Issue:
The building code does not provide a definition of separate facilities. Traditionally, the term has become accepted as meaning that two totally different toilet rooms are provided; one for each gender, each containing water closets with privacy provided by partial-partitions that cover a portion of the water closet from a couple of feet above the floor to a couple of feet or more below the ceiling. Neither the building code nor the plumbing code requires these partitions.

Recent trends in the design community seek to replace this traditional setup with a concept that places each water closet in a separate room; a room with full height (floor to ceiling) walls and doors. In some instances, a lavatory is included inside the toilet room, while in others the lavatories are grouped in a central location in the vicinity of the individual toilet rooms.

Background
IBC Section 2902.2 states that where plumbing fixtures are required, separate facilities shall be provided for each sex.

Exceptions:
1. Separate facilities shall not be required for dwelling units and sleeping units.
2. Separate facilities shall not be required in structures or tenant spaces with a total occupant load, including both employees and customers, of 15 or less.
3. Separate facilities shall not be required in mercantile and business occupancies in which the maximum occupant load is 50 or fewer.

Conclusion
Where the required number of toilet room fixtures to accommodate both men and women is in compliance with IBC Table 2902.1, each water closet may be located in a separate, individual room with full height walls, doors and ventilation. The lavatories may be located inside each room or outside the rooms in a cluster setting. Signage per IBC 2902.4 is required.