404.2.10 requires door and gate surfaces within 10 inches (255mm) of the finish floor to have a smooth surface on the push side. This smooth surface must extend the full width of the door or gate. If there are parts creating horizontal or vertical joints in the area required to be smooth, the planes of adjacent surfaces shall be within 1/16 inch (1.6 mm) of each other. If there are cavities created by added kick plates, those cavities shall be capped. A cover (kick) plate must extend the full width of the door surface, including at the door jamb with a smooth transition to any portion that is deeper than 1/16 inch. This standard is applicable to doors and gates on an accessible route. Doors which meet conditions described in this Technical Memorandum will be in compliance with TAS 404.2.10. The illustration depicts the intent of TAS 404.2.10.

The intent of this section is to provide protection for persons with mobility impairments from injury by preventing projections that may catch a cane, crutch, walker, or wheelchair and inhibits passage through the door or gate opening. The smooth surface allows users’ mobility aids to pass along the door surface as the user passes through the door or gate.

TAS 404.2.10 also includes Exceptions for (1) sliding doors, (2) tempered glass doors (3) doors and gates which do not extend to within 10 inches of the finish floor, and (4) existing doors.

The Department has determined that a lock, latch or other door hardware in the bottom 10 inches of a door (such as an exposed bottom rod for a panic device, surface latch or door stop) may be deemed to be an employee work area (exempting it from reach range requirements). Whether an employee work area or not, said lock, latch or other door hardware must be flush with the level of the smooth surface of the door unless it is concealed within the door or protected by a compliant cover (kick) plate.

This clarification does not constitute a substantive change to the requirements of TAS 404.2.10.