



Facilities Planning & Management

UNIVERSITY OF WISCONSIN-MADISON

Department:	Campus Planning and Landscape Architecture (CPLA)
Standard Operating Procedure Tag:	CPLA-SOP - 004
Origination Date	February 3, 2026
Revision Number and Date	NA

Subject: ADA 20% Disproportionality Rule: Mandatory Accessibility Requirements for Primary Function Area Alterations

Purpose: UW-Madison is committed to ensuring our facilities are readily accessible to and usable by all individuals, including those with disabilities. This is requirement under the Americans with Disabilities Act (ADA) and other federal, state, and local statutes. Alteration projects that include primary function areas will trigger a requirement to upgrade the accessible path of travel to that area.

Reference: Federal and State Accessibility Code. The 20% Disproportionality Rule.

- Federal regulations stipulate that when a primary function area is altered, an accessible path of travel to that area must also be provided. The associated costs for these path-of-travel improvements are required and should include all required elements up to 20% of the total construction cost of the overall alteration to the primary function area itself.

Procedure:

AE to incorporate accessibility features throughout the path of travel to the altered area. Note that these are listed in and should be addressed in prioritized order.

- **Accessible Entrance:** At least one accessible entrance to the building and the specific project area.
- **Accessible Route:** A continuous, unobstructed accessible route to the altered area from site arrival points (parking, public transit stops, sidewalks).
- **Core Elements – list in prioritization order:** Accessible restrooms, telephones, and drinking fountains serving the altered area.
- **Technical Compliance:** Ensure all design elements, from door hardware to maneuvering space and signage, adhere strictly to the 2010 ADA Standards for Accessible Design, and other applicable code requirements i.e. ANSI 117.1, IBC, etc.

AE to consult with the UW CPLA Accessibility Coordinator during scope development to discuss proposed path of travel improvements.

In historic facilities, any exceptions anticipated by the AE should be reviewed with the CPLA Director and will require the approval of the State Historic Preservation Officer.

Documentation and Justification:

AE will provide a detailed breakdown with the project documentation outlining the costs associated with the accessible improvements. This will allow for the calculation of the 20% threshold to ensure compliance. Submit the form during schematic design or preliminary design for review by the CPLA Accessibility Coordinator.

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Alteration Budget Worksheet for Accessibility Compliance

Project Name: XXX
UW/DFD Project Number: XXX
AE Firm: XXX
Project Manager: XXX
Date: XXX

Project Scope at Primary Function	Anticipated cost	
<i>Scope 1</i>	\$	-
<i>Scope 2</i>	\$	-
<i>Scope 3</i>	\$	-
<i>Scope 4</i>	\$	-
Total Alteration Cost	\$	-

Improvements to Path of Travel	Anticipated Costs	
<i>Improvement 1</i>	\$	-
<i>Improvement 2</i>	\$	-
<i>Improvement 3</i>	\$	-
<i>Improvement 4</i>	\$	-
Total Improvement Costs	\$	-
Disproportionality Requirement (20%)	\$	-