



ACCESSIBILITY

THE CASp REPORT

PASSING THE CASp OPEN BOOK EXAM

The Division of the State Architect (DSA) Certified Access Specialist (CASp) Program receives many inquiries from architects, building officials, and plans examiners who ask us "Why is it difficult to pass the plan review or open book part of the CASp Examination?"

These individuals spend many hours reading and applying the code in their respective professions, and leave the examination thinking they have performed well, only to discover upon receiving results that they did not pass.

In order to understand how one who is intimate with the accessibility provisions California Building Code (CBC) can have difficulty passing

the open book part of the CASp Examination, consider this scenario: As children, we had spent many hours reciting the Pledge of Allegiance. Once we had learned to memorize the words we would recite the Pledge by rote every morning, without pausing to understand how the words work together to establish the meaning of the Pledge as a whole. Likewise, in using Chapter 11B of the CBC on a regular basis, many apply the technical requirements individually by rote, by memory, or without understanding how all the requirements of a given provision work in concert with each other. Addressing this question is critical to understanding how one can approach studying for the open book part of the CASp Examination.

"Accessibility compliance violations in a set of plans can translate into big dollars of corrections in the field."

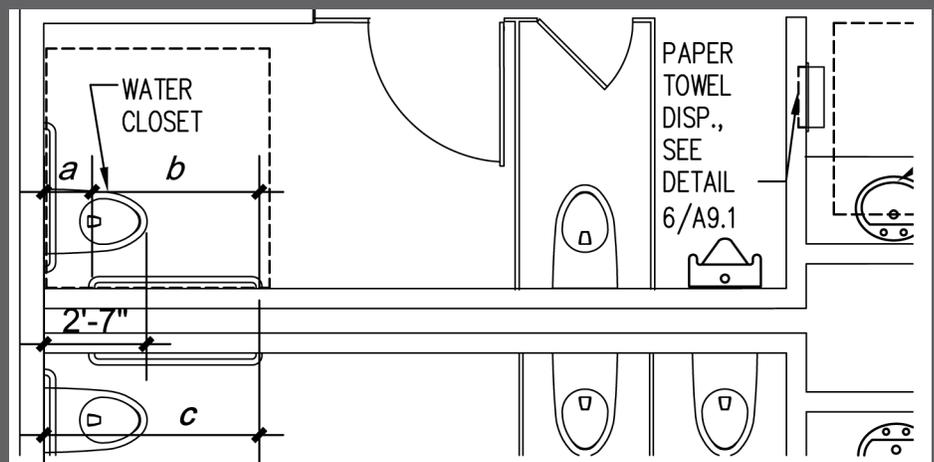
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Sample Exam Question

In the drawing, what is the prescribed dimension of a, prescribed minimum dimension of b, and actual required minimum dimension of c, respectively, with regard to the side wall grab bar?

- a. 12" minimum, 42", 54"
- b. 12" maximum, 42", 55"
- c. 12" maximum, 42", 54"
- d. 12" maximum, 48", 60"



Note: Drawing Not To Scale



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Analyzing the Question

In answering the sample question, the following should be considered:

- Determine the item being addressed: side wall grab bar for a wheel chair accessible toilet.
- Identify that the question is asking for three distinct dimensional measurements: a, b, and c.
- Perform a code analysis for the item (see sidebar). For this item, the question is answered by using the technical requirements in Section 11B-604.5.1 Side wall.
- Determine what about the dimensional measurements is being asked by looking at the words used in the question. “Prescribed”, “prescribed minimum”, and “actual required” are specific indications of the correct answer.

In the context of CBC language “prescribed minimum” means given or stipulated. The answer would then mean a technical minimum requirement as given in the CBC. The words “actual required” are words used to indicate a project specific dimension determined from the information given by the drawing.

Answering the Question

CBC Section 11B-604.5.1 states: “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.” Since the prescribed dimension of a is 12” maximum, answer “a” is eliminated among the four choices; and the prescribed minimum dimension b is 42”, so answer “d” is eliminated from the four choices. Choices “b” and “c” remain.

