

# Clark County ADA Compliance Program

Date: May 13, 2008

Facility Surveyed: Clark County Jail

707 West 13<sup>th</sup> Street Vancouver, WA

Construction Completion Date: April 1984

ADA Committee Members Present During Survey:

- Wayne Yarnall
- Jesse Magana
- Tim McVicker

Clark County Jail Representative Present During Survey:

- Commander Cliff Evelyn

## Applicable Codes:

- International Building Codes (IBC)
- American National Standard Institute Codes (ANSI)

**IBC 308.4 Group I-3 -** This occupancy shall include buildings and structures that are inhabited by more than five persons who are under restraint or security. An I-3 facility is occupied by persons who are generally incapable of self-preservation due to security measures not under the occupants' control. This group shall include, but not be limited to, the following:

- Prisons
- Jails
- Reformatories
- Detention centers
- Correctional centers
- Prerelease centers

Buildings of Group I-3 shall be classified as one of the occupancy conditions indicated in Sections 308.4.1 through 308.4.5 (see Section 408.1).

**IBC 308.4.5 Condition 5 -** This occupancy condition shall include buildings in which free movement is restricted from an occupied space. Staff-controlled manual release is provided to permit movement from sleeping units, activity spaces and other occupied areas within the smoke compartment to other smoke compartments.

**IBC 1107.5.5 Group I-3 -** Accessible units shall be provided in Group I-3 occupancies in accordance with Sections 1107.5.5.1 through 1107.5.5.3.

**IBC 1107.5.5.1 Group I-3 Sleeping Units -** In Group I-3 occupancies, at least 2 percent, but not less than one, of the dwelling units and sleeping units shall be Accessible units.

**IBC 1107.5.5.2 Special Holding Cells and Special Housing Cells or Rooms -** In addition to the Accessible units required by Section 1107.5.5.1, where special holding cells or special housing cells or rooms are provided, at least one serving each purpose shall be an accessible unit. Cells or rooms subject to this requirement include, but are not limited to, those used for purposes of orientation, protective custody, administrative or disciplinary detention or segregation, detoxification and medical isolation.

**Exception:** Cells or rooms specially designed without protrusions and that are used solely for purposes of suicide prevention shall not be required to include grab bars.

**IBC 1107.5.3 Medical Care Facilities -** Patient sleeping units or cells required to be Accessible units in medical care facilities shall be provided in addition to any medical isolation cells required to comply with Section 1107.5.5.2.

**IBC Section 3402 Definitions - Technically Infeasible** - An alteration of a building or a facility that has little likelihood of being accomplished because the existing structural conditions require the removal or alteration of a load-bearing member that is an essential part of the structural frame, or because other existing physical or site constraints prohibit modification or addition of elements, spaces or features which are in full and strict compliance with the minimum requirements for new construction and which are necessary to provide accessibility.

### ANSI 806 Holding Cells and Housing Cells

**ANSI 806.1 General -** Holding cells and housing cells shall comply with Section 806.

ANSI 806.2 Features for People Using Wheelchairs or Other Mobility Aids - Cells required to have features for people using wheelchairs or other mobility aids shall comply with Section 806.2.

**ANSI 806.2.1 Turning Space -** Turning space complying with Section 304 shall be provided within the cell.

**ANSI 806.2.2 Benches-** Where benches are provided, at least one bench shall comply with Section 903.

**ANSI 806.2.3 Beds -** Where beds are provided, clear floor space complying with Section 305 shall be provided on at least one side of the bed. The clear floor space shall be positioned for parallel approach to the side of the bed.

**ANSI 806.2.4 Toilet and Bathing Facilities -** Toilet facilities or bathing facilities provided as part of a cell shall comply with Section 603.

**ANSI 806.3 Communication Features -** Cells required to have communication features shall comply with Section 806.3.

**ANSI 806.3.1 Alarms -** Where audible emergency alarm systems are provided to serve the occupants of cells, visual alarms complying with Section 702 shall be provided.

**EXCEPTION:** In cells where inmates or detainees are not allowed independent means of egress, visual alarms shall not be required.

**ANSI 806.3.2 Telephones -** Where provided, telephones within cells shall have volume controls complying with Section 704.3.

