



PACT Program Guidance

Accessibility Checklist

Checklist for Accessible Design and Compliance with the PACT FHEO Assurances Agreement

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This document is intended to provide a checklist for the design and compliance with the agreement entered into in December 2021 by NYCHA and HUD's Office of Fair Housing and Equal Opportunity ("FHEO"), intended to ensure compliance with federal accessibility requirements and standards under Section 504 of the Rehabilitation Act ("**Section 504**") and Title II of the Americans with Disabilities Act ("**ADA**") in PACT Projects, while also recognizing potential infeasibilities in the full remediation of accessibility barriers to achieve compliance throughout certain properties (the "**PACT FHEO Assurances Agreement**"), and is meant only for guidance to assist PACT Partners. PACT Partners must comply with all applicable agreements, laws and regulations. NYCHA reserves the right to amend this guidance at NYCHA's sole discretion.

- Confirm the technical criteria used to design Mobility Accessible Units in PACT/RAD projects:
 - UFAS or the 2010 ADA Standards (with exceptions noted in HUD's deeming notice) may be used as the technical standard to demonstrate compliance with Section 504 and the PACT FHEO Assurances Agreement. Which standard was used to design Mobility Accessible Units?

- Confirm that Section 809.5 (Residential Dwelling Units with Communication Features) of the 2010 ADA Standards was used to design Hearing/Vision Accessible Units required by the PACT FHEO Assurances Agreement.
 - The definition of Hearing/Vision Accessible Units contained in the PACT FHEO Assurances Agreement requires compliance with Section 809.5 of the 2010 ADA Standards. Designs must include clear and complete information on plans that address each sub section of 809.5. Clearly show all alarm locations and communication features in Hearing/Vision Accessible Units.

- Confirm that all buildings in all PACT/RAD projects include no less than 4% Hearing/Vision Accessible Units.
 - The PACT FHEO Assurances Agreement requires that all buildings in all PACT/RAD projects include no less than 4% Hearing/Vision Accessible Units. Include information about the communication features required by Section 809.5

at the primary entry to each Hearing/Vision Accessible Unit and at the building entrance. Locate all alarms inside Hearing/Vision Accessible Units.

- Confirm that all buildings in all PACT/RAD projects include an updated or adequate existing electrical system that will allow conversion of any unit in any building from a standard unit to one that is Hearing/Vision Accessible.
 - The PACT FHEO Assurances Agreement requires an updated electrical system in all buildings on all PACT/RAD sites.
- For all Mobility Accessible Units and Hearing/Vision Accessible Units, provide information on plans and associated letters that show where units are located within buildings. Cross check charts at the top of the plan sets with the information provided in letters and in the plan set to ensure that everything is aligned.
- For all Mobility Accessible Units, if full compliance with new construction criteria is not met, then briefly explain why. For example, did the alterations project consist of an in-kind replacement only? Were there structural issues that prevented full compliance? If so, then please describe the structural issues. Were there parts of the unit that were not altered and as a result those unaltered parts of the unit remain as is, even if access does not exist. For example, were there narrow doors to bedrooms that were not part of the planned alteration and as a result they remain unaltered?
- If Mobility Accessible Units are grouped on one floor of an elevator building, is it because the elevator is not accessible and therefore an accessible route is not provided to floors above the ground floor? Indicate the dimensions of all elevator cabs highlighting those that provide an interior dimension of less than 48 inches x 48 inches.
- Were elevators modified in any way as part of the planned alteration? Indicate the extent of the modifications.
- Mobility Accessible Units must be connected by an accessible route to common area amenities, parking, to public transportation stops within the boundary of the site, and to all other indoor and outdoor areas that are provided for the benefit of residents. Confirm that an accessible route has been provided.
- Confirm that all FF&Es are compliant with associated requirements included in UFAS and/or the 2010 ADA Standards.
 - For example, furniture, tables, fixtures, appliances, etc. must comply with associated requirements.
- Confirm that all operable parts intended for use by residents, e.g., appliance controls, thermostat controls, door hardware, laundry equipment, vending machines, trash chute handles, etc. requires no more than 5 lbs. of force to operate and do not require pinching, grasping, or twisting of the wrist to operate. Ensure that operable parts are located within accessible reach range; provide enough detail for an assessment of accessible reach.

