

Adult-Sized Changing Stations DRAFT Rule Language

1341.0011 IBC CHAPTER 11. (Underlined and strikethrough language shows TAG changes)

Subpart 8. IBC section 1109, Other features and facilities

D. Section 1109.2 is amended to add a section to read as follows:

1109.2.4 Adult-sized changing stations. Where provided, adult changing stations shall be accessible. Where required, adult changing stations shall be accessible and shall comply with sections 1109.2.4.1 through 1109.2.4.4.

1109.2.4.1 Where required. At least one adult changing station shall be provided in all of the following locations:

1. In assembly and mercantile occupancies, where ~~family or assisted use toilet or bathing rooms are required to comply with Section 1109.2.1~~ an aggregate of six or more male and female water closets are required. In buildings of mixed occupancy, only those water closets required for the assembly and mercantile occupancies shall be used to determine the adult changing station requirement.
2. In Group B occupancies providing educational facilities for students above the 12th grade, where an aggregate of twelve or more male and female water closets are required to serve the classrooms and lecture halls.
3. In Group E occupancies, where a room or space used for assembly purposes requires an aggregate of six or more male and female water closets for that room or space.
4. In ~~highway rest stops and highway service plazas~~ Minnesota Department of Transportation rest areas provided with plumbing and electricity at toileting locations.
5. State park campgrounds
6. State park visitor centers provided with plumbing and electricity at toileting locations.

1109.2.4.2 Room. Adult changing stations shall be located in toilet rooms that include only one water closet and only one lavatory. Fixtures located in such rooms shall be included in determining the number of fixtures provided in an occupancy. The occupants shall have access to the required adult changing station at all times that the associated occupancy is occupied.

Exception: Adult changing stations shall be permitted to be located in family or assisted toilet rooms required in Section 1109.2.1.

1109.2.4.3 Prohibited location. The accessible route from ~~separate-sex public and employee toilet or bathing rooms~~ required by Minnesota Rules, chapter 1305, to an accessible adult changing station shall not require travel through security checkpoints.

1109.2.4.4 Travel distance. The adult changing station shall be located on an accessible route ~~such that and a person is no more than two stories above or below the story with the adult changing station and the path of travel to such~~ the facility shall not exceed 2000 1000 feet.

Exception: In Group A-4 and A-5 occupancies the path of travel shall not exceed 2000 feet.

1341.0603 A117.1 SECTION 603, TOILET AND BATHING ROOMS. Strikethrough and underlined language in this section shows ICC revisions)

Subpart 1. **Section 603.2.2 Door swing.** A117.1 section 603.2.2 is amended to read as follows:

603.2.2 Door swing. Doors shall not swing into the clear floor space or clearance for any fixture.

Exceptions:

1. Doors to a toilet or bathing room for a single occupant, accessed only through a private office and not for common use or public use shall be permitted to swing into the clear floor space, provided the swing of the door can be reversed to comply with Section 603.2.2.
2. Where the room is intended for individual use, family or assisted-use, and a clear floor space ~~complying with Section 305.3~~ is provided within the room ~~beyond~~ outside the arc of ~~the~~ a door swing, ~~the~~ such a door shall not be required to comply with Section 603.2.2.

1341.0902 A117.1 SECTION 902, DINING SURFACES AND WORK SURFACES. (Strikethrough and underlined language in this section shows ICC revisions)

A117.1 section 902.1 is amended to read as follows:

902.1 General. Accessible dining surfaces and work surfaces shall comply with Section 902.

Exceptions:

1. Dining surfaces and work surfaces primarily for children's use shall be permitted to comply with Section 902.5.
2. Adult changing surfaces shall not be required to comply with this section.

1341.0613 A117.1 SECTION 613, ADULT CHANGING STATIONS.

A117.1 chapter 6 is amended by adding a section and subsections to read as follows:

SECTION 613

ADULT CHANGING STATIONS

613.1 General. Adult changing stations shall comply with Section 613.2 through 613.4.

613.2 Installation location. Where provided, adult changing stations shall be installed in accordance with the locations specified in Section 613.2.1, 613.2.2 or 613.2.3.

613.2.1 Single user or family or assisted use toilet or bathing room. **Where** adult changing stations are provided in a toilet room with only one water closet and one lavatory, or in a family or assisted-use toilet or bathing room, the room shall provide all of the following components:

1. A dispenser for soap complying with Section 308.

2. A hand towel dispenser or hand dryer complying with Table 603.6.
3. A coat hook located in close proximity to the changing surface.
4. A waste receptacle.
5. Signage indicating “Adult Changing Station” provided at the entrance to the room and complying with the visual character requirements in Section 703.2.
6. Signage indicating the weight capacity and instructions for operation of the changing station within the room.