# Cells in the Clark County Jail

Day room	# of cells	Purpose	
A1	5	suicide	
A2	4	ad seg	
A3	4	disc seg	
B1	open	Detox male	
B2	open .	Detox female or male	
В3	open .	temp holding male or female	
B4	1	temp holding male or female	
B5	1	temp holding male or female	
B6	1	special needs male or female	
B7	1	special needs "rubber room" male or female	
B8	1	special needs "rubber room" male or female	
B9	1	special needs male or female	
C1	14	female med/max	
C2	open	female min	
C3	7	female med	
D1	7	female intake	
D2	7	female med	
D3	open	female min	
D4	open	male intake overflow	
E1	14	max	
E2	open	min	
E3	open	min	
E4	15	med	
E5	15	med	
F1	15	min/med pc	
F2	open	min	
F3	open	min	
F4	14	max special needs	
F5	15	med/max pc	

G1	15	med
G2	15	intake
G3	14	max
G4	open	min
G5	open	min
H1	open	min
H2	open	min
H3	open	trusty min
H4	open	F1 overflow min only
Med	6	male & female medical needs

Total cells 186

B cells are not in the overall cell count

Open = Dayroom with no individual cells

Open = Dayroom with no individual cells, not included in overall count

PC = Protective Custody
Ad seg = Administrative segregation

Disc seg = Disciplinary segregation

If sex isn't listed then it is male.

# Synopsis:

Construction of the Clark County Jail was completed in April 1984 prior to the enactment of the Americans with Disabilities Act. Construction codes regarding accessibility were not recognized at that time. The building is concrete block and masonry construction.

Pursuant to IBC 1107.5.5.2 - Special Holding Cells and Special Housing Cells or Rooms - Where special holding cells or special housing cells or rooms are provided, at least one serving each purpose shall be an accessible unit. Cells or rooms subject to this requirement include, but are not limited to, those used for purposes of orientation, protective custody, administrative or disciplinary detention or segregation, detoxification and medical isolation. As noted above, there are several holding cells within the Clark County jail specifically designed for various purposes. Therefore, at least one of each of these cells must be made accessible.

IBC 1107.5.5.1 Group I-3 - Sleeping Units - requires that at least 2 percent, but not less than one dwelling units and sleeping units meet accessibility standards.

The Clark County Jail holding, medical and housing cells do not meet code for the number of required cells or the accessible features needed within those cells. It would probably be **technically infeasible (IBC Section 3402 Definitions)** to bring the jail up to current code for accessibility. The services of an architect and/or structural engineer may be required to determine if any alterations could be made.

However, a few items were noted during the survey that can be readily addressed to improve accessibility. Those suggestions are listed below.

- All staff should be trained to recognize and assist persons with disabilities while incarcerated. Situations may require staff to provide additional monitoring and care.
- Facility accessibility improvements include:



Issue: Signage – North entrance is inaccessible

Issue:

Location: North Entrance

Code: IBC 1110.1 - Signs Required

Accessible elements shall be identified by the International Symbol of Accessibility at the

following locations:

Entrances where not all entrances are accessible.

Code: IBC 1110.2 - Directional Signage

Directional signage indicating the route to the nearest like accessible element shall be provided at the following locations. These directional signs

shall include the International Symbol of

Accessibility:

Inaccessible building entrances

Sign Sample: Signs must meet ANSI Chapter 7

Communication

Notes: Signage is required with directions to nearest

accessible entrance to the east.



Issue: Ramp Slope (1 1/4:12) Length 10.5 feet, width

exceeds code requirement of 36 inches.

(Calibrated digital level)

Issue:

Location: Sally-port Entrance to Booking.

Code: ANSI Code: 405 Ramps

ANSI 405.1 General. Ramps along accessible

routes shall comply with Section 405.

ANSI 405.2 Slopes. Ramp runs shall have a

running slope not steeper than 1:12.

EXCEPTION: In existing buildings or facilities, ramps shall be permitted to have slopes steeper than 1:12 complying with Table 405.2 where <u>such slopes</u> are necessary due to space limitations.

ANSI Table 405.2—Allowable Ramp Dimensions for

Construction in Existing Sites, Buildings, and

**Facilities** 

Slope1 Maximum Rise

Steeper than 1:10 but not steeper than 1:8 3

inches (75 mm)

Steeper than 1:12 but not steeper than 1:10 6

inches (150 mm)

1A slope steeper than 1:8 shall not be permitted.

Notes: Custody or law enforcement personnel are always

present with prisoners in this area of the jail.

Personnel can assist individuals in wheelchairs by

assisting them up or down the ramp.



Item # 3

Issue: Clear floor space for telephone access – Chairs

block telephone access

Issue:

Location: Booking Holding Cell

Code: Code: ANSI 305.3 Size – The clear floor space

shall be 48 inches minimum in length and 30

inches minimum in width.



Issue: Height of operable Parts – Telephone – Volume

Control is 56" above floor

Issue:

Location: Medical Unit - Inmate Phone

Code: Only ANGL 704

Code: ANSI 704.2.2 Operable Parts. The highest operable part of the telephone shall comply with Section 308. Telephones shall have push button controls where service for such equipment is

available.

