

Cahill, Jennifer

From: Elizabeth Fust <liz@gatheringstrength.org>
Sent: Tuesday, July 7, 2026 9:01 PM
To: Cahill, Jennifer
Subject: OHFA draft accessibility standards

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Jennifer,

Thanks so much for sharing OHFA's draft Design & Architectural Standards. I'm so glad you are working on these. I looked at the standards related to accessibility. It looks like Ohio has adopted the 2021 IBC, which includes the 2017 ICC/ANSI A117.1 accessibility standards. Kentucky is still using the 2015 IBC and 2009 ICC A117.1 standards.

I believe I told you when we spoke that I don't love everything about Section 504 requirements because they are older standards from the 1970s and 80s. The 2017 A117.1 standards are much more modern and accommodate larger wheelchairs of today but they don't require everything that section 504 does (like grab bars installed). Won't the developers of multifamily housing of more than 20 units have to comply with the building code and have 2% of the units be Type A units? Would those be included in (or in addition to) the 10% required by OHFA?

Have you considered requiring 10% of units to be Type A units under the 2017 A117.1 standards as opposed to Section 504? That wouldn't require installation of grab bars and open space under sinks, just the ability to add grab bars and knee/toe space.

On p. 9, is where the Section 504 requirements are discussed. The UFAS is a safe harbor for complying with section 504, but it is an old standard from the 1980s. Many criteria don't align with the 2017 ICC A117.1 standards. So, I encourage you to consider including some exceptions or amendments in the OHFA standards, especially related to bathroom clear spaces.

1. Bathroom clear space. For example, UFAS allows a 30"x48" clear space by the tub/shower for a FORWARD transfer and this is impossible for many wheelchair users. Consider using the ICC/ANSI A117.1 2017 standards for clear space, which I believe requires clear space that spans the length of the tub/shower and is at least 30" deep. (A 3x"x36" transfer shower needs a 48"x36" clear space, I believe). Or, if that's too much, at the very least, required the old 48"x30" clear space parallel to the tub/shower - No forward transfers allowed.
2. For new construction, consider requiring the 2017 ICC/ANSI A117.1 standards regarding other clear and turn-around spaces, which accommodate the larger wheelchair made these days and are larger than UFAS or 2010 ADA amendments:
 - a. 67" diameter circular turnaround
 - b. OR the 3 new T-shaped turnaround spaces (now 68"x60")
 - c. Clear floor space changed from 30x48 to 30"x52"

- d. Push-side of door clearance now 52" up from 48"
 - e. Turn space in hallways with 2 90 degree turns - 52" between them, up from 48"
 - f. Space around toilet now 60" x 56"
3. Dispersal of units. When we talked, you asked for my input in the requirement to offer accessible units in a variety of sizes and to disperse throughout the development. First, I'd tell anyone who asks that this is protective of your developers since the Fair Housing Act, Section 504, and the Building code (A117.1 standards) require this. So, you're helping them comply. Second, people with disabilities, like all people, come in multiple different family size configurations and with different wants and needs. So, affording them the same kind of choice as everyone else is important.
4. P. 11 Additional Features. I like this idea of having people choose from a table to balance increase accessibility and cost. I have questions and suggestions about column C:
- a. "Space designated for wheelchair charging..." I'm not sure what this means. My power wheelchair uses a regular outlet. It is very rare for a wheelchair to require anything but a regular 120V so you can charge your wheelchair anywhere you want in the home. Trying to choose a "designated" space that would suit most people would be difficult. Everyone has a different system or routine, and most charge at night in their bedroom after transferring from the chair to the bed. So, I don't see this is a high priority.
 - b. "Swing-up grab bar..."
 - c. "Storage in bathroom." Include within a reach range of 18" - 48" AFF. In fact, you might also say something like 75% of storage within reach range of 18" - 48."
 - d. "Grab bars installed at toilets and tub/showers." I believe this is required by Section 504. Aren't you expecting them to install grab bars in 10%? It's the ICC/ANSI A117.1 standards that don't require grab bars to be installed.
 - e. "Closets with no doors." I could see this, perhaps, for rehab, but I'd hate to give new construction developers the option to have closets with no doors.
 - f. Consider including Closets with 32" clear space with shelves, hooks, hanging rods within the reach range of 18" - 48"
 - g. Consider including: Provide additional backing in walls around the toilet and tub/shower from a range of 18" to 48" AFF to accommodate grab bar placement for children and short females (like myself)
 - h. Consider including: At least 32" clear space on one side of toilet to facilitate horizontal transfer from wheelchair (no overlap with fixtures)
 - i. consider including: Mirror edge at top counter
 - j. Consider including: Rectangular roll-in/walk-in shower minimum 60"x30" with the entry on the 60" side and clear space adjacent to it that is 60"x30" (this is required in the 1027 A117.1 standards)

Thanks again for sharing this. I really appreciate it. Let me know if you have any questions about my comments/suggestions.

Liz

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