613.2.2 Multi-user toilet or bathing room. Where adult changing stations are provided in a multi-user toilet or bathing room, the adult changing station shall be located in a compartment that includes all of the following components:

1. Privacy provided by walls, curtains, or partitions enclosing the compartment.
2. A turning space complying with Section 304.
3. A lavatory complying with Section 606.
4. A dispenser for soap complying with Section 308.
5. A hand towel dispenser or hand dryer complying with Table 603.6.
6. A coat hook in close proximity to the changing surface.
7. A waste receptacle.
8. Signage indicating “Adult Changing Station” provided at the entrance to the room and complying with the visual character requirements in Section 703.2.
9. Signage indicating the weight capacity and instructions for operation of the changing station within the compartment.

613.2.3 Room or space other than a toilet room or bathing room. Where adult changing stations are provided in a room or space other than a toilet or bathing room and including, but not limited to nurses’ work areas, therapist work areas, or special education classrooms, the adult changing station shall be located in a compartment or room that includes all of the following components:

1. Privacy provided by walls, curtains, or partitions.
2. A turning space complying with Section 304.
3. A lavatory complying with Section 606 or an alcohol-based hand sanitizer dispenser.
4. Where a lavatory is provided in the compartment or room, provide a dispenser for soap.
5. Where a lavatory is provided in the compartment or room, provide a hand towel dispenser or hand dryer complying with Table 603.6.
6. A waste receptacle.
7. Signage indicating the weight capacity and instructions for operation of the changing station within the compartment.

613.3 Room clearances. An adult changing station and its supporting structure shall not obstruct required clear floor spaces and clearances at accessible elements, maneuvering clearances at doors or at the wheelchair turning spaces.

613.4 Changing surface. A changing surface shall be provided and shall comply with Section 613.4.

613.4.1 Safety and performance. Adult changing stations shall comply with the following safety and performance requirements:

1. Protect the user from falling from the changing surface along the open long sides by means such as retractable safety rails.
2. Provide a belt to secure the user on the changing surface.
3. Protect the user and caregiver from entrapment during operation.
4. Support a weight of not less than 400 lbs. (182 kg) applied to the changing surface.
5. Provide a method to prevent tipping such as secured to the floor or wall, or other means.
6. Provide a changing surface that is durable, cleanable, non-absorbent, and resistant to corrosion.
7. Electrical components complying with the Minnesota Electrical Code NFPA-70.
8. Operable controls for height adjustment and, where provided, on and off complying with Section 309.4.

613.4.2 Size. The changing surface shall be 70 inches (1778 mm) minimum in length and 30 inches (762 mm) minimum in width.

613.4.3 Height adjustability. The changing surface height shall be adjustable at variable heights from 17 inches (432 mm) minimum to 38 inches (965 mm) maximum above the floor as measured to the top of the changing surface.

Exception: Where the adult changing station is not required by the administrative authority, a fixed height changing surface shall be permitted and shall be mounted with the top of the changing surface 19 inches (483mm) minimum and 23 inches (584mm) maximum above the floor.

613.4.4 Clearances. Clearances complying with Sections 613.4.4.1 and 613.4.4.2 shall be provided adjacent to the changing surface, measured when the surface is in the operational position.

613.4.4.1 Side clearance. A 36-inch (914mm) deep minimum side clearance shall be provided along the open long side of the changing surface.

Exception: In the raised position, the side rail shall be permitted to overlap the side clearance.

613.4.4.2 End clearance. A 36-inch (914mm) wide minimum end clearance shall be provided along the depth of one end of the changing surface. The width of the end clearance shall extend the depth of the changing surface and the side clearance.

Exceptions:

1. A 24-inch (610mm) wide minimum end clearance shall be permitted where a clear floor space complying with Section 305.3 is provided within the room beyond the clearances for the changing surface.
2. Where installed in locations specified in Section 613.2.3, end clearances complying with Section 613.4.4.2 is not required.

613.4.5 Side Rail. Where side rails are provided at the changing surface they shall comply with Sections 613.4.5.1 and 613.4.5.2.

613.4.5.1 Size and location. Side rails shall be a minimum of 2/3 of the length of the changing surface and shall be centered +/- 3 inch (75mm) along the long open sides of the changing surface.