- Specifications packages will not be reviewed. The compliance evaluation will rely on the architect's statement confirming compliance of all specifications subject to requirements contained in UFAS and/or the 2010 ADA Standards.
- Employee areas are subject to Section 504 and will be evaluated as part of the compliance assessment. What is the status of employee areas? Have they been altered to ensure compliance? Or, were employee areas not part of the alterations project?
 - Utility and mechanical areas are exempt from compliance. Include the full level of detail required to permit a compliance assessment. Show height of operable parts, maneuvering clearance on both sides of doors, clear width at doors, turning space inside rooms, etc.
- Confirm that all requirements for life safety are met. Life safety, including all aspects of means of egress will not be a part of the compliance assessment. An architect's statement indicating that life safety requirements are met will suffice to satisfy the compliance assessment.
- Play equipment is subject to compliance with the ADA. See requirements in the 2010 ADA Standards Chapter 10. Confirm that play equipment complies with relevant Sections of Chapter 10.
- For Mobility Accessible Units designed to meet the UFAS Standard:
 - Show the level of detail required to support a full compliance assessment with requirements outlined in Section 4.34 Dwelling Units:
 - All common-use, public, and employee areas that are part of the planned alteration must include the level of detail that will support a full compliance assessment.
 - Clearly indicate spaces that are not part of the planned alteration.
 - Mobility Accessible Units will be certified as compliant when they are served by compliant and accessible common areas and sites.
 - An example of details to be provided for all spaces that are part of the PACT/RAD renovation (units/common areas/sites) includes, but is not limited to the following (Sections 4.34 (1) through (15) for specific requirements). The list below is not exhaustive but is intended to communicate the level of detail required to confirm compliance with the PACT FHEO Assurances Agreement.
 - Show the turning space (60-inch diameter circle or T-shaped turn) in all spaces required to be accessible.
 - Mark the accessible route that connects accessible building entrances to all exterior site and common-use amenities.
 - Provide details for the accessible route
 - Dimension the width of the accessible route, include slope and cross slope indications, detail ramps, landings, handrails, edge protection, and curb cuts, passenger drop off areas, transportation stops within the boundary of the site, etc.

- Provide parking details
 - Include slope of the ground surface, height of garage spaces, signage, and dimensions for parking spaces and access aisles, etc.
- Provide details for exterior amenities
 - Locate clear floor space at benches, detail exterior drinking fountains and other site amenities, etc.
- Provide details for employee work areas (mechanical and utility spaces are exempt)
 - Show room dimensions, dimension maneuvering clearance on both sides of doors, show alarms, show reach range of operable parts, etc.
- Show/indicate height of operable part, including but not limited to:
 - Switches, outlets, thermostats, circuit breakers in Mobility Accessible Units, trash chute controls, etc.
- Provide details for interior common-use areas, including but not limited to:
 - Trash rooms (ensure lever-type controls and not butterfly controls if hand operated), laundry rooms, community rooms, community room kitchens, fitness rooms, bathrooms, etc. Show turning space, room dimensions, fixture clearance at bathrooms, maneuvering clearance at doors, etc.
 - Laundry rooms
 - If the floor slopes toward a drain, detail the slope of the floor, include turning space, maneuvering clearance at doors, etc. Detail laundry sinks.
 - Provide dimensions and plans of common-use hallways, mailbox areas, the entrance lobby, etc.
 - Provide plans and elevations for all bathrooms (common-use areas and inside Mobility Accessible Units). Show fixture clearance, room dimensions, maneuvering clearance at doors, turning space, etc. Show height of all fixed elements in all bathrooms. Show elevation of all four walls.
 - Provide appropriate level of detail for Mobility Accessible Units, including all room dimensions, maneuvering clearance on both sides of all doors, dimensioned hallways and closet interiors, height of all elements that are expected to be operated by the resident, etc.
 - Include door schedules with information about thresholds.
 - Provide appropriate level of detail for all kitchens in Mobility Accessible Units. Include room dimensions

and width at entry. Detail elevation of all walls and specify height of all fixed elements, including but not limited to countertops, wall cabinets, etc. Detail knee clearance below the sink and work surface. Indicate distance between opposing elements, such as between counters and opposing appliances, walls, etc.

- Provide details for balcony doors, level changes, door width, threshold, balcony surface, etc. Show turning space on the balcony.

- For Mobility Accessible Units designed to meet the 2010 ADA Standards:
 - Show the level of detail required to support a full compliance assessment with requirements outlined in Section 809 Residential Dwelling Units:
 - All common-use, public, and employee areas that are part of the planned alteration must include the level of detail that will support a full compliance assessment. Clearly indicate spaces that are not part of the planned alteration.
 - Mobility Accessible Units will not be certified as compliant if they are not served by accessible common areas and sites.
 - Show the level of detail required to support a compliance assessment with Sections 809 (see above for a list of details to be provided).