
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: CEB-2021-18-2014 IBC-1210.3.1

Building or Fire Safety Law Interpreted

[675 IAC 13-2.6](#) **Indiana Building Code, 2014 Edition, Section 1210.3.1**

Water closet compartment. Each water closet utilized by the public or employees shall occupy a separate compartment with walls or partitions and a door enclosing the fixtures to ensure privacy.

Exceptions:

1. Water closet compartments shall not be required in a single-occupant toilet room with a lockable door.
2. Toilet rooms located in child day care facilities and containing two or more water closets shall be permitted to have one water closet without an enclosing compartment.

Issue

Whether Section 1210.3.1 of the 2014 Indiana Building Code (IBC) requires the doors to single-user, adult-supervised, children's water closet rooms located in a day care facility to be full-height in design.

Interpretation of the State Building Commissioner

Section 1210.3.1 of the 2014 IBC does not require the doors to single-user, adult-supervised, children's water closet rooms located in a day care facility to be full-height in design.

Rationale

There are two specific matters critical to this issue. The first is the question of whether the cited section includes a requirement for a full-height door. The second question is whether the requirements of the section are applicable to water closet compartments, to single-user water closet rooms (as cited in the project at the center of the request), or to both.

Section 1210.3.1 obviously contains a regulation with which doors are required to comply, but it is a performance requirement, and not a prescriptive one. There are no dimensional requirements of any kind, but simply the requirement that the door, and the rest of the fixture's enclosure, provide privacy for the fixture and, presumably, its user. The only prescriptive requirement for doors appears in the first exception to the section. We will discuss the two exceptions later in the interpretation, as they are both relevant to the issue, even if only tangentially.

In examining the section text that precedes the exceptions, we see that both title and content indicate the section's requirements are applicable to water closet compartments, with no mention of water closet rooms. While neither "compartment" nor "room" are code-defined terms, they are distinctly different in their use and construction in toilet facilities. Water closet or toilet *compartments* are utilized to provide a degree of user privacy in multi-fixture toilet facilities, without incurring the dual costs of space utilization and construction dollars that would be required to fully enclose fixtures in *rooms*. Further, they are typically, and acceptably, designed and installed without full-height walls or full-height doors, but rather both are open at the bottom and the top, providing only line-of-sight screening among the occupants of the room. The idea that rooms and compartments are different from one another in intent and application is also reflected in the text of the first exception, which states that under a specific design condition, single-occupant toilet *rooms* do not require the use of *compartments* within them. Consequently, we see that in the body of the section itself, 1) the only requirement doors must meet is the ensuring of privacy, and 2) that privacy requirement is applicable solely to compartments, and not to rooms.

This leaves us with the two exceptions, each of which adds further insight into the primary question of this interpretation request. The first exception, as we have mentioned, provides for the elimination of required compartments if a toilet is located in a single-user toilet room. In allowing this, it introduces the section's sole prescriptive requirement for doors in a toilet facility – the need for the door to be lockable. While this further reinforces the importance of user privacy, it must be noted that when stated as it is in the exception, the locking capability of the door is still not absolute, but only optional.

The second exception states that rooms with two or more toilets in child day care facilities are allowed one toilet fixture unenclosed by compartments. This is to allow adult supervision of the child's use of the room and its fixtures. The existence of this exception, and its supporting commentary narrative, reflect the importance of supervision, and reinforces the fact that in day care facilities, user privacy needs are superseded by the need for supervision capabilities.

The net result of this examination is thus:

- There is no specific required height dimension for doors in toilet rooms.
- There is a requirement that compartment doors provide user privacy, but industry-wide these doors are commonly less than full-height.
- Single-user toilet rooms require a door capable of locking if the designer wishes to avoid partitions within the room.
- As important as user privacy is in the eyes of the code, in child day care facilities adult supervision capabilities trump user privacy needs, even in single-user toilet rooms. The manner in which supervision is accomplished in the design and use of the room and its door is not regulated and is therefore a matter for the designer and/or owner to determine, including the questions of desired door height and hardware function.

Posted: 05/26/2021 by Legislative Services Agency

An [html](#) version of this document.