



## DISABILITY AND COMMUNICATION ACCESS BOARD

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### INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all public buildings, facilities, and sites constructed by, or on behalf of the State or any county, shall conform to the 2004 Americans with Disabilities Act Accessibility Guidelines (2004 ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-216, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

**Docket: DCAB 2023-01 ADAAG 604.3.2 lists specific elements that are permitted to overlap the accessible water closet clearance which includes coat hooks and shelves, ADAAG 607.2 & 608.2 contains no exceptions. Can a towel bar/ring, which serves the same function as a coat hook or shelf be permitted to overlap the water closet clearance? Can a towel bar/ring be permitted to overlap the required bathtub/shower clearance?**

**Summary:** In bathrooms/restrooms, lavatories are typically located adjacent to the water closet, a towel bar/ring is commonly provided between the water closet and the lavatory so the user of the lavatory can easily wipe/dry their hands after washing. Likewise, a towel bar/ring is commonly provided directly outside of a shower so a user can easily wipe/dry themselves after showering. Locating a towel bar/ring adjacent to lavatories and showers provides user convenience and minimizes water accumulation on floors.

ADA compliant bathrooms have numerous clear floor space requirements at all plumbing fixtures and doors. Unless there is an exception that permits an element to be within the clear floor space, the clear floor space needs to be clear of any obstructions and typically extends upwards to the 80-inch mark, therefore the installation of toilet accessories can be a challenge. At accessible water closets, ADAAG 604.3.2 permits specific items to overlap the water closet clearance, however a towel bar/ring is not one of them, but coat hooks and shelves are. At accessible bathtub and roll-in showers, ADAAG 607.2 and the exception in ADAAG 608.2.2.1 permit a lavatory to overlap the bathtub or shower clearance. At transfer showers, unfortunately no items are permitted to overlap the clearance.

*Ruling:* For buildings or facilities subject to HRS §103-50,

**ADAAG Section 604.3.2 Overlap, 607.2 Clearance and 608.2 Size and Clearances for Shower Compartments**

Where towel bars/rings are provided, the towel bar/ring shall comply with ADAAG Section 225.2. Towel bars/rings may overlap the required clear floor space at water closets, bathtubs, and showers when ALL the following conditions are met:

- 1) The towel bar/ring protrudes from the face of the wall 4-inches or less.
- 2) The lowest part of the towel bar/ring is no less than 33-inches above the finish floor.
- 3) The towel bar/ring does not protrude into the clearance for any grab bar.

[Rul: 03/09/2023] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call us at 586-8121.  
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