Section 11B-604.5.1 prescribes a minimum dimension for c as 54”, but this minimum dimension is qualified by the subsequent phrase “...with the front end positioned 24 inches minimum in front of the water closet.” As a qualified dimension more information is required, as the actual required minimum dimension is dependent on the dimension of the front of the toilet from the rear wall. The illustration shows the dimension from the rear wall to the front edge of the water closet as 2'-7" (31"). In determining the actual required minimum dimension of the grab bar from the rear wall, add 31" to 24" for a total actual required minimum dimension of 55". The correct answer is “b.” If you arrived at answer “c,” then you determined the prescribed minimum dimension of c, as opposed to determining the actual required minimum dimension of c as requested in the question.

CBC Chapter 11B Analysis

Chapter 11B of the CBC is quite different from prior editions of the CBC. Because of its alignment with the 2010 ADAS, the provisions of Chapter 11B no longer relate to occupancy classification, but instead are based on the use of the space. To use Chapter 11B effectively, the sections of the CBC that address the particular item being reviewed for compliance must be applied consecutively in the following manner:

1. Identify in the Matrix Adoption Table of Chapter 2 if any definition listed for the item is applicable to DSA-AC
2. Apply the scoping requirements for the item addressed in CBC Chapter 11B Division 2: Scoping Requirements
3. Apply technical requirements using code section hierarchy convention:
 - a. Apply the general provisions in the respective technical section
 - b. Apply requirements in any referenced sections if stated within the general provisions
 - c. Apply the specific technical requirements



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Unintended Consequences of Plan Review Violations

A CASp is required to review all the information provided in a set of construction documents to determine the information required to establish compliance, or the information required that may affect compliance.

In this sample question, in order to determine the dimension from the rear wall to the front edge of the water closet, the CASp may need to look at a referenced detail, the plumbing schedule, or the project manual (specifications) for the depth of the toilet. If such a dimension is not established in the drawings, it should be requested of the architect in order to determine compliance. If not addressed at the plan review stage, correction in the field for one stall could include purchasing a new 48" long grab bar, installing additional length of reinforcement for the grab bar behind the wall surface, repairing the wall surface, and additional costs for contractor overhead. Additionally, the CASp who performed a plan review of this set of construction documents may be financially responsible for correcting this compliance violation.

Accessibility compliance violations in a set of plans can translate into big dollars of corrections in the field. If this restroom was a typical layout occurring in four restrooms on each

floor of a 50-story office building, when one multiplies the cost of correction for one toilet by 200, which is the number of toilet stalls affected in this scenario, the dollar amount is quite significant! A thorough plan review by the CASp would permit the architect to specify a new toilet of shallower depth or specify a longer grab bar, and allow the decision to occur at a time when costs could be evaluated prior to construction in order to determine the best course of action.

Answering this sample question illustrates how the CBC is used holistically. In the same manner that the components and placement of the various items of a wheelchair accessible toilet work together to permit an individual that uses a wheelchair to effectively transfer to the toilet stall and use the accessories, the various provisions of an item in the CBC work together to achieve compliance with the requirements specified and work in concert with actual design decisions made by the architect in designing the project. It is in this mindset that the CASp uses the CBC to find potential compliance violations in a set of construction documents and it is in this mindset that the open book part of the CASp Examination is developed to assess CASp knowledge.

Open Book Exam Reference Material

The CASp Examination aims to test knowledge of the applicable state and federal accessibility standards listed in the Examination and Certification Handbook through the closed book part of the examination.

The open book part of the CASp Examination, however, at present tests only to the accessibility provisions of Part 2 and Part 8 of the California Building Standards Code, due to the time constraints of the examination and in consideration that all questions can be answered using only the referenced materials provided.

A CASp in practice, however, would be required to address all applicable accessibility standards in plan review, unless the CASp is performing the service under the employment or retainer of a jurisdictional agency where the specified accessibility standards are Part 2 and Part 8 of the California Building Standards Code.



