



Appendix 6.6

Physical Structures Upgrade List

Chapter 6: Accessible Physical Structures and Features

This chart provides examples of structural accessibility upgrades and accessibility features, organized by setting and the staff responsible for building/installing that upgrade.

This chart is also intended to give you a sense of what tasks may require hiring an external contractor/consultant, and those that can be completed by maintenance or facilities staff.*

Setting	Upgrade/Feature	Example Staff Responsibility
Parking, Driveways, Route to Entrance	Signage installation	Internal facilities/maintenance
	Parking striping and access aisles	Specialized contractor
	Curb ramps	General contractor
	Detectable warning surfaces	Specialized contractor
	Accessible route to facility entrance	General contractor
	Sidewalk repair or widening	Specialized contractor
Entrances	Automatic doors	Specialized contractor
	Automatic door buttons	Skilled trade/specialized contractor
	Door force	Internal facilities/maintenance or Specialized contractor
	Doorknob replacement**	Internal facilities/maintenance
	Entryway widening	General contractor
	Signage installation	Internal facilities/maintenance
	Handrail installation	Internal facilities/maintenance
	Ramps	General contractor
Lobby/Waiting Areas	Lower check-in counters	General contractor
	Furniture layout:** - Wheelchair-accessible seating - Clear circulation routes - Access to outlets	Any staff
	Door force	Internal facilities/maintenance or Specialized contractor
	Lower water fountains	Internal facilities/maintenance

Chapter 6: Accessible Physical Structures and Features

Hallways/Passageways	Signage installation	Internal facilities/maintenance
	Braille/tactile text room identification signs	Internal facilities/maintenance
	Door force	Internal facilities/maintenance or Specialized contractor
	Hallway widening	General contractor
	Carpet/flooring leveling/replacement	General contractor
	Handrails	Internal facilities/maintenance
	Clear pathways (remove trash cans, plants, décor, etc.)**	Any staff
Toilet and Shower Rooms	Grab bars	Internal facilities/maintenance
	Room layout redesign	Architect; General contractor
	Toilet height	Internal facilities/maintenance
	Shower seat (folding, wall-mounted, transfer, L-shaped, etc.)	Internal facilities/maintenance
	Accessible sink	Internal facilities/maintenance
	Accessory relocation (soap, towel, dispensers)**	Internal facilities/maintenance
	Accessible stalls	General contractor
	Lower mirrors**	Internal facilities/maintenance
	Baby changing table	Internal facilities/maintenance
	Adult changing table	Internal facilities/maintenance
Exam/Imaging/Treatment Rooms	Room layout/floor space	Architect & General contractor or accessibility consultant
	Accessible medical diagnostic equipment - Height-adjustable exam table - Wheelchair-accessible weight scale	Internal facilities/clinical engineering

	Accessible family/caregiver/visitor seating**	Internal facilities
	Accessible dressing/changing space	General contractor
	Low coat hooks**	Internal facilities/maintenance
Elevators	Braille/tactile signage	Elevator vendor/contractor
	Audible floor indicators	Elevator vendor/contractor
	Visual floor indicators	Elevator vendor/contractor
	Call button	Elevator vendor/contractor
Cafeteria/Dining Areas	Low dining tables/counters	General contractor
	Low service counters	General contractor
	Low self-service stations	General contractor

**Low-cost modifications that can be completed immediately.

Technical Infeasibility

In some cases, accessibility upgrades may be “**technically infeasible**” to make, particularly in older facilities or those located in historic buildings. Under the ADA, “technically infeasible” is defined as:

“Something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements.”¹

Upgrades that will be costly or inconvenient are NOT considered technically infeasible. When a certain upgrade *is* technically infeasible, compliance is still required to the maximum extent technically feasible—your organization must determine alternative methods to ensure equal access to people with disabilities. The following table lists examples of those circumstances and potential solutions. This is not an exhaustive list.

Technical Infeasibility Table*

Accessibility Upgrade/Feature	Technical Infeasibility Conditions	Solutions
Accessible route to entrance	• Steep grade changes • Retaining walls • Drainage • Underground utilities	• Route with clear directional signage to alternate entrance • Install handrails • Incorporate flat resting areas • Staff assistance programs/policies
Code-compliant elevators	• Building too small for elevator shaft and equipment • Solid core shafts	• Install platform lift(s) where permitted • Relocate key services to accessible floor within building with clear directional signage
Entrance ramps	• Steep grade changes • Limited horizontal space on building's property	• Install limited-use lift • Create alternate accessible entrance with clear signage
Widening doors, hallways, entrances, etc.	• Requires removing load bearing walls or core building frame • Would damage historic features	• Alternate accessible entrance with clear signage • Prioritize wayfinding improvements
Accessible room layouts	• Load bearing walls	• Offer appointments & services in accessible rooms nearby
Walk- or roll-in showers	• Fixed plumbing/utility lines under existing bathroom	• Portable transfer benches • Install wall-mounted shower chair • Install handheld showerhead
General structural accessibility	• Irregular floor heights • Low floor-to-floor clearances	• Vertical platform lifts • Limited-use elevator • Reroute ramps

Reference

1. U.S. Department of Justice. Definitions. 36 CFR Appendix-B-to-Part-1191 106.5. 2010. [https://www.ecfr.gov/current/title-36/part-1191#p-Appendix-B-to-Part-1191\(106\)\(106.5\)](https://www.ecfr.gov/current/title-36/part-1191#p-Appendix-B-to-Part-1191(106)(106.5))

**This document includes content generated with the assistance of NYU Langone Health Ultraviolet AI, a secure, HIPAA/PII-compliant LLM platform powered by OpenWebUI customized by NYU Langone Health. All AI-generated content has been edited by the DEC Team and reviewed by subject matter experts to ensure accuracy.*