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

**Written Interpretation of the State Building Commissioner**

**Interpretation #:** CEB-2023-26 [2009 ICC A117.1-1003.11.1]

**Building or Fire Safety Law Interpreted**

**[675 IAC 13-2.6-13](#) ICC A117.1-2009, Section 1003.11.1 Grab Bar and Shower Seat Reinforcement.**

Reinforcement shall be provided for the future installation of grab bars complying with Section 604.5 at water closets; grab bars complying with Section 607.4 at bathtubs; and for grab bars and shower seats complying with Sections 608.3, 608.2.1.3, 608.2.2.3 and 608.2.3.2 at shower compartments.

**Exceptions:**

1. At fixtures not required to comply with Section 1003.11.2, reinforcement in accordance with Section 1004.11.1 shall be permitted.
2. Reinforcement is not required in a room containing only a lavatory and a water closet, provided the room does not contain the only lavatory or water closet on the accessible level of the dwelling unit.
3. Reinforcement for the water closet side wall vertical grab bar component required by Section 604.5 is not required.
4. Where the lavatory overlaps the water closet clearance in accordance with Section 1003.11.2.4.4 reinforcement at the water closet rear wall for a 24-inch (610 mm) minimum length grab bar, centered on the water closet, shall be provided.

**Issue**

Whether Section 1003.11.1 of *ICC A117.1-2009* requires the installation of grab bars and shower seats in toilet and bathing facilities of Type A dwelling units.

**Interpretation of the State Building Commissioner**

No, Section 1003.11.1 of *ICC A117.1-2009* does not require the installation of grab bars and shower seats in toilet and bathing facilities of Type A dwelling units.

**Rationale**

Section 1003 of the *A117.1-2009* standard applies to Type A dwelling units, which are not fully accessible as initially constructed, but are designed to be readily adaptable to achieve accessibility at such time as access is needed in the future. This is confirmed in the text of Section 1003.11.1, where it states that reinforcement is required for the "future installation" of grab bars and seats.

Sections 1003.11.1 and 1003.11.2 work together to describe the accessibility design requirements of toilet and bathing facilities in Type A dwelling units. In each Type A unit, all bathing and toilet rooms are required to have built-in reinforcing for future grab bars and seats, subject to stated exceptions (1003.11.1); and no less than one bathing and toilet room in each Type A unit must be designed with the proper fixture locations, fittings and clearances for accessibility adaptations, subject to stated exceptions (1003.11.2).

Do not be misled by the references contained in Section 1003.11.1 to those Chapter 6 sections that describe actual grab bar and seat requirements. The syntax in 1003.11.1 is clear – at the time of initial construction the designer is required to provide only the reinforcement necessary to support bars and seats *that comply with Chapter 6 requirements*. This is an important distinction. It does not state that the grab bars and seats themselves are required at the time of construction. The Chapter 6 references are made only to ensure the installed reinforcement will be of the necessary size, location, and strength to support the types and sizes of grab bars and seats required by the standard for future accessibility adaptations.

*Interpretation Replaces: New*

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