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ON THE REGULATION RADAR

In each issue the DSA CASp Program will feature information regarding state and federal regulations that affect CASp work. We encourage you to read the respective new or improved regulations so that you become aware of the various applicable standards and information affecting your practice.

Federal

In March of 2011 the Department of Justice (DOJ) advised federal agencies that they may use the 2010 ADA Standards for Accessible Design (2010 ADAS) as an acceptable alternative to the Uniform Accessibility Standards (UFAS) until such time as each agency updates their respective regulations implementing the federally-assisted provisions of Section 504.

On May 23, 2014 the U.S. Department of Housing and Urban Development (HUD) issued a notice permitting recipients of federal financial assistance from HUD to use an alternative accessibility standard for purposes of complying with Section 504 of the Rehabilitation Act of 1973 and HUD's implementing regulation at 24 CFR part 8 until HUD formally revises its Section 504 regulations to adopt an updated accessibility standard.

The notice issued by HUD allows recipients to use the 2010 ADAS under title II of the ADA, except for certain specific provisions, as an acceptable alternative to UFAS for new construction and alterations commenced on or after May 23, 2014.

The full text of the Notice can be found on the following website:

www.regulations.gov/#!documentDetail;D=HUD-2014-0042-0001

State of California

The California Tax Credit Allocation Committee (TCAC) administers both federal and state low-income housing tax credit programs. Both programs are authorized to encourage private investment in affordable rental housing for households meeting certain income requirements.

TCAC has adopted regulations effective January 29, 2014 with two sections of interest for CASps:

Requirements for private housing made available for public use to comply with the provisions in Chapter 11B of the California Building Code. *Section (M) Page 51.*

Confirmation from a CASp that accessibility requirements have been met. *Section (9) (B) Page 43.*

The regulations can be found on the following website:
[www.treasurer.ca.gov/ctcac/
programreg/2014/20140611/regulations.pdf](http://www.treasurer.ca.gov/ctcac/programreg/2014/20140611/regulations.pdf)

Additional information on the activities of the TCAC is available on the California State Treasurer's website:
www.treasurer.ca.gov/ctcac/index.asp



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FREE CEU SPOTLIGHT

In each issue the CEU Spotlight will highlight an offering of free online CEU for CASp certification maintenance.

This quarter we feature...

Happy Anniversary ADA!

July 26, 2014 is the 24th anniversary of the ADA. Find out more about the celebration by accessing the ADA Anniversary Tool Kit at:
<http://adaanniversary.org>

The Tool Kit features:

- Publications
- Events
- Videos
- Resources
- Training

Links to free training is provided on the website. CEU qualifies for non-CBC specific course credit. Please ensure you retain any information provided to you from the course and document the date the course was taken in case you are selected for CEU audit by the DSA CASp Program.

DSA ACADEMY PRESENTS...

CASp 101: Certification & Practice

When: Tuesday, September 23, 2014
Sacramento, CA

Friday, September 26, 2014
San Diego, CA

Cost: \$50

CEUs earned: 3
(equivalent activity credit)

This 3-hour seminar will discuss in detail DSA improvements to the CASp Program with information relevant to the CASp, candidates interested in seeking certification, or individuals who want to find out more about the CASp Program. Topics covered in this presentation are:

- History of Disability Rights in California
- Legislation and the CASp Program: SB262, SB1608, and SB1186
- DSA CASp Program Regulations and proposed changes
- DSA Examination and Certification Improvements

- CASp Practice Standards for both the independent CASp and the CASp employed by a jurisdictional agency
- Best Practices for CASp
- Guidance on CRASCA and Disability Access Inspection Certificates
- Auditing procedures for recertification
- Analysis on the effectiveness of CASp services
- Understanding CRASCA's "applicable standards"
- Clarification on Continuing Education requirements
- CASp Complaints Process and Disciplinary Actions

Presented by:

Ida A. Clair AIA, LEED AP, CASp
Senior Architect at DSA

For more information, visit the DSA Academy Web page at:
www.DSAacademy.dgs.ca.gov



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CASp PUBLIC LIBRARY

No card required! Ok, well maybe your email... The CASp Public Library will make you aware of **free** publications to enhance your access inspection experience and increase your accessibility knowledge. In this issue we feature...

