

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. (Underlined and strikethrough language shows TAG changes)

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~~ 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 or 613.2.3.

613.2.1 Single user or family or assisted use toilet or bathing room. Where adult changing stations are ~~provided~~ required in an accessible 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**~~ **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:

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 when in the operational position 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: Sarah St. Louis

Date: 8/24/2023

Email address: sarahstlouis@gmail.com

Model Code: 2024 IBC

Telephone number: 651-216-5461

Code or Rule Section: 1109.2.4.1

Firm/Association affiliation, if any:

Code or rule section to be changed:

Intended for Technical Advisory Group ("TAG"): Adult-Sized Changing Tables

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 ~~striethrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

In medical facilities that provide outpatient services

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.)
Because the disability community spends a significant amount of their time at outpatient therapies and medical appointments and those appointments are often lengthy requiring the need to be changed during those times
2. Why is the proposed code change a reasonable solution?
So that those with disabilities are able to attend outpatient therapies and medical appointments
3. What other factors should the TAG consider?
n/a

Cost/Benefit Analysis

1. Will the proposed code change increase or decrease costs? Please explain and provide estimates if possible.
No. The proposed change is simply adding locations to intended code
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 disability community 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.
To have the adult-sized changing table Family Assist Restroom be on the waiting room side vs being both in the waiting room and back in patient/doctor rooms

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?
That the disability community may miss needed care or be forced onto dirty floors to be changed increasing the risk of infection and viruses. It could also cause physical harm to the disabled person's care attendant in charge of changing them.

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

***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: Roberta L. Kehne

Date: 8/18/2023

Email address: rlkehne@umn.edu

Model Code: 2024 IBC

Telephone number: (651) 774-7851/ 612-624-1801

Code or Rule Sections: 613.2.1&613.2.2

Firm/Association affiliation, if any: University of Minnesota

Code or rule section to be changed:

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.
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.

613.2.1 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.
7. A bedpan rinsing device

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 within a toilet 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.
10. A bedpan rinsing device

613.3.2 Rooms 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 stations 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 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. A bedpan rinsing device shall be installed on the toilet in which the bedpan contents will be disposed.

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.)

It is known that some people who use adult changing stations provide their own bedpans and "portable (male) urinals" as toileting aids. After this equipment is emptied into the toilet, it needs to be rinsed before being put away. If a bedpan washer is not provided, the most likely choice for rinsing this equipment would be a lavatory meant for hand washing. This would greatly increase the likelihood of spreading harmful bacteria to other people.

The specific reason for this additional requirement is to address health & sanitation concerns and to ensure the proper disposal of human excreta.

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

The installation of a bedpan rinsing device (fixture) on a water closet is commonly found in health occupancies such as hospitals and assisted living facilities. The current MN Plumbing approves the installation of this device (fixture) if this fixture meets ASME A112.18.1/ CSA 125.1. This fixture provides a method for the rinsing of a bedpan or similar human excreta component and is a better alternative than using the lavatory meant for handwashing to rinse a bedpan.

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.

Yes, there is an upfront cost of \$750 - \$1,000. This cost includes labor and materials for the installation.

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.

Yes, the cost put forth for a fixture will provide a more sanitary method to rinse a bedpan or similar human excreta collection equipment that is commonly used at an adult changing situation.

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

Yes, the Owner, at initial installation and life-cycle maintenance of this fixture, will bear 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

Regulatory Analysis

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

Architects, engineers, building owners, developers, AHJs.

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?

Per MN Rule 1300.0030 the purpose of the code is to provide minimum requirements to safeguard the public health, safety, and general welfare, etc. By introducing a requirement for adult changing stations, there is possible increased exposure to human waste that must be disposed of properly to protect public health.

Improper disposal of human excreta (in a sink or in a typical restroom trash) has public health consequences, which includes health outbreaks due to bacteria exposure resulting from a lack of dedicated rinsing options.

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

***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: Roberta L. Kehne

Date: 8/18/2023

Email address: rlkehne@umn.edu

Model Code: 2024 IBC

Telephone number: (651) 774-7851/(612) 624-1801

Code or Rule Sections: 613.2.1&613.2.2

Firm/Association affiliation, if any: University of Minnesota

Code or rule section to be changed:

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).

