
BULLETIN: IDENTIFICATION OF SINGLE-USER TOILET FACILITIES AS ALL-GENDER

PURPOSE: The Division of the State Architect (DSA) provides this bulletin for reference by schools, community colleges, and other entities under its jurisdiction, as an aid in complying with new state law requirements. Subject to approval by the local enforcing agency, this bulletin is also provided for reference by other interested parties as an aid in complying with new state law requirements.

BACKGROUND: Assembly Bill 1732 (Ting, Chapter 818, Statutes of 2016) was signed into law on September 29, 2016, to create Health and Safety Code Section 118600, relating to the identification of single-user toilet facilities as all-gender toilet facilities.

Health and Safety Code Section 118600 requires:

- (a) All single-user toilet facilities in any business establishment, place of public accommodation, or state or local government agency shall be identified as all-gender toilet facilities by signage that complies with Title 24 of the California Code of Regulations, and designated for use by no more than one occupant at a time or for family or assisted use.
- (b) During any inspection of a business or a place of public accommodation by an inspector, building official, or other local official responsible for code enforcement, the inspector or official may inspect for compliance with this section.
- (c) For the purposes of this section, "single-user toilet facility" means a toilet facility with no more than one water closet and one urinal with a locking mechanism controlled by the user.
- (d) This section shall become operative on March 1, 2017.

DISCUSSION: The following directive is provided for clarity, to address identification of single-user toilet facilities as all-gender, in compliance with the accessibility provisions of California Building Code (CBC) Chapter 11B. It is important to note that the clarification provided herein is not the result of a change in accessibility regulations, and is in accordance with existing accessibility requirements for symbols at entrances for toilet facilities, and wall-mounted designation signs if provided, as is already expressed in both the 2013 CBC and 2016 CBC.

1. The provisions of CBC Chapter 11B require that a sanitary facility that is not specifically identified as for "men" or "women" (referred to in Chapter 11B as a "unisex" facility) have a geometric symbol on the door that is an equilateral triangle superimposed onto a circle. The "unisex" symbol is the only specific indicator required to be provided by Chapter 11B for a toilet facility that is available for use by all

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individuals. No pictogram, text, or braille is required on the symbol. (See attachment, Exhibit A.)

2. CBC Chapter 11B does not require a wall-mounted designation sign identifying a permanent room or space to be provided for a toilet facility. CBC Chapter 11B provisions for designation signs are conditional and the technical requirements apply only when a designation sign is provided.

2.1 According to CBC Chapter 11B, where a toilet facility is identified with a designation sign adjacent to the door, the sign is required to comply with the technical requirements for visual characters, raised characters, braille, and must also comply with other accessibility requirements for mounting height, clear floor space, and proximity to the door/entrance of the room. A pictogram is not required to be provided; however, where a facility owner elects to identify a toilet facility with a pictogram, a text descriptor consisting of visual characters, raised characters, and braille is required to accompany the pictogram.

2.2 DSA does not have the authority to specify designation sign text, nor does DSA have the authority to regulate the image for a pictogram that is provided on a designation sign. The image of the pictogram and text descriptor is left to the discretion of the facility owner/operator. (See attachment, Exhibit B.)

The CBC requirements for use and application of designation signs are consistent with the 2010 Americans with Disabilities Act Standards (2010 ADAS).

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The following information pertains to projects within DSA's enforcement jurisdiction, namely schools, community colleges, and state-funded facilities:

3. Addressing the enforcement provisions of the statute: HSC §118600 states: "an inspector, building official, or other local official responsible for code enforcement, the inspector or official may inspect for compliance." For projects within DSA enforcement jurisdiction, DSA provides the following guidelines for enforcement:

3.1 Projects under plan review as of March 1, 2017: If a project is in plan review, DSA access staff will review that all single-user toilet facilities in new construction, or those undergoing alteration that are part of the project, have the required "unisex" symbols on the door (see attachment, Exhibit A), and indicate that the symbol be provided without text, braille, or use of a pictogram. If the designer has indicated a wall-mounted designation sign will be provided at the single-user toilet facility, DSA will require the sign to be specified in the construction documents, and to be indicated as a designation sign with raised text, corresponding braille, and no pictogram (see attachment, Exhibit B).

3.2 Single-user toilet facilities in projects under construction, and existing single-user toilet facilities requiring a change of identification symbols: In accordance with the guidelines provided herein, implementation of the statute for existing single-user toilet facilities and for single-user toilet facilities in projects under construction is to be effected by the school district. The effective date for compliance is March 1, 2017. When changing identification symbols of existing single-user toilet facilities from gender-specific to all-gender, DSA advises against providing a pictogram to represent an all-gender image on a designation sign or unisex symbol. The pictogram might be perceived as inappropriate, and in fact, DSA reminds facility owners that a pictogram is not required.

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ATTACHMENT

**IDENTIFICATION OF ALL GENDER SINGLE-USER TOILET FACILITIES
Compliant with the California Building Code (CBC) Chapter 11B**

EXHIBIT A - Door Symbol (required by the CBC)

This image represents the door symbol that is required by CBC 11B-216.8 to identify an all-gender/unisex single-user toilet facility. The symbol must comply with the requirements of CBC 11B-703.7.2.6.3. No pictogram, text, or braille is required on the symbol.

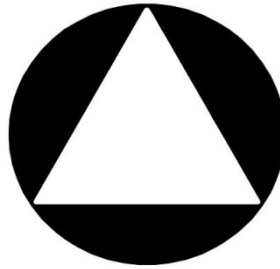


EXHIBIT B - Designation sign on wall

Designation signs are not required to be provided by the CBC or the 2010 ADAS. If provided, a designation sign adjacent to the door must comply with the scoping requirements of CBC 11B-216.2, and the technical requirements for raised characters (CBC 11B-703.2), braille (CBC 11B-703.3), visual characters (CBC 11B-703.5), and requirements for installation height and location (CBC 11B-703.4). No pictogram is required. The following signs illustrate acceptable examples for designation sign text:



Note: Braille translation not verified by DSA.