Helping People with Hearing Loss Hear in Public Places: The ADA and ANSI A117.1

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On July 17th the ANSI A117.1 Committee convened in Washington DC voted to revise the current 2009 International Building Code to include a statement that when a hearing loop is installed it shall meet the IEC 60118-4 induction hearing loop standard. This paper explains why this is important.

There are so many different groups involved each with their own acronyms… it is enough to drive someone like me, an advocate focused on helping people with hearing loss hear better in public places, to exasperation. ADA, ANSI, ICC and IBC, Chapter 11 and Section 706 did not mean much to me up until a few weeks ago but the light is beginning to dawn.

The Americans with Disabilities Act, commonly referred to as the ADA, is a law that among other things, ensures access to the built environment for people with disabilities. The ADA standard establishes design requirements for the construction and alteration of facilities subject to the law. These enforceable standards apply to places of public accommodation, commercial facilities, and state and local government facilities.

It is the US Access Board that is responsible for developing and updating design guidelines known as the ADA Accessibility Guidelines (ADAAG). These guidelines are used by the Department of Justice (DOJ) and the Department of Transportation (DOT) in setting enforceable standards that the public must follow.

In the ADA Standards, Chapter 2 on scoping, section 219, the reasons for accessible design are explained see http://www.ada.gov/regs2010/2010ADAStandards/2010ADAstandards.htm#pgfId-1010597

- The term scoping refers to what facilities need to be accessible. In regards to hearing accessibility the scoping requirements dictate that in assembly areas *where audible communication is integral to the use of the space, an assistive listening system shall be provided.* Section 219 lists one exception: Other than in courtrooms, assistive listening systems shall not be required where audio amplification is not provided.

It is in ADA Standards Chapter 7, section 706 that the technical requirements for accessible design are explained see
http://www.ada.gov/regs2010/2010ADAStandards/2010ADAstandards.htm#pgfId-1006522

- The technical requirements refer to the design and construction specifications and are found in section 706. In the case of hearing accessibility Section 706 dictates that 25% of the required assistive listening receivers shall be hearing aid compatible via the use of a

neckloop, that a 1/8" standard mono jack shall be provided and that the individual receivers shall meet certain standards in regards to SPL, Peak-Clipping and SNR levels.

It is the International Code Council (ICC), a member-focused association, dedicated to developing model codes and standards used in the design, build and compliance process to construct safe, sustainable, affordable and resilient structures that develops the International Building Code or IBC aka the "I-Code".

Most U.S. communities and many global markets choose to reference the IBC. This code book, which is the most widely adopted building code in the United States, comprises of 35 chapters and a series of Appendices A thru M. When referenced in local, state or federal legislation, the IBC becomes the minimum requirement for construction.

Chapter 11 of the International Building Code addresses accessible design and construction of facilities for physically disabled persons. Chapter 11 is developed by the ANSI A117.1 committee. This A117.1 standard is a recognized accessibility standard that provides the technical criteria which must be met in order to accomplish the required level of accessibility. When sites, facilities, buildings and elements are built to the specifications in the A117.1 they become usable by people with disabilities.

A117.1 is comprised of 11 chapters and it is chapter 7, section 706 that *specifically deals with Assistive listening systems*. Section A117.1 is a scoping free document. In other words, it has no triggers telling the user when to apply the specific criteria, that is what the ADA standard does.

For the readers of this document it is important to know that section 706 of the ANSI A117.1 Standard is *not* Section 706 of the 2010 ADA Standards. At this time, it is only ANSI A117.1, section 706 that has been changed. Section 706 of the ADA standards has *not* been changed. Once states adopt the new A117.1 building code, the IBC code will be more stringent than the ADA standards.

What exactly *was* accomplished at the ANSI A117.1 meeting?

Until A117.1 is officially adopted, slated for December 2014, hearing loop installers and advocates will be able to state to architects, designers, construction companies and building inspectors that the proposal to modify the 2009 IBC was passed and will be changed to reference the IEC 60118-4 hearing loop standard.

It is important to keep in mind that once A117.1 is officially adopted it will not indicate that hearing loops are the assistive listening system *of choice* for hearing aid users nor does it recommend using hearing loops as the default assistive listening system.

Currently the ADA Standards lists FM and IR technology as an equivalent assistive listening option for people with hearing loss. The ADA guidelines fail to take the users' preferences into account, one study show experienced hearing aid users preferring hearing loops over FM/IR technology nearly 9 to 1, nor does it mention the numerous advantages of hearing loops listed here: http://www.hearingloop.org/fq_preferred.htm).

That hearing loops *should be* considered the assistive listening system of choice, because they are fully hearing aid compatible and therefore do not require the use of an auxiliary receiver, needs to be addressed by the Hearing Loss Association of America (HLAA) and other consumer organization such as ALDA, NAD, TDI and AMPHL, when the ADA Accessibility Guidelines are up for review.

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