Code: ANSI 308.2 Forward Reach; 308.2.1 Unobstructed – Where a forward reach is

unobstructed, the high forward reach shall be 48 inches maximum and the low forward reach shall

be 15 inches minimum above the floor.

Notes: Height of all phones within the jail should be

examined



Item #

Issue: Volume Control

Issue:

Location: Visitor Area

Code: Code: ANSI 704.3 Volume–Control Telephones.

Public telephones required to have volume controls shall be equipped with a receive volume control that provides a gain adjustable up to 20 dB minimum. Incremental volume controls shall provide at least one intermediate step of gain of 12 dB minimum. An automatic reset shall be

provided.

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Notes: At least one phone in the visitor area should be

equipped with volume control



Item #

Issue: Mirror height – Current height is 55" from bottom

edge to floor

Issue:

Location: Video Arrangement Restroom

Code: ANSI 603.3 Mirrors - Maximum height of 40"

above the floor at the base of mirror.



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Issue: Grab bar height and location – Current height is

38" from top of bar to floor - Positioning and

number of grab bars

Issue: Video Arrangement Restroom

Location:

Code:

609.4 Position of Grab Bars. Grab bars shall be installed in a horizontal position, 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the floor measured to the top of the gripping surface.

604.5.1 Fixed Side Wall Grab Bars. Fixed sidewall grab bars shall be 42 inches (1065 mm) minimum in length, located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1370) mm) minimum from the rear wall. In addition, a vertical grab bar 18 inches (455 mm) minimum in length shall be mounted with the bottom of the bar located between 39 inches (990 mm) and 41 inches (1040 mm) above the floor, and with the center line of the bar located between 39 inches (990 mm) and 41 inches (1040 mm) from the rear

wall.

#### Notes: **EXCEPTIONS:**

In Type A and Type B units, the vertical grab bar component is not required.

In a Type B unit, when a side wall is not available for a 42-inch (1065 mm) grab bar, the sidewall grab bar shall be permitted to be 18 inches (455 mm) minimum in length, located 12 inches (305 mm) maximum from the rear wall and extending 30 inches (760 mm) minimum from the rear wall.

604.5.2 Rear Wall Grab Bars. The rear wall grab bar shall be 36 inches (915 mm) minimum in length, and extend from the centerline of the water closet 12 inches (305 mm) minimum on the side closest to the wall, and 24 inches (610 mm) minimum on the transfer side.

#### **FXCFPTIONS:**

- 1. The rear grab bar shall be permitted to be 24 inches (610 mm) minimum in length, centered on the water closet, where wall space does not permit a grab bar 36 inches (915 mm) minimum in length due to the location of a recessed fixture adjacent to the water closet.
- 2. In a Type A or Type B unit, the rear grab bar shall be permitted to be 24 inches (610 mm) minimum in length, centered on the water closet, where wall space does not permit a grab bar 36 inches (915 mm) minimum in length.
- 3. Where an administrative authority requires flush controls for flush valves to be located in a position that conflicts with the location of the rear grab bar, 8 that grab bar shall be permitted to be split or shifted





Issue: Call button heights – Current heights are 58".

Issue:

Location: Visitor Area –Lobby Elevator

Code: ANSI 308.2 Forward Reach; 308.2.1 Unobstructed

 Where a forward reach is unobstructed, the high forward reach shall be 48 inches maximum and the low forward reach shall be 15 inches minimum

above the floor.

Notes:



Item #

Issue: Elevator Floor Designation Signage

Issue: Car Designation Signage

Location: Visitor Area –Lobby Elevator

Code: ANSI 407.2.3.1 Floor Designation – Floor

designations shall be provided in tactile characteristics complying with Section 703.3 located on both side jambs of elevator hoistway entrances. Tactile characters shall be 2 inches minimum in height. A tactile star shall be provided

on both jambs at the main entry level.

Notes:



Item # 10

Issue: Cab Call Buttons – Lack of Braille Characters

Issue:

Location: Interior Elevator Cab

Code: Code: 407.4.7.1.1 Type – Control buttons shall be

identified by tactile characters complying with

section 70303.

Code: 407.4.7.1.2 Symbols – The control button for emergency stop, alarm, door open, door close, main entry floor and phone shall be identified with tactile symbols as shown in Table 407.7.1.3Tactile

character and Braille designators



Issue: Call button height – Current height is 58"

Issue:

Location: Elevator Interior

Code: ANSI 308.2 Forward Reach; 308.2.1 Unobstructed

 Where a forward reach is unobstructed, the high forward reach shall be 48 inches maximum and the low forward reach shall be 15 inches minimum

above the floor.