- x 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 ~~striketrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

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 and tactile character requirements in Section 703.
6. Signage indicating the weight capacity and instructions for operation of the changing station within the room will comply with the visual and tactile character requirements in Section 703.

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 within a toilet 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.
5. Signage indicating "Adult Changing Station" provided at the entrance to the room and complying with the visual and tactile character requirements in Section 703.
6. Signage indicating the weight capacity and instructions for operation of the changing station within the room will comply with the visual and tactile character requirements in Section 703.

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.)

According to the information published on the website of the US Access Board, Chapter 7 in the Guide to the ADA Standards, accessible signs are used to identify certain accessible elements and spaces. The goal is full access. Therefore, any person who is using tactile

means to achieve access should have the same information as those who are visually perceiving the information.

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

The proposed change provides access to more disabled individuals for an extremely minor cost.

3. What other factors should the TAG consider?

The proposed change will provide individuals who use tactile signage with information necessary for and, perhaps, dignity.

Cost/Benefit Analysis

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

Cost will be minimal (under \$25) and provides access to more individuals for an extremely minor cost.

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.

Yes. An individual with visual impairments will know that an adult changing station is within the space. This will provide context in the event that a changing station has been left in the open position. It is also possible that a visually impaired person could be a caregiver for an older child or other person needing to use an adult changing station.

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

No

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.

Regulatory Analysis

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

No

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?

Reduced access, that can be provided at minimal cost, to individuals who use tactile signage.

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

***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: Mara Peterson

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Model Code: ANSI A117.1

Telephone number: 612-709-2498

Code or Rule Section: 613.3

Firm/Association affiliation, if any: JQP, Inc.

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).
613.3 Room clearances
 - 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 ~~striethrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

OPTION 1

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

Exception: Turning space shall be permitted to include knee and toe clearance complying with 306 below the adult changing station if provided with the changing surface in the lowest operational position.

OPTION 2

613.3 Room clearances. An adult changing station and its supporting structure, when in the operational position, shall not obstruct required clear floor spaces and clearances at accessible elements, maneuvering clearances at doors or at the wheelchair turning spaces compliant with 304, including knee and toe clearance.

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.
NA

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 make it clear that the turning space can include knee and toe clearance below the adult size changing surface and to clarify that it would need to be provided when the changing table is in its lowest operational position. (Note: based on the proposed minimum height of 17" in 613.4.3 it will never provide knee clearance.)
2. Why is the proposed code change a reasonable solution?
To eliminate confusion among designers and enforcement about if knee and toe clearance can be used as part of the turning space and if so, what position does the table need to be in.
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.
Possible reduction in cost by the slight reduction in room size if toe clearance is utilized.
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.
NA
3. If there is a cost increase, who will bear the costs? This can include government units, businesses, and individuals.
NA

4. Are there any enforcement or compliance cost increases or decreases with the proposed code change? Please explain.
NA
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, designers, building owners / developers and members of the public utilizing the adult-size changing tables.
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.
This is primarily for clarification.
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?
Inconsistent application/enforcement of the room clearance requirements.
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

***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: Karen Gridley

Date: August 18, 2023

Email address: karen.gridley@state.mn.us

Model Code: IBC / ANSI A117.1

Telephone number: 612-490-3317

Code or Rule Section: 613.4.1

Firm/Association affiliation, if any: AIA

Code or rule section to be changed: 614.4.1 Safety and Performance

Intended for Technical Advisory Group ("TAG"): Adult 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).

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 ~~strikethrough~~ words proposed for deletion. Include the entire code (sub) section or rule subpart that contains your proposed changes.

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. (needs editorial clean up)

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 modification to subitem 1 is needed because side rail requirements are addressed more specifically in Section 613.4.5.

The modification to delete subitems 3 and 5 is due to concerns that they are not in enforceable language.