613.4.5.2 Rail positioning. Side rails shall be capable of being raised and lowered. The side rail shall be fixed in place when in the raised position. The top of the side rail shall extend 5 inches (127mm) minimum above the top of the changing surface.

DRAFT

CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Katlyn Flannery

Date: 8/7/2023

Email address: flann046@umn.edu

Model Code: 2024 IBC

Telephone number: (please contact via email only)

Code or Rule Section: 1109.2.4.4

Firm/Association affiliation, if any: University of Minnesota

Code or rule section to be changed:

Intended for Technical Advisory Group ("TAG"): Adult sized changing facilities

General Information

Yes No

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:
 - change language contained the model code book? If so, list section(s).
1109.2.4.4 Travel Distance
 - change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
 - delete language contained in the model code book? If so, list section(s).
 - delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
 - add new language that is not found in the model code book or in Minnesota Rule.
2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

1109.2.4.4 Travel distance. The adult changing station shall be located on an accessible route such that a person is no more than two stories above or below the story with the adult changing station and the path of travel shall not exceed 1000 feet.

~~Exception: In A-4 and A-5 Occupancies the path of travel shall not exceed 2000 feet.~~

4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)

The change is necessary to provide ore equitable toileting access to people with disabilities who require changing facilities as provided for all other in accordance with Minnesota Rule 13.5, Section 2902.3.3 Location of Toilet Facilities other than malls.

A-4 and A-5 are the most public spaces

2000 ft takes 5-10 mins just for travel one-way, that means and approx.. 15-30mins minimum round trip for a person to utilize an adult changing station, in programmatic spaces that host time sensitive events (airports?, games, etc)

2. Why is the proposed code change a reasonable solution?

Minnesota Rule 2902.3.3 requires all toileting facilities in budlings to be located within one story and 500 feet of any occupied location within the building. Because an adult sized changing facility serves a small sector of the population, it is reasonable that they not be provided at the same frequency of other toileting facilities, however an exception allowing a 2000 foot travel distance in A-4 and A-5 occupancies is too far.

A-4 and A-5 occupancies are arguably the most public of spaces and should not be less restrictive than other occupancies when it comes to including people with disabilities. Although A-4 and A-5 facilities are often leisurely in nature, they also typically have a time component (example – breaks between innings at a baseball game). 2000 feet is too far to travel when there is a time element associated with the occupancy activity. It takes an able-bodied person approximately 6-8 minutes to walk 2000 feet without obstructions such as crowds (which may be present in A-4 and A-5 occupancies). A person needing to use an accessible changing station who needs to travel 2000 feet is going to spend a min of 12-16 mins in transit alone. When considering travel time + time to use the adult changing station + the time sensitive nature of A-4 and A-5 occupancies, the 2000 feet exception is inequitable.

3. What other factors should the TAG consider?
None

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.

The proposed code change will potentially increase costs in very large facilities where travel distances exceed 1000 feet.

2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
Cost is offset by the benefit – improves usability of A-4 and A-5 buildings for people who use adult changing stations

The increased cost is necessary to provide more equitable access to toileting facilities for people who have disabilities requiring changing. Proximity access will still be half that of toileting facilities for the able-bodied person, and will be consistent across occupancy types (no less-restriction exceptions for A-4 and A-5, which are arguably the most public of spaces).

3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.

The cost will be borne by the owners or tenants of buildings requiring adult-sized changing facilities. Owners of When the owner is the state, then the citizens of Minnesota will bare the cost.

4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.

No

5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.

No. A small business or small city will not be of sufficient size to require installation of adult-sized changing facilities.

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?

Architects, engineers, building owners, developers, people who have a disability that require changing as part of toileting.

2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.

No.

3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?

The cost of not adopting the code change is that access to adequate private and dignified toileting facilities for a person with a disability will not be equal.

4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.

N/A

***Note: Incomplete forms may be returned to the submitter with instruction to complete the form. Only completed forms can considered by the TAG.

CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Greg Metz and Karen Gridley

Date: 8/04/2023

Email address: Greg.Metz@State.MN.US and Karen.Gridley@state.mn.us

Model Code: ANSI A117.1

Code or Rule Section: 613.2, 613.2.1,

613.2.2 and 613.2.3

Telephone number: 651-284-5884; 651-284-5877

Firm/Association affiliation, if any: DLI/CCLD

Code or rule section to be changed:

Intended for Technical Advisory Group ("TAG"): Adult sized changing facilities

General Information

Yes **No**

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:

change language contained the model code book? If so, list section(s).
613.2 Installation location, 613.2.1 and 613.2.3

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in the model code book? If so, list section(s).
613.2.2 Multi-User toilet or bathing room

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

add new language that is not found in the model code book or in Minnesota Rule.