Notes:



Item # 12

Issue: Height of Book Shelves – Height of upper shelve is

81".

Issue: Jail Library

Location: ANSI 308.3 Side Reach.

ANSI 308.3.1 Unobstructed. Where a clear floor space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm)

minimum above the floor.

EXCEPTION: Existing elements shall be permitted at 54 inches (1370 mm) maximum above the

floor.

Note: Due to limited space available within the library adding additional shelves to meet height standards may not be possible. Therefore, at a minimum, signage should be placed in the library indicating that jail staff will assist individuals with disabilities in acquiring books that are out of reach.

Code:







Issue: Tables in Jail Library - Insufficient Knee Clearance

– The tables in the jail library have a "U" shaped pedestal as displayed in the bottom photo to the left. There is insufficient clearance for individuals using wheelchairs. Minimum outer clearance is 8 inches and maximum clearance in the center for the table is 17 inches. Knee clearance must be a

minimum of 30 inches in width.

Issue:

Location: Jail Library

Code: ANSI 306.3 Knee Clearance

ANSI 306.3.1 General. Space beneath an element between 9 inches (230 mm) and 27 inches (685 mm) above the floor shall be considered knee clearance and shall comply with Section 306.3.

ANSI 306.3.2 Maximum Depth. Knee clearance shall be permitted to extend 25 inches (635mm) maximum under an element at 9 inches (230 mm) above the floor.

ANSI 306.3.3 Minimum Depth. Where knee clearance is required beneath an element as part of a clear floor space, the knee clearance shall be 11 inches (280 mm) minimum in depth at 9 inches (230 mm) above the floor, and 8 inches (205 mm) minimum in depth at 27 inches (685 mm) above the floor.

ANSI 306.3.4 Clearance Reduction. Between 9 inches (230 mm) and 27 inches (685 mm) above the floor, the knee clearance shall be permitted to be reduced at a rate of 1 inch (25 mm) for each 6 inches (150 mm) in height.

ANSI 306.3.5 Width. Knee clearance shall be 30 inches (760 mm) minimum in width.

Notes: Acquire a table meeting clearance requirements









Issue: **Inaccessible Water Closet** 

Issue:

Location: Medical Unit - Common Restroom

Code:

ANSI 604 Water Closets and Toilet Compartments

ANSI 604.1 General. Accessible water closets and toilet compartments shall comply with ANSI Section 604. Compartments containing more than one plumbing fixture shall comply with ANSI Section 603. Wheelchair accessible compartments

shall comply with Section 604.8.

Note: There are numerous issues regarding accessibility to the water closet displayed to the left. It is possible that this room, in its entirety, could be remodeled to meet accessible concerns. ANSI Chapter 6 – Plumbing Elements and Facilities

should be referenced.

Code requirements are too extensive to list.

Notes:

Some of the immediate concerns include:

- Water closet is not wheelchair accessible
- Sink is inaccessible
- Placement, number and height of grab bars around water closet
- Location and type of flushing mechanism
- Inadequate space on side of toilet
- Bathtub is inaccessible and should be replaced with a standard roll-in shower (ANSI 608.5.2)
- Call "button" is inaccessible. It cannot be operated with a closed fist and exceeds height requirements
- Inmates may use the restroom on their own. However, door handles and closure device cannot be used with a closed fist. (ANSI 309 Operable Parts)
- Floor Space









Issue: Medical Unit "Accessible" Cell

Issue:

Location: Medical Unit

Code:

Notes:

Accessible cells must meet requirements of ANSI 806.2 Features for People Using Wheelchairs or Other Mobility Aids - Cells required to have features for people using wheelchairs or other mobility aids shall comply with Section 806.2. Currently, two inmates can utilize the cell and sleep on bunks. However, if two bunks are placed in the room, the call button, shown in the photo to the left, cannot be accessed.

Note: There are numerous issues regarding accessibility within this cell. It is possible that this cell, in its entirety, could be remodeled to meet accessibility concerns. ANSI Chapter 6 – Plumbing Elements and Facilities should be referenced. Code requirements are too extensive to list.

