Delaware Lottery ADA Pre-Inspection Guidelines

The following guidelines are meant to help potential lottery retailers prepare for their ADA inspection. **These guidelines do not replace the actual inspection and report and do not include all ADA requirements. They do include issues most commonly observed issues at Lottery sales facilities.** Click here to access full regulations regarding the 2010 ADA Standards for Accessible Design.

Simple fixes (like adjusting door closers, adding signs, re-striping parking, or keeping areas clear) can resolve many issues before the official inspection. Use this guideline document as a **self-audit tool**: walk through your facility section by section, using the criteria above to check compliance. By correcting issues in advance, you improve accessibility and avoid compliance delays. **If you are in doubt about a requirement, do not make changes until after the inspection is completed and a report has been issued.**

Common ADA Non-Compliance Issues in Lottery Retailer Inspections

Top Recurring Issues: Based on our review of Delaware Lottery site inspection reports, the following issues are most frequently cited. Retailers should pay special attention to these problem areas, as they often require corrections to meet ADA 2010 standards:

1. **Accessible Parking Not Meeting Standards** – Missing **van-accessible** spaces, or improper signage/striping. Often, we find no "Van Accessible" sign, or the access aisle is undersized or not marked. In some cases, the slope of the accessible space or aisle exceeds 2%. *ADAAG refs: 208.2, 502.2–502.6*.
2. **Excessive Slope on Routes** – **Exterior accessible routes** (sidewalks, paths from parking) with cross slopes or steep sections beyond 1:48 (2%). This can make a route impassable for wheelchairs. *ADAAG ref: 403.3 (Surface slope max 2%)*.
3. **Non-Compliant Curb Ramps** – Ramps at curbs or entrances that are too steep, lack level landings, or have abrupt drop-offs. For example, curb ramp slopes >8.33% without meeting the old exception criteria, or side flares too steep. *ADAAG refs: 406.1–406.3, 405.2*.
4. **Door Thresholds and Maneuvering Clearance** – Front door thresholds higher than ½" or without beveling (trip hazard), and inadequate clear floor space at entrances. Many older stores have tight vestibules or clutter near the door, which fail the required 18–24" side clearances. *ADAAG refs: 404.2.4 (maneuvering clearance), 404.2.5 & 303.2 (threshold height)*.

5. **Door Closers and Opening Force – Heavy or fast-closing doors** are extremely common issues. We often measure exterior entrance door opening forces well above 10 lbf, and closing speeds faster than 5 seconds, making the door non-compliant. This issue is typically resolved by adjusting or replacing the door closer. *ADAAG refs: 404.2.9 (opening force).*
6. **Service Counter Too High** – Counters exceeding 36" without any lower section or alternative accommodation. *ADAAG ref: 904.4.1 (service counter height)*. In many cases, the solution was to add a lower auxiliary counter or provide clipboard service.

Section I – Parking (Accessible Parking Spaces)

Requirement: If your business provides a parking area (and is not merely in a larger shopping center with shared parking), you must have the correct number of **accessible parking spaces** based on the lot's size, including at least one **van-accessible** space. Use the table below (from ADA standards) to ensure the count is sufficient for your lot's total spaces:

- **Location without dedicated parking:** If your business has *no parking lot or only street parking*, you can skip this section (no on-site spaces to modify).
- **Number of Accessible Spaces:** Count total parking spaces and verify ADA-compliant accessible spaces as follows:

Total Spaces	Accessible Spaces
1 – 25	1
26 – 50	2
51 – 75	3
76 – 100	4
100+ see 2010 Standards 208.2	
At least **one (1)** of every **six (6)** parking spaces must be **van accessible**.	

- **Dimensions:** Standard car accessible spaces must be **8 ft (96") wide** with an **5 ft (60") wide access aisle** adjacent. **Van-accessible** space options per ADA: either **11 ft space + 5 ft aisle** or **8 ft space + 8 ft aisle**. The access aisle (striped area) allows wheelchair lift deployment and passenger loading. *If you have only one accessible parking spot, it **must** be van-accessible.* (See Figure 1 for photo).
- **Location:** Place accessible parking on the **shortest accessible route** to the building entrance. If multiple entrances, each should have nearby accessible parking. Spaces should be on a **level surface** – ground slopes must not exceed **1:48 (2%)** in any direction to ensure a flat, safe transfer to a wheelchair.

