

ADA in Your Foodservice Facility

I remember when the Americans with Disabilities Act was first introduced in early 1990's. While the impact on design from the architectural side was fairly well defined, the impact on other disciplines was not ... including foodservice design. ADA requirements in the kitchen are a gray area and, thus, open to interpretation by each local inspector. The reason for this gray area is that the ADA guidelines were established to protect the average citizen, regardless of any physical impairments. In reality, however, the percentage of physically impaired individuals working in foodservice establishments is extremely low, industry-wide. I have had numerous discussions with various local and state officials and still, to this day, have not received a clear or consistent answer regarding the implementation of ADA requirements in kitchens. It seems as though the "don't ask, don't tell" approach is the one that prevails in this instance. Nevertheless, the issue warrants a closer look.

A Common Mistake

When the issue of ADA comes up, the natural reaction for most individuals is to automatically think of a wheel chair. It should be noted that there are other disabilities that warrant consideration when designing a foodservice facility. What accommodations could be made for the visual or hearing impaired? How about for the blind? I have worked on kitchens that were specifically designed to be used by blind staff members. A local services for the blind organization had received a contract to run and operate a small snack bar. The various preparation and storage methods had to be carefully evaluated. Microwaves were used as the primary cooking appliance. Additional storage was also required, as many of the foods came in pre-portioned to eliminate the need for on-site preparation. One reason that the physically challenged often come to mind first is that they often require the most significant accommodations in the design and construction of a facility, and a foodservice establishment is no different.

Customers vs. Employees

There is a clear distinction between the accommodations that must be made for customers and those that must be made for employees. All customer accessible areas must be designed to accommodate any patrons that would be covered by the ADA statutes. Most of the areas not directly related to the actual preparation or service of food, such as the restrooms, dining room, entrance, and other such areas, are clearly covered in the ADA code. A self-service area, where patrons can serve themselves, is perhaps the most directly affected front-of-house area. Consider for instance the counter height and location of the service equipment. Service counters, traditionally built at 36" high, are subject to the ADA guidelines which indicate a 34" height. While the two-inch difference may not seem like much, consider the impact that it has on the equipment that traditionally goes below the counter. Few of the foodservice equipment manufacturers have addressed this issue through the design of their equipment. Most recommend the use of low-profile casters in lieu of legs to compensate for the difference, but this is not an acceptable alternative. Casters move, legs don't. This impacts the way that the staff interfaces with the equipment.

The back-of-house areas, however, fall under the gray area of the code. While it is physically possible for a chef in a wheel chair to cook on a commercial kitchen cooking line, the accommodations that would have to be made and the impact that those accommodations would have on the operation of the facility and other workers are significant. To allow for a 5'-0" turning radius for a wheel chair on the cooking line, for instance, would make it difficult on those staff members who are not physically challenged, as the typical aisle width in this area would be 42". In yet another example, I have worked on designs where a 42" high pick-up counter was required – a clear violation of the heights stipulated by the ADA guidelines.

When speaking with various state officials, the only real consensus that I have received has been that they would like to see minimum 36" aisle widths in the kitchen to ensure accessibility, albeit limited, for those in wheelchairs. This, to me, makes sense as I am in favor of making reasonable accommodations where possible and their impact is not negative on other staff members. In the kitchen

run by blind staff members, for instance, brail on the doors, drawers, and appliances is essential and does not affect other users of the facility who are not physically impaired.

What Makes Sense

Because the application of ADA in the back-of-house is subject to interpretation, there are those officials who are more aggressive in the implementation of ADA requirements in kitchen facilities. In certain applications, such as culinary labs or teaching facilities for students, this is reasonable. In one kitchen, I had an inspector request that we remove shelving from the walk-in cooler or make the cooler larger to ensure that a 5'-0" turning radius would be maintained. In yet another facility, we made sure to provide ADA compliant hand sinks within reasonable distance of the preparation areas. Students should be afforded equal opportunities to participate in the culinary experiences shared by their classmates.

Trying to enforce such guidelines in the typical, every-day commercial kitchen facility, however, is not practical at this point in time. The primary reason is the equipment. Most foodservice equipment is not designed to accommodate the physically challenged. Thus, an inspector may wish to see a more ADA-friendly facility, but it is not realistic to make such accommodations at the present time. This is not to say that the manufacturers couldn't make such accommodations, where reasonable. They just haven't done so yet – primarily because it has not been required.

Conclusion

What the future will hold with regards to enforcement of ADA guidelines in the kitchen is unknown. However, we must keep in mind that our industry is ever-challenged with labor shortages, and there are plenty of physically challenged individuals who would entertain employment in the kitchen. Will the manufacturers wait until such accommodations are required? Will the industry's labor woes force manufacturers to make such accommodations to the equipment? Would such accommodations encourage dedicated, hard-working,

physically challenged individuals to consider our industry for employment? I don't know the answer ... but the topic is an interesting one to consider.