Some of the immediate concerns include:

Call button cannot be operated with a closed fist (ANSI 309 Operable Parts)

Call button is too high (49.5") (ANSI 308.2 Forward Reach and ANSI 308.3.1 Side Reach – Unobstructed – Maximum 48" – Minimum 15")

Water closet is not wheelchair accessible (Side Clearance)

Flush controls are inaccessible ANSI 604.6 (Flush Controls)

Drinking fountain accessibility also needs to be reviewed. (ANSI 602.4 Spout Outlet Height)

Mirror is too high. Maximum height of 40" above the floor at the base of mirror. (ANSI 603.3 Mirrors)

Light switch is inaccessible. It cannot be operated with a closed fist. (ANSI 309 Operable Parts)

Inmates may use the restroom on their own. However, door handles and closure device cannot be used with a closed fist. (ANSI 309 Operable Parts)

Complete text of applicable codes is not listed for this cell. Architectural review is required to ascertain if it is technically feasible to make this cell accessible.



Issue: Television Control not Accessible

Issue:

Location: Medical Unit Day Room

Code: ANSI 308.2 Forward Reach.

308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum

above the floor.



Item # 17

Issue: Phone Height – Bottom buttons are 48" above floor

- Volume control is approximately 55" above the

floor.

Issue:

Location: Medical Unit Day Room

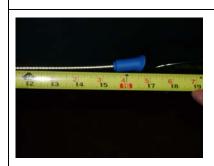
Code: ANSI 308.2 Forward Reach.

ANSI 308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm)

minimum above the floor

ANSI 704.2.2 Operable Parts. The highest operable part of the telephone shall comply with Section 308. Telephones shall have push button controls where service for such equipment is available.

Notes:



Item # 18

Issue: Telephone receiver cord length

Issue:

Location: All Phones within jail for inmate access

Code: ANSI 704.2.4 Cord Length. The telephone handset

cord shall be 29 inches (735 mm) minimum in

length.

Notes: Cord lengths are approximately 16 to 17 inches

throughout the jail. The purpose is for suicide prevention. Administrative need to help ensure the safety of inmates should take preference over

ANSI requirements in this area.



Issue: Insufficient Knee Clearance

Issue:

Location: Tables in Medical Unit Day Room

Code:

ANSI 306.3 Knee Clearance

ANSI 306.3.1 General. Space beneath an element between 9 inches (230 mm) and 27 inches (685 mm) above the floor shall be considered knee clearance and shall comply with Section 306.3.

ANSI 306.3.2 Maximum Depth. Knee clearance shall be permitted to extend 25 inches (635mm) maximum under an element at 9 inches (230 mm) above the floor.

ANSI 306.3.3 Minimum Depth. Where knee clearance is required beneath an element as part of a clear floor space, the knee clearance shall be 11 inches (280 mm) minimum in depth at 9 inches (230 mm) above the floor, and 8 inches (205 mm) minimum in depth at 27 inches (685 mm) above the floor.

ANSI 306.3.4 Clearance Reduction. Between 9 inches (230 mm) and 27 inches (685 mm) above the floor, the knee clearance shall be permitted to be reduced at a rate of 1 inch (25 mm) for each 6 inches (150 mm) in height.

ANSI 306.3.5 Width. Knee clearance shall be 30 inches (760 mm) minimum in width.

Notes: Acquire a table meeting clearance requirements



Issue: Height of Book Shelves – Height of upper shelve is

55

Issue:

Location: Indoor Recreation Area

Code: ANSI 308.3 Side Reach.

ANSI 308.3.1 Unobstructed. Where a clear floor space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm)

minimum above the floor.

EXCEPTION: Existing elements shall be permitted at 54 inches (1370 mm) maximum above the

floor.

Notes: Move books to lower shelves or place signage in

the day room indicating that jail staff will assist individuals with disabilities in acquiring books that

are out of reach.



Issue: Insufficient Knee Clearance

Issue:

Location: Tables in Interview Room

Code: ANSI 306.3 Knee Clearance

ANSI 306.3.1 General. Space beneath an element between 9 inches (230 mm) and 27 inches (685 mm) above the floor shall be considered knee clearance and shall comply with Section 306.3.

ANSI 306.3.2 Maximum Depth. Knee clearance shall be permitted to extend 25 inches (635mm) maximum under an element at 9 inches (230 mm) above the floor.

ANSI 306.3.3 Minimum Depth. Where knee clearance is required beneath an element as part of a clear floor space, the knee clearance shall be 11 inches (280 mm) minimum in depth at 9 inches (230 mm) above the floor, and 8 inches (205 mm) minimum in depth at 27 inches (685 mm) above the floor.

ANSI 306.3.4 Clearance Reduction. Between 9 inches (230 mm) and 27 inches (685 mm) above the floor, the knee clearance shall be permitted to be reduced at a rate of 1 inch (25 mm) for each 6 inches (150 mm) in height.

ANSI 306.3.5 Width. Knee clearance shall be 30 inches (760 mm) minimum in width.

Notes: Acquire a table meeting clearance requirements