

## Short-Term Vacation Rentals

**Q: Are hotels covered under the ADA?**

**A:** Yes, hotels, inns, and motels are considered a “place of public accommodation” and are covered under Title III of the ADA. Other lodging places are also covered if they have amenities similar to a hotel, like management and reservation services; reservable rooms; housekeeping or linen services; and non-specific unit reservations – without a lease or security deposit. If a facility has five reservable rooms or less and the owner lives on the property, it is not considered a place of public accommodation and is not covered under the ADA.

**Q: Do hotels have to hold their accessible rooms only for people with disabilities?**

**A:** Hotels are required to ensure that accessible rooms are held for individuals with disabilities until all other guest rooms of that type have been requested, and accessible rooms are the only ones left. However, once an individual with a disability reserves an accessible room, the room must be removed from the reservation system to ensure it is held for that customer.

**Q: If I call a hotel, does the staff have to tell me what accessibility features are offered?**

**A:** Yes, the hotel must describe accessibility features for people to determine whether the hotel meets their accessibility needs. However, the hotel does not need to provide every room detail. The hotel may simply say that the entire unit is wheelchair accessible.

**Q: Hotel rooms can be reserved on the hotel’s website, but the website says I have to call to book an accessible room. Is this allowed?**

**A:** If the hotel offers online reservations for non-accessible rooms, the hotel must also offer accessible room reservations online. The hotel’s website does not need to state every room detail. Instead, the website may simply state the entire unit is wheelchair accessible.

**Q: The hotel I reserved offers one-bedroom and two-bedroom options. However, the hotel only provides accessible one-bedrooms. Are they required to also have accessible two-bedrooms?**

**A:** If the hotel offers several types of rooms, it should offer different types of accessible rooms. The hotel does not, however, need to offer an accessible option for every kind of room.

## Americans with Disabilities Act (ADA): FAQ Series

### **Q: Can a hotel charge more for an accessible room?**

**A:** No, a hotel may not charge additional fees for accessible rooms.

### **Q: The hotel offers a shuttle from the airport to the hotel. Must the hotel offer accessible transportation?**

**A:** If the hotel has shuttle services, it must also offer accessible options. Though the hotel shuttle is not required to be accessible, the hotel must provide an equivalent service. Shuttles should be offered on the same schedule, hours of operation, and have the same pick-up and drop-off locations.

### **Q: I stayed at a hotel that was built in the 1970s. They told me they are not required to be accessible because they were “grandfathered” in. Are older hotels covered under the ADA?**

**A:** No place of public accommodation is “grandfathered” in and allowed to remain completely inaccessible. Under the ADA, all hotels built after January 26, 1993, must be accessible and usable by individuals with disabilities. If it was altered after January 26, 1992, it must be accessible to the maximum extent feasible. If a hotel was built before those dates, architectural barriers must be removed when readily achievable. If barrier removal is not achievable, the hotel should provide alternative accessibility options.

### **Q: I tried to rent a room at a hotel, and they said they do not have any accessible rooms. Are accessible rooms required under the ADA?**

**A:** Hotels built after the implementation of the ADA must have a certain number of accessible rooms. Small hotels with up to 25 rooms must have at least one accessible room. The more rooms the hotel offers, the more accessible rooms are required. For example, a hotel with 51 to 75 rooms must have at least four accessible rooms.

### **Q: I tried to reserve a room at a small bed and breakfast. The owner said they did not have any accessible rooms. Are B&Bs required to have accessible rooms?**

**A:** If the B&B has five rooms or less and the owner lives on the property, it is not covered by the ADA. If it has six or more reservable rooms, it must meet the same standards as a hotel.

### **Q: When I went to the hotel, the check-in counter was too high for me to reach and not wheelchair accessible. What are the requirements for the check-in counter?**

**A:** Service counters should be no more than 36 inches high and at least 36 inches long. It should also have a clear floor space of at least 30 inches by 48 inches. If the hotel’s counter was built before but altered after the ADA’s effective date, a 24-inch counter may be permitted. Also, if an accessible service counter is not readily achievable, the hotel may temporarily use a table.

### **Q: Must every accessible room have a roll-in shower?**

**A:** No, only a certain number of accessible rooms must have roll-in showers, and only hotels with over 50 rooms are required to have any roll-in showers. The number of accessible rooms and required roll-in showers vary on the year the hotel was built. Hotels built after March 15, 2012, with 76 to 100 rooms, must have at least five accessible rooms, but only one must have a roll-in shower. Hotels built between January 26, 1993, and March 15, 2012, with the same

## Americans with Disabilities Act (ADA): FAQ Series

number of rooms, are required to only have four accessible rooms with one roll-in shower. Larger hotels built after March 15, 2012, with 301 to 400 rooms, need at least 12 accessible rooms with four roll-in showers. Hotels with the same number of rooms built between January 26, 1993, and March 15, 2012, only need eight accessible rooms with four roll-in showers.

