
FIRE PREVENTION AND BUILDING SAFETY COMMISSION
Department of Homeland Security

Written Interpretation of the State Building Commissioner

Interpretation #: ALB-2023-35 [2014 IBC-2902.2.2-Exc]

Building or Fire Safety Law Interpreted

675 IAC 13-2.6 2014 Indiana Building Code Section 2902.2.2 Unisex toilet rooms. Unisex toilet rooms shall include only one (1) water closet and only one (1) lavatory. Where a bathing facility is provided within a unisex toilet room, only one (1) shower shall be provided.

Exception: A separate sex toilet room containing not more than two (2) water closets without urinals, or containing only one (1) water closet and one (1) urinal, may be considered a unisex toilet room.

Issue

Whether Section 2902.2.2 of the *2014 Indiana Building Code* (IBC) allows the use of two unisex toilet rooms in place of otherwise required separate sex toilet rooms.

Interpretation of the State Building Commissioner

Yes, Section 2902.2.2 of the *2014 IBC* allows the use of two (2) unisex toilet rooms in place of otherwise required separate sex toilet rooms – provided the design of the toilet rooms meet the fixture count limits of the section's stated exception.

Rationale

The main body of Section 2902.2.2 does not directly address the issue of allowing the substitution of unisex toilet rooms for otherwise code-required separate sex toilet facilities, rather it merely describes the fixture count parameters of unisex toilet rooms. In doing so it provides a working template for their design. An exception follows in which the code allows "considering" separate sex toilet rooms to be unisex toilet rooms. A careful reader will note, however, that the exception does not address the converse, i.e., the "considering" of unisex toilet rooms as separate sex toilet rooms.

This distinction is largely one of grammar and syntax – and not one of regulatory intent – because in practical use there is no difference in effect. If a separate sex toilet room may be considered unisex, that unisex toilet room is essentially substituting for the separate sex toilet room. Which room is the "original" one required by code, and which is the acceptable "substitute" is immaterial.

Interpretation Replaces: New

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