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

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2020-02-2009 ICC-A117.1-604.5.2

**Building or Fire Safety Law Interpreted**

ICC A117.1-2009, Section 604.5.2 Rear Wall Grab Bars

**Issue**

Whether the grab bar installation exceptions listed in A117.1-2009 Section 604.5.2 are applicable to children's facilities.

**Interpretation of the State Building Commissioner**

Yes, they are applicable to children's facilities.

**Rationale**

While it is true that toilet facilities intended primarily for children's use have their own set of rules, they are not the only regulations that apply to them.

Regulations specific to grab bars for such facilities are found in Section 604.11.5 and Section 609.4.2. While Section 609.4.2 provides specific information regarding size and placement, Section 604.11.5 states that children's grab bars must also comply with Section 604.5, which includes Subsection 604.5.2 and, therefore, its two stated exceptions as well.

It is important to note, however, that the two exceptions cannot be applied simultaneously, as the results of applying the two exceptions are mutually exclusive:

- Exception 1 provides an alternative installation if a 36-inch bar cannot be provided due to the location of a recessed fixture adjacent to the toilet. The result of applying this exception is a one-piece, 24-inch bar, centered on the toilet.
- Exception 2 provides an alternative installation if the position of the plumbing flush valve interferes with the location of the grab bar. The result of applying this exception is either a split bar, or a single bar shifted to the side, neither of which is the first exception's single bar, centered on the toilet.

*Posted: 02/19/2020 by Legislative Services Agency*

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