its safe use.*

## Common Questions: Readily Achievable Barrier Removal

***Because one of my buildings is very inaccessible, I don't know what to fix first. Is guidance available?***

Yes. The Department recommends priorities for removing barriers in existing facilities because you may not have sufficient resources to remove all existing barriers at one time. These priorities are not mandatory. You are free to exercise discretion in determining the most effective "mix" of barrier removal measures for your facilities. The **first priority** is enabling individuals with disabilities to enter the facility. This priority on "getting through the door" recognizes that providing physical access to a facility from public sidewalks, public transportation, or parking is generally preferable to any alternative arrangements in terms of both business efficiency and the dignity of individuals with disabilities. The **second priority** is providing access to those areas where goods and services are made available to the public. For example, in a hardware store these areas would include the front desk and the retail display areas of the store. The **third priority** is providing access to restrooms (if restrooms are provided for use by customers or clients). The **fourth priority** is removing any remaining barriers, for example, lowering telephones.

***What about my employee areas? Must I remove barriers in areas used only by employees?***

No. The "readily achievable" obligation to remove barriers in existing facilities does not extend to areas of a facility that are used exclusively by employees. Of course, it may be necessary to remove barriers in response to a request for "reasonable accommodation" by a qualified employee or applicant as required by Title I of the ADA. For more information, contact the Equal Employment Opportunity Commission (EEOC) which enforces Title I of the ADA.

***How can a public accommodation decide what needs to be done?***

One effective approach is to conduct a "self-evaluation" of the facility to identify existing barriers. While not required by the ADA, a serious effort at self-assessment and consultation can save resources by identifying the most efficient means of providing required access and can diminish the threat of litigation. It serves as evidence of a good faith effort to comply with the barrier removal requirements of the ADA. This process should include consultation with individuals with disabilities or with organizations representing them and procedures for annual reevaluations.

## Common Questions: Readily Achievable Barrier Removal

***If a public accommodation determines that its facilities have barriers that should be removed, but it is not readily achievable to undertake all of the modifications now, what should it do?***

*The Department recommends that a public accommodation develop an implementation plan designed to achieve compliance with the ADA's barrier removal requirements. Such a plan, if appropriately designed and executed, could serve as evidence of a good faith effort to comply with the ADA's barrier removal requirements.*

***What if I'm not able to remove barriers at this time due to my financial situation? Does that mean I'm relieved of current responsibilities?***

*No, when you can demonstrate that the removal of barriers is not readily achievable, you must make your goods and services available through alternative methods, if undertaking such methods is readily achievable. Examples of alternative methods include having clerks retrieve merchandise located on inaccessible shelves or delivering goods or services to the customers at curbside or in their homes. Of course, the obligation to remove barriers when readily achievable is a continuing one. Over time, barrier removal that initially was not readily achievable may later become so because of your changed circumstances.*

***If the obligation is continuing, do you mean there are no limits on what I must do to remove barriers?***

*No. There are limits. In removing barriers, a public accommodation does not have to exceed the level of access required under the alterations provisions contained in the Standards (or the new construction provision where the Standards do not provide specific provisions for alterations).*

*ILLUSTRATION 1: An office building that houses places of public accommodation is removing barriers in public areas. The alterations provisions of the Standards explicitly state that areas of rescue assistance are not required in buildings that are being altered. Because barrier removal is not required to exceed the alterations standard, the building owner need not establish areas of rescue assistance.*

*ILLUSTRATION 2: A grocery store has more than 5000 square feet of selling space and prior to the ADA had six inaccessible check-out aisles. Because the Standards do not contain specific provisions applicable to the alteration of check-out aisles one must look to the new construction provisions of the Standards for the upper limit of the barrier removal obligation. These provisions require only two of the six check-out aisles to be accessible. Because the store found it readily achievable in 1993 and 1994 to remove barriers and make two of check-out aisles accessible, the store has fulfilled its obligation and is not required to make more checkout aisles accessible.*

## Common Questions: Readily Achievable Barrier Removal

***What is the difference between barrier removal and alterations? Aren't they both very similar?***

*Not really. Under the ADA, barrier removal is done by a place of public accommodation to remove specific barriers that limit or prevent people with disabilities from obtaining access to the goods and services offered to the public. This is an ongoing obligation for the business that has limits determined by resources, size of the company and other factors. An alteration is replacement, renovation or addition to an element or space of a facility. Generally alterations are done to improve the function of the business, to accommodate a change or growth in services, or as part of a general renovation. The requirements for alterations are greater than those for barrier removal because the alteration is part of a larger construction or replacement effort.*

***One of the buildings that I own is a small factory with offices. Do I have to make that accessible?***

*No, commercial facilities such as factories, warehouses, and office buildings that do not contain places of public accommodation are considered "commercial facilities" and are not required to remove barriers in existing facilities. They are, however, covered by the ADA's requirements for accessible design in new construction or alterations.*

Sample