



STATE OF WASHINGTON

## STATE BUILDING CODE COUNCIL

906 Columbia Street SW • P.O. Box 48300 • Olympia, Washington 98504-2525 • (360) 725-2967

### STATE BUILDING CODE INTERPRETATION NO. 01-01

- CODE:** 1997 Uniform Building Code (UBC),  
State Regulations for Barrier-Free Facilities
- SECTIONS:** Sections 1106.11.5 Water closets: 1106.11.5.1 Clear floor space,  
1106.11.5.2 Height, and 1106.11.5.3 Grab bars
- QUESTIONS:**
1. Department of Social and Health Services(DSHS) regulations require toilet fixtures to be approximately 11 inches high for toddlers and younger preschoolers. State Regulations for Barrier-free Facilities specifies a height of 17-19 inches with no exceptions shown for children or daycare facilities. DSHS regulations (WAC 388-150-340), however, do not require grab bars and clear floor space for any water closets used by toddlers and preschoolers.  
Can grab bars and clear floor space for water closets be omitted from daycare restrooms intended strictly for toddlers and younger preschoolers in Group E-3 Occupancies when they are licensed and approved through DSHS and meet the requirements of WAC 388-150-340?
  2. Is it the intent of the Regulations for Barrier-Free Facilities to require grab bars and clear floor space for at least one water closet in all restrooms, including those in Group E-3 Daycare Occupancies?
  3. Can the building department accept clear floor space and grab bar dimensions per some recognized standard (along with the lower water closet height) as an equivalent alternative to the state barrier-free requirements (ADAAG, for example, identifies clear space, height, and grab bar dimensions specifically for children)?
- ANSWERS:**
1. **No.**
  2. **Yes.** See also State Building Code Interpretation No. 92-86 and Section 1112.3.7.1.
  3. **Yes.** See also State Building Code Interpretation No. 00-09, Question 1.
- SUPERSEDES:** None
- REQUESTED BY:** City of Bellevue