

**Town of Princeton
Self-Evaluation and Transition Plan
June 2021**



Prepared by:

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188 Lower Westfield Road, Holyoke, MA 01040**

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Disclaimer: This Self-Evaluation and Transition Plan is a “planning” document which is intended to identify areas of non compliance under the Federal Americans with Disabilities Act as it pertains to the provision of services, programs, and activities. In doing so, this Plan provides an evaluation of policies and procedures and provides recommendations and sample documents for compliance. This Plan also includes a facilities assessment to identify non-conforming building and site conditions including a description and applicable regulatory standards for compliance. This is not an engineering or architectural assessment nor does it provide engineering or design solutions. Construction solutions need to be designed by a qualified engineering or architectural professional in order to ensure compliance under the MAAB 521 CMR requirements and the 2010 ADA Standards for Accessible Design.

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I. INTRODUCTION

The Central Massachusetts Regional Planning Commission in partnership with the Center for Living & Working, Inc. and James M. Mazik, AICP – Consulting Services has prepared this Self-evaluation and Transition Plan (“Accessibility Plan” hereafter) on behalf of the Town of Princeton to determine its level of compliance under the Americans with Disability Act (ADA) of 1991, as amended in 2008 and 2010.

The ADA is a civil rights law. Under the ADA, civil rights are guaranteed to individuals who experience discrimination because they; 1) have a physical or mental impairment that substantially limits a major life activity, 2) have a record of such an impairment, and 3) are regarded as having such an impairment. The ADA provides civil rights protections to those with disabilities in a manner similar to that provided to individuals on the basis of race, color, sex, natural origin, age, and religion. The law is intended to ensure that those with a disability cannot be excluded from participating in, or denied the benefits of programs, services and activities offered by state and local governments because of that disability.

Under Title II of the ADA, as amended, requires local municipalities to conduct a Self-Evaluation of programs and services as well as an evaluation of all facilities to document physical barriers to access as part of the requirements for developing a Transition Plan.

In Massachusetts, public buildings and facilities must adhere to Section 521 of the Code of Massachusetts Regulations, “521 CMR: Architectural Access Board”, a specialized section of the State Building Code as governed by the Massachusetts Architectural Access Board (M.G.L. c.22, S13A).

This ADA Self-evaluation and Transition Plan (“Accessibility Plan” hereafter) includes model policies and procedures for adoption by the town as well as barrier removal solutions for the Town’s public buildings and facilities. The assessment of physical barriers and subsequent recommendations are based on the current 2010 ADA Standards for Accessible Design (2010 ADA Standards) and MA State Building Code 521 C.M.R., the higher standard to prevail. Although there are exceptions and variations (described below), this Accessibility Plan and its recommendations are based on compliance with the current Federal and State standards and the measures required to do so.

II. AMERICANS WITH DISABILITIES ACT

Background

On July 26, 1990 President George H. W. Bush signed the Americans with Disabilities Act, a federal civil rights law that prohibits the exclusion of people with disabilities from the right of equal opportunity. Much of the ADA legislation was built upon legislation that had already been in place for a number of years including the Civil Rights act of 1964 and the Rehabilitation Act of 1973 which regulates employment practices in the federal government and by federal contractors, establishes architectural and transportation accessibility standards and guarantees equal access to entities that receive federal funds.

The ADA is a civil rights law. Under the ADA, civil rights are guaranteed to individuals who experience discrimination because they; 1) have a physical or mental impairment that substantially limits a major life activity, 2) have a record of such an impairment, and 3) are regarded as having such an impairment. Interpretation of the law and its enforcement was intended to be carried out on a case-by-case basis through the nation's legal system. Specific complaints of individuals may be filed with a number of different federal agencies including the Equal Employment Opportunity Commission (Title I), the United States Department of Justice (Titles II and III), the United States Department of Transportation (Titles II and III), and the Federal Communications Commission (Title IV).

The ADA is divided into five titles or sections. These are:

Title I: Employment

Title II: State and Local Government and Public Transportation

Title III: Public Accommodations and Services Operated by Private Entities

Title IV: Telecommunications

Title V: Miscellaneous Provisions

The Town of Princeton is bound specifically by Titles I and II.

There is a basic process for complying with the Americans with Disabilities Act:

- Learning about the requirements of the ADA and how it applies to a facility or program;
- Conducting a survey to identify barriers;
- Establishing a list of potential modifications for barrier removal, including changes to policies, facilities and cost estimates;
- Removing existing barriers.

The ADA prohibits discrimination on the basis of disability in all services, programs, and activities provided by small local governments (i.e. towns). Thus, people with disabilities must have an equal opportunity to participate in and benefit from a town's services, programs and activities. To accomplish this, the ADA sets requirements for town facilities, new construction and alterations, communication with the public and policies and procedures governing town programs, services, and activities.

All towns must perform a self-evaluation of its policies, practices, programs, procedures, services, etc. (including communication) to determine compliance under the ADA. Towns must make reasonable modifications to these policies, programs, services, etc. to avoid discrimination against individuals with disabilities unless such modification would result in a fundamental alteration in the nature of that program or service.

Although the ADA only requires local governments with 50 or more employees to take additional, specific measures, it is strongly encouraged that even smaller towns with less than 50 employees follow the same process to ensure overall compliance with the ADA. These additional measures include 1) the designation of an individual to coordinate ADA compliance, 2) the development of a transition plan, and 3) the development of an ADA grievance procedure.

The 2008 Amendments to the ADA broadened the definition of "disability", thereby extending the ADA's protections to a greater number of people. The 2008 Amendments provided examples which limit "major life activities" including, but not limited to, "caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working" as well as the operation of several specified major bodily functions. The Amendments also stated that when determining whether one qualifies as disabled, one cannot take into account the mitigating effects of assistive devices, auxiliary aids, accommodations, medical therapies, and supplies. In order to be protected under the ADA, an individual with a disability must also be qualified to perform the essential functions of a job with or without a reasonable accommodation. In 2010, the Department of Justice has revised regulations for Titles II and III of the ADA of 1990. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design. On March 15, 2012, compliance with the 2010 Standards was required for new construction and alterations under Titles II and III. March 15, 2012, is also the compliance date for using the 2010 Standards for program accessibility and barrier removal. The 1991 ADA Standards for Accessible Design could be used for new construction and alterations under Titles II and III until March 14, 2012.

Title I

Equal Employment Opportunity

The ADA guarantees equal employment opportunities to people with disabilities who are qualified for a job. The ADA specifically prohibits discrimination in all activities relating to employment. This includes hiring, termination, compensation, recruitment, tenure, job training, advancement and promotion, layoff, fringe benefits, and any other employment-related benefits or activities. Employers, including municipal governments, should carefully review their employment policies and procedures to eliminate discriminatory practices. In many cases, discrimination is unintentional, due to a lack of knowledge and awareness of the employer. The ADA covers all aspects of "employment" including the application and interview process, hiring, promotion, termination, compensation and benefits, and training.

Reasonable Accommodations

Qualified applicants for employment are entitled to "reasonable accommodation" during the hiring process and as part of his/her employment. The term reasonable accommodation can mean many different things depending on the circumstance and what is "reasonable" under that circumstance. It may mean modifying an existing facility so that a person with a disability can perform his/her job (i.e. replace a door handle with a lever, lower a counter top, etc.), changing the way things are customarily done (office policy, work hours, etc.) or restructuring a job. It is the responsibility of the employer to provide a reasonable accommodation unless it would impose an "undue hardship" on the employer or detract from the essential functions of a position. Once the proposed accommodation becomes too difficult or expensive, it can be deemed as no longer reasonable and therefore, not required. *Caution:* What is unreasonable for an employer of six persons, may be deemed reasonable for an employer of twenty-five persons. Legal counsel should always be consulted when a reasonable accommodation is being considered to ensure compliance with law.

Title II

Program Accessibility

Title II is divided into two parts. Subtitle A covers all programs, services, and activities of state and local government. Subtitle B contains requirements for public transportation systems such as regional transit authorities. If the town provides senior or other local bus or van transportation services, then compliance with applicable provisions of Title II for wheelchair users or individuals with ambulatory limitations may be required. The following applies to Subtitle A of Title II.

The ADA guarantees people with disabilities equal opportunity to participate in programs, services, and activities of state and local government. Such participation must be viewed in its entirety with the service or activity and must be equal and effective as that offered to those without a disability. Accessibility standards must be followed for new construction as well as accommodations. These standards are based on the ADA Accessibility Guidelines (ADAAG) as developed by the U.S. Access Board provide guidance to the ADA Standards for Accessible Design as enforced by the U.S. Department of Justice (DOJ), U.S. Department of Transportation (DOT), and the federal courts and apply nationwide.

The ADAAG involves a distinction between public or common use area and employee work areas. Public/common use areas must be fully accessible. Employee work areas may be addressed through Title I and "reasonable accommodations" made when the need arises. A higher level of expectation is anticipated for governmental entities than that of the private sector. Regardless of receipt of federal aid, all local governments and their boards, departments, commissions and districts are subject to the provisions of the ADA. Access to services is a critical aspect and basic premise of the ADA. Governmental sponsored programs, services and activities must be available to all, regardless of disability. If structural changes to buildings are required, a transition plan is also usually required. New construction and/or additions to local governmental buildings must be fully compliant and accessible to those with disabilities. Alterations to space used by the public as well as employee work areas must also be ADA compliant unless it is "technically infeasible" to do so (i.e. involves structural, physical, or site constraints). If technically infeasible, the alteration must comply "to the maximum extent feasible". Existing buildings require that the services or programs offered in that facility are readily accessible.

When programs, services, or activities are located in facilities that existed prior to January 26, 1992, the effective date of Title II of the ADA, towns must make sure that they are also available to persons with disabilities. If however, it requires that these programs, services, or activities be substantially altered to provide access or results in undue financial or administrative burden, then reasonable alternatives or accommodations may be allowed. When a service, program, or activity is located in a building that is not accessible, Title II of the ADA allows a "small" local government to achieve program accessibility in several ways. This can include:

- relocating the program, service, or activity to an accessible facility; or
- providing the program, service, or activity in another manner that meets ADA requirements; or
- undertaking modifications to the building or facility itself to provide accessibility.

Thus, to achieve program accessibility, a small town need not make every existing facility accessible. It can relocate some programs to accessible facilities and modify other facilities, avoiding expensive physical modifications of all town facilities.

Effective Communication

Local governments must ensure effective communication with individuals with disabilities. Where necessary to ensure that communications with individuals with hearing, vision, or speech impairments

are as effective as communications with others, municipal governments must provide appropriate auxiliary aids.

The type of auxiliary aid or service necessary to ensure effective communication will vary according to the type of communication involved and the needs of the individual. "Auxiliary aids" include such services or devices as sign language interpreters, assistive listening headsets, television captioning and decoders, telecommunications devices for deaf persons (TDD's), videotext displays, readers, taped texts, Brailled materials, computer disks, audio recordings, and large print materials. In addition, telephone emergency services, including 911 services, must provide direct access to individuals with speech or hearing impairments.

Municipal governments are not required to provide auxiliary aids or take any actions that would result in a fundamental alteration in the nature of a service, program, or activity or that will result in undue financial and administrative burdens. However, alternative auxiliary aids that do not result in a fundamental alteration or undue burden must be provided. For example, it is not necessary to provide sign language interpreters for all interactions with persons who are deaf or hard of hearing. Daily interaction may suffice through written notes or similar exchanges. However, public meetings, interrogations by local police officers, or similar technical interactions will most likely require interpreters or assistive listening systems. It is required that alternative auxiliary aids be available that do not result in financial or administrative burdens yet meet the needs of the disabled individual.

Title III

Title III of the Americans with Disabilities Act requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. It is intended that all individuals have the opportunity to benefit from businesses and services of a place of public accommodation. The regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable. Public accommodations that must meet the barrier removal requirement include a broad range of establishments (both for- and non-profit) such as inns, hotels, motels, restaurants, bars, theaters, concert halls, stadiums, museums, auditoriums, retail stores, grocery stores, bakeries, laundromats, banks, barber and beauty shops, gas stations, professional offices, medical offices, private schools, health spas, bowling alleys and other places that serve the public. Private entities that own, lease, lease out, or operate places of public accommodation in existing buildings are responsible for complying with the barrier removal requirement. Private clubs and religious organizations, including places of worship, are exempt from the ADA public accommodation requirements.

Transportation services provided by the senior center/Council on Aging would also be bound by Title III.

Title IV

Title IV requires common carriers engaged in interstate communications by wire or radio to provide telecommunications relay services for both hearing- and speech-impaired individuals. Regulations developed to implement this provision require that these services operate 24 hours a day. It is the intention to give those persons with hearing and speech impairments the opportunity to communicate with any other individual. This is to be achieved in a manner such that the users are not paying greater rates than those for equivalent services used by persons without hearing or speech impairments. In addition, any televised public service announcements provided or funded in whole or in part by any federal agency or instrument of the federal government must include closed captioning of the verbal content of such announcement.

Title V

Title V consists of various miscellaneous provisions of the ADA including a requirement for the development of technical assistance manuals by the appropriate regulatory federal agency, a report on the ADA and wilderness areas, a description of the responsibility of the United States Congress, religious organizations, and enforcement and dispute resolution.

Definition of Commonly Used Terms

Disability - a physical or mental impairment that substantially limits a major life activity, such as walking, seeing, hearing, learning, breathing, caring for oneself, or working. To be protected under the ADA, a person must have, have a record of, or be regarded as having a record of, a substantial impairment. A substantial impairment is one that significantly limits or restricts a major life activity such as hearing, seeing, speaking, breathing, performing manual tasks, walking, caring for oneself, learning or working. Individuals who have successfully completed or are currently enrolled in a drug or alcohol rehabilitation program are also considered to be disabled. The ADA protects three classes of people with disabilities:

- those who have a disability, and
- those who have a record of having a disability, and
- those who are regarded as having a disability, whether or not they actually have one.

Qualified Individual with a Disability - an employee or job applicant who meets legitimate skill, experience, education, or other requirements of an employment position that he or she holds or seeks. The person must also be able to perform the "essential" (as opposed to marginal or incidental) functions of the position either with or without reasonable accommodation. Job requirements that screen out or tend to screen out people with disabilities are legitimate only if they are job-related and consistent with business necessity.

Reasonable Accommodation - any change or adjustment to a job or work environment that permits a qualified applicant or employee with a disability to participate in the job application process, to perform the essential functions of a job, or to enjoy benefits and privileges of employment equal to those enjoyed by employees without disabilities. For example, reasonable accommodations may include: acquiring or modifying equipment or devices, job restructuring, modifying work hours, making the workplace structurally accessible to individuals with disabilities, reassigning an employee with a disability to an equivalent position as soon as one becomes vacant, providing qualified readers for the blind or interpreters for the deaf, and/or appropriately adjusting or modifying examinations, training materials, or policies.

Essential Functions – the basic job duties that an employee must perform, with or without reasonable accommodation.

Readily Achievable - the removal of physical barriers which are easily accomplishable without much difficulty or expense. The "readily achievable" requirement is based on the size and resources available. For example, a larger business with more resources is expected to take a more active role in removing barriers than smaller businesses. The ADA also recognizes that economic conditions vary. When a business has resources to remove barriers, it is expected to do so; but when profits are down, barrier removal may be reduced or delayed. Barrier removal is an ongoing obligation, thus physical barriers must be removed as resources become available in the future.