The NFPA e-Access Newsletter:

A quarterly e-newsletter designed to help reduce the worldwide burden of fire and other hazards on the quality of life for people with disabilities.

The National Fire Protection Association Standard NFPA 72 is the referenced standard for permanently installed audible and visible fire alarms for the California Building Code, and NFPA 720 is the referenced standard for permanently installed carbon monoxide alarms for the California Building Code. Where Chapter 9 of the CBC specifies where visible alarms are required, mounting height and area coverage requirements for visible alarms can be found in the referenced standards. NFPA standards are available to read for free online at www.nfpa.org.

Subscribe at www.nfpa.org/e-access. Click on the Subscribe button and enter your name and email and start receiving your newsletter today! Archived copies of previous newsletters can be accessed by going to the subscription page www.nfpa.org/safety-information/for-consumers/populations/people-with-disabilities/e-access-newsletter.

DSA NEWS



New Process for DSA Jurisdictional Projects

The California Division of the State Architect (DSA) is launching a new campaign to introduce the new certification program for public schools and community colleges! CASp who are involved in projects where DSA has jurisdiction are reminded that **Certification Starts When Construction Begins**.

Teamwork, open communication, and a commitment to excellence between all partners is essential to make the certification process a success for all parties involved. Timely submission of required documents will result in automatic project certification.

As of August 1, 2014, DSA has eliminated use of the 90-day closing letter as part of the project certification process. The 90-day closing letter will be replaced with a process whereupon notification of occupancy, use, or completion by the project inspector, DSA will commence a review of required

items necessary for certification. After the 60-day review period, DSA will prepare a deficiency list that identifies outstanding items necessary for certification and submit it to the respective school district.

Districts will then have 60 days to address the outstanding items and achieve project certification. If the items are not addressed within the 60-day period, the project will be identified as "uncertified" on DSA's public website. As with all uncertified or incomplete projects, school districts can use DSA's automated document filing system, Certification Box, to provide the required documentation and achieve project certification.

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CASp NEWS

New CASp Web Page

The Division of the State Architect (DSA) has launched a new web page for the Certified Access Specialist (CASp) Program. The page has new and revised information for CASp, examination candidates, and consumers. Featured are:

- Enhanced features on the published *List of Certified Access Specialists*
- Why should I hire a CASp? and other Consumer Frequently Asked Questions
- Revised *CASp Examination and Certification Handbook*
- New *Practice Standards and Best Practices Handbook* for CASp

Visit our new Web page at:
[www.dgs.ca.gov/DSA/Programs/
programCert/casp.aspx](http://www.dgs.ca.gov/DSA/Programs/programCert/casp.aspx)

Questions?

Call or email us!
CASp Direct Line: 916.658.1081
Email: CASprogram@dgs.ca.gov

Revised CASp Program Regulations Stakeholder Outreach

DSA will be conducting stakeholder outreach for comment on our revised CASp Program Regulations. All CASps will be notified of a 45-day comment period and possible public hearing. Individuals and organizations interested in automatically receiving meeting announcements and other materials related to DSA's accessibility code development and rulemaking activities may request to be included on DSA's contact list at: DSAAccess2013@dgs.ca.gov.

CASp STATS

CASp Examination Results:

October 2013

EXAM	CANDIDATES	PASSED
Closed Book	202	82 (41%)
Open Book	202	78 (39%)

Total new CASps for October 2013: **33**

March 2014

EXAM	CANDIDATES	PASSED
Closed Book	103	53 (51%)
Open Book	118	33 (28%)

Total new CASps for March 2014: **36**

Total certified as of July 2014: **573**

Next CASp Exam for 2014

The next—and last CASp Examination for 2014—is scheduled for:

Wednesday, October 8

The deadline to register for this examination is:

**Wednesday, September 10
at 5:00 PM.**

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TWEET?



Follow us on Twitter at www.Twitter.com/CalifDSA

Tell us what you think about DSA's improvements to the CASp Program!

#CaliCASp