- **Signs:** Every accessible space needs a **posted sign** with the **International Symbol of Accessibility** (the wheelchair symbol) mounted **at least 60" above the ground** so it's visible over parked cars. Van-accessible spaces require an additional "**Van Accessible**" sign below the main symbol. (See Figure 2 for photo.) *(Note: The wheelchair symbol painted on pavement alone is **not** sufficient; the upright sign is required.)*
- **Maintenance:** Keep accessible spaces in good condition. Repair any potholes or uneven surfaces, repaint faded striping, and ensure signs remain posted and unobstructed.
-

Section II – Walkways and Aisle Ways (Accessible Route)

This section addresses the general **accessible route** within and into your location – essentially, the **walkways, aisles, pathways and curb ramps or ramps** that customers use to approach and move around your store. Key points:

- **Clear Width:** Every accessible walkway or aisle must be at least **36 inches wide** continuously. However, it is acceptable for the width to narrow briefly to **32 inches** at a single point (e.g., a doorway or a structural column) for a length no more than 24 inches, **then widen back to 36"**. This ensures wheelchairs can pass through tight spots as long as they're not prolonged.
- **Stable, Non-Slip Surface:** The walkway surface should be **stable, firm, and slip-resistant**. Secure any loose mats or runners (tape them down or use non-slip backing). Carpets should be low-pile and secure. **Mats**: If floor mats are used at entrances (inside or outside), ensure they lie flat with no curled edges and are **½" or less in height** with tapered edges. Mats must not slide when stepped on – if a mat can slide, use carpet tape or remove it to prevent tripping.
- **Slope of Path:** Any part of the path that has a slope greater than **5% (1:20)** is considered a ramp and must meet ramp requirements (see Section IV). Generally, walking surfaces should be as level as possible. **Cross slope** (side-to-side tilt of the path) must not exceed **2% (1:48)**. This ensures wheelchairs don't experience excessive tilt. For example, an exterior sidewalk that is tilted for drainage should still be under 2% cross-slope so it remains easy to traverse.
- **Obstructions:** Keep the full width of walkways **clear of obstructions**. No merchandise, displays, trash cans, etc., should protrude into the 36" pathway. A person using a wheelchair or cane should be able to travel the route without detouring or bumping into objects.
- **Thresholds:** If there are any small level changes along the route (like a single step or threshold within the store area), remember that any vertical rise above

0.5" must be ramped. A rise of 0.25" to 0.5" should be beveled at 1:2; anything higher needs a proper ramp.

Section III – Curb Ramps

If an **accessible route** to your entrance crosses a curb an ADA-compliant **curb ramp** is required to allow wheelchair access (See Figure 3 for photo). See Section IV for requirements for other types of ramps. This section ensures curb ramps meet slope and dimension rules:

- **When Required:** A curb ramp must be present wherever an accessible path crosses a curb – typically at transitions between a parking area and a sidewalk or at drop-off areas. If your site has no grade changes or curbs on the accessible route, you can *skip curb ramps* (or confirm none are needed).
- **Slope:** For new or altered facilities under current standards, the **ramp slope** must not exceed **8.33% (1:12)**. In practical terms, this means for every inch of vertical rise, there should be at least 12 inches of ramp run. **Steeper slopes are not allowed** except in very limited cases for existing older facilities. Steep ramps are difficult and dangerous for wheelchair users.
- **Width:** The curb ramp must be at least **36 inches wide** (clear width) to accommodate wheelchairs. This does not include flared sides – the main ramp path itself should be 3 feet min. wide.
- **Landings:** The ramp should have a level landing at the top, at least **48" long** (in the direction of travel) before any door or turn. The bottom of the ramp should also have a level area clear of obstructions. Landings and adjacent surfaces must have at most 2% slope (nearly flat) so wheelchair users can safely pause and maneuver.
- **Side Flares:** If the curb ramp is in the path of pedestrian travel (e.g., a cut through a curb at a sidewalk), any exposed sides should be **flared** with a **slope** not exceeding **10% (1:10).**
- **Surface and Transition:** The ramp surface should be firm, stable, and slip-resistant. There should be no abrupt changes in level at the top or bottom of the ramp. Any vertical rise > 0.25" at transitions should be beveled for smooth passage.

Section IV – Ramps

A **ramp** here refers to any inclined (slope >5%) surface on the accessible route. (See Figure 4 for photo.) If a ramp crosses a curb it shall be considered a curb ramp and follow the guidance in Section III. If your business **does not have any ramps** on the accessible route (no sloped entries or interior ramps), you can skip this section.

