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Florida Housing Finance Corporation
c/o Marisa Button, Director of Multifamily Allocations
227 N Bronough Street, Suite 5000
Tallahassee, FL 32301
marisa.button@floridahousing.org

RE: Roll-In Showers

Dear Marisa,

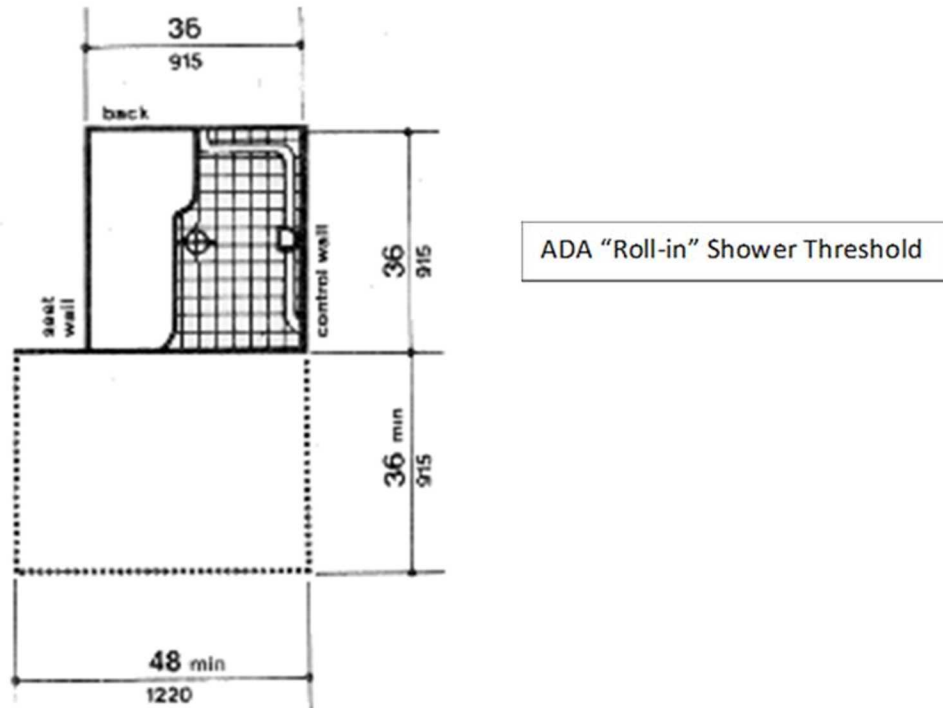
If you refer to **RFA 2018-110, Section 8, Construction Features, C.(3)**, one of the Accessibility Features requirements for Developments with the Elderly (ALF or Non-ALF) Demographic reads as follows:

“15 percent of the new construction units must have roll-in showers.”

We believe the term “roll-in shower” as used in the RFA is intended to require fully compliant ADA showers and is not restricted to the use of one such type. The origin of the term “roll-in shower” as used in the FHFC regulations is based on the common understanding that an ADA shower has a threshold nearly level with the abutting surfaces. An ADA threshold for a shower provides access to the shower by removing the standard shower threshold dam which is a potential tripping hazard. Recently, this term has been used to restrict the type of ADA compliant shower that can be provided.

The fully ADA compliant showers proposed to satisfy the requirement for “roll-in showers” are 36" x 36" interior clear space with fold-down seats, horizontal and vertical grab bars, and adjustable spray units with 60" long hose. It is illustrated and described in the ADA figure below. This is referred to as a transfer shower because it allows a person in a wheelchair or motorized device to slide onto the built-in, fold-down seat. This is the typical use of a handicap shower that is not designed for a nursing home where the user is not capable of independent living. The use of a transfer shower does not require the wheelchair or motorized device as used by most elderly today to be soaked while the user is showering. As noted in the ADA regulations: “Shower stalls that are 36 in by 36 in wide provide additional safety to people who have difficulty maintaining balance because all grab bars and walls are within easy reach. Seated people use the walls of 36 in by 36 in showers for back support.”

The following is the proposed shower design for compliance with roll-in shower.



**ADA Figure 35a
Shower Size and Clearances
36-in by 36-in Stall**

“The clear floor space shall be a minimum of 48 inches in length by a minimum of 36 inches in width and allow for a parallel approach. The clear floor space shall extend 1 foot beyond the shower wall on which the seat is mounted.”

We request that FHFC clarify that the use of the ADA shower as illustrated and described in ADA Figure 35a complies with the “roll-in shower” requirement for elderly housing.

Thank you for your consideration.

Sincerely,

Stacy Banch