



Issue Date	January 9, 2012
Code/Section	ADAAG 4.1.1 (3), IBC 1103.2.3 and Section 1109.3
Approved:	Technical Review Team. January 9, 2012
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Issue:

Are sinks in employee work areas required to be accessible? Are sinks in medical patient examination rooms, not defined as employee work areas, required to be accessible?

Interpretation:

Per ADAAG 4.1.1 (3) and IBC 1103.2.3 sinks in employee work areas, such as in medical laboratories, are not required to be accessible. This applies to the lab sinks and hand sinks in the employee work area. Regarding sinks in medical examination rooms, although a patient might use them and not in an area defined as an employee work area, their intended use is by the medical staff and therefore they are not required to be accessible. Accessible sinks in employee toilet rooms, kitchenettes and break rooms are required per IBC 1109.2 and 1109.4. Break room sinks do not require knee clearance unless the sink is used for food preparation and there is a cook top or conventional range, per ICC/ ANSI A117.1-2003 Sections 804.4 and 606.2. (The interpretations above are supported by the U.S. Department of Justice, ADA Office and the Access Board. It is consistent with the 2010 ADA Standards which will be effective 3/15/12.)

In summary:

- Sinks in employee work areas are not required to be accessible, with the exception of sinks in toilet rooms, kitchenettes and break rooms.
- Sinks in public areas that are intended for employee use are not required to be accessible.

Note: The intention of the COP amendments to IBC 1109.3, which added exceptions 2 & 3, is to exempt sinks in employee areas with the exception of hand sinks in commercial kitchens. Per recent advice from the U.S. Department of Justice and Access Board, the hand sinks in commercial kitchens are also exempt per the ADA but per the IBC 1109.3 amendment, 5% of the hand sinks in commercial kitchens are required to be accessible.