



U.S. Department
of Veterans Affairs

Office of Construction &
Facilities Management

Office of Facilities Planning
Facilities Standards Service

STANDARDS ALERT

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VA Standards and Criteria for ABA Countertops and Base Cabinets

ISSUE:

The United State Access Board requires all federally funded facilities to meet the requirements of the Architectural Barriers Act (ABA 1968) and the Architectural Barriers Act Accessibility Standard (ABAAS 2006). The VA Technical Information Library (TIL) does not currently meet the ABA requirements for accessible countertops.

BACKGROUND:

Current VA Facility Standards do not clearly address how to meet the Architectural Barriers Act (ABA) and the Architectural Barriers Act Accessibility Standard (ABAAS) height requirements for countertops (with or without base cabinets and sinks). Multiple sources within the Technical Information Library (TIL) and Space and Equipment Planning System (SEPS) specify 36-inch-high base cabinets and countertops, exceeding the 34-inch Above Finished Floor (AFF) maximum height stipulated in Section 902.3 of the ABA. This discrepancy has prompted the need for clearer guidance and compliance measures.

DISCUSSION:

- 1) VA Design Guides for various departments (PG-18-12) and the Equipment Guide List (PG-18-5) which is the source document for the Project Room Contents Report that comes from SEPS; both prescribed base cabinets with countertops at 36 inches high, inconsistent with the ABA's accessibility requirements. The Office of Construction and Facilities Management (CFM) Facilities Standards Service (FSS) has reviewed this issue with the US Access Board Accessibility Specialists and the Office of Healthcare Environment and Facility Engineering (HEFE) and determined that:
 - a) Countertop heights for VA staff and patients must meet the requirements of ABA section 902.3 in all VA facilities to the greatest extent possible.

- b) Countertops shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground. This includes both seated and standing employee work areas and those which have sinks and or other ABA required accessible fixtures.
 - c) The scope of this document includes but is not limited to patient rooms, medication rooms, exam rooms, teamwork rooms, nourishment stations, laboratory spaces, imaging rooms, meeting rooms, reception, intake and nurses' stations as well other similar spaces and areas not listed above.
- 2) In rooms or areas with 36" high countertops, at a minimum, provide one 30" wide section of countertop which meets ABA wheelchair accessibility requirements.
 - 3) Industry standard for ergonomic seated worksurfaces range between 27"-29" Above Finished Floor (AFF).

NEW STANDARD(S):

- 1) VA Planning, Design and Construction Standards (PDC) are required to be used as a basis of design for all new, renovation and retrofit projects. VA TIL documents PG-18-13 VA Barrier Free Design Standard, PG-18-1 Master Construction Specifications, PG-18-5 Equipment Guide List, PG-18-4 Standard Details, PG-18-12 Design Guides, and the Space and Equipment Planning System (SEPS) Data base will be updated to reflect the following changes:
 - a) For all standing height work areas:
 - i) Where countertops lengths are 60" or greater provide one section which is ABA accessible. (30" long x 34" high).
 - ii) Where countertop lengths are 60" or less the entire countertop shall be ABA accessible at 34" height.
 - iii) Where a single sink is provided in the countertop it shall be mounted at the ABA 34" height.
 - iv) Where multiple sinks are provided at least one will be at ABA 34" height.
 - b) For all sitting height work areas:
 - i) All countertops shall be 28" AFF.
 - ii) If system furniture is used at least one unit shall be ABA compliant. It is recommended to use sit/stand desks where possible.



2) Interpretations or deviations:

- a) Interpretations, definition of requirements, or deviations from any VA standards and criteria for ABA countertops (with or without base cabinets) must be evaluated and adjudicated by the appropriate committee of subject matter experts as managed through the VHA Healthcare Engineering SharePoint site.

3) Authority Having Jurisdiction (AHJ)

- a) In accordance with Title 38 USC 312A, the Authority Having Jurisdiction (AHJ) for planning, design, and construction (PDC) of facilities for the Department of Veterans Affairs (VA), including determining architectural and engineering requirements and ensuring compliance of the Department with applicable laws relating to the construction program of the Department, is the Executive Director (ED) of the Office of Construction and Facilities Management (CFM). This authority includes the delegation of authority to the Administrations for their projects. The VA/VHA project manager, project engineer, or COR must obtain AHJ identification, contact information and the process and procedures for compliance reviews, evaluations, and adjudications no later than initiation of the contract.

IMPLEMENTATION

Effective immediately upon date of publication. This Standards Alert immediately supersedes and/or supplements all corresponding material in all VA TIL Standards and Criteria.

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