Undue Hardship - an action or accommodation that requires significant difficulty or expense for an entity. Criteria for making such a determination include the nature and cost of the accommodation, the financial resources of the employer, or the impact of such accommodations on the financial resources of the employer.

Programmatic Access –Programmatic access requires that a public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.

Program Accessibility

Under Title II of the ADA, the town of Princeton must ensure that when “viewed in entirety”; all programs, services, and activities that are offered must be equally available to persons with disabilities. The Town is not necessarily required to remove architectural barriers from a building or site, but rather, must make sure that its programs are accessible. Non-structural methods to achieve program accessibility include:

- relocating a program or service to an accessible location in the existing building or facility, or
- relocation of a program or service to a different building or facility, or
- providing short-term or intermediate modifications to ensure program access until a permanent or structural solution is achieved (Example – creating an accessible meeting space on the first floor of a building such that staff providing services on a second or third floor can meet with persons in the accessible first floor space).

III. OTHER FEDERAL ACCESSIBILITY REGULATIONS

Architectural Barriers Act (ABA) - 1968

The Architectural Barriers Act requires access to facilities designed, built or altered with Federal funds or leased by Federal agencies. The law covers a wide range of facilities, including post offices, social security offices, prisons, and national parks. It also applies to non-government facilities that have received Federal funding, such as certain schools, public housing, and mass transit systems. Passed in 1968, the ABA is the first measure by Congress to ensure access to the built environment. Facilities that predate the law generally are not covered, but alterations or leases undertaken after the law took effect can trigger coverage. Building construction changes made under this law, must meet the Uniform Federal Accessibility Standards (UFAS). Special provisions are included in the UFAS for historic buildings that would be threatened or destroyed by meeting full accessibility requirements

The Rehabilitation Act – 1973

The Rehabilitation Act requires recipients of federal financial assistance to make their programs and activities accessible to everyone. Recipients are allowed to make their properties accessible by altering buildings, by moving programs and activities to accessible spaces, or by making other accommodations. It also protects the rights of Federal employees with disabilities. The law also requires electronic and information technology procured by Federal agencies to be accessible according to certain established standards.

Section 504 of the Rehabilitation Act and ADA. Both the ADA and Section 504 ensure that people with disabilities are not discriminated because of their disability.

The ADA was modeled after Section 504 and adds to the strength of Section 504 by extending it to private institutions, workplaces and other institutions that were not originally covered under Section 504.

Section 504 only applies to entities that receive financial assistance. The ADA applies to entities which receive funds from federal, state, or privately owned establishments and businesses. In effect, the ADA extends a legal mandate of Section 504 beyond the recipients of the funds from the federal government.

According to Section 504, a person with disability is one who has (1) a physical or mental impairment that substantially limits major life functions (2) a history of impairment (3) or if s/he is regarded as having an impairment. However, ADA also covers HIV and contagious and non-contagious diseases.

Both the ADA and section 504 are civil rights statutes. The Office for Civil Rights of the United States Department of Education is responsible for enforcing Section 504. The United States Department of Justice enforces the Americans with Disabilities Act.

Unlike Section 504, the ADA does not have any direct responsibility for providing free and appropriate public education. The ADA does not come up with any specific evaluation or placement procedures, whereas Section 504 requires a notice and consent for an evaluation process.

Section 508 of the Rehabilitation Act and ADA. Section 508 of the Rehabilitation Act, as amended by the Workforce Investment Act of 1998, requires federal agencies to develop, procure, maintain and use information and communications technology (ICT) that is accessible to people with disabilities - regardless of whether or not they work for the federal government. The US Access Board established the Section 508 standards that implement the law and provides the requirements for accessibility.

Section 508 requires federal agencies to make their ICT such as technology, online training and websites accessible for everyone. This means that federal employees with disabilities are able to do their work on the accessible computers, phones and equipment in their offices, take online training or access the agency's internal website to locate needed information. Section 508 also means that a person with a disability applying for a job with the federal government or a person who is using an agency's website to get information about a program, or completing an online form has access to the same accessible information and resources available to anyone.

Information and Communications Technology (ICT) is any equipment or system that is used to create, convert, duplicate or access information and data. Examples of ICT include, but are not limited to:

Telephones, smart phones and mobile devices

- Televisions, DVD players and videotaped productions
- Internet and Intranet websites
- PDF documents
- Content on DVDs and CDs
- Online training
- Webinars and teleconferencing
- Technical support call centers
- Remote access websites and tools
- Tablet, laptop and desktop computers
- Software and operating systems
- User guides for software and tools
- Copiers, printers and fax machines

Voting Accessibility for the Elderly and Handicapped Act - 1984

The Voting Accessibility for the Elderly and Handicapped Act of 1984 generally requires polling places across the United States to be physically accessible to people with disabilities for federal elections. Where no accessible location is available to serve as a polling place, a political subdivision must provide an alternate means of casting a ballot on the day of the election. This law also requires states to make registration and voting aids available for disabled and elderly voters, including information by telecommunications devices for the deaf (TDDs), which are also known as teletypewriters (TTYs).

Air Carrier Access Act - 1986

The Air Carrier Access Act of 1986 prohibits discriminatory treatment of people with disabilities in air travel. The law applies to both domestic and foreign air centers. Regulations issued by the Department of Transportation under this Act cover a range of issues, including boarding assistance and access features in newly built aircraft.

Fair Housing Act - 1988

The Fair Housing Act, as amended in 1988, prohibits discrimination in housing on the basis of disability, as well as race, color, gender, and religion. It covers housing in the public and private sectors and bans discrimination in any aspect of selling or renting housing. Under the law, new multifamily housing must be able to be adapted for accessibility according to established guidelines. The law also requires reasonable exceptions to housing policies and operations so that people with disabilities are afforded equal housing opportunities.

Individuals with Disabilities Education Act - 1990

The Individuals with Disabilities Education Act (IDEA) is a law that ensures students with a disability to be provided with Free Appropriate Public Education (FAPE) that is tailored to their individual needs. IDEA was previously known as the Education for all Handicapped Children Act (EHA) from 1975 to 1990. In 1990 Congress reauthorized EHA and changed the title to IDEA. Overall, the goal of IDEA is to provide children with disabilities the same opportunity for education as those students who do not have a disability.

IDEA is composed of four parts, the main two being part A and part B. Part A covers the general provisions of the law; Part B covers assistance for education of all children with disabilities; Part C covers infants and toddlers with disabilities, including children from birth to age three; and Part D consists of the national support programs administered at the federal level. Each part of the law has remained largely the same since the original enactment in 1975.

In practice, IDEA is composed of six main elements that illuminate its main points. These six elements are: Individualized Education Program (IEP); Free and Appropriate Public Education (FAPE); Least Restrictive Environment (LRE); Appropriate Evaluation; Parent and Teacher Participation; and Procedural Safeguards. To go along with those six main elements, there are also a few other important components that tie into IDEA: Confidentiality of Information, Transition Services, and Discipline. Throughout the years of IDEA's being reauthorized, these components have become key concepts when learning about IDEA.

Congress reauthorized the IDEA in 2004 and most recently amended the IDEA through the Every Student Succeeds Act, in December 2015. In this Act, Congress states: *“Disability is a natural part of the human experience and in no way diminishes the right of individuals to participate in or contribute to society. Improving educational results for children with disabilities is an essential element of our national policy of ensuring equality of opportunity, full participation, independent living, and economic self-sufficiency for individuals with disabilities”*.

Telecommunications Act - 1996

The Telecommunications Act of 1996 requires telecommunications products and services to be accessible according to guidelines developed by the Access Board. It covers a broad range of products, including telephones, cellular phones, pagers, and fax machines. The Federal Communications Commission (FCC) enforces requirements of the law.

Help America Vote Act – 2002

Each polling place must have at least one accessible voting machine by January 1, 2006 under the Help America Vote Act. The act (Public Law 107-252), which was signed by President Bush on October 29, 2002 also requires each piece of voting equipment bought with federal money on or after January 1, 2007 to be accessible.

ADA and The Rehabilitation Act Enforcement and Compliance

Private parties may file lawsuits to enforce their rights under Title II of the ADA. The remedies available are the same as under Section 504 of the Rehabilitation Act. There are eight administrative agencies designated to handle complaints filed under Title II. These are:

- Department of Agriculture
- Department of Education
- Department of Health and Human Services
- Department of Housing and Urban Development
- Department of Interior
- Department of Justice
- Department of Labor
- Department of Transportation

Individuals may file a complaint with the appropriate administrative agency or with any federal agency that provides financial assistance to the program in question. Complaints may also be filed with the Department of Justice who will refer the complaint to the appropriate agency.

The address for the Department of Justice is:

Disability Rights Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

Complaints should be in writing, signed by the complainant or an authorized representative, and should contain the complainant's name, address, and describe the public entities discriminatory action.

The Massachusetts Office on Disability has also taken a more active role in recent years in enforcing both MA 521 CMR and the Americans with Disabilities Act. Complaints may also be filed with the Office on Disability who will investigate and determine the appropriate action.

The address and contact information for the Office on Disability is:

Massachusetts Office on Disability
One Ashburton Place-Room 1305
Boston, MA 02108
Telephone No.: 617.727.7440
Fax No.: 617.727.0965

For technical assistance, the following can be contacted:

Institute of Human Centered Design at <https://www.humancentereddesign.org>
New England ADA Center at <https://www.newenglandada.org>
Center for Living & Working, Inc. at <https://www.centerlw.org>

IV. 521 CODE OF MASSACHUSETTS REGULATIONS ARCHITECTURAL ACCESS BOARD (MGL C. 22, S. 13a)

Section 521 of the Code of Massachusetts Regulations, "521 CMR: Architectural Access Board" is a specialized section of the State Building Code which provides the actual construction standards and specifications which must be adhered to for work performed on "public" buildings (see definition of public building in 521 CMR) in the Commonwealth of Massachusetts. The purpose of 521 CMR is to make public buildings and facilities accessible to, functional for, and safe for use by persons with disabilities. It is the intent of 521 CMR to provide persons with disabilities full, free and safe use of all buildings and facilities so that all such persons may have the educational, living and recreational opportunities necessary to be as self-sufficient as possible and to assume full responsibilities as citizens.

The Massachusetts Architectural Access Board (MAAB) is a regulatory agency whose mandate, as established under M.G.L. c.22 S13A, is to develop and enforce regulations pertaining to public access. The MAAB also decides on variance requests, issues advisory opinions, and makes decisions on complaints. Local building inspectors are responsible for enforcement of the provisions of 521 CMR.

Jurisdiction of 521 CMR

All additions to, reconstruction, remodeling, and alterations or repairs of existing public buildings, which require a building permit or which are so defined by a state or local inspector, shall be governed by those applicable sections of 521 CMR.

If the work being performed amounts to less than 30% of the full and fair cash value of the building and

- a) the work costs less than \$100,000, then only the work being performed is required to comply with 521 CMR; or
- b) the work costs \$100,000 or more, then the work being performed is required to comply and an accessible entrance, toilet, telephone and drinking fountain (if toilets, telephones and drinking fountains are provided) are also required.

If the work performed amounts to 30% or more of the full and fair cash value of the building, the entire building is required to comply with 521 CMR. Where the cost of constructing an addition to a building amounts to 30% or more of the full and fair cash value of the existing building, both the addition and the existing building must be fully accessible.

A historic building or facility that is listed or is eligible for listing in the National or State Register of Historic Places or is designated as historic under appropriate state or local bylaws may be granted a variance by the MAAB to allow alternate accessibility.

The MAAB Regulations also address various circumstances involving change in use, work performed over a period of time, multiple uses of one building, outdoor facilities, temporary structures, security structures and non-occupiable spaces. For more information on these areas, the administrative process (variances, complaints, hearings) as well as specific architectural requirements, reference to 521 CMR should be made.

V. ALTERATIONS TO HISTORIC PROPERTIES

ADA 2010 Standards

There are exceptions for alterations to qualified historic buildings and facilities for accessible routes (206.2.1 Exception 1 and 206.2.3 Exception 7); entrances (206.4 Exception 2); and toilet facilities (213.2 Exception 2). When an entity believes that compliance with the requirements for any of these elements would threaten or destroy the historic significance of the building or facility, the entity should consult with the State Historic Preservation Officer. If the State Historic Preservation Officer agrees that compliance with the requirements for a specific element would threaten or destroy the historic significance of the building or facility, use of the exception is permitted.

Public entities have an additional obligation to achieve program accessibility under the Department of Justice ADA regulations (See 28 CFR 35.150). These regulations require public entities that operate historic preservation programs to give priority to methods that provide physical access to individuals with disabilities. If alterations to a qualified historic building or facility to achieve program accessibility would threaten or destroy the historic significance of the building or facility, fundamentally alter the program, or result in undue financial or administrative burdens, the Department of Justice ADA regulations allow alternative methods to be used to achieve program accessibility. In the case of historic preservation programs, such as an historic house museum, alternative methods include using audio-visual materials to depict portions of the house that cannot otherwise be made accessible. In the case of other qualified historic properties, such as an historic government office building, alternative methods include relocating programs and services to accessible locations. The Department of Justice ADA regulations also allow public entities to use alternative methods when altering qualified historic buildings or facilities in the rare situations where the State Historic Preservation Officer determines that it is not feasible to provide physical access using the exceptions permitted in Section 202.5 without threatening or destroying the historic significance of the building or facility. See 28 CFR 35.151(d).

Massachusetts 521 CMR

A historic building or facility that is listed or is eligible for listing in the National or State Register of Historic Places or is designated as historic under appropriate state or local laws may be granted a variance by the Architectural Access Board to allow alternate accessibility. If a variance is requested on the basis of historical significance, then consultation with the Massachusetts Historical Commission is required in order to determine whether a building or facility is eligible for listing or listed in the National or State Register of Historic Places. The Massachusetts Historical Commission may request a copy of the proposed variance request and supporting documentation to substantiate the variance request and its effect on historic resources. A written statement from the Massachusetts Historical Commission is required with the application for a variance.

VI. ELECTRIC VEHICLE (EV) CHARGING STATIONS

Although neither 521 CMR nor the 2010 ADA Standards specifically address EV charging stations, the Massachusetts Architectural Access Board (AAB) has issued an advisory opinion on this matter and the U.S. Department of Energy (DOE) has issued guidance on complying with ADA requirements as it pertains to EV charging station installation. *Please note that AAB and Federal guidance pertaining to clear widths and reach range vary according to the respective regulation or standard. The stricter of the two would apply.*

Massachusetts Architectural Access Board

The AAB's advisory opinion was in response to the number of "accessible" EV chargers required at public places of assembly as specified in 521 CMR 14.1. The AAB noted that although EV charging stations do not have to be reserved for persons with disabilities, stations should comply with 521 CMR 6.00 (Space Allowance and Reach Range), 521 CMR 20.00 (Accessible Route), and 521 CMR 39.00 (Controls). The AAB also noted that strict enforcement of its regulations with respect to EV charging stations may result in excessive and unreasonable costs without substantial benefit to persons with disabilities. Therefore, variance requests would not only be considered, but in fact, encouraged. However, the AAB noted that in considering such requests, reduced compliance would be more in terms of requiring only 5%, but not less than one (1) EV charging station to be accessible. The AAB further noted that all variance requests would be viewed upon on a case-by-case basis.