A note of commentary: The national committee ended up deleting the entire Section 613.4.1 at this time due to concerns over the lack of existence of any one safety standard in the industry that can be referenced for this type of equipment. IAPMO is currently developing a standard to address this need and they intend to include safety standards that will address protection from electrical shock, pinching points, etc. In the interim the national committee felt it was better to omit any requirements in this code at this time, until such time as the new IAPMO standard is finished being developed.

However, there are certain subitems (e.g. # 3 and 5) that are still needed such as the requirement for weight capacity of the table. So this proposed change is proposing to keep key subitems while eliminating only those that would be difficult or impossible for a code official to enforce.

Also just a note that subitem 8 is in need of some editorial cleanup of the language.

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

It ensures that the language can be enforced by code officials and cleans up some duplication in requirements.

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.
N/A. the change is only about enforceability and some editorial changes.
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, code officials, architects, contractors, manufacturers.
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.
A new industry standard is currently under development by IAPMO. However the date when it may be available is yet to be determined.
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 some of the subitems not being enforceable.
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: 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. 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 1: ~~Where the adult changing station is not required by the administrative authority,~~ Where the adult changing station is required, a fixed height changing surface shall be permitted when approved by the local administrative authority due to for facilities, buildings or spaces known to the local jurisdiction to have high incidence of vandalism. ~~The fixed height changing surface 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.

Exception 2: Where the adult changing station is not required but provided in a facility, building or space subject to high incidence of vandalism, 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.

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.

Reason for replacement language: : My intent is to allow a fixed height table in all spaces where not otherwise required by code, assuming that a fixed height table is still better than nothing for the general public. My example is a free-standing restroom building with less than 6 toilet fixtures in the middle of a picnic/recreation area. For Exception 2, where the table is not required, I want to disconnect the vandalism determination from the requirement for variable height in order to give the Owner the option to provide variable height or not. However, if you feel that the vandalism determination is the only way to make Exception 2 acceptable to the majority of reviewers, then I'll withdraw this suggestion as well because having the exception, even with 'vandalism' as a pre-requisite, is still worth more to me than no exception.

- Related, if 'vandalism' remains a part of Exception 2: unlike Exception 1 where the 'authority' validates/makes the determination of a 'high incidence of vandalism', who makes the determination in Exception 2? In other words, if 'vandalism' remains a part of Exception 2, I think we may need to retain the language from Exception 1 '...known to the local jurisdiction to have a high incidence of vandalism...' otherwise there is too much room for interpretation – either we have to strengthen it, or get rid of it.
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.

CODE CHANGE PROPOSAL FORM

(Must be submitted electronically)

Author/requestor: Karen Gridley

Date: August 18, 2023

Email address: karen.gridley@state.mn.us

Model Code: IBC / ANSI A117.1

Telephone number: 612-490-3317

Code or Rule Section:

1341.0613 A117.1 Section 613.4.3 Adult-sized Changing Stations (proposed)

Firm/Association affiliation, if any: DLI

Code or rule section to be changed: 614.4.3 Height Adjustability

Intended for Technical Advisory Group ("TAG"): Adult 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).
- 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. 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 1: ~~Where the adult changing station is not required by the administrative authority,~~ Where the adult changing station is required, a fixed height changing surface shall be permitted with the approval of the administrative authority in areas or spaces where the applicant provides documentation of prior incidents of vandalism rendering fixtures, equipment or elements inoperable. The fixed height changing surface 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.

Exception 2: Where the adult changing station is not required but provided in an area or space subject to high incidence of vandalism rendering fixtures, equipment or elements inoperable, 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.

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 is to provide an option for a fixed height changing station in certain locations where vandalism is a known problem in order to ensure that a working changing surface is always available. In locations where adjustable height tables would continuously be broken and difficult to repair the idea is that it is better to have a fixed height surface than a surface that isn't functional at all.

The reason for two exceptions is the first one is for required locations that would need a code official to approve the fixed height table as an alternate for areas known to them, or for areas where it can be demonstrated, that fixtures and elements always get broken. The second exception is more relaxed since it is for locations where tables aren't required at all but are still being provided as an option. Even though adjustable-height tables are the preference of the end users for safer and more effective transferring, if the choice is a fixed height table or nothing at all, it is better to have something rather than nothing.

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 be considered by the TAG.