

MAURA HEALEY
GOVERNOR



LAYLA R. D'EMILIA
UNDERSECRETARY OF
CONSUMER AFFAIRS AND
BUSINESS REGULATION

KIM DRISCOLL
LIEUTENANT GOVERNOR

SARAH R. WILKINSON
COMMISSIONER, DIVISION OF
OCCUPATIONAL LICENSURE

**Commonwealth of Massachusetts
Division of Occupational Licensure
Office of Public Safety and Inspections
Architectural Access Board**

One Federal Street, Suite 600 • Boston • MA • 02110
V: 617-727-0660 • www.mass.gov/aab • Fax: 617-979-5459

ERIC PALEY
SECRETARY, EXECUTIVE OFFICE
OF ECONOMIC DEVELOPMENT

Subcommittee on Regulations Open Meeting Minutes June 24, 2026
Remote Teams Meeting

INFORMATIONAL NOTE: All votes were taken by roll call

This meeting was open to the public and began approximately at 10:11 AM.

Subcommittee member attendance:

Jeff Dougan (JD)- Chairperson

Carol Steinberg (CS)- Vice Chairperson

Patricia Mendez (PM)

Ana Julian (AJ)

Mike Kennedy (MK)

Paul Logan (PL)

Division of Professional Licensure Employees in attendance:

William Joyce –Executive Director (WJ)

Stephen Pleva- Board Counsel (SP)

Molly Griffin – Program Coordinator (MG)

JD opened the meeting for Roll Call:

AJ, MK, PL, PM, CS (arrives at 10:31 AM)

Chapter 100- Definitions

- WJ: I think we left off on section M- do we want to use this mezzanine definition?
- WJ: Something can only be a mezzanine if it is creating an extra floor.
- JD: Is that helpful (to you all)?

- WJ: Mezzanine only comes into play when we are discussing multi-floor dwellings. This may be protecting from nothing, but I do not see any harm from not adding it.
- JD: The ADA definition might be a little more inclusive than the 521 definition.

Motion to Accept the ADAAG definition of Mezzanine by PL

2nd by PM

Roll Call Vote

AJ- yes

MK- yes

PL- yes

PM- yes

JD- yes

5 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Okay, last thing for M- multiple dwelling. We do not use this term anymore, we adopted a different nomenclature (R1, R2, I1, I2, etc.) from the Minnesota Code.
- PL: Is there a sufficient explanation of the new nomenclature so people know it's a multiple dwelling?
- WJ: It might be useful to define those in here or within section 200.
- JD: So, we need to define the R types.
- JD: We can come back to the multiple dwellings at another meeting. We don't need a motion on that - we are just going to table it.
- WJ: Okay, so moving along to the O section. I do not have any recommendations here, do people have any thoughts?
- JD: My next one was play component, but that is jumping ahead.
- WJ: Okay, P, does anyone have anything?
- JD: My only one was play component.
- WJ: I think we need to eliminate platform- this is from the Minnesota code. We use multiple different meanings of platform throughout the code.

Motion to Delete platform by PL

2nd by PM

Roll Call Vote

AJ- yes

MK- yes

PL- yes

PM- yes

JD- yes

5 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Okay, play component. The 521 draft includes an additional clause. I think that is the only difference.
- JD: Do people have any feelings?
- WJ: I think it's harmless, but I am not sure if the extra clause in 521 is necessary.

- JD: Okay which do people want, ADAAG or 521?

Motion to Accept the 521 CMR definition for play component as written by PL
2nd by MK

Roll Call Vote

AJ- yes

MK- yes

PL- yes

PM- yes

CS- abstains

JD- yes

5 yes, 0 no, 1 abstention- Motion Passes

CS arrives at 10:31 AM

- WJ: The next definition I have a recommendation on is project; it refers you to sections that no longer exist.

Motion to Delete project by PM

2nd by PL

Roll Call Vote

PM- yes

PL- yes

MK- yes

AJ- yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Alright, I think that was it for section P for me.
- JD: I had public entrance.
- CS: Is restricted defined somewhere?
- WJ: What I would consider restricted is an entrance people are not able to use without some sort of security clearance.
- CS: I had a question about public buildings. Is this coming from the statute now?
- WJ: Yes. This is based on our enabling statute – it must be.
- CS: Do we define multiple dwellings?
- WJ: No, we are proposing cutting it. We are tabling it for now.
- PL: As far as changing the 15 parking spaces- is there any way we can lower it?
- WJ: The legislature would have to make the change.
- CS: But ADAAG does have authority.
- WJ: Yes, but we have no authority to enforce ADAAG.
- CS: So public buildings do reference multiple dwellings.

- WJ: But I don't think there is meaningful confusion about what this means in this context.
- WJ: Okay any other letter P issues before we move on to Q?
- JD: I noted qualified historic building or facility.
- WJ: I think that we can strike this.
- JD: Okay so we have an option to leave it in with some small edits.
- WJ: I think we can strike this and take out the word qualified from section 202.5.

