

ETA Opinion on ADA Signage at Exit Doors

Notes from written and oral communication with the DOJ
and references to the International Building Code and the Access Board

The Department of Justice (DOJ) has interpreted the ADAAG requirement for raised letter & Braille signage to apply to exit signs. This comes from an interpretation of the wording in ADAAG §4.1.3(16)(a) which states: "Signs which designate permanent rooms and spaces shall comply with 4.30.1, 4.30.4, 4.30.5 and 4.30.6."

The word "spaces" here is meant to pertain to exit signs according to the following reference from the DOJ ADA Title III Technical Assistance Manual:

III-7.5165 Signage (ADAAG §§4.1.3(16); 4.30.7). Different requirements apply to various types of signs:

1) Signs designating permanent rooms and spaces (e.g., men's and women's rooms, room numbers, **exit signs** [emphasis added]) must have raised and Brailled letters; must comply with finish and contrast standards; and must be mounted at a certain height and location.

In the new Draft Final ADA & ABA Accessibility Guidelines, published April 2, 2002, by the Access Board, the following language appears under §216 Signs:

§216.4.1 Exit Doors. Doors at exit passageways, exit discharge, and exit stairways shall be identified by tactile signs complying with 703.1, 703.2, and 703.5.

§703.2 Raised Characters. Raised characters shall comply with 703.2 and shall be duplicated in Braille complying with 703.3.

Similar language appears in the year 2000 International Building Code scoping in §1109.3 Other Signs. Sub-paragraph 2 states:

Each door to an exit stairway shall have a tactile sign, including raised letters and Braille, stating: EXIT.

During an on-site inspection of a one-story place of public accommodation, which was under investigation by the Department of Justice, ETA represented the company and their facility as their accessibility consultant. The following was among the list of deficiencies that the DOJ noted as needing correction:

Where exit signs are provided, there are no exit signs with Braille and raised letters mounted on the wall on the latch side of the door at 60" above the floor to the centerline of the sign. See §§ 4.1.3(16)(a), 4.30.1, 4.30.4, 4.30.5, and 4.30.6.

In prior and subsequent conversations between ETA staff and the architectural staff of the DOJ regarding the issue in general [outside of this investigation], ETA sought to further define the DOJ's position. They clearly are interpreting that doors to fire stairs are required to have the raised letter and Braille signage and that they should comply with the other requirements that are scoped in 4.1.3(16)(a) as a permanent room or space.

Furthermore, when an overhead illuminated exit sign is used at the door to an exit, such as those commonly required by building codes, the consistent interpretation from the DOJ staff was that a raised letter and Braille sign mounted per ADAAG 4.30.6 was required. Text could be as simple as saying "EXIT." The same overhead illuminated signs would not trigger the need for the raised letter and Braille counterpart when used as intermediate way-finding signs (not at the exit door itself), because they are directional signs covered by 4.1.3(16)(b) which do not require raised letter and Braille.

When the overhead exit sign was mounted above a series of glass doors in a lobby, the opinion by the DOJ staff was not as tenaciously held. However, in the on-site example mentioned above, the intent was to have the sign mounted so that a blind or visually impaired individual would be able to identify those doors as ones leading to a safe exit from the facility. This was successfully done with an adhesive-backed sign mounted directly to the glass door (in a series of glass double-doors). For aesthetics, a matching sign was mounted on the other side of the glass reading "PULL" with raised letter and Braille.

As a result of these references and examples, it is the opinion of ETA that signage at exit doors must comply with the raised letter & Braille requirements of the ADA. This applies not only to exit stair doors, but also to any door leading to an exit corridor or to an outside exit which is otherwise marked as an exit.

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