



And a VERY HAPPY NEW YEAR

From our Family to Yours

Hopefully everyone had a Great Year - A great thanks to all of our customers -we appreciate you



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TAS Services

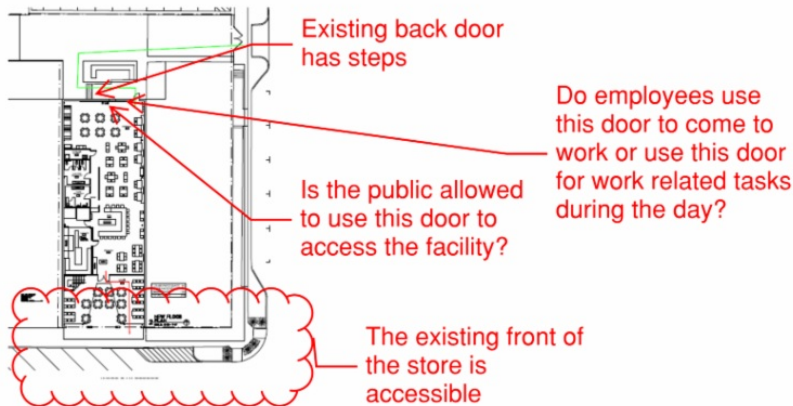
ADAAG Consulting

Fair Housing reviews

**TAS 202.4**

**Back Door** requirements in alterations

Is the back door required to be accessible if originally it was Not



This existing facility has accessible parking and an accessible route only through the front door.

**First**, you need to look at the extent and areas scoped in the alterations.

If all you are doing is adding a set of updated bathroom, then would you be required to update the

accessible route through the back door? NO, not per TAS or ADAAG but it may still be recommended if it is being used for access by employees or the Public.

**WHY?** Because you have not altered a **Primary function** area of this facility. This is one of the main **items** that you will need to examine as well as who is using this door and how are they using it.

It is always the best recommendation to update the accessible route when the opportunity arises. Be proactive in protecting yourself as an Architect and to protect you clients.

If you remodel the dining area and a bar, would you be required to bring the back door into compliance?

**Yes and/ or maybe No.** The problem with some of the TAS/ ADAAG standards is how it is really being used or applied to your specific project.

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The requirement to have an accessible route in an alteration from a back door to the public way must be looked at very carefully. If this door is used for employees in any way or if the public can or is allowed to use this door in any way, then this door would be considered an **entrance** and would be required to have a fully compliant accessible route to and through this door.

When you alter an area that contains the **primary function** of a facility then you need to look at 202.4.

**202.4 Alterations Affecting Primary Function Areas.** In addition to the requirements of 202.3, an alteration that affects or could affect the usability of or access to an area containing a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area, including the *parking areas*, rest rooms, telephones, and drinking fountains serving the altered area, are readily accessible to and usable by individuals with disabilities, unless such alterations are disproportionate to the overall alterations in terms of cost and scope.

**206.4.1 Public Entrances.** In addition to entrances required by 206.4.2 through 206.4.9, at least **60 percent** of all public entrances shall comply with 404.

**206.5.1 Entrances.** Each entrance to a building or facility required to comply with 206.4 shall have at least one door, doorway, or gate complying with 404.

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**Question** to TDLR

1. Does 206.4.1 only have to do with newconstruction ( The 60% rule)

TDLR RESPONSE TO RAS:Section 206.4 is applicable to new construction and alterations. If you are constructing a new facility, 60%of the entrances are required to be accessible. If an existing facility has only one accessible entrance and other entrances are being altered, then they are required to be accessible until the 60% requirement is satisfied. Additionally, if you do an alteration to a **primary function area**, 20% of the construction costs should be devoted to the removal of architectural barriers to provide an accessible path of travel to the altered area and this may require making another entrance accessible.

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**Jeff's comment** - if the door entrance itself is not being altered and you have an accessible route through another door then a back door that has steps would be permitted as long as there is no requirement by employees to use this door or the public that would use this door as the path of travel. **Understand** that the door location may be moved from the center of the building over to one edge but this moving of the door is not what triggers the requirement for an accessible route, it is how or who will be using this door. **If employees** are expected to use this back door for work tasks or to park and then come in through this door for work, then you are expected to make this back door accessible and then you have triggered 203.9. To comply with 203.9 you would then be required to comply with TAS 402 which is the requirement for an accessible route up to and in through the back door. Then the door itself would be required to comply with TAS 404.

**203.9 Employee Work Areas.** Spaces and elements within employee work areas shall only be required to comply with 206.2.8, 207.1, and 215.3 and shall be designed and constructed so that individuals with disabilities can approach, enter, and exit the employee work area.

**402.2 Components.** Accessible routes shall consist of one or more of the following components: walking surfaces with a running slope not steeper than 1:20, doorways, ramps, curb ramps excluding the flared sides, elevators, and platform lifts. All components of an accessible route shall comply with the applicable requirements of Chapter 4.

**404.1 General.** Doors, doorways, and gates that are part of an accessible route shall comply with 404.

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Note: Service entrances are not required to be accessible as long as it is not the only entrance to a facility and it is actually a service entrance **ONLY**. This would apply if there is an accessible door and path of travel in another location. There would be a requirement to add proper signage at the service door. (Service entrance only- Would or could apply only if there is no public or employees using this door for entry to come to work or the requirement to use this door for work related tasks).

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Comments for discussion are always welcome- E mail to

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**Jeff Gutknecht is a Register Accessibility Specialist # 00000472 with 22 years of experience and knowledge in the construction field and accessibility services to assist your company in all related TAS, ADAAG and Fair Housing compliance work. We are one of the Top RAS companies with a different and unique plan review method with clear and concise explanations of areas of deficiencies with the plans. All plans can be sent by PDF and we will use Bluebeam to mark-up and review all areas for compliance. We enjoy traveling to all locations to cover any of your jobs.**

**Thank You** [Jeff Gutknecht, RAS # 472](mailto:jeff.gutknecht@ras472.com) See more at [www.TexasAccessibilitySpecialist.com](http://www.TexasAccessibilitySpecialist.com)