Motion to Delete Qualified Building or Facility and to delete the word Qualified from 202.5 by PL

2nd by CS

Roll Call Vote

PM- yes

PL- yes

MK- yes

AJ- yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Okay, moving on to section R, my first thought is to use the PROWAG definition for ramp.
- JD: I like the fact that 521 mentions 1:12.
- WJ: You must be careful with that.
- CS: The PROWAG definition does not give an upper limit.
- WJ: Yes, because the upper limit is in the technical provisions.
- CS: Does this need to say "walking surface?"
- WJ: I think the idea is to differentiate this from a surface intended for bike use or vehicles.

Motion to Use the PROWAG definition of ramp by PM

2nd by CS

Roll Call Vote

CS- yes

AJ- yes

MK- yes

PL- yes

PM- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- CS: I had a question about reasonable modification- is this anywhere in 521?
- WJ: I think it is in the current code- we exempt them in certain situations. It is in the current code and the draft code.

- WJ: For the term repair I suggest using the 521 definition.

Motion to Accept the 521 definition of repair by CS

2nd by PL

Roll Call Vote

PM- yes

PL- yes

MK- yes

AJ- yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- CS: Where does replacement cost come up in the code?
- WJ: For determining the full and fair cash value of a building that is not assessed.
- WJ: Okay, the next one is the term running slope.
- CS: Does anyone think we need the cross-slope part? People that design? PM, what do you think?
- PM: I'm comfortable; no I do not have strong feelings.

Motion to Accept the ADAAG definition of running slope by PL

2nd by MK

Roll Call Vote

CS- yes

AJ- yes

MK- yes

PL- yes

PM- yes

JD- yes

6yes, 0 no, 0 abstentions- Motion Passes

- WJ: Okay, moving on to section S. For self-service storage, I like the ADAAG definition.

Motion to Accept the ADAAG definition of self- service storage by CS

2nd by PM

Roll Call Vote

PM- yes

PL- yes

MK- yes

AJ- yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- CS: I had a question about shared-use paths.

- WJ: This is for pedestrians, bikes, and other types of vehicles.
- WJ: PROWAG does not cover bike lanes- they cover shared use paths. It might be like a rail trail.
- CS: Is this definition useful?
- WJ: Yes.
- WJ: Okay, the next one I had is the term sidewalk- I like PROWAG's definition.

Motion to Accept the PROWAG definition of sidewalk by PL

2nd by AJ

Roll Call Vote

CS- yes

AJ- yes

MK- yes

PL- yes

PM- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: The next term I had was "story." I think we can use the 521 definition.

Motion to Use the 521 definition of Story by PL

2nd by CS

Roll Call Vote

PM- yes

PL- yes

MK- yes

AJ-yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- JD: I had a question on the term structural frame.
- WJ: 521 specifically mentions foundation and spandrels.
- JD: Do we want to add the word "facility?"

10-minute break taken at 11:20 AM- Meeting resumes at 11:30 AM

- JD: Okay, we can continue our discussion on structural frame.
- WJ: There is no reason to not use the 521 definition.

Motion to Use the 521 definition of structural frame by CS

2nd by PL

- WJ: I don't even think we need this definition. The only time this shows up is in the definition of technologically infeasible which we do not define in 521.

- WJ: It is referenced in ADAAG exactly once.
- AJ: It appears in the definitions.
- WJ: It would be defining a term that does not appear.
- CS: How did they use this in their description of technological infeasibility?
- WJ: Reads ADAAG definition of technological infeasibility.

CS withdraws this motion

Motion to Delete structural frame by PL

2nd by PM

Roll Call Vote

CS- yes

AJ- yes

MK- yes

PL- yes

PM- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Okay, moving on to section T. TTY (text telephone) first; I do not have strong preferences.

Motion to Accept the ADAAG definition of TTY by MK

2nd by PM

- MK: I don't think anyone uses TTYs anymore.

Roll Call Vote

PM- yes

PL- yes

MK- yes

AJ-yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Okay, the term townhouse- we can eliminate this. We moved away from having separate rules for townhouses. I will not be sad to see this go.
- CS: So, the language about multi-story dwelling units covers townhouses?
- WJ: Assuming they have multiple stories, yes. Now we are going to treat townhouses like every other kind of dwelling unit.

Motion to Delete Townhouse by PL

2nd by PM

Roll Call Vote

CS- abstains

AJ- abstains

MK- yes

PL- yes

PM- yes

JD- yes

4 yes, 0 no, 2 abstentions- Motion Passes

- CS: I would like to investigate this more.
- WJ: Ok the next term is Type A Unit- I think we must use the 521 definition.
- JD: Okay, so we are looking to modify the Minnesota code.
- PM: Can we keep the idea that it has greater floor space somehow?
- WJ: It often has more floor space, but not always. This is not an educational tool.
- PM: I am thinking of regular people reading this who are not lawyers or architects.
- CS: It will come up in the Type B definition as well.
- WJ: I think that is why we are doing an advisory booklet as well this time around.
- PM: I understand.