For those with ramps, ensure the following ADA-compliant features:

- **Maximum Slope:** For permanent ramps built or altered **on or after March 15, 2012**, the slope must be **8.33% (1:12) or less** – identical to the curb ramp rule. *(In practice, aim for slightly less to provide a margin of error.)*
    - As with curb ramps, **existing older ramps** (constructed pre-2012) that haven't been modified can have slightly steeper slopes if space is limited: up to **10% for 6" rise** or **12.5% for 3" rise** maximum, if those were built under prior codes. However, any **new** ramp work now must meet the 8.33% standard. **No ramp, new or old, can ever exceed 12.5%** slope – steeper would be essentially a step, not a ramp.
- **Rise and Length:** A single run of ramp can only rise up to **30 inches** in height without a landing. If a greater height must be spanned, the ramp should be built in sections (runs) with intermediate **landings** to break up the rise. This is to prevent overly long or steep continuous runs that are exhausting or unsafe.
- **Width:** Ramp runs must have a clear width of at least **36 inches** between handrails, same as the minimum for routes.
- **Landings:** There must be a **level landing at the top and bottom** of each ramp run. Landings should be at least **60" (5 feet) in length**, and at least as wide as the ramp. They provide a rest area and room to turn if needed. Also, if a ramp changes direction (e.g., 90° turn), the landing should be sized to accommodate turning (typically 60"×60" landing for a turn).
- **Edge Protection:** If a ramp or landing has an open drop-off on the sides, install curbs (at least 2" high), railings, or raised edges to prevent wheels from rolling off. This is especially relevant for ramps not against a wall.
- **Handrails:** Any ramp with a **rise of 6" or more** (or a horizontal projection of 72" or more) must have handrails on **both sides** for safety. Handrails should be mounted 34"–38" above the ramp surface, be continuous, and extend a bit (12") beyond the top and bottom of the ramp where possible. The rails need to be easy to grip (circular profile or similar) and with returns to the ground or wall to avoid snagging clothes.
- **Surface and Maintenance:** Ramp surfaces should be non-slip. If outdoors, consider texture or tread strips for traction. Keep ramps clear of ice, algae, or debris that could cause slipping.

Section V – Entrances (Doors)

Entrance here means the primary public entrance to your business. If the main entrance is not wheelchair-accessible, an alternate entrance must be made accessible

and clearly marked. This section ensures doorways, doors, and entry features meet ADA requirements:

- **Doorway Width:** The entrance door (or one leaf of a double door) must provide a **minimum clear opening width of 32 inches** when the door is open 90°. This is measured between the door's edge and the frame (the narrowest point). Standard commercial doors are often 36" wide, which yields about 33" clear width when open – that meets the requirement. Double doors can have one active leaf that provides 32" clear. If your entrance has two narrow double doors that each, when open, give less than 32" clear, that is a problem – at least one side must suffice on its own.
- **Threshold Height:** The threshold (the raised transition at the door bottom) cannot be more than **½ inch high** at the tallest point. If the threshold is between ¼" and ½", its edges should be **beveled at 1:2 slope** to smooth the bump. (See Figure 5 for photo) Any threshold higher than ½" must be modified (ground down, replaced, or ramped) because it's a barrier to wheelchairs and tripping hazard. Many older doors have ¾" or 1" high saddles – these should be adjusted.
- **Hardware:** Door handles, pulls, latches, locks, and other operating hardware must be **easy to operate with one hand** and not require tight grasping, pinching, or twisting of the wrist. In practice, this means **lever-style handles, U-shaped pulls or similar** are compliant, whereas round doorknobs or thumb-turns are not (See Figure 6 for photo). Also, the hardware must be mounted between 34" and 48" above the floor (48" max) so that it is reachable by wheelchair users. Check that any locks or latches meet this height (some older designs have top bolts or low foot-bolts which would violate this).
- **Door Opening Force:** Interior doors on accessible routes should require no more than **5 pounds of force (lbf) to open**. Use a door pressure gauge or fish scale to measure the force needed to pull the door open. If it's higher than 5 lbf (which is common with doors that have strong closers or tight seals**), adjust the door closer** tension or lubricate hinges. Exterior hinged doors should require no more than**10 lbf to open.** Aim for the **lowest force** that still allows the door to close properly—excessive force can effectively bar access for many users.
- **Closing Speed:** A door with a closer should **not close too quickly.** From a 90° open position, it should take at least **5 seconds** to reach a point 12° from the latch. In other words, the door should swing closed slowly enough for a person with limited mobility to get through without it slamming on them. Adjust the closer's speed setting ("sweep" and "latch" speeds) to slow it down if needed. Most closers have adjustable valves for this. Spring hinges (self-closing hinges often used on light doors) should be set so that from 70° open, they take at least

1.5 seconds to close. Tip: If the door tends to “slam” or feels too fast, it likely fails this requirement – a common issue we find in the field is closers not adjusted to ADA speed.