U.S. Department of Energy

In formally issued guidance, the DOE notes that although the ADA does not provide design standards for EV charging stations, several industry studies and EV planning guides do. In addition, several plans developed under the DOE's Clean Cities EV Community Readiness projects describe best practices for installing ADA compliant charging stations. When designing EV charging stations, accessibility considerations should include ease of use, adequate space for exiting and entering the vehicle, unobstructed access to the charging station, free movement around the charging station and connection point to the vehicle, as well as clear paths and close proximity to any building entrances. Specific guidance and recommendations are as follows:

Parking Stall	Minimum 10 feet (car) to 13 feet (van) wide
Accessible Route Width	Minimum 3 feet' wide on both sides of the vehicle space that connects To the charging station (4 feet under 521 CMR) as well as in front of the charging station (2.5 feet x 4 feet under 521 CMR)
Slopes	No more than 2% in all directions
Reach Range	No more than 4 feet above ground level
Controls	Operable with one hand and not requiring grasping, pinching, or twisting of the wrist and no more than 5 lbs. of operating force
Other Considerations	Provide bollards or curb stops to prevent vehicle obstruction of the accessible clear space in front of the charging station

VII. EMERGENCY PREPAREDNESS

Ensuring that local government emergency preparedness and response programs are accessible to people with disabilities is a critical component and requirement of the Americans with Disabilities Act.

The municipality's designated staff or department responsible for emergency planning or response activities, should involve people with disabilities in identifying needs and evaluating effective emergency management practices. Issues that have the greatest impact on people with disabilities include:

- notification
- evacuation
- emergency transportation
- sheltering
- access to medications, refrigeration, and back-up power
- access to their mobility devices or service animals while in transit or at shelters; and,
- access to information.

Notification

In planning for emergency services, the municipality should consider the needs of people who use mobility aids such as wheelchairs, scooters, walkers, canes or crutches, or people who have limited stamina. Plans also need to include people who use oxygen or respirators, people who are blind or who have low vision, people who are deaf or hard of hearing, people who have a cognitive disability, people with mental illness, and those with other types of disabilities. Many traditional emergency notification methods are not accessible to or usable by people with disabilities. People who are deaf or hard of hearing cannot hear radio, television, sirens, or other audible alerts. Those who are blind or who have low vision may not be aware of visual cues, such as flashing lights. Warning methods should be developed to ensure that all citizens will have the information necessary to make sound decisions and take appropriate, responsible action. Often, using a combination of methods will be more effective than relying on one method alone. For instance, combining visual and audible alerts will reach a greater audience than either method would by itself.

Provide ways to inform people who are deaf or hard of hearing of an impending disaster if the municipality uses emergency warning systems such as sirens or other audible alerts. When the electric power supply is affected, it may be necessary to use several forms of notification. These might include the use of telephone calls, auto-dialed TTY (teletypewriter) messages, text messaging, E-mails, and even direct door-to-door contact with pre-registered individuals. Also, the municipality should consider using open-captioning on local TV stations in addition to incorporating other innovative uses of technology into such procedures, as well as lower-tech options such as dispatching qualified sign language interpreters to assist in broadcasting emergency information provided to the media

Evacuation

Individuals with disabilities will face a variety of challenges in evacuating, depending on the nature of the emergency. People with a mobility disability may need assistance leaving a building without a working elevator. Individuals who are blind or who have limited vision may no longer be able to independently use traditional orientation and navigation methods. An individual who is deaf may be trapped somewhere unable to communicate with anyone because the only communication device relies on voice. Procedures

should be in place to ensure that people with disabilities can evacuate the physical area in a variety of conditions and with or without assistance. The municipality should adopt policies to ensure that its community evacuation plans enable people with disabilities, including those who have mobility, vision, hearing, or cognitive disabilities, mental illness, or other disabilities, to safely self-evacuate or to be evacuated by others. Some communities are instituting voluntary, confidential registries of persons with disabilities who may need individualized evacuation assistance or notification. If this municipality opts to maintain such a registry, have procedures in place to ensure its voluntariness, guarantee confidentiality controls, and develop a process to update the registry. Also consider how best to publicize its availability. Whether or not a registry is used, the plan should address accessible transportation needs for people who use wheelchairs, scooters, or other mobility aids as well as people who are blind or who have low vision.

The municipality should also identify accessible modes of transportation that may be available to help evacuate people with disabilities during an emergency. For instance, some communities have used lift-equipped school or transit buses to evacuate people who use wheelchairs during floods. Both public and private transportation may be disrupted due to overcrowding, because of blocked streets and sidewalks, or because the system is not functioning at all. The movement of people during an evacuation is critical, but many people with disabilities cannot use traditional, inaccessible transportation.

Sheltering

The municipality should survey its shelters for barriers to access for persons with disabilities. For instance, if a particular high school gymnasium is being considered as part of a sheltering plan, early in the process the municipality should examine its parking, the path to the gymnasium, and the toilets serving the gymnasium to make sure they are accessible to people with disabilities. When disasters occur, people are often provided safe refuge in temporary shelters. Some may be located in schools, office buildings, tents, or other areas. Historically, great attention has been paid to ensuring that those shelters are well stocked with basic necessities such as food, water, and blankets. However, many of these shelters have not been accessible to people with disabilities. Individuals using a wheelchair or scooter have often been able somehow to get to the shelter, only to find no accessible entrance, accessible toilet, or accessible shelter area. Until all emergency shelters have accessible parking, exterior routes, entrances, interior routes to the shelter area, and toilet rooms serving the shelter area; the municipality should identify and widely publicize to the public, including persons with disabilities and the organizations that serve them, the locations of the most accessible emergency shelters.

Shelter staff and volunteers are often trained in first aid or other areas critical to the delivery of emergency services, but many have little, if any, familiarity with the needs of people with disabilities. In some instances, people with disabilities have been turned away from shelters because of volunteers' lack of confidence regarding the shelter's ability to meet their needs. Generally, people with disabilities may not be segregated or told to go to "special" shelters designated for their use. They should ordinarily be allowed to attend the same shelters as their neighbors and coworkers.

Consider inviting representatives of group homes and other people with disabilities to meet with the municipality as part of its routine shelter planning. Discuss with them which shelters they would be more likely to use in the event of an emergency and what, if any, disability-related concerns they may have while sheltering. Develop site-specific instructions for volunteers and staff to address these concerns.

Access to Medications, Refrigeration, and Back-up Power

Individuals whose disabilities require medications, such as certain types of insulin that require constant refrigeration, may find that many shelters do not provide refrigerators or ice-packed coolers. Individuals who use life support systems and other devices rely on electricity to function and stay alive and, in many cases, may not have access to a generator or other source of electricity within a shelter. Ensure that a reasonable number of emergency shelters have back-up generators and a way to keep medications refrigerated (such as a refrigerator or a cooler with ice). These shelters should be made available on a priority basis to people whose disabilities require access to electricity and refrigeration, for example, for using life-sustaining medical devices, providing power to motorized wheelchairs, and preserving certain medications, such as insulin, that require refrigeration. The public should be routinely notified about the location of these shelters. In addition, if the municipality chooses to maintain a confidential registry of individuals needing transportation assistance, this registry could also record those who would be in need of particular medications. This will facilitate planning priorities.

Access to Mobility Devices or Service Animals While in Transit or at Shelters

Many shelters have a “no pets” policy and some mistakenly apply this policy to exclude service animals such as guide dogs for people who are blind, hearing dogs for people who are deaf, or dogs that pull wheelchairs or retrieve dropped objects. When people with disabilities who use service animals are told that their animals cannot enter the shelter, they are forced to choose between safety and abandoning a highly trained animal that accompanies them everywhere and allows them to function independently. Adopt procedures to ensure that people with disabilities who use service animals are not separated from their service animals when sheltering during an emergency, even if pets are normally prohibited in shelters. While a municipality cannot unnecessarily segregate persons who use service animals from others, the municipality may consider the potential presence of persons who, for safety or health reasons, should not be with certain types of animals.

Access to Information

People who are deaf or hard of hearing may not have access to audible information routinely made available to people in the temporary shelters. Individuals who are blind or who have low vision will not be able to use printed notices, advisories, or other written information. Adopt procedures to provide accessible communication for people who are deaf or hard of hearing and for people with severe speech disabilities. Train staff on the basic procedures for providing accessible communication, including exchanging notes or posting written announcements to go with spoken announcements. Train staff to read printed information, upon request, to persons who are blind or who have low vision.

Leaving the Shelter and Returning Home

The needs of individuals with disabilities should be considered as well when they leave a shelter or are otherwise allowed to return to their home. If a ramp has been destroyed, an individual with a mobility impairment will be unable to get into and out of the house. In case temporary housing is needed past the stay at the shelter, the municipality’s emergency response plan could identify available physically accessible short-term housing, as well as housing with appropriate communication devices, such as TTY’s, to ensure individuals with communication disabilities can communicate with family, friends, and medical professionals. Identify temporary accessible housing (such as accessible hotel rooms within the community or in nearby communities) that could be used if people with disabilities cannot immediately return home after a disaster if, for instance, necessary accessible features such as ramps or electrical systems have been damaged.

VIII. ADA SERVICE ANIMALS

Beginning on March 15, 2011, only dogs are recognized as service animals under Titles II and III of the ADA. A service animal is a dog that is individually trained to do work or perform tasks for a person with a disability. Generally, Title II and Title III entities must permit service animals to accompany people with disabilities in all areas where members of the public are allowed to go.

Definition of Service Animal

Service animals are defined as dogs that are individually trained to do work or perform tasks for people with disabilities. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability.

Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA. Emotional support animals, comfort animals, and therapy dogs are not service animals under Title II and Title III of the ADA. Other species of animals, whether wild or domestic, trained or untrained, are not considered service animals either. Emotional support animals are different than service animals as they are trained to follow basic commands, but unlike service animals, are not trained for a specific task to assist a person with a disability. It does not matter if a person has a note from a doctor that states that the person has a disability and needs to have the animal for emotional support. A doctor's letter does not turn an animal into a service animal. People with emotional support animals might not have any physical disabilities or outward signs of why they need an emotional support animal. As emotional support animals are not covered by the ADA, they are not allowed in public places such as restaurants and stores.

This definition does not affect or limit the broader definition of "assistance animal" under the Fair Housing Act or the broader definition of "service animal" under the Air Carrier Access Act. Some State and local laws also define service animal more broadly than the ADA does. Information about such laws can be obtained from the MA State Attorney General's Office.

Where Service Animals Are Allowed

Under the ADA, State and local governments, businesses, and nonprofit organizations that serve the public generally must allow service animals to accompany people with disabilities in all areas of the facility where the public is allowed to go. For example, in a hospital it usually would be inappropriate to exclude a service animal from areas such as patient rooms, clinics, cafeterias, or examination rooms. However, it may be appropriate to exclude a service animal from operating rooms or burn units where the animal's presence may compromise a sterile environment.

Service Animals Must Be Under Control

A service animal must be under the control of its handler. Under the ADA, service animals must be harnessed, leashed, or tethered, unless the individual's disability prevents using these devices or these devices interfere with the service animal's safe, effective performance of tasks. In that case, the individual must maintain control of the animal through voice, signal, or other effective controls.

Inquiries, Exclusions, Charges, and Other Specific Rules Related to Service Animals

- When it is not obvious what service an animal provides, only limited inquiries are allowed. Staff may ask two questions: (1) is the dog a service animal required because of a disability, and (2) what work or task has the dog been trained to perform. Staff cannot ask about the person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task.
- Allergies and fear of dogs are not valid reasons for denying access or refusing service to people using service animals. When a person who is allergic to dog dander and a person who uses a service animal must spend time in the same room or facility, for example, in a school classroom or at a homeless shelter, they both should be accommodated by assigning them, if possible, to different locations within the room or different rooms in the facility.
- A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken. When there is a legitimate reason to ask that a service animal be removed, staff must offer the person with the disability the opportunity to obtain goods or services without the animal's presence.
- Establishments that sell or prepare food must generally allow service animals in public areas even if state or local health codes prohibit animals on the premises.
- People with disabilities who use service animals cannot be isolated from other patrons, treated less favorably than other patrons, or charged fees that are not charged to other patrons without animals. In addition, if a business requires a deposit or fee to be paid by patrons with pets, it must waive the charge for service animals.
- If a business such as a hotel normally charges guests for damage that they cause, a customer with a disability may also be charged for damage caused by himself or his service animal.
- Staff are not required to provide care for or supervision of a service animal.

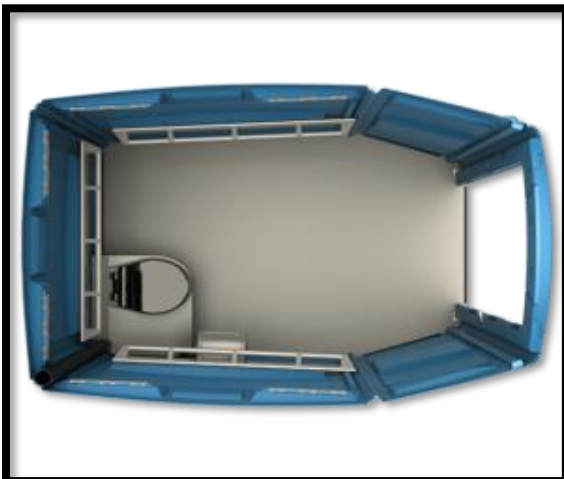
Miniature Horses

In addition to the provisions about service dogs, the Federal Department of Justice's ADA regulations have a separate provision about miniature horses that have been individually trained to do work or perform tasks for people with disabilities. (Miniature horses generally range in height from 24 inches to 34 inches measured to the shoulders and generally weigh between 70 and 100 pounds.) Entities covered by the ADA must modify their policies to permit miniature horses where reasonable. The regulations set out four assessment factors to assist entities in determining whether miniature horses can be accommodated in their facility. The assessment factors are (1) whether the miniature horse is housebroken; (2) whether the miniature horse is under the owner's control; (3) whether the facility can accommodate the miniature horse's type, size, and weight; and (4) whether the miniature horse's presence will not compromise legitimate safety requirements necessary for safe operation of the facility.

IX. ADA COMPLIANT PORTABLE TOILETS

If the town provides portable toilets for short-term events or for seasonal use, then they must be “ADA Compliant”. An important distinction to note is that “ADA Compliant” is not synonymous with “Wheelchair Accessible.” Wheelchair Accessible usually indicates a ramped or ground level entrance with a wide enough door for a wheelchair to gain entry. Clearances; setbacks; and dispenser, grab bar, and water closet heights do not necessarily meet ADA or 521 CMR Standards. “ADA Compliant”, however, generally means reinforced construction; ramped or ground level and wheelchair accessible entrance; spring loaded magnetic door that closes automatically; reinforced grab bars; dispensers, grab bars, and the water closet at the proper height and near, far and front setbacks; compliant door hardware; and enough interior space for a wheelchair to make a 360 degree turn that all fully comply with the 2010 ADA Standards and/or 521 CMR, whichever is more stringent. Illustrative examples of an “ADA Compliant” portable toilet are shown below.