2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.
No.
3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~strikethrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

613.2 Installation location. Where required, adult changing stations shall be installed in accordance with the locations specified in Section 613.2.1. Where not required but provided, adult changing stations shall be installed in accordance with the locations specified in Section 613.2.1 or 613.2.2..

613.2.1 Single user or family or assisted use toilet or bathing room. Where adult changing stations are required in a toilet room with only one water closet and one lavatory, or in a family or assisted-use toilet or bathing room, the room shall provide all of the following components:

1. A dispenser for soap complying with Section 308.
2. A hand towel dispenser or hand dryer complying with Table 603.6.
3. A coat hook located in close proximity to the changing surface.
4. A waste receptacle.
5. Signage indicating "Adult Changing Station" provided at the entrance to the room and complying with the visual character requirements in Section 703.2.
6. Signage indicating the weight capacity and instructions for operation of the changing station within the room.

~~**613.2.2 Multi-user toilet or bathing room.** Where adult changing stations are provided in a multi-user toilet or bathing room, the adult changing station shall be located in a compartment that includes all of the following components:~~

- ~~1. Privacy provided by walls, curtains, or partitions enclosing the compartment.~~
- ~~2. A turning space complying with section 304.~~
- ~~3. A lavatory complying with section 606.~~
- ~~4. A dispenser for soap complying with section 308.~~
- ~~5. A hand towel dispenser or hand dryer complying with Table 603.6.~~
- ~~6. A coat hook in close proximity to the changing surface.~~
- ~~7. A waste receptacle.~~
- ~~8. Signage indicating "Adult Changing Station" provided at the entrance to the room and complying with visual character requirements in Section 703.2.~~
- ~~9. Signage indicating the weight capacity and instructions for operation of the changing station within the compartment.~~

613.2.2 Room or space other than a toilet room or bathing room. Where adult changing stations are provided in a room or space other than a toilet or bathing room and including, but not limited to nurses' work areas, therapist work areas, or special education classrooms, the adult changing station shall be located in a compartment or room that includes all of the following components:

4. Privacy provided by walls, curtains, or partitions.
5. A turning space complying with Section 304.
6. A lavatory complying with Section 606 or an alcohol-based hand sanitizer dispenser.
7. Where a lavatory is provided in the compartment or room, provide a dispenser for soap.
8. Where a lavatory is provided in the compartment or room, provide a hand towel dispenser or hand dryer complying with Table 603.6.
9. A waste receptacle.

10. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No.

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)

To avoid confusion in allowed locations for adult sized changing facilities. Section 1109.2.4.2 requires that adult changing stations are located in toilet rooms with only one water closet and only one lavatory. That language will specifically prohibit installation in a multi-user toilet facility. The intent of the language for allowing installations in multi-user toilet facilities is for use in alterations to existing buildings where it may be technically infeasible to add a single-user, family, or assisted-use toilet room, but the designer may be able to find space in an existing multi-user toilet room that could be utilized to gain an some level of access, to the maximum extent technically feasible as allowed as an alternate by the Minnesota Accessibility Code for alterations to existing buildings. Since the directive for this expedited rulemaking is to require adult changing facilities for newly constructed facilities, Section 613.2.2 being proposed for deletion here would be relocated and added to the portion of the Accessibility Code for alterations to existing buildings in our next code cycle.

2. Why is the proposed code change a reasonable solution?

Deleting the section that indicates the compliance criteria will eliminate the confusion that the scoping does not allow this type of installation.

3. What other factors should the TAG consider?
None.

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
No change in cost, only reduction of confusion.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
N/A
4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
No
5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.
No.

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?
Architects, engineers, building owners, developers, the disabled public that require changing as part of toileting.

2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.
No.

3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?
The cost of not adopting the code change is that changing facilities requirements will be mis-applied in non-uniform ways costing building owners the installation and long-term real-estate costs of needing to correct a non-compliant code condition.

4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.
No.

N/A

***Note: Incomplete forms may be returned to the submitter with instruction to complete the form. Only completed forms can be considered by the TAG.

CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Jason Zemke

Date: July 18, 2023

Email address: jasonzemke@threeriversparks.org
Code: 2020 IBC

Model

Telephone number: 612-490-3317
1341.0613 A117.1 Section 613 Adult-sized Changing Stations (proposed)

Code or Rule Section:

Firm/Association affiliation, if any: AIA

Code or rule section to be changed: 614.4.3 Height Adjustability

Intended for Technical Advisory Group ("TAG"):

General Information

Yes **No**

- | | | |
|--|-------------------------------------|-------------------------------------|
| A. Is the proposed change unique to the State of Minnesota? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| B. Is the proposed change required due to climatic conditions of Minnesota? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| C. Will the proposed change encourage more uniform enforcement? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| D. Will the proposed change remedy a problem? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| E. Does the proposal delete a current Minnesota Rule, chapter amendment? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| F. Would this proposed change be appropriate through the ICC code development process? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Proposed Language

1. The proposed code change is meant to:
 - change language contained the model code book? If so, list section(s).
 - change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
 - delete language contained in the model code book? If so, list section(s).
 - delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).
 - add new language that is not found in the model code book or in Minnesota Rule.
2. Is this proposed code change required by Minnesota Statute? If so, please provide the citation.

N/A

3. Provide *specific* language you would like to see changed. Indicate proposed new words with underlining and ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.
613.4.3 Height Adjustability. Exception: A fixed height changing surface shall be permitted and shall be mounted with the top of the changing surface 19 inches (483mm) minimum and 23 inches (584mm) maximum above the floor in lieu of an adjustable height when approved by the administrative authority due to concerns for security or safety.
4. Will this proposed code change impact other sections of a model code book or an amendment in Minnesota Rule? If so, please list the affected sections or rule parts.
No

Need and Reason

1. Why is the proposed code change needed? Please provide a general explanation as well as a specific explanation for any changes to numerical values (heights, area, etc.)
The proposed code requires an electrified, adjustable changing station, whenever the changing station is required by code. The changing stations that are currently on the market are relatively expensive pieces of equipment. This request assumes that these pieces of equipment will be targets of vandalism and/or frequent damage in unsupervised, public locations. Therefore, to prevent the need for an Owner to continually be obligated to repair/replace the equipment, this request is to provide an option for a fixed-height changing station in certain circumstances, in the same way of the MN exception to omit hand showers in locations with concerns for security or safety.
2. Why is the proposed code change a reasonable solution?
If a fixed-height table is acceptable for locations where the changing station is not required by code, then the same should be acceptable for locations where required by code but are subject to concerns for security or safety.
3. What other factors should the TAG consider?
Constant upkeep of this type of equipment if damaged/vandalized: what is expected of Owners when the equipment is out of service – What parts are available, how easily repaired, and how quickly must these be repaired/replaced and at what cost? These are not code issues, of course, but these will be an added burden on Owners moving forward under the new code.

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
Decrease: a fixed-height changing station, without electricity, will be easier and cheaper to implement than a fully adjustable, electrified station, perhaps even easier to install in existing toilet/bathing rooms.
2. If there is an increased cost, will this cost be offset by a safety or other benefit? Please explain. If the benefit is quantifiable (for example energy savings), provide an estimate if possible.
N/A
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.

N/A

4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.

N/A

5. Will the cost of complying with the proposed code change in the first year after the rule takes effect exceed \$25,000 for any one small business or small city ([Minn. Stat. § 14.127](#))? A small business is any business that has less than 50 full-time employees. A small city is any statutory or home rule charter city that has less than ten full-time employees. Please explain.

N/A

Regulatory Analysis

1. What parties or segments of industry are affected by this proposed code change?

Public agencies, perhaps Institutional and Educational agencies.

2. Can you think of other means or methods to achieve the purpose of the proposed code change? What might someone opposed to this code change suggest instead? Please explain what the alternatives are and why your proposed change is the preferred method or means to achieve the desired result.

The proposed change is to omit the requirement for an adjustable height changing surface with electricity, in certain circumstances. Understanding that a fixed-height surface does not serve the most users possible, an opposition party may accept a mechanically adjustable height surface, without electricity, if one exists in the market. If a mechanically adjustable changing station is available and cheaper and easier to repair than a fully electric model, it would be a reasonable compromise to be written in as a broader exception to the new code.

3. What are the probable costs or consequences of not adopting the code change, including those costs or consequences borne by identifiable categories of affected parties, such as separate classes of government units, businesses, or individuals?

Consequences include anticipated time and costs for frequent repair of the changing station equipment in locations with safety or security concerns.

4. Are you aware of any federal or state regulation or requirement related to this proposed code change? If so, please list the federal or state regulation or requirement and your assessment of any differences between the proposed code change and the federal regulation or requirement.

N/A

***Note: Incomplete forms may be returned to the submitter with instruction to complete the form. Only completed forms can considered by the TAG.