Motion to Accept the modified Minnesota code definition of Type A Unit by PM

2nd by PL

Roll Call Vote

CS- yes

AJ- yes

MK- yes

PL- yes

PM- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Okay, Type B units- I think we need to modify the Minnesota definition in the same way in this case. We don't require certain things in Type B units that we do in Type A units.

Motion to Accept the modified Minnesota code definition of Type B unit by PL

2nd by AJ

Roll Call Vote

CS- yes

AJ- yes

MK- yes

PL- yes

PM- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Ok, next section- U; the only one here is use zone.

Motion to Accept the 521 definition of use zone by PL

2nd by MK

Roll Call Vote

PM- yes

PL- yes

MK- yes

AJ-yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Alright, next section – V. Vessel length is something I do not think that we deal with anymore.

Motion to delete vessel length by PL

2nd by MK

Roll Call Vote

CS- yes

AJ- yes

MK- yes

PL- yes

PM- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Okay- section W – walk/walkway. I don't love the 521 definition.
- JD: I don't think it's bad to have interior ones mentioned.

Motion to Accept the 521 definition of walk/walkway by CS

2nd by MK

Roll Call Vote

PM- yes

PL- yes

MK- yes

AJ-yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- WJ: Okay, so we are done with definitions. We have 40 minutes left. We do not have time to do the PROWAG update.
- CS: I would like to discuss the modified ISA.
- WJ: Okay, so we have gotten a decent amount of feedback from people that they would like 521 CMR to use the modified ISA.
- CS: Also called the dynamic sign.

- WJ: My recommendation was going to be – to accept both the ISA and modified ISA. I think the correct way to handle this would be to have a comment period for a period of time to ensure that people have the opportunity to participate; then we can adopt something in the next meeting.
- PL: Does adopting both symbols lead to confusion?
- WJ: I think they are similar enough.
- JD: I do think we need public discussion. On March 27, 2017, there was guidance from the US Access Board on this. I want to make sure we are meeting the ADA.
- CS: What did they say?
- WJ: It's squishy. I don't think they have put out any other formal guidance since this. The RMV has adopted the modified ISA for placards, and you can see some of it on The Ride buses and vehicles.
- CS: Tom Hopkins was vehemently against this. I like the idea of a public comment period. I love it myself, but some people do not.
- PL: I am okay with public comment. I totally support the modified ISA version it is moving ahead.
- MK: I vividly recall that previously we agreed the modified symbol is doing the same thing as the original ISA. But public discussion should rule here.
- WJ: We can legally use this now as it is now in the public domain whereas in the past it was not.

Motion to Have a written public comment period up to and including August 25, 2026 and to discuss this at the July and August 2026 meetings by PL

2nd by CS

Roll Call Vote

PM- yes

PL- yes

MK- yes

AJ-yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes

- JD: I think with that we are on to the high contrast color.
- WJ reads edits
- CS: So, no more blue or green?
- PL: Yellow- in most people's minds- means do not park here.
- WJ: Do you only want this on the access aisles? Only yellow or yellow and white?
-

Motion to Add this revised parking paragraphs written by WJ by PL

2nd PM

Roll Call Vote

PM- yes

PL- yes

MK- yes
AJ-yes
CS- yes
JD- abstains
5 yes, 0 no, 1 abstention Motion Passes

- JD: We will pause here for public comment and pick up with detectable warnings next time.

Motion to Approve minutes from the May 27, 2026, meeting by MK
2nd by PL
Roll Call Vote
CS- yes
AJ- abstains
MK- yes
PL- yes
PM- abstains
JD- yes
4 yes, 0 no, 2 abstentions- Motion Passes

Public Comments

Michael Muehe (BCIL): I think the motion to eliminate reasonable accommodation which is currently defined in 521 includes information about equivalent facilitation and I think it is important to keep that. Secondly, regarding the discussion about structural frame I could think of a pedestrian bridge and could be important. I would endorse keeping the TTY definition. Buildings that have some kind of security measure of asking guests to relinquish their phones upon entering. I would appreciate the subcommittee citing a specific example of new construction of 20 or 30 townhouses and how accessibility can be addressed. Type A/Type B definitions; I would like the subcommittee to address defining dwelling units if they are going to use the term itself. I would agree with the subcommittee's decision for the public comment period for the modified ISA. There is a much wider margin of blue around the traditional ISA and the modified ISA; I would argue for the borders for both to be equivalent.

June Hailer: I never went by what is written on the ground for parking spaces, I go by what is written on the sign, so I think that is important to keep.

John Nunnari (AIA): Is there any update on the overall timing when the subcommittee will be sending this up to the Board for their full consideration?

Michael Muehe: I am referring to 521 CMR 2.5.1.

Motion to Adjourn by PL
2nd by MK
Roll Call Vote

PM- yes

PL- yes

MK- yes

AJ-yes

CS- yes

JD- yes

6 yes, 0 no, 0 abstentions- Motion Passes