Representative Examples of an ADA Compliant Portable Toilet



X. ADA SELF-EVALUATION

All municipalities must perform a self-evaluation of its policies, practices, programs, procedures, services, etc. (including communication) to determine compliance under the ADA. Municipalities must make reasonable modifications to these policies, programs, services, etc. to avoid discrimination against individuals with disabilities unless such modification would result in a fundamental alteration in the nature of that program or service.

Although the ADA only requires local governments with 50 or more employees to take additional, specific measures, it is strongly encouraged that even smaller municipalities with less than 50 employees follow the same process to ensure overall compliance with the ADA. These additional measures include 1) the designation of an individual to coordinate ADA compliance, 2) the development of a transition plan, and 3) the development of an ADA grievance procedure.

All local governmental entities were required to complete a self-evaluation of their facilities, programs, policies, and practices by January 26, 1993. The self-evaluation identifies and corrects those policies and practices that are inconsistent with Title II's requirements. Self-evaluations should consider all of a municipality's programs, activities, and services, as well as the policies and practices that it has put in place to implement its various programs and services. Remedial measures necessary to bring the programs, policies, and services into compliance with Title II should be specified - including, but not limited to 1) relocation of programs to accessible facilities; 2) offering programs in an alternative accessible manner; 3) structural changes to provide program access; 4) policy modifications to ensure nondiscrimination; and 5) auxiliary aids needed to provide effective communication.

Under Title II of the ADA, a municipality is required to:

1. Designate a responsible employee as ADA Coordinator.
2. Adopt and distribute a Public Notice on the municipality's ADA policies and procedures.
3. Adopt, distribute and/or post an ADA Grievance Procedure.
4. Modify, maintain, and update policies, procedures, and practices, including job descriptions and hiring practices, as required.
5. Provide Reasonable Accommodations to qualified individuals with disabilities.
6. Maintain and upkeep accessible features.
7. Provide auxiliary aids and services to ensure effective communications to those with disabilities.

It is also recommended under the provisions of MGL C40 s8J that towns establish a 5 to 13 member Commission on Disability. This can be achieved through acceptance of *"the provisions of Massachusetts General Laws Chapter 40, Section 8J relative to the establishment of the municipal Commission on Disability"*.

A self-evaluation was conducted of those municipal departments that offer programs or provides services to the general public. A memo and accompanying survey form (**See Appendix A**) was sent to all departments, boards, commissions and individuals who were identified as either providing a service or program to area residents.

Information from each survey response, along with supplemental department information was used to develop the self-evaluation. Together with the structural assessment and policy recommendations, an accessibility compliance plan for the Town of Princeton is achieved.

Commission on Disability (MGL C40 s8J)

Massachusetts General Law Chapter 40 Section 8J gives municipalities the authority to establish commissions.

The function of a disabilities commission is to:

- Advise and assist municipal officials in ensuring compliance with federal and state disability laws;
- Review policies and activities of municipal departments and boards as they affect persons with disabilities;
- Provide information, referral, advocacy and technical assistance to individuals, businesses and organizations in all matters pertaining to disability;
- Coordinate the activities of other local groups organized to meet the needs of persons with disabilities.

Commissions consist of no less than five and no more than nine members chosen by the Board of Selectman or Town Manager (in a town) and the Mayor or City Manager (in a city). The majority must be persons with disabilities and one may be a member of the immediate family of a person with a disability. In addition, one member must be an elected or appointed municipal official.

Princeton Self-evaluation. Commissions on Disability are established by vote of Town Meeting to promote the inclusion and integration of persons with disabilities in the activities, services and employment opportunities or in the community. MGL Chapter 40 Section 8J gives municipalities the authority to establish a Commission on Disability.

The Town of Princeton does not have an active Commission on Disability. As of 5/12/20, the Massachusetts Office on Disability has no Commission on Disability listed on its Municipal Commission on Disability Listing for the Town of Princeton. In addition, there is no evidence of the Town’s adoption of Chapter 40 Section 8J for the establishment of a Commission on Disability or a Disability Committee.

Recommendation
It is recommended that the Town, through town meeting action, accept the provisions of MGL C40 S8J to establish a Commission on Disability and allow the Select Board to appoint a minimum of 5 members to serve on this board.

The role of the ADA Coordinator is extensive and includes:

- ensuring overall compliance with the ADA
- notification and outreach
- addressing grievances as filed under the town's established grievance policy
- ensuring timely implementation of the town's transition plan
- on-going assessment of programs and services
- serving as a technical advisor and resource on accessibility matters.

In order for a municipality to successfully comply with the intent of the ADA, it is critical that its ADA Coordinator take a pro-active role in performing his or her role. It is not adequate for an ADA Coordinator to serve only as a decision-making authority under the town's ADA grievance procedure. The ADA Coordinator must monitor daily and long-term compliance with the town's ADA policies, procedures, and plans. This includes ADA compliance and assurance pertaining to postings, employment practices, education, dissemination of literature to the public and private businesses, daily activities and practices of town government, insuring that facilities are properly maintained, serving as a town-wide resource on accessibility matters and issues, and staying current on changes in state and federal law, regulations, programs, policies, interpretations, and decisions which affect persons with disabilities.

Princeton Self-evaluation. Town Administrator Sherry Patch is listed as the ADA Coordinator on the Town's website in the "Departments Section" under Americans With Disabilities (ADA).

As of 8/31/2018, the Massachusetts Office on Disability lists Rich Breagy, Building Inspector/Zoning Enforcement Officer/ADA Coordinator in its Municipal ADA Coordinator's Listing.

Recommendation

It is recommended that the appointment and listing of this position be added to the town's website under "Department" and posted in the town hall. It also recommended that the Town provide to the Massachusetts Office on Disability the name/title of the current ADA Coordinator.

Public Notice (ADA Title II - 35 CFR Part 35.106)

Title II of the ADA requires that public entities notify participants of its non-discrimination policies. Similarly, there should also be notification of non-discrimination policies relative to persons with disabilities in brochures and other materials provided to the public and on a town's website. All Notices should also include the ADA Coordinator's name and contact information.

Princeton Self-evaluation. Commendably, the Town has created an Americans with Disabilities (ADA) webpage on its website under "Departments" which includes a Notice of Rights inclusive of statements and information on modifications to policies and procedures, equal access to public meetings, effective communication, and ADA Coordinator contact information.

Six out of ten ADA Self-Evaluation survey respondents answered “yes” to the question “Are staff aware it may be necessary to modify program policies or practices to enable people with disabilities to participate in and benefit from the programs?” The remaining responses were either “N/A” or “no policies exist”. Two out of ten survey responses to the question “Is the public informed that these programs/services are prepared to make reasonable modifications?” were “yes”. The remainder of the responses were either “no, N/A, I don’t think so, or not well enough”.

Recommendation

Based on that noted above, the Town should include ADA training for new town employees and hold a training for the existing staff in light of the “N/A” responses to the above-mentioned questions. .

A town must provide notice to the public about its ADA obligations and about accessible facilities and services in the town. The notice must inform the public about the ADA's nondiscrimination requirements. It may also describe how the public or employees may contact specific town officials about problems with accessibility and the need for effective communication. The information must be accessible to the public, including people who have disabilities that affect communication, such as blindness, low vision, deafness, and hearing loss. Although no specific method is required to reach the public, notice can be provided in more than one format and by using more than one type of media, such as the Town's website, print, radio, or television. Although the Town does have a Public Notice statement, a single and consistent Public Notification Policy should be in place for all town functions, activities, departments, and committees. **A sample slightly more expansive Public Notice is provided for consideration as Appendix B.**

ADA Grievance Procedure (ADA Title II - 35 CFR Part 35.107 (b))

The ADA Title II regulations require that all municipalities with 50 or more employees (regional school systems must prorate the number of employees for each member community) adopt and publish grievance procedures. The purpose is to encourage local resolution of complaints concerning employment, services, programs and activities. It is important to note that complainants are not required to exhaust the municipality’s procedures before filing a federal complaint or taking court action.

The regulations do not stipulate time frames or procedures for the grievance procedure, however, the following are recommended:

- A detailed description of the procedures for submitting a complaint;
- A two-step review process which allows for appeal;
- Reasonable timeframes for review and resolution of the complaint;
- Good record keeping for all complaints submitted and documentation of steps taken toward resolution.

Princeton Self-evaluation. The Town does have a 2-level Grievance Procedure posted on the Town’s website under the Americans With Disabilities webpage. This policy was adopted by the

Board of Selectmen on August 25, 2020. This 2-level process involves the ADA Coordinator (Level 1) and Town Administrator (Level 2) with copies of the grievance to be provided to the Town's Commission on Disability. However, the Town Administrator also so serves as the ADA Coordinator so the process is flawed as Level 1 and Level 2 involve the same individual. In addition, the Town does not currently have a Commission on Disability. In addition, the grievance procedure is not posted any municipal buildings.

Recommendation

It is recommended that the Town modify the current grievance procedure to a 2-level process involving the ADA Coordinator/Town Administrator and the Select Board. The grievance procedure should be posted in municipal office buildings and on the Town's website. **A revised Grievance Procedure is provided as Attachment C.**

Policies/Procedures/Practices (ADA Title II - 35 CFR Part 35.130 (b)(7))

A municipality should have formal separate policies and procedures pertaining to the ADA and program accessibility, grievances, communications, equal opportunity and non-discrimination except when it comes to employment opportunities.

Princeton Self-evaluation. A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.

The Town of Princeton provides the following statement in the Americans With Disabilities webpage under Departments:

"Modifications to Policies and Procedures: The Town will make all reasonable modifications to policies and programs to ensure that persons with disabilities have an equal opportunity to enjoy all of its programs, services, and activities.

Equal Access to Public Meetings: All Town-sponsored public meetings and hearings must be held in locations that are accessible to persons with disabilities, including persons who use wheelchairs."

Self-evaluation Survey Responses

Six out of ten Self-Evaluation responses to the question "Are staff aware it may be necessary to modify program policies or practices to enable people with disabilities to participate in and benefit from the programs?" were either "staff are aware or "yes". Two responded with "N/A", one response was "I don't know", and the Building Department response to this Self-Evaluation survey question was "The Building Department does not have any program policies. Would it be necessary to modify any of our practices we would of course do so, however to date that has not been necessary while meeting with people regarding their projects or doing inspections".

Response to the survey question: “Is the public informed that these programs/services are prepared to make reasonable modifications?” varied extensively from “Yes”, “Yes to a degree”, “N/A”, “Not well enough”, and “If asked, we would.”

Four out of ten responses to the Self-Evaluation survey question: “Does the department/program have a formal or informal process for responding to requests for modifications?” were “No”. Two responses were “Yes” and “Yes to a degree”. The remaining four responses were either “Informal”, “Formal”, “I don’t know” or “No requests have been made”

Employment Postings

The following statement preceded the attached job description for the Town of Princeton Municipal Light Department (PMLD) :

“The Town of Princeton Municipal Light Department (PMLD) is accepting applications for the position of ACCOUNTANT/BOOKKEEPER/CUSTOMER SERVICE REP. This is a full-time position of 40 hours a week, with a wage range of \$22.00 to \$28.00 per hour, DOQ. Minimum qualifications include a High School Diploma and five years of experience; a Bachelor’s Degree is preferred; or any equivalent combination of education and experience. Cover letter and resume, should be submitted to the PMLD General Manager by mail at PO Box 247, Princeton, MA 01541 or dropped off at the PMLD office located at 168 Worcester Road, Princeton, MA. The Town of Princeton Municipal Light Department is an Equal Opportunity Employer.”

The PMLD Administrative Assistant/Customer Service Billing Associate and Town Clerk had a similar job-posting paragraph with the Equal Opportunity Employer statement preceding the actual job description.

The following statement appears at the top of the on-line town employment application:

“An Equal Opportunity Employer. The Town of Princeton is an equal opportunity employer and does not discriminate against any applicant because of race, color, religion, sex, marital status, ancestry, national origin, age, disability, sexual orientation, gender identification, pregnancy, or any other class protected by federal, state or local law. Any person who needs assistance in fully participating in the application process should contact the Town Administrator.”

Recommendation

There should be consistency in all departmental policies, procedures, and practices including the posting of employment ads, actual job descriptions, and reasonable accommodations to potential and existing employees. **(See Reasonable Accommodations)**. Information of this nature should be posted in appropriate public buildings, and on the town’s website.

In the physical requirements/work location portion of job descriptions, the following paragraph or similar language should be provided:

“The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions”.

Reasonable Accommodations (ADA Title II - 35 CFR Part 35.140 (a))

Under the ADA, a person is considered a qualified individual with a disability if s/he can perform essential functions of the job with or without a reasonable accommodation. Although the ADA does not require an employer to have job descriptions, they can be used as evidence of the essential functions of the job. Job descriptions should be up-to-date and should differentiate between the essential and the marginal duties of the position.

Princeton Self-evaluation. Based on what was available for review, the following are more specific comments and findings.

Town of Princeton Job Descriptions

Forty job descriptions were provided by the Town as part of this evaluation. Only one of these (Revised General Manager of PMLD job description) had the following reasonable accommodations language under Physical Requirements: *“Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions”*.

Essential Functions

All forty submitted job descriptions had the following statement either in regular or italics font:

“The essential functions or duties listed below are intended only as illustrations of the various type of work that may be performed. The omission of specific statements of duties does not exclude them from the position if the work is similar, related, or a logical assignment to the position.”

No job descriptions had Reasonable Accommodation language under Essential Functions and only one, (Revised General Manager of PMLD job description) had this language under Physical Requirements.

Physical Skills

Below are examples of the physical skills wording in the job descriptions that were provided for the Self-evaluation component of this ADA Plan.

Highway General Foreman. *“Work requires moderate intermittent physical strength and effort daily, such as lifting heavy objects, carrying the object(s) and stacking them or moving them. In addition, pulling, pushing, standing or walking for the full workday may also be involved. A great deal of physical effort must be exerted at this level”*. In this example, it is not unreasonable to stand and walk considering what the job entails.

Office Manager. *“Minimal physical demands are required to perform most of the work. The work principally involves sitting, with intermittent periods of stooping, walking, and standing. May be required to lift objects such as files, boxes of papers, office supplies, and office equipment weighing up to 30 pounds”*. In this example, it is unreasonable to have standing and walking as part of the physical requirements because it is an office job where these two abilities are not necessary.

Inspector of Buildings/Zoning Enforcement Officer. The following appears in the KNOWLEDGE, ABILITY, AND SKILLS section of the Job description: *“Knowledge of Uniform Building Code, Uniform Mechanical Code, Uniform Plumbing Code, National Electric Code, State Building Regulations and related codes, ordinances and regulations; Federal and Town codes and ordinances related to private and public construction inspection”*. Even though State Building Regulations is listed under “Knowledge”, it is highly recommended that Section 521 of the Code of Massachusetts Regulations (CMR) be included here as well.

Reasonable Accommodation Language

Reasonable Accommodation language should be included under Essential Functions or Physical and Mental Requirements or Physical Demands or Requirements. Below are two samples of Reasonable Accommodation language:

“Physical and Mental Requirements: The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the position’s essential functions.”

“Physical Requirements: The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.”

