



COMMISSIONER
Chris Traylor

January 10, 2011

To: Free-Standing Hospice Facilities, Intermediate Care Facilities for Persons with Mental Retardation or Related Conditions (ICFs/MR) and Nursing Facilities

Subject: **Provider Letter #11-06** – Wall-mounted Objects

The Department of Aging and Disability Services (DADS) is issuing this letter to notify providers that guidance from the Centers for Medicare and Medicaid Services (CMS) in **Survey and Certification (S&C) Memo 10-18** dated May 14, 2010, regarding wall-mounted objects and titled *Revision of S&C 04-41 dated August 12, 2004 Corridor Width & Corridor Mounted Computer Touch Screens in Health Care Facilities* **does not meet** the requirements of Section 4.4, *Protruding Objects*, of the Texas Accessibility Standards (TAS) authorized by Texas Government Code, Chapter 469, Elimination of Architectural Barriers, or Section 4.4, *Protruding Objects*, of the ADA Accessibility Guidelines for Buildings and Facilities (ADAAG).

The guidance from CMS in S&C Memo 10-18 allows projections of six inches from the wall at least 40 inches above the floor. These dimensions are consistent with allowable projections in Chapters 18/19.2.3.4 of the National Fire Protection Association 101, *Life Safety Code*, 2000 Edition. However, because TAS Section 4.4.1 limits projections that are between 27 and 80 inches above the floor to four inches from the wall for new construction or installations, **DADS cannot permit installing wall-mounted objects in accordance with the guidance in S&C Memo 10-18.**

An electronic version of S&C Memo 10-18 may be reviewed at http://www.cms.gov/SurveyCertificationGenInfo/Downloads/SCLetter10_18.pdf. The TAS can be reviewed at <https://www.tdlr.texas.gov/ab/abtas.htm> and the ADAAG can be reviewed at <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/background/adaag>. If you experience problems opening any of these links, copy and paste the link into the address bar of your web browser to go directly to the website. If you have questions about the content of this letter, please contact a policy specialist in the Policy, Rules and Curriculum Development unit at (512) 438-3161.

Sincerely,

[signature on file]

Veronda L. Durden
Assistant Commissioner
Regulatory Services

VLD:dlm