- **Maneuvering Clearances:** Around the entry door, there must be a clear floor space for a wheelchair to maneuver while opening the door (See Figure 7 for all acceptable clearance widths and depths). Essentially, a wheelchair user approaching the door needs room to position and reach the handle, and room to retreat as the door opens. Keep these areas free of any furniture, merchandise, or trash cans. The ground in these maneuvering zones should be level (≤2% slope) for ease of movement.
- **Alternate Entrance Signage:** If your main entrance **cannot be made accessible** (for example, there are steps and no space for a ramp), and you have another entrance that is accessible, you **must post a sign** at the main entrance directing people to the accessible entrance. Use the International Symbol of Accessibility and clear directions. The alternate entrance should be unlocked during business hours. The goal is no customer arrives and finds only an inaccessible door with no guidance.
- **Doors in Series:** (Applicable if there is a vestibule with inner/outer doors) Ensure there is at least 48" plus the width of a door (typically another 36") between two doors in series so a wheelchair can clear one before opening the next.
- **Visual markers:** Glass doors should have contrast markings (decals) at eye level for visibility to prevent people with low vision from walking into them.

Section VI – Sales / Customer Service Counter

Many lottery agents have a counter where tickets are sold or customer service is provided. ADA requires that counters be usable by people with disabilities:

- **Counter Height:** At least a portion of the main service counter must be no higher than **36 inches** above the floor. The 36" high portion should be **at least 36" in length** (wide enough to place paperwork, tickets, a payment pad, etc.) (See Figure 8 for photo). This lower section allows a wheelchair user to perform transactions. If your existing counter is taller (e.g., a 42" high counter), you can provide an auxiliary surface like a fold-out shelf or have a clipboard available **as a last resort**, but ideally the counter should have a built-in accessible height segment.
- **Clear Floor Space:** In front of the counter, there must be a clear floor area at least **30" by 48"** for a wheelchair to approach (See Figure 9 for photo). This space should adjoin the counter and not be obstructed by display racks or waste bins. If the approach is frontal and there is knee space, part of that space can extend under the counter; if parallel, it should be fully in front.
- **Turning Space:** Within the sales area, a wheelchair user should be able to turn around. An open area of **60" diameter** should exist somewhere accessible to them. Often the store aisles themselves or an open floor area suffice, but be mindful not to create dead-end narrow spaces.
- **Equipment:** Any point-of-sale equipment (credit card readers, lottery terminals for customers) on the counter should be within reach range (typically 48" max height) and ideally on the accessible section of the counter.
- **Alternate Service:** If the physical counter cannot be modified immediately, staff should be trained to assist customers at an accessible location or with a clipboard as needed. (This is a temporary measure and not a substitute for eventually providing an ADA-compliant counter section.)