### **Q: What kind of features must an accessible room have?**

**A:** Accessible rooms must have doorways at least 32 inches wide and at least 36 inches clear passage around beds and furniture. Bathrooms are regulated, too, such as the turning space in the bathroom and the height of sinks and toilets. Drapery wands, fixed lamps, and temperature controls must be within 48 to 54 inches, depending on the approach.

### **Q: I rented an accessible room. The bed was too high for me to transfer onto. Are beds required to be a certain height under the ADA?**

**A:** Unfortunately, no. The ADA does require a 36-inch-wide route to the bed and 36 inches of clear floor space between the beds in accessible rooms, but there are no specified standards for the bed's height. You may be able to ask the hotel to remove the box spring or make other modifications to the bed to adjust the height. The staff should make adjustments when they are readily achievable and easily accomplished without too much difficulty or expense.

### **Q: The hotel has a parking lot. Must the hotel have accessible parking spaces?**

**A:** If the hotel has a self-parking lot, it must have a certain number of accessible spaces. For example, if the lot has 1 to 25 spaces, it must have at least one accessible space. If there are 51 to 75 spaces, there must be at least three accessible spaces, with at least one van-accessible space.

### **Q: The hotel offers breakfast at a breakfast bar. The counters are too high for me to reach in my wheelchair. What does the ADA say about food service counters?**

**A:** Similar to service counters, breakfast bar counters should be no more than 36 inches high and at least 36 inches long. The portion of the lobby used for the breakfast service should be approachable and useable for individuals in wheelchairs.

### **Q: The hotel has a pool. Is the pool required to be accessible?**

**A:** If the pool was built or altered after March 15, 2012, it must be accessible. Large pools must have at least two accessible means of entry, one being a pool lift or sloped entry, while smaller pools are only required to have one pool lift or sloped entry. However, if the pool was installed before March 15, 2012, the pool is not required to be accessible, but the hotel should modify the pool to the extent that is readily achievable.

### **Q: Does the ADA require the fitness equipment in the hotel's gym to meet certain accessibility standards?**

**A:** The ADA does not include specific access requirements for exercise machines or equipment. For fitness centers installed after March 15, 2012, one of each type of exercise equipment must be on an accessible route and have clear floor space for transfer purposes. Each type needs clear floor space of a minimum of 30 inches by 48 inches for either forward or parallel transfers.

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### **Q: I have a service dog. Can the hotel deny my dog? Can the hotel charge me a pet fee?**

**A:** No, hotels must allow service dogs to accompany individuals in all areas of the facility that are open to the public. The hotel may not charge any “pet fees” for the service dog but may charge a guest for any damage the service dog causes.

### **Q: Do any states have additional laws?**

**A:** Maryland passed a law, “Act for Lodging Establishments – Accessible Rooms for Individuals with Disabilities – Bed Height,” requiring hotels with at least four guest rooms to provide beds with certain heights in accessible rooms, even though this is not required by the ADA. The height of the beds must be between 20-23 inches, with at least seven inches of clearance under the bed for a lift. The law requires full compliance by the end of 2024.

### **Q: What if my rights were violated or the hotel is not ADA-compliant?**

**A:** The hotel’s actions may be in violation of local or state laws. Check whether the city, county, or state has anti-discrimination laws that may apply. To learn more, contact the region’s ADA Center. The list of regional centers can be accessed on the [national network’s website](#).

You can also file an ADA complaint with the Department of Justice:

1. [Online](#)

2. By mail: [Fill out the ADA Complaint Form](#), or send a letter containing the same information, and mail to:

**U.S. Department of Justice  
Civil Rights Division  
950 Pennsylvania Avenue, NW  
Washington, DC 20530**

3. Fax: [Fill out the ADA Complaint Form](#), or send a letter containing the same information, and fax it to (202) 307-1197.

Remember to keep a copy of your complaint and the original documents for your records.

### **Need more information?**

You can reach the Department of Justice, Civil Rights Division by phone at:

1-855-856-1247 (toll free)  
(202) 514-0716 (TTY)

Talk to an ADA Specialist or call the ADA Information Line at:

(800) 514-0301 (voice)  
(800) 514-0383 (TTY)