Job Descriptions

Job descriptions should use clear, concise, non-technical language. In defining essential functions, the description should focus on the outcome and not the process to achieve that outcome. For example, if a position requires lifting supplies onto a truck, the description should read, “the ability to lift supplies weighing up to 35 lbs. to a height of 4 feet and into a truck bed” and not “the ability to manually lift supplies weighing 35 lbs”. It also better to use words that describe the job requirements as opposed to words that focus on specific abilities (i.e. – hearing, speaking, walking). The following table provides preferred wording that does not restrict the physical requirements of positions.

Physical Requirements Suggested Wording

Stand or sit	Stationary position
Walk	Move, traverse
Use hands and fingers	Operate, use
Climb Stairs or ladders	Ascend, descend
See	Detect, determine, identify recognize, observe
Taste/smell	Detect, distinguish, determine
Carry/lift	Move, transport, position

Under Title II of the ADA, reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions of his/her job. **A sample Reasonable Accommodation Policy and Request Form for adoption by the Select Board is provided as Appendix D and E.**



Maintenance (ADA Title II – 28 CFR Part 35.133 (a))

A municipality must maintain in operable working condition those features that are necessary to provide access to services, programs, and activities. This includes door closers, sidewalks, parking space signage and striping, and ramps, among many other things. Isolated or temporary interruptions in service or access are permitted for maintenance or repairs. However, this is deemed as short-term and not of a semi-permanent or seasonal nature.

When weather conditions such as snow and ice limit or prevent access to services, programs, and activities to or within a facility, access must be maintained to ensure that those programs are accessible. Maintenance of accessible features includes the removal of snow from accessible parking spaces; curb ramps, accessible routes of travel, and entrances. Although temporary interruptions in services due to bad weather are expected, alternate services must be provided if snow and ice cannot be cleared in a timely manner. Snow removal and removal of other obstructions within the accessible route of travel must be done to a minimum width of 36". Similarly, if an automatic door opener, elevator, lift or similar accessible-related device is not working properly and is denying access, repairs must be made in a timely manner. In the interim, alternative services must be provided.

Princeton Self-evaluation. During the facility assessments, a number of observations were made in direct violation of Title II. This included such items as:

- Storage of items in bathrooms or in accessible routes of travel reducing required maneuvering clearances and clear widths.
- Interior and exterior doors with excessive operating forces and closing speeds.
- Missing elements such as signage.
- Missing protective equipment or insulation on sink plumbing.
- Outside accessible routes of travel surfaces not maintained.
- Not maintaining a minimum 36 inches clearance of snow on outside accessible routes to a public building.

Recommendation
It is recommended that facilities be inspected regularly to ensure compliance with program accessibility and to initiate repairs and related actions as required.

Effective Communication, Auxiliary Aids and Services (ADA Title II – 28 CFR Part 35.160)

Local governments must ensure effective communication with individuals with disabilities. To ensure that communications with individuals who have hearing, vision or speech impairments, municipal governments must provide appropriate auxiliary aids. The type of auxiliary aids or services necessary to ensure effective communication will vary according to the type of communication involved and the needs of the individual. Auxiliary aids include such services or devices as sign language interpreters, assistive listening headsets, television captioning and decoders, telecommunications devices for people who are deaf such as TDD's or video phones, use of 711 telephone interpreter service, readers, Brailled materials, documents on electronic format, audio recordings and large print materials. In addition, telephone

emergency services including 911 must provide direct access to individuals with speech and hearing impairments.

Municipal governments are not required to provide auxiliary aids or take any actions that would result in a fundamental alteration in the nature of a service, program, or activity or that will result in undue financial and administrative burdens. However, alternative auxiliary aids that do not result in a fundamental alteration or undue burden must be provided. For example, it is not necessary to provide sign language interpreters for all interactions with persons who are deaf or hard of hearing. Daily interaction may suffice through written notes or similar exchanges. However, public meetings, interrogations by local police officers, or similar technical interactions will most likely require interpreters or assistive listening systems. It is required that alternative auxiliary aids be available that does not result in financial or administrative burdens yet meet the needs of the individual with a disability.

Princeton Self-evaluation. The Town of Princeton has the following statement posted on their website in the Americans with Disabilities (ADA) webpage under “Departments”:

Effective Communication: Persons with disabilities who need either: (1) auxiliary aids and services for effective communication, or (2) written materials in alternative formats, or (3) reasonable modifications in policies and procedures, in order to access programs and activities of the Town of Princeton, are invited to make their needs known to program staff or to the Town’s ADA Coordinator. Requests should be made as soon as possible but no later than fourteen (14) days before a scheduled event.

The Self-Evaluation survey question “Briefly describe general office/service communications. Specifically, how is information disseminated and communicated? Are there assistive devices or auxiliary aids (i.e. TTY, TDD, sign language interpreter) which are used or available?” resulted in only one affirmative response from the Police Department. The Department stated that “*The station does not have any (auxillary aids, assistive devices), but our dispatch center in Holden has TTY capabilities*”.

All other survey respondents stated that their usual method of communication was via as mail, email, telephone, website, newsletter, or in person.

Auxiliary Aids

The town must ensure that accessibility and accommodations language appear on all meeting notices including contact information and the advance timeframe required to arrange for disability related and accommodations requests. In addition, it does not appear that the town has auxiliary aids such as TTY’s, TDD’s, or assistive listening systems.

Recommendation

If the Town of Princeton does not have a portable Assisted Listening System, then one should be considered for purchase and use as deemed appropriate for all town services and programs. It is also recommended that Princeton add the following to its meeting agendas: “*If you need auxiliary aids and services for effective communication (such as sign language interpreter, an assistive listening device or print material in digital format) or a reasonable modification in programs, services, or activities, contact the ADA Coordinator as soon as possible but no later than fourteen (14) days before the activity or event.*”

Virtual Meetings

In June 2020, the Massachusetts Office on Disability offered a guidance memo on “Accessible and Inclusive Virtual Trainings”. The memo reinforces the basic requirement that programs, services, and activities of government, including in person and virtual meetings/presentations, must be conducted in a way that provides equivalent access unless to do so presents a fundamental alteration. Providing reasonable accommodations and effective communication are critical components to achieving equal access. The following summarizes some of the highlights and key components of this memo.

Effective Communication. Effective Communication ensures that people with vision, hearing, or speech disabilities can communicate, receive, and convey information in a manner that is accessible to them. Entities must furnish auxiliary aids when needed to communicate effectively with people who have language-based disabilities. Examples of auxiliary aids for meetings/presentations may include accessible electronic documents that can be read with assistive technology, large print documents, American Sign Language (ASL) interpreters, and Communication Access Real-time Translation (CART) services. The entity that is hosting the event is responsible for providing ASL and CART along with other needed accessibility features.

Selecting a Platform. After determining which platforms meet an entity’s operational needs, the entity should consider selecting the platform that provides the highest level of accessibility. Consult with vendors and review their accessibility statements which offer insight into how various users with disabilities would interact with the platform. Find out how the system would work with CART, an ASL interpreter, or closed captioning or if a screen reader or strictly keyboard user could access features such as screenshare, chat, and video recording. If an entity has identified a platform that meets its operational objectives but has inaccessible features the entity should determine which barriers are likely to prevent access and whether those features are critical. If the identified barriers are not critical then the entity should avoid using those features during the meeting/presentation. For those components deemed to be critical but not accessible, the entity should explore alternative ways that a participant with a disability can effectively participate in the meeting/presentation.

Presentation Materials. To the extent possible, ensure that all presentation materials are accessible to and usable for people with disabilities including those using screen readers and other assistive technologies and those requiring large print. Since users of screen readers cannot read documents through a screen share and those using magnification may find that screen share video may be distorted with increased magnification, providing these materials in advance would allow these participants to better follow the discussion in real time. Information and communication technology must be usable by people with disabilities. How-to guidance as well as references to relevant laws, regulations, and standards to help comply with this requirement can be found through the following link:

<https://wiki.state.ma.us/display/assistivetechgroup/IT+Accessibility+home>.

Additionally, the Texas Governor's Committee on People with Disabilities have created learning modules on making Microsoft Office documents accessible to people with

disabilities. Access to these modules can be found through the following link: <https://gov.texas.gov/organization/disabilities/accessibledocs>.

Plan Ahead. Secure ASL interpreters and CART services in advance of the date of the meeting/presentation. These important communication services can easily be offered on a digital platform. The Massachusetts Commission for the Deaf and Hard of Hearing provides interpreting services and the information below will help you to schedule an interpreter:

- Request ASL Interpreting or CART
 - a. Online: <https://www.mcdhh.net/request/> i. Choose ASL Interpreting or CART under Service Information
 - b. Phone: 617-740-1600 VOICE and 617-740-1700 TTY
- Additional information on how to request an interpreter is available at <https://www.mass.gov/how-to/request-an-interpreter>.

Keep in mind that depending on the nature of the meeting, these services might be required regardless of whether an individual has specifically requested it (e.g. public meetings where there is no registration or invitee list). In instances where participants have been invited in advance, the invitation should include a directive to notify the entity holding the meeting/presentation to identify whether they require ASL or CART to participate. This can be included in the reasonable accommodation statement provided in the meeting notice or agenda.

Best Practices

- Do a trial run. If you have already identified employees who need to use accessible features of a platform, ask them to test it with you.
- Determine which features will be used in the meeting/presentation and include details about how to use those features on the meeting/presentation invitation or reminder. For example, provide a list of commonly used shortcut keys that can be used on the platform or any specific instructions that pertain to users of assistive technology.
- When sending a meeting reminder, include the link to CART so the user can access the meeting link and the link to the CART platform in one place.
- Send out accessible meeting materials in advance.
- Become familiar with the features of the platform, including the accessible features and share them with participants. This could include providing a link to CART in the chat window, offering a brief overview of how to interact with the platform at the beginning of the meeting/presentation, and providing these types of verbal instructions for the duration as features are being utilized.
- Utilize closed captioning features when and if available.

- If the meeting/presentation will be recorded, advise attendees at the start. Inform the CART reporter in advance if you want a copy of the transcription.
- When using ASL make sure that the video remains prominently visible onscreen throughout the meeting/presentation. Depending on the platform, this may require asking participants to turn off their video to ensure that the interpreter can be seen or possibly be displayed more prominently.
- If audio quality is an issue, consider requesting that participants turn off the video feature if it is not essential to participation.
- When using screenshare or presenting materials on screen, provide a verbal explanation of what is being displayed so that those participating by phone or those who are unable to see the document or review the materials with assistive technology will be better able to follow along.
- If you are planning on using a video as part of your training or presentation curriculum then it should have audio description or the visual aspects of the video should be described before or in between the dialogue of the video by a person on the training team.

Website Accessibility (Web Content Accessibility Guidelines 2.0 AA or Section 508 Standards). Title II of the Americans with Disabilities Act requires that local governments ensure that, when viewed in their entirety, the programs, services, and activities offered are equally available to people with disabilities. Websites of local governments are considered to be a “program” and should be accessible to the standards of the Web Content Accessibility Guidelines 2.0 AA or Section 508 Standards.

Many people with disabilities use assistive technology that enables them to use computers. Some assistive technology involves separate computer programs or devices such as screen readers, text enlargement software, and computer programs that enable people to control the computer with their voice. Other assistive technology is built into computer operating systems. For example, basic accessibility features in computer operating systems enable some people with low vision to see computer displays by simply adjusting color schemes, contrast settings, and font sizes. Operating systems enable people with limited manual dexterity to move the mouse pointer using key strokes instead of a standard mouse.

Poorly designed websites can create unnecessary barriers for people with disabilities. The following are common problems and solutions in website accessibility.

a) Images Without Text Equivalents. Persons with low vision often use screen readers and refreshable Braille displays to access information on a webpage. These technologies read text, however, they cannot translate “images” into speech or Braille. Images includes photographs, charts, color-coded information or other graphic elements on a webpage. The solution to this problem would be to add a line of HTML code to provide text for each image and graphic so that the user can understand what the image is.

b) Documents Are Not Posted In an Accessible Format. Municipalities will often post documents on their websites using Portable Document Format (PDF). However, PDF documents, or those in other image based formats, are often not accessible to blind people who use screen readers and people with low vision

who use text enlargement programs or different color and font settings to read computer displays. The solution would be to always provide documents in an alternative text-based format, such as HTML or RTF (Rich Text Format), in addition to PDF. Text-based formats are the most compatible with assistive technologies.

c) Specifying Colors and Font Sizes. Websites are often designed in a manner such that everything is exactly the same color, size and layout. However, because of one's disability, a person with low vision does not see web pages the same as other people. Some see only small portions of a computer display at one time. Others cannot see text or images that are too small. Still others can only see website content if it appears in specific colors. For these reasons, many people with low vision use specific color and font settings when they access the Internet – settings that are often very different from those most people use. For example, many people with low vision need to use high contrast settings, such as bold white or yellow letters on a black background. Others need just the opposite – bold black text on a white or yellow background. And, many must use softer, more subtle color combinations. Users need to be able to manipulate color and font settings in their web browsers and operating systems in order to make pages readable. Some web pages, however, are designed so that changing the color and font settings is impossible. The solution is to design websites so they can be viewed with the color and font sizes set in users' web browsers and operating systems. Users with low vision must be able to specify the text and background colors as well as the font sizes needed to see webpage content.

d) Videos and Other Multimedia Lack Accessible Features. Due to increasing bandwidth and connection speeds, videos and other multimedia are becoming more common on the websites of local governments. Today, some government entities use their websites to post training videos for their employees, feature automated slide shows of recent public events, and offer video tours of local attractions. These and other types of multimedia can present two distinct problems for people with different disabilities. People who are deaf or hard of hearing can generally see the information presented on web pages. However, a deaf person or someone who is hard of hearing may not be able to hear the audio track of a video. On the other hand, persons who are blind or have low vision are frequently unable to see the video images but can hear the audio track. The solution is to incorporate features that make them accessible to everyone. Provide audio descriptions of images (including changes in setting, gestures, and other details) to make videos accessible to people who are blind or have low vision. Provide text captions synchronized with the video images to make videos and audio tracks accessible to people who are deaf or hard of hearing.

e) Other Considerations When Developing Websites Include:

- include a "skip navigation" link at the top of web pages that allows people who use screen readers to ignore navigation links and skip directly to webpage content;
- minimize blinking, flashing, or other distracting features;
- if they must be included, ensure that moving, blinking, or auto-updating objects or pages may be paused or stopped;
- design online forms to include descriptive HTML tags that provide persons with disabilities the information they need to complete and submit the forms;
- include visual notification and transcripts if sounds automatically play;

- provide a second, static copy of pages that are auto-refreshing or that require a timed-response;
- use titles, context, and other heading structures to help users navigate complex pages or elements (such as web pages that use frames).

f) Resources and Additional Information on Website Accessibility. Additional information and guidance on website accessibility can be found on the following:

- www.w3.org/WAI/fundamentals/accessibility-intro/
- <https://webaim.org>
- www.ada.gov/pcatoolkit/chap5toolkit.htm
- www.webaccessibility.com

In addition, assistance can be obtained by contacting the MA Commission for the Blind in writing or by email, telephone, or fax as noted below:

Massachusetts Commission for the Blind
 Technology for the Blind Program
 John Oliveira, Deputy Commissioner
 600 Washington Street –3rdFloorBoston, MA 02111
www.mass.gov/mcbJohn.Oliveira@state.ma.us
 617-626-7509 Voice
 617-422-0419 Fax

Princeton Self-evaluation. A visually impaired colleague using the JAWS 2020 Screen Reading software (see Note below) was able to easily navigate the Town of Princeton’s website, including the individual Departments and Committee/Commission web pages.

