

---

**FIRE PREVENTION AND BUILDING SAFETY COMMISSION**  
**Department of Homeland Security**

**Written Interpretation of the State Building Commissioner**

**Interpretation #: CEB-2021-29-2012 IPC-405.3.2**

**Building or Fire Safety Law Interpreted**

[675 IAC 16-1.4](#) 2012 Indiana Plumbing Code Section 405.3.2 Public lavatories. In employee and public toilet rooms, the required lavatory shall be located in the same room as the required water closet.

**Issue**

In single-user children's toilet rooms accessed from only one classroom, does Section 405.3.2 of the *2012 Indiana Plumbing Code* (IPC) require the lavatory to be installed in the same room as the water closet?

**Interpretation of the State Building Commissioner**

No. In single-user children's toilet rooms accessed from only one classroom, Section 405.3.2 of the *2012 IPC* does not require the lavatory to be installed in the same room as the water closet.

**Rationale**

The focus of the request is a structure containing children's single-user toilet rooms that are each accessed solely from an adjoining classroom, and where the associated lavatory is located in the classroom rather than the toilet room.

Section 405.3.2 states that the required lavatory must be located in the same room as the required toilet when that toilet room is for employee or public use. If the room is not for employee or public use, then the lavatory may be located elsewhere. The critical question then is whether the toilet rooms at issue can be considered for the use of either employees or the public, as those terms are used in Section 405.3.2.

The term "employee" is not defined in the IPC, and so we turn to its customary meaning. Merriam Webster's online dictionary defines the term as "one employed by another usually for wages or salary and in a position below the executive level" (<https://www.merriam-webster.com/dictionary/employee>, last viewed August 9, 2021). Since the design of the rooms is intended for the use of children, they cannot be considered for employee use in this instance.

The term "public," however, is defined in the IPC. In Section 202 it states:

**PUBLIC OR PUBLIC UTILIZATION:** In the classification of plumbing fixtures, "public" applies to fixtures in general toilet rooms of schools, gymnasiums, hotels, airports, bus and railroad stations, public buildings, bars, public comfort stations, office buildings, stadiums, stores, restaurants and other installations where a number of fixtures are installed so that their utilization is similarly unrestricted.

This definition provides two basic classifications under which plumbing fixtures are considered "public." The first is fixtures in *general* toilet rooms intended for the use of occupants of a variety of types of structures, and the second is fixtures in toilet rooms that contain sufficient numbers of fixtures to allow simultaneous use. In other words, a toilet room is considered "public" if it is either intended to be used by the general occupants of the structure, or it has multiple water closets permitting use by multiple occupants at once.

A toilet room that is accessed from only one classroom, and that contains only one water closet fixture, fails to meet either of the criteria found in the definition. The limited access to the room prevents it from being considered for the general use of the school's occupants, and it does not contain multiple toilets. Consequently it is not considered "public," and the lavatory location requirement of Section 405.3.2 does not apply.

*Posted: 09/08/2021 by Legislative Services Agency*  
An [html](#) version of this document.