FIGURES

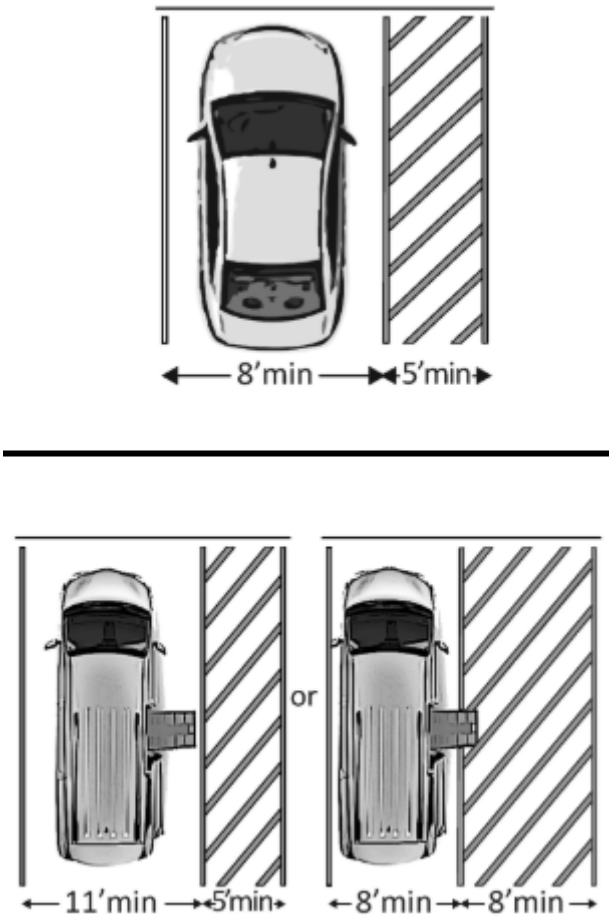

Figure 1: Accessible Parking Space & Access Aisle Configuration (Top)
Van Accessible Parking Space & Access Aisle Configurations (Bottom)

Figure 2: Accessible Parking Space Signage (Left)
Van Accessible Parking Space Signage (Right)

Figure 3: Typical Curb Ramp

Figure 4: Typical Ramp (Courtesy of Florida Sidewalk Solutions)