The Town of Princeton uses the “CivicPlus” software platform built for modern local governments allowing one to work seamlessly and securely, leveraging existing data and reducing information silos so a person can collaborate efficiently. It also features an online help center in the event the Town of Princeton has problems with their website including accessibility requirements. CivicPlus uses the firm “AudioEye” as its ADA web accessibility provider in order to determine compliance with the Success Criteria of the Web Content Accessibility Guidelines (WCAG) 2.0 and ADA related requirements.

A cursory review of the website found it to be compliant with such things as visual contrast, the use of text versus graphics, and text enhancement features.

Best practices to ensure that the Town’s website maintains its accessibility for people with various levels of visual impairments such as low vision or the need for using a screen reader include:

1. Establish, implement, and post online a policy that web pages will be accessible and create a process for implementation.
2. Ensure that all new and modified web pages and content are accessible.

- Check the HTML of all web pages. Make sure that accessible coding is used.
- Make sure that website is designed so it can be displayed using the color and font settings of each visitor's browser and operating system.
- If images are used, including photos, graphics, scanned images, or image maps, make sure to include a text equivalent, by adding "alt" tags or long descriptions, for each.
- When online forms and tables are used, make those elements accessible by labeling each control (including buttons, check boxes, drop-down menus, and text fields) with a descriptive HTML tag.
- When posting documents on the website, always provide them in HTML or a text-based format (even if you are also providing them in another format, such as PDF).

Note: JAWS ("Job Access With Speech") is a computer screen reader program for Microsoft Windows that allows blind and visually impaired users to read the screen either with a text-to-speech output or by a refreshable Braille display. JAWS is produced by the Blind and Low Vision Group of Freedom Scientific.

Emergency Preparedness, Evacuation Plans, and Emergency Shelters (ADA Title II)

The Department of Justice views emergency preparedness plans as key components of a municipality's responsibility to accessibility compliance. These plans and facilities should be adapted to address the needs of those with a disability and/or who require a reasonable accommodation.

Princeton Self-evaluation. There was very little Emergency Preparedness information available on the Town of Princeton's website. The Fire Department does have a Student Awareness of Fire Education (SAFE) tab on its webpage. The SAFE Program has been in Princeton since 1998 and brings Fire and Life Safety Education to the children of Princeton. Every year the Princeton Fire Department applies for funding in the form of a grant from the Massachusetts Department of Fire Services. This grant allows the department to place firefighters and EMT's in the classrooms at the Thomas Prince School.

The members of TEAM SAFE instruct students in a number of Fire and Life Safety Behaviors such as:

- Proper use of the 911 Emergency Calling System
- Stop, Drop and Roll when your clothes catch fire
- Crawling low under smoke in a fire
- Preparing and practicing Exit Drills in the Home (EDITH)
- Home Fire Safety Checks
- Proper use of Smoke and CO Detectors

The Police Department web page has a link to the DISABILITY INDICATOR FORM for LANDLINE CUSTOMERS ONLY where your local Public Safety Answering Point 9-1-1 system automatically displays your name, address and telephone number on the dispatcher's screen. At one's request, codes will be displayed on the dispatcher's screen that will identify the disability indicators that have been reported for you or someone living with you at your address. These codes will help the dispatcher at the 9-1-1 Public Safety Answering Point to communicate with the caller and provide useful information to the responding public safety personnel.

The town does not appear to have in place a formal town-wide Emergency Management Plan as one could not be found on the town's website or in any reports or documents that were reviewed.

Recommendation

It is recommended that the guidance provided in Chapter VII of this document be followed when developing an Emergency Management Plan or, if one is in place, modifying such that notification and assistance to persons with disabilities be included within the plan. In addition, provide easier access to the Disability Indicator form through either the Fire Department or Police Department webpage for people that are not tech savvy. The Town should provide links to both the Massachusetts Emergency Management Agency (MEMA) and the Federal Emergency Management Agency (FEMA) as these websites provide a wealth of information on Emergency Preparedness for both people with and without disabilities.

Polling Places

Under the ADA, Help America Vote Act, Voting Accessibility for the Elderly and Handicapped Act, and Massachusetts General Laws, polling places are required to be accessible to persons with disabilities. This includes site access, parking, entrances, interior access, and voting equipment. In addition, registration and voting aids for the disabled and elderly are required, including information by alternative accessible means.

The Elections Division of the Secretary of the Commonwealth of Massachusetts (Elections Division) office works with each municipal clerk to ensure polling places are accessible by meeting state (and federal) regulations.

All polling locations in Massachusetts are required to be accessible and must provide access on a permanent or temporary basis on an Election Day. Voting assistance and absentee voting offer options that persons with disabilities may use to vote, but are not considered substitutes to actual accessibility to the voting location.

Both federal law and state requirements mandate that voting systems be equipped for voters with disabilities allowing such voters to have the same opportunity to vote privately and independently. It is required that every precinct must have at least one accessible voting machine available.

According to the Elections Division, there is at least one accessible marking unit in every polling place in Massachusetts. The "*AutoMARK Voter Assist Terminals*" are marking devices that use audio cue capacity for visually impaired voters. The *AutoMARK* also has a feature that will greatly magnify the ballot or display the ballot high-contrast for voters that have limited visual impairment. The *AutoMARK* can also produce an oral report to the voter as the choices selected prior to the voter printing the ballot.

Princeton Self-evaluation. There is only one voting precinct for the Town of Princeton. All elections are held in the gymnasium at the Thomas Prince School (170 Sterling Road). An AutoMARK Voter Assist Terminal is available for use in all elections that enables voters with visual, physical, and cognitive related disabilities to vote independently. According to the Town Clerk, the Automark is positioned so that the screen does not face the public, therefore ensuring the voter's privacy.

XI. ADA TRANSITION PLAN

In accordance with the ADA Standards and MA 521 CMR, an assessment of the Town of Princeton's public facilities inclusive of public buildings, active and passive recreation facilities, and schools was conducted to identify physical barriers to programs and services. This assessment or "transition plan" includes the following elements, which fulfill the requirements for the preparation of a transition plan:

- identification of physical obstacles in the building or facility that limit the accessibility of its programs or activities to persons with disabilities, and
- 2010 ADAAG and MAAB 521 CMR citation, and
- a description of methods or type of action to be taken to eliminate identified obstacles, and
- priority of removal of barrier, and
- feasibility of removal of barrier, and
- establishment of a recommended completion date to achieve accessibility, and
- general cost parameters for each action to be taken, and
- responsible party for implementation.

Limitations of the Transition Plan and Compliance

The primary obligation under Title II of the ADA is to ensure that programs and services are equally available to persons with disabilities. Municipalities are required to adhere to the 2010 Standards for Accessible Design in new construction and alterations. Programs must be relocated or access provided in inaccessible existing facilities as of the effective date of the ADA or January 26, 1992. When existing facilities comply with the 1991 Standards, there is no requirement to update to the current 2010 Standards. However, if conditions in existing facilities do not adhere to the original Standards, then the 2010 Standards must be followed.

ADA Safe Harbor: Elements in facilities built or altered before March 15, 2012 that comply with the 1991 ADA Standards for Accessible Design (1991 Standards) are not required to be modified to specifications in the 2010 Standards. For example, the 1991 Standards allow the maximum side reach of a control or dispenser to be 54 inches. The 2010 Standards lowered that side reach range to 48 inches maximum. If a control or dispenser was installed prior to March 15, 2012 with its highest operating part at 54 inches, that control or dispenser does not need to be lowered to 48 inches. Since the dispenser complies with the 1991 Standards, that Standard provides a "safe harbor".

Tolerances: Both the 2010 ADA Standards and 521 CMR allow for "tolerances as follows:

2010 ADA Standards

All dimensions are subject to conventional industry tolerances except where the requirement is stated as a range with specific minimum and maximum end points.

521 CMR

- Dimensions between zero and two inches, (0" and 2") inclusive, shall have a maximum tolerance of plus or minus one-eighth inch (1/8").
- Dimensions more than two inches and less than 36 inches (>2" and <36") shall have a maximum tolerance of plus or minus one-half inch (1/2").

- Dimensions 36 inches or greater (36" or >) shall have a maximum tolerance of plus or minus one inch (1")
- Slopes may not exceed maximums. Slopes shall be measured in two-foot increments. Tolerances do not apply to minimums or maximums.

For the purposes of this plan, unless specifically noted, facility assessments are based on the 2010 ADA Standards and 521 CMR (Massachusetts Architectural Access Board MGL. C. 22 s13A), whichever is more stringent.

The plan does not address what is accessible, but rather obstructions to mobility. Fieldwork was performed in winter and spring of 2021. Although general recommendations are made as corrective actions to eliminate identified obstacles, it is expected that the town will be solely responsible for designing the specific construction solution in accordance with 521 CMR: Architectural Access Board Regulations or the 2010 ADA Standards for Accessible Design, whichever is appropriate.

As part of the transition plan assessment, deficiencies or limitations to access were identified at each location. The actions noted in this plan to be taken in removing obstacles to mobility are descriptive and are not intended to be construction specifications. The specific construction action can vary substantially depending on desirability and type of materials. In addition, historically significant properties can result in additional cost due to more architecturally sensitive construction alternatives (historic properties discussed elsewhere in this Plan). As a result, the costs can vary accordingly. The party responsible for implementing the identified action will be responsible for working with the town's building inspector and a design professional, if necessary, so as to ensure compliance with 521 CMR and/or the ADA Standards. Where appropriate, due to historic considerations, building configuration, or extent of use, a combination of programmatic solutions and construction alternatives are provided. Such measures are in full compliance with Title II of the ADA. In circumstances where there are differences in the compliance requirements between 521 CMR and the ADAAG, the stricter or more encompassing standard shall apply.

The Department of Justice issued 1991 Standards for Accessible Design to address physical barriers to facilities and transportation. There were technical amendments to these standards in 1994 followed by more substantive amendments in 2010 (2010 ADA Standards for Accessible Design). These 2010 Standards revised policy requirements for certain areas such as service animals. The 2010 Standards also addressed certain physical components including assembly seating, the establishment of construction tolerances for certain items and formalized standards for docks, fields, pools, and other recreational facilities.

As is the circumstance with 521 CMR of the Massachusetts State Building Code, under the Federal ADA, construction modifications for accessibility compliance is not required unless triggered by renovation and/or new construction. Municipalities must still ensure that individuals are not excluded from programs and services because buildings or facilities are inaccessible. This can be accomplished through relocating a program or service to an accessible location or other means of reasonable accommodation. For the purposes of this Transition Plan, the higher standard of compliance will be used for the purpose of identifying obstacles and determining cost, however, descriptive alternatives will also be provided in the narrative.

Use of the Transition Plan

This plan is intended to be a working document. If a barrier was overlooked it can easily be added to the plan. Programs and services can be modified and adapted over time as needed. Similarly, policies and procedures can be modified and adopted to reflect current legislative requirements. Actual construction methods to arrive at a solution for an identified problem may vary depending on final plans and specifications. The town should use this plan as a guide for compliance and modify it as needed without altering its initial intent and efforts of compliance. In addition, the inventory of barriers can be used in concert with the town’s capital budget process to assist in the determination of how and when to proceed with the many suggested improvements.

The plan provides a description of the obstacle which limits mobility or access, 2010 ADA Standards citation reference, MA 521 CMR citation reference, the type of action required to be taken for compliance, the priority for the action, the feasibility of undertaking the action, the timeframe for completion, a representative photo, and a general parameter of cost.

Priority(P)

Each architectural barrier has also been ranked according to the priority of removal based upon the type of access that is affected. The priority rankings (#1 being the highest priority and #4 being the lesser priority) are determined by the ADA and are defined as follows:

<u>Priority</u>	<u>Description</u>
1	Accessible approach and entrance
2	Access to goods and services
3	Access to public toilet rooms
4	Access to other items (ie – water fountains, public telephones, etc.)

Feasibility(F)

Each architectural barrier has been ranked according to the feasibility of removing that particular barrier. The feasibility rankings are somewhat subjective and are based on a perceived degree of difficulty or skill level required to remove an architectural barrier. These rankings are as follows:

<u>Ranking</u>	<u>Description</u>
1	Can be easily undertaken (i.e. move furniture, put sign on a wall)
2	Can be undertaken by maintenance staff, DPW, etc. (i.e. install post and sign, move dispensers, adjust door closer, change door hardware)
3	Minor modifications which require skilled or specialized work (build ramp, alarm installation, sink/toilet installation, etc.)
4	Major modifications which require skilled or specialized work (structural changes, building additions, elevators/lifts, etc.)

Time-frame(TF)

A recommended time-frame for removing the architectural barrier is provided as follows:

<u>Time-frame</u>	<u>Description</u>
I	Immediate Term (2021-2022)
N	Near Term (2023-2026)
L	Long Term (2027-2030)

Costs

Cost estimates are based on recent projects of similar nature, unit quantity pricing (where appropriate), and R.S. Means Company, Inc. ADA Compliance Pricing Guide 2nd Edition and updated for current pricing. Cost estimates are also based on the type and complexity of work. It is being assumed that simple changes

(Feasibility ranking of 1 or 2) will be made through the use of town personnel (custodial, DPW, etc.). More complex construction or and include labor, overhead, and profit.

List of Buildings and Facilities

Municipal Buildings: Bagg Hall, Town Hall Annex, Goodnow Memorial Library, Police Department, Fire Department, Highway Department, Senior & Community Center, Municipal Light Department.

Schools: Thomas Prince School.

Passive Recreation Areas: Goodnow Park, Calamint Hill Conservation Area, Town Common.

Active Recreation Areas: Krashes Field, Thomas Prince School Recreational Area, Center School Area, Sawyer Field.

Sidewalks, Curb Ramps, and Crossings: Main Corridors and Town Center Area.

Abbreviations

a.f.f.	above finish floor	c.f.s	clear floor space
s/b	should be	r.s	running slope
>	greater than	c.s.	cross slope
<	less than	o.c.	on center

XII. MUNICIPAL BUILDING ASSESSMENTS

BAGG HALL

TOWN HALL ANNEX

GOODNOW MEMORIAL LIBRARY

POLICE DEPARTMENT

FIRE DEPARTMENT

HIGHWAY DEPARTMENT

SENIOR & COMMUNITY CENTER

MUNICIPAL LIGHT DEPARTMENT

THOMAS PRINCE ELEMENTARY SCHOOL

BAGG HALL (Princeton Town Hall)

Description of Facility and Programs: Bagg Hall is a 2+ level masonry building with a basement which was constructed in 1885. The building has remained generally unchanged to the present except for interior partition work, electrical, heating, plumbing and some first floor accessibility modifications in 1998. The building is currently undergoing additional first floor primarily cosmetic office renovations. Bagg Hall is listed on the National Register of Historic Places, as part of the Princeton Town Center Common Historic District and also has a recorded preservation restriction (2002) with the Massachusetts Historical Commission. The first floor of the building houses local government offices and services including Board of Assessors, Board of Health, Board of Registrars, Building Department, Cemetery Department, Recreation, Tax Collector, Town Administrator, Town Clerk, Town Treasurer, and Veteran's Services. The second floor is not accessible and consists of a large meeting hall, stage, and balcony. This area of the building is not open to the public and used solely for storage. There is also an upper clock tower and a basement, both of which are also closed to the public.