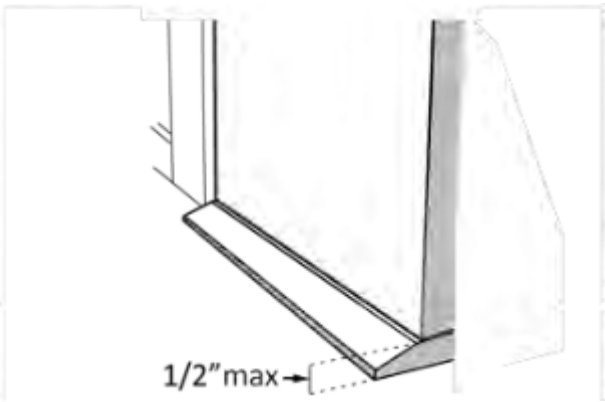

Figure 5: Door Threshold

Figure 6: Compliant Door Handles

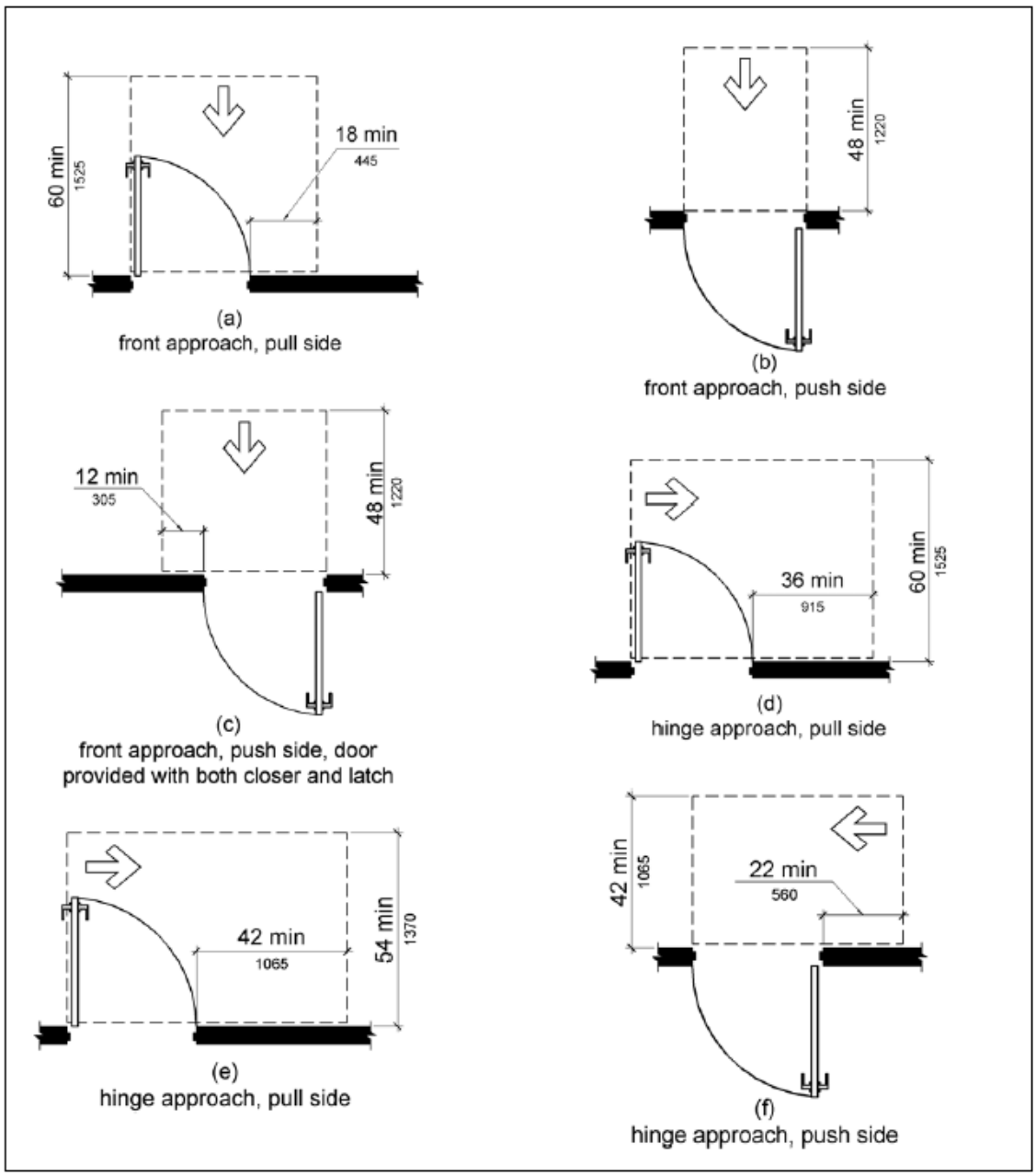

Figure 7: Acceptable Maneuvering Clearances

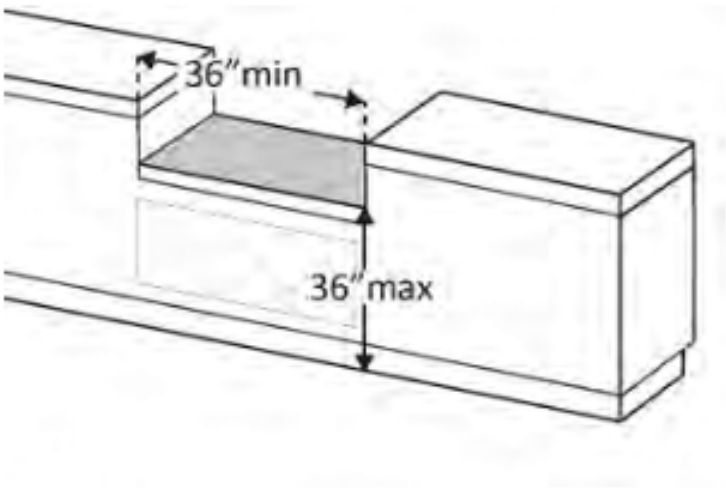

Figure 8: Sales Counter Dimensions

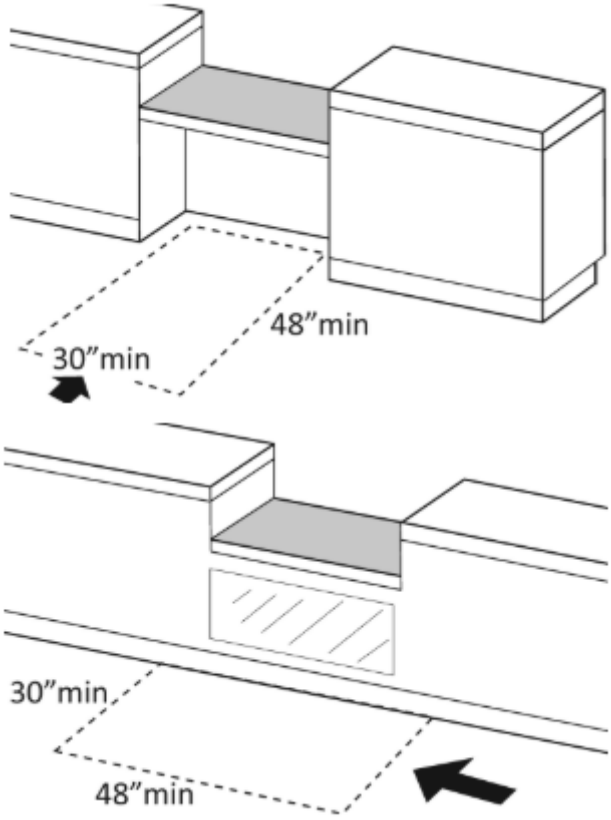

Figure 9: Forward Counter Approach Clearance (Top)
Parallel Counter Approach Clearance (Bottom)