Responsible Party: Select Board.

General Description or Obstacle Which Limits Mobility or Access: Neither of the accessible parking spaces are designated as van accessible. The parking spaces and shared access aisle have excessive running slopes and the signage for the accessible parking is mounted too low. The main entrance lacks directional signage for the side/rear accessible entrance. The ramped approach to the accessible entrance only has a railing on side but because the running slope is under 5.0%, no further action is required. The stair railings at the front entrance do not fully extend at the bottom of the stairs. The drop box located at the top of the stairs to the front entrance is not on an accessible route of travel. Interior and exterior doors with closers have excessive operating forces and close too fast. Interior doors have non-compliant knob-style hardware and also lack tactile designation signage. Wall mounted room signage, although not installed due to renovations, appear that once installed, will serve as protruding objects. Office counters at doorways are too high. In addition, hallway coat hooks and a number of light switches are not within

reach range. Some of the offices have non-complaint thresholds. In addition, 3 offices and the employee hallway and bathroom doors provide inadequate clear width. The designated accessible bathroom has a number of areas of non-compliance including a towel dispenser that is too high and located over the grab bars, a side grab bar that is too short and that is mounted too low, a water closet flush control located on the wrong side, insufficient clearance in front of the water closet, and a toilet paper dispenser that is mounted too close to the front of the water closet. The “employee only” bathroom is wholly non-compliant.

Employee Kitchenette

The rough plumbing was in place for an apparent employee kitchenette at the time of the assessment. If installed, the top of kitchenette counter/sink should not exceed 34” a.f.f.; have sink piping that is guarded, recessed, or insulated; and have hardware that can be used with a closed fist.

Level Two of Bagg Hall

There is no vertical access to the upper levels of the building including the second floor, second floor balcony, second floor stage, and the clock tower. Stair railings are generally non-compliant due to size, height, and the lack of extensions. Stair risers are too high under the 2010 ADA Standards and are also not uniform. The second floor also has non-compliant door thresholds. Doors have non-compliant hardware and lack tactile designation signage. The stairs to the stage lack railings. The double doors at the lobby on the main entrance side have insufficient clear width as each door is only 21½” wide. Similarly the doorway near the stage side stairs has only 30” of clearance.

Assuming only the first level of Bagg Hall remains open to the public, prioritization of barrier removal, efforts should be focused on parking, bathroom accessibility, and access to programs and services on this level (thresholds; door widths, door hardware and closing speeds, room signage, etc.).

As noted, Bagg Hall is located on the National Register of Historic Places and is also subject to a preservation restriction, and therefore, many of these identified areas of non-compliance may be subject to variation or exception. See Section V of this plan.

VariANCES

The town applied for four variances from the MA Architectural Access Board and received a formal Notice of Action dated September 29, 2020. One (1) variance pertaining to the accessible entrance was granted with conditions and three (3) variances pertaining to the accessible bathroom were denied.

- Granted relief to 521 CMR S25.1 that the front main entrance not be made accessible provided that:
 - a) An accessible entrance be provided with an automatic door opener. This has been fully met.
 - b) A curb cut be provided at the accessible parking allowing for a continuous accessible route from the sidewalk to the accessible entrance. This has been met as the parking (although modifications required) is close to the entrance and has a striped accessible route to the entrance with no abrupt changes in level surface.
 - c) Signage be provided at the base of the inaccessible entrance and on the town’s website indicating the location of the accessible entrance. This has not been met as there is no signage at the front/main entrance and there is nothing on the town’s website.

- Variances under 521 CMR S30.5 clear floor space, 30.8 grab bars, and 30.7.2 water closet setbacks and clearances.

Bagg Hall Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<p>Parking The designated accessible parking spaces (2) and shared access aisle have running slopes that vary up to 3.8%. Neither space is designated as van accessible. The signage is 5" to 6" too low under the 2010 ADA Standards.</p> <p>See Photo Bagg Hall 1.</p>	208.2 502.6 502.4	23.2 23.6 23.4	Resurface the parking spaces and access aisles such that the running and cross slopes do not exceed 2.0% and the ground surface is uniform, stable, firm, and slip resistant. The van accessible space s/b 8' wide with a 8' access aisle (the access aisle can be shared with the accessible passenger vehicle space). Van accessible signage should be provided. Signage s/b set so that the bottom of the sign is at least 60" a.f.f. and the top no more than 96" a.f.f and located no more than 10' from the parking spaces.	1	3	N	\$1,500
<p>Directional Signage Outside directional signage at the front of the building directing patrons to the accessible entrance is not provided.</p>	216	41.1.3	Provide directional signage noting the accessible side/rear entrance.	1	2	I	\$100
<p>Main Entrance Drop Box The envelope drop located in the door of the main entrance to the building is not on an accessible route of travel.</p> <p>See Photo Bagg Hall 2.</p>	206 403	20 22	Relocate the envelope drop to a location near the accessible entrance or as a "drive by" box similar to that at the library. The height of the envelope drop should not exceed 48 " a.f.f.	2	2	I	\$0
<p>Main Entrance Stair Railings The railings do not fully extend at the base of the stairs.</p> <p>See Photo Bagg Hall 3.</p>	505.10	27.4.3	Stair railings need to be modified so the bottom railings are the slope distance of one tread then 12" parallel to the ground.	1	3	N	Up to \$750
<p>Level 1 Exterior and Interior Doors The main front entrance doors do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and do not fully comply with the minimum closing speed requirement of 6 seconds under 521 CMR. <u>The measured operating force varied from 17 to 20 lbs. and the closing speed was 3 to 4 seconds.</u></p> <p>The interior doors (with closers) do not fully comply with the maximum allowed operating force for an interior door (5 lbs.) and do not fully comply with the minimum closing speed requirement of 6 seconds under 521 CMR. <u>The interior hallway door from the accessible entrance has an operating force of 12 lbs. and a closing speed of 4 seconds. The interior hallway glass doors near the main front entrance had an operating force of 24 lbs. and a closing speed of 4 seconds.</u></p>	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.	1	2	I	\$50
			If the interior glass hallway doors cannot be modified to comply with the maximum operating force and minimum closing speed requirements, then an automatic door opener should be installed.	1, 2	3	N	Up to \$2,750
Level 1 Door Hardware							

<p>The following 15 interior doors have knob-style hardware:</p> <ul style="list-style-type: none"> • Basement • Hallway door from accessible entrance • Door from accessible entrance vestibule to Room #6 • Rooms #1, 2, 3, 4, 5, 6, 7, #5 (side), #1/#3 pass-through, #4/#2 pass-through • Employee only hallway • Employee only bathroom <p>See Photo Bagg Hall 4.</p>	404.2	26.11	<p>Install lever-style or similar accessible compliant hardware on the interior doors.</p> <p><i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i></p>	2	2	1	\$2,250
<p>Level 1 Signage</p> <p>The following 13 interior doors lack tactile accessible signage:</p> <ul style="list-style-type: none"> • Basement • Hallway door from accessible entrance • Door from accessible entrance vestibule to Room #6 • Rooms #1, 2, 3, 4, 5, 6, 7, #5 (side) • Employee only hallway • Employee only bathroom • Accessible bathroom <p>See Photo Bagg Hall 5.</p>	703	41.1	<p>Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p>	2	2	1	\$455
<p>Level 1 Protruding Objects</p> <p>Offices have wall-mounted brackets for hanging signs outside each office. Although the signs were not in place at the time of assessment, it appears that some, if not all of these will serve as protruding objects.</p> <p>Rooms #3, 5, and 7 have bracket heights of 79" to 80" which extend more than 4" into the hallway before sign installation.</p> <p>Rooms # 1, 2, 4, and 6 have bracket heights of 90" to 91" a.f.f. which extend more than 4" into the hallway before sign installation.</p> <p>Protruding objects extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80". Based on the bracket heights of Rooms #3, 5, and 7, and the type of signage display (2 or more hanging signs per bracket), some or all of these signs will be protruding objects.</p> <p>See Photo Bagg Hall 6.</p>	307.2	20.6.1	<p>Raise the brackets so that the signage is at least 80" a.f.f. at the bottom of the sign(s).</p>	2	2	1	\$0

<p>Level 1 Office Door Counters</p> <p>The office door counters for the following offices are 2¼" to 5" too high:</p> <ul style="list-style-type: none"> • #1 (39¼") • #2 (38¼") • #3 (40½") • #6 (39½") • #7 (40") <p>See Photo Bagg Hall 7.</p>	904.4	7.2	Modify the doors/counters so they are no more than 36" a.f.f.	2	3	N	Up to \$750
<p>Level 1 Adult Reach Range</p> <p>The following exceed the maximum reach range of 48" a.f.f. under the 2010 ADA Standards for adults:</p> <p><u>Coat Hooks</u></p> <ul style="list-style-type: none"> • Level 1 employee hallway coat hooks (13 @ 76" a.f.f. and 9 @ 64" a.f.f.) • Level 1 front entrance lobby coat hooks (21 @ 72" a.f.f. and 4 @ 62" a.f.f.) <p><u>Light Switches</u></p> <ul style="list-style-type: none"> • Accessible entrance lobby (54" a.f.f.) • Hallway by Room #3 (3 @ 51" a.f.f.) • Room #4 (51" a.f.f.) • Room #3 (51" a.f.f.) • Room #2 (51" a.f.f.) • Room #1 (51" a.f.f.) • Employee hallway (49½" a.f.f.) • Main entrance lobby (52½" a.f.f.) <p>See Photo Bagg Hall 8.</p>	308.2 308.3	6.5 6.6	Provide at least two coat hooks at no more than 48" a.f.f. in the employee hallway and in the front entrance lobby (total of 4 coat hooks)	4	2	I	\$0
<ul style="list-style-type: none"> • Accessible entrance lobby (54" a.f.f.) • Hallway by Room #3 (3 @ 51" a.f.f.) • Room #4 (51" a.f.f.) • Room #3 (51" a.f.f.) • Room #2 (51" a.f.f.) • Room #1 (51" a.f.f.) • Employee hallway (49½" a.f.f.) • Main entrance lobby (52½" a.f.f.) 	308.2 308.3	6.5 6.6	Lower the switches to a height of no more than 48" a.f.f.	4	3	N	Up to \$2,800
<p>Level 1 Doorway Widths</p> <p>The doorways to Rooms #3, #5, #7, the employee hall door, and the employee bathroom door have clear widths that vary from 28" to 29" which do not meet the minimum 32" clear width requirement for a doorway.</p>	404.2	26.5	At a minimum, modify the door openings of Rooms #3, #5, and #7, to comply with the minimum 32" wide clear opening. As the employee hallway and bathroom doors are not open to the public, modifications would be necessitated as a reasonable accommodation request.	2	3	N	Up to \$5,550
<p>Level 1 Thresholds</p> <p>Doorways to the following areas have ½"+ thresholds with bevels in excess of a 1:2 slope:</p> <ul style="list-style-type: none"> • Rooms # 2, 3, 4, 6, 7 • Hallway <p>See Photo Bagg Hall 9.</p>	404.2	26.10	Modify thresholds so that the maximum 1:2 beveled change in level surface is no more than ½".	2	3	N	\$900
<p>Level 1 Accessible Bathroom</p> <p>The paper towel dispenser is 7½" too high and located over the grab bars.</p> <p>The side grab bar is only 24" long, which is 18" too short.</p>	308.2 308.3	30.12	Relocate the dispenser so that it is no more than 42" a.f.f. and not located over the grab bars.	3	2	I	\$0
<p>The side grab bar is only 24" long, which is 18" too short.</p>	604.5	30.8	Replace the side grab bar with one that is at least 42" long, located no more than 12" from the interior corner, and at a height of between 33" and 36" a.f.f. to the top of the gripping surface.	3	2	N	Up to \$500

<p>The water closet flush control is on the near side not the wide or approach side.</p> <p>There is only 23½" clearance in front of the water closet is 18½" too short.</p> <p>The toilet paper dispenser is too close to the front of the water closet.</p> <p>The bathroom lacks audible and visual alarms.</p> <p>Based on current configuration, the minimum required "T" or 60" circular wheelchair turning space is not available.</p> <p>See Photo Bagg Hall 10.</p>	604.6	30.7.5	Replace the water closet or the tank of the water closet with one that has a flush control on the approach or wide side.	3	3	N	\$100 to \$250
	604.3	30.7.2	Relocate the water closet to achieve the minimum required clearances and setbacks. Grab bar relocation will also be required.	3	3	N	Up to \$2,500
	604.7	30.7.6	Relocate the toilet paper dispenser so that it is at least 24" a.f.f., not mounted over the grab bars, and between 7" to 9" o.c. to the front of the water closet.	3	2	I	\$0
	702	40	Install audible and visual alarms in compliance with NFPA 72.	3	3	N	Up to \$500
	304	30.5 6.3	In conjunction with the above noted required actions, additional modifications will be necessary to ensure compliance with the required maneuvering clearance.	3	4	N	TBD
<p><u>Level 1 Employee Unisex Bathroom</u></p> <p>The employee bathroom is wholly non-complaint with inadequate clearances for wheelchair maneuverability and no accessible components (signage; grab bars; sink piping; sink faucets; water closet; dispenser, coat hook, and mirror heights; stall door pull devices, stall door locking mechanism, etc.). In addition, the bathroom is not on an accessible route of travel due to an 8" abrupt change in level surface (step down into the bathroom).</p> <p>See Photo Bagg Hall 11.</p>	604 404 308 309 609 606 603 205 703	30 39.5 41	As there is a unisex accessible bathroom on the first floor, the town may be required to modify or change the use of this bathroom as a result of a reasonable accommodation. Unless there are substantial building modifications to Bagg Hall triggering full compliance, no further action would be required at the present time.	3	-	-	NA
<p><u>Accessible Route (Vertical Access) to 2nd Level, 2nd Level Balcony, 2nd Level Stage, and Clock Tower</u></p> <p>There is no accessible route between the first level and 2nd level, 2nd level balcony, 2nd level Stage and the clock tower</p> <p>The balcony has no designated wheelchair viewing areas.</p>	401 221	20.00 14.0	<p><u>Option #1:</u> Continue to use the 2nd level for storage only and restrict all public access. Address employee accessibility issues through a reasonable accommodation.</p> <p><u>Option #2:</u> Provide an elevator between levels and a lift to the stage and balcony (if feasible). If access to the balcony is provided, modify the balcony to provide compliant wheelchair viewing areas.</p> <p><i>Note: Construction could trigger required electrical upgrades as well as other building code issues to be addressed as well as possible full building accessible compliance.</i></p>	2 2	1 4	I L	\$0 TBD
<p><u>Level 2 Stairs and Railings</u></p> <p>The second level stairs and railings are non-compliant as they do not have extensions at the top and bottom, exceed the maximum allowed width, and vary in height from 29" to 32" a.f.f. which is 2" to 5" too low. The stairs to the second level near the accessible entrance have railings on one side only.</p>	504 505 504.2	27 27.2	<p>Seek historic variance under ADA and 521 CMR to maintain existing historic railings. Install complaint continuous railings on the wall side of all stairways at a height of 34" – 38" to the top of the handrails, round or oval in x-section and between 1¼" – 2" in outside diameter, and with extensions at the top 12" parallel to the floor and the slope distance on one tread then 12" parallel to the floor at the bottom.</p> <p>Modify treads and risers to achieve compliance.</p>	2 2	3 3	L L	TBD TBD

In addition many of the stair treads do not have uniform riser heights and tread widths. See Photos Bagg Hall 12 and 13.							
Level 2 Stage No railings exist on the stairs (3) to the stage. See Photo Bagg Hall 14.	505	27.4	The existing stairs to the stage must be modified with compliant handrails on both sides of the stairs, 34" to 38" a.f.f. and with 12" extensions at the top and extensions at the bottom of one tread (sloped) then 12" parallel to the floor.	2	3	L	TBD
Level 2 Door Hardware A minimum of 7 doors have non-compliant knob-style hardware.	404.2	26.11	Install lever-style or similar accessible compliant hardware on the main entrance door and the 7 interior doors.	2	2	L	TBD
Level 2 Signage A minimum of 9 doors lack tactile designation signage.	703	41.1	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	L	TBD
Level 2 Doorway Widths The side door to the stage (30" clear width) and 2 double doors at the main entrance side (21" clear width per open door) do not meet the minimum required 32" clear width requirement.	404.2	26.5	Modify the doors and door openings to achieve the minimum required 32" clear width per door/door opening.	2	3	N	TBD
Level 2 Thresholds Thresholds are ½" + in height with bevels in excess of a 1:2 slope	404.2	26.10	Modify thresholds so that the maximum 1:2 beveled change in level surface is no more than ½".	2	3	N	TBD

Total \$21,605+

Bagg Hall Assessment Photos



Photo Bagg Hall 1



Photo Bagg Hall 2



Photo Bagg Hall 3



Photo Bagg Hall 4

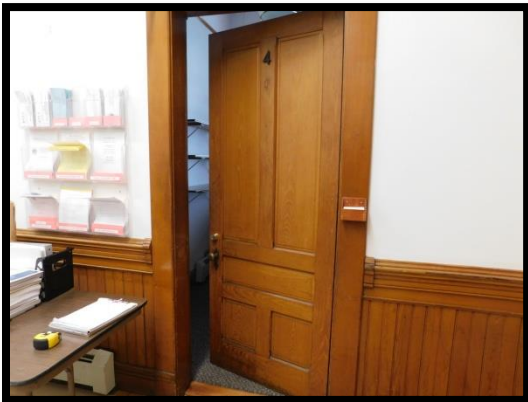


Photo Bagg Hall 5

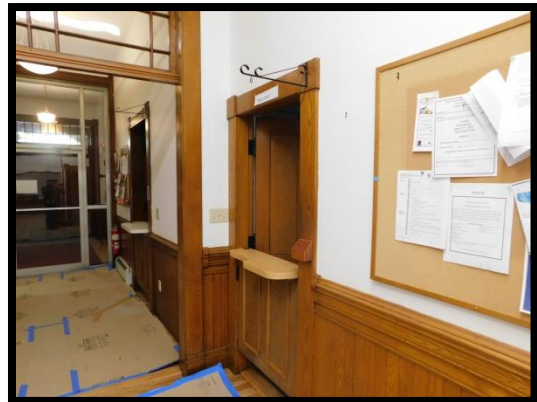


Photo Bagg Hall 6



Photo Bagg Hall 7

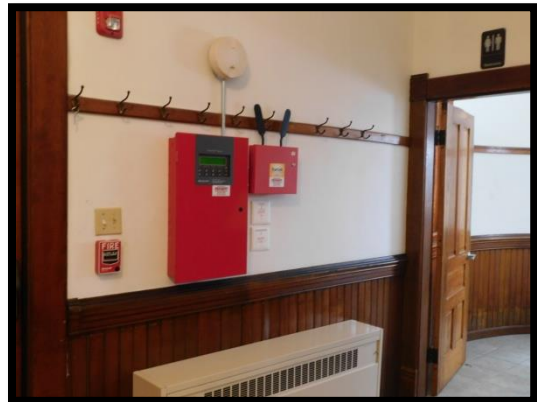


Photo Bagg Hall 8



Photo Bagg Hall 9



Photo Bagg Hall 10



Photo Bagg Hall 11

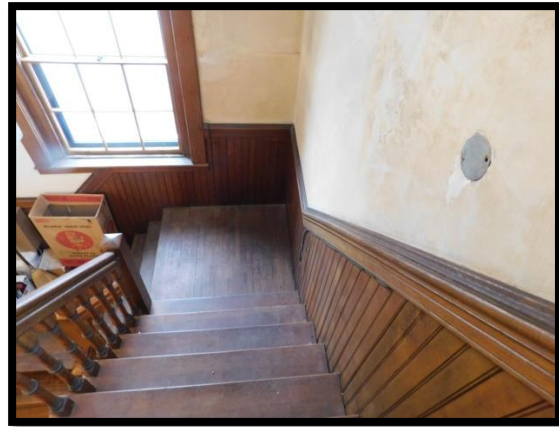


Photo Bagg Hall 12

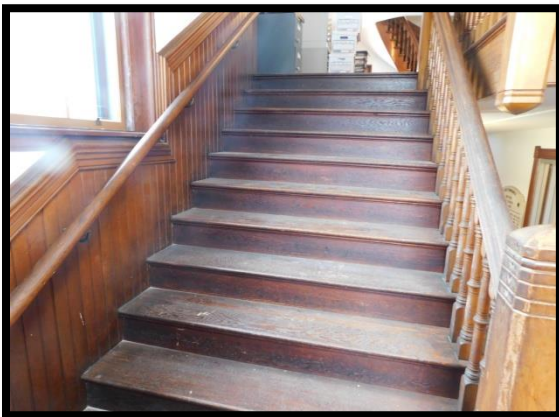


Photo Bagg Hall 13



Photo Bagg Hall 14

TOWN HALL ANNEX

Description of Facility and Programs: The Town Hall Annex is a single-story masonry building which was constructed in the 1950's. The building contains a large meeting room with a unisex "accessible" bathroom, a smaller meeting room with office and file space, and a garage/storage area. The garage/storage area is closed to the public.



Responsible Party: Select Board.

General Description or Obstacle Which Limits Mobility or Access: The accessible parking space lacks striping for both the space and access aisle. The signage for the accessible parking is too low. The landing at the accessible entrance is not fully level. There is no directional signage noting which of the 2 doors to the annex serves as the accessible entrance. The support bracing for the overhang at the entrances serve as protruding objects. The landing at the front accessible entrance is not fully level. The front exterior doors close too fast. Interior doors have non-compliant knob-style hardware and also lack tactile designation signage. The large meeting room light switch is too high. The ramp from the large meeting room to the smaller meeting room/offices is wholly non-compliant as the running slope is too steep, the ramp is too narrow, the ramp lacks railings and a level landing at the top, among other things. Similarly, the ramp to the accessible bathroom is also non-compliant as there is only one ramp railing which lacks extensions and has a lower railing that is too low. The ramp is too narrow and the top landing lacks the minimum required maneuverability. The designated accessible bathroom has a number of areas of non-compliance including the lack of tactile designation signage, a towel dispenser that is too high, grab bars that are mounted too high, a rear grab bar that is too short, a water closet flush control located on the wrong side, and a toilet paper dispenser that is mounted too far from the front of the water closet.

Non-accessible Entrance/Egress Door

The non-accessible entrance/egress door has a 4½" abrupt change in level surface from the interior of the building to the outside. If both of the rooms are in use, the ability to use the accessible entrance in the larger meeting room may be compromised if access to that room is not available due to an executive session or similar activity that would restrict entry into that room. The town must insure, through the adoption of building and room use policies, that the accessible entrance/egress is available for use at all times.

Assistive Listening System

It does not appear that the Town has an assistive listening system (ALS) for persons who are hard of hearing as no signage or equipment was present. It is recommended that an assistive listening system for

shared use in other municipal locations be provided. An ALS with up to 12 receivers with 6 being hearing-aid compatible can be purchased for roughly \$2,500 to \$5,000 depending on the equipment brand.

Town Hall Annex Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<p>Parking There is no designated accessible parking space and access aisle with striping. The signage is 42" too low.</p> <p>See Photo Town Hall Annex 1.</p>	208 502	23	Stripe an 8' wide parking space and an 8' wide access aisle. Raise the sign so that it is at least 60" a.f.f. to the bottom of the sign and no more than 96" a.f.f. to the top. Add a van accessible sign.	1	2	I	\$150
<p>Directional Signage Outside directional/designation signage at the front of the building noting which entrance is accessible is not provided.</p>	216	41.1.3	Provide directional/designation signage noting the accessible entrance.	1	2	I	\$50
<p>Protruding Objects The four supporting braces for the front entrance roof overhang protrudes up to 14" at a height up to 80" a.f.f. into the accessible route of travel along the side of the building.</p> <p>See Photo Town Hall Annex 2.</p>	307.2	20.6.1	Provide fixed objects below the braces for cane detection.	1	2	I	\$0
<p>Exterior Doors The front entrance/egress doors do not comply with the minimum closing speed requirement of 6 seconds under 521 CMR. The measured closing speeds were 3 to 4 seconds.</p>	404.2.8	26.9	Adjust door closers such that the closing speeds are at least 6 seconds.	1	2	I	\$0
<p>Door Hardware The following interior doors have knob-style hardware:</p> <ul style="list-style-type: none"> • Small meeting room bathroom • Door to garage 	404.2	26.11	Install lever-style or similar accessible compliant hardware on the interior doors.	2	2	I	\$300
<p>Tactile Designation Signage The following 8 interior doors lack tactile accessible signage:</p> <ul style="list-style-type: none"> • Small meeting room bathroom • Door to garage • Exit doors (3) • Door between meeting rooms (2) • Door to accessible bathroom <p>See Photo Town Hall Annex 3.</p>	703	41.1	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2,3	I	\$280
<p>Reach Range The large meeting room light switch (3 switches at one location) exceeds the maximum reach range of 48" a.f.f. by 5" under the 2010 ADA Standards.</p>	308.2 308.3	6.5 6.6	Lower the switches to a height of no more than 48" a.f.f.	4	3	N	Up to \$350

<p><u>Ramp Between Rooms</u> The ramp between the large meeting room and the small meeting room/office is non-compliant as follows.</p> <p>The ramp width is only 41" which is at least 7" too narrow.</p> <p>The running slope varies up to 12.5% which exceeds the maximum allowed of 8.3%.</p> <p>There are no railings on either side of the ramp.</p> <p>There is no level landing at the top of the ramp.</p> <p>The side approach to the ramp serves as a tripping hazard as it creates a greater than ¼" abrupt change in level surface along an accessible route of travel.</p> <p>See Photo Town Hall Annex 4.</p>	405.5	24.3	Reconstruct the ramp as an "L-shaped" ramp running parallel to the wall so that it is not within the accessible route of travel. The running slope of the ramp should not exceed 8.3% with a 60" x 60" level landing (2% slope or less) at the top. Paired railings are to be provided on both sides of the ramp at a height of 18" to 20" a.f.f. to the top of the handrail for the lower railing and 34" to 38" a.f.f. to the top of the handrail for the upper railing. The railings must be oval or round in shape with an outside diameter of 1½" to 2" and they must extend 12" at the top and bottom of the ramp. The ramp must have a minimum of 48" clear width between the railings.	2	3	I	Up to \$5,000
	405.2	24.2					
	405.8 505	24.5					
	405.7	24.4					
	403.4 303	22.4					
<p><u>Ramp to Bathroom</u> The ramp to the bathroom is non-compliant as follows.</p> <p>The ramp width is only 47" between the sole railing and the wall, which is too narrow.</p> <p>There are no railings on the wall side of the ramp. The existing railing does not extend at the base of the ramp and the lower segment is 2" too low.</p> <p>There level landing at the top of the ramp is not long or wide enough at 48" x 54".</p> <p>See Photo Town Hall Annex 5.</p>	405.5	24.3	Reconstruct the ramp as follows: The width of the ramp must be at least 48" between railings with a 60" x 60" level landing (2% slope or less) at the top. Paired railings are to be provided on both sides of the ramp at a height of 18" to 20" a.f.f. to the top of the handrail for the lower railing and 34" to 38" a.f.f. to the top of the handrail for the upper railing. The railings must be oval or round in shape with an outside diameter of 1½" to 2" and they must extend 12" at the top and bottom of the ramp.	2	3	I	Up to \$4,000
	405.8 505	24.5					
	405.7	24.4					
<p><u>Accessible Bathroom</u> The paper towel dispenser is 1½" too high.</p> <p>The bathroom lacks audible and visual alarms.</p> <p>The rear grab bar is only 36" long, which is 6" too short. The side and rear grab bars are both 36¾" a.f.f. which are ¾" too high. <i>Note: There are no tolerances allowed for a range of dimensions.</i></p> <p>The water closet flush control is on the near side not the wide or approach side.</p>	308.2 308.3	30.12	Relocate the dispenser so that it is no more than 42" a.f.f.	3	2	I	\$0
	702	40	Install audible and visual alarms in compliance with NFPA 72.	3	3	N	Up to \$500
	604.5 609.4	30.8 30.8.2	Replace the rear grab bar with one that is at least 42" long, located no more than 6" from the interior corner. Both grab bars need to be lowered to a height of between 33" and 36" a.f.f. to the top of the gripping surface.	3	2	N	Up to \$350
	604.6	30.7.5	Replace the water closet or the tank of the water closet with one that has a flush control on the approach or wide side.	3	3	N	\$100 to \$250

<p>The toilet paper dispenser is 4" to 6" too far from the front of the water closet.</p> <p>There is only 24" clearance in front of the sink due to the placement of a chair.</p> <p>See Photo Town Hall Annex 6.</p>	604.7	30.7.6	Relocate the toilet paper dispenser so that it is at least 24" a.f.f., not mounted over the grab bars, and between 7" to 9" o.c. to the front of the water closet.	3	2	I	\$0
	305.3	30.9	Remove the chair to provide the required maneuverability and minimum 30" x 48" forward approach.	3	1	I	\$0
	606.2	6.3					

Total \$11,230+

Town Hall Annex Assessment Photos



Photo Town Hall Annex 1



Photo Town Hall Annex 2



Photo Town Hall Annex 3



Photo Town Hall Annex 4



Photo Town Hall Annex 5



Photo Town Hall Annex 6

GOODNOW MEMORIAL LIBRARY

Function and Description of Facility and Programs: The Goodnow Memorial Library is a 2-story masonry building with a clock tower and a finished basement. The clock tower is closed to the public. A 2001 renovation included improvements to the basement converting the space into a story hour room, kitchen area, small meeting room, and a room for the Historical Society. Bathrooms are located on the basement and main levels with the Director's Office located on the 2nd level. The library is listed on the National Register of Historic Places.



Responsible Party: Library Trustees

General Description or Obstacle Which Limits Mobility or Access: None of the “accessible” parking spaces are designated as van accessible. The cross slopes for both designated accessible spaces and the shared access aisle vary from 3.4% to 4.0%. Signage for both spaces is 13½” to 16” too low. There is no level landing at the top of the curb ramp from the parking. There are abrupt changes in level surface at the transition from asphalt to brick walkway, at the transition from the walkway to the concrete ramp, and along the walkway itself to the ramp due to deterioration and heaving. The ramp railings do not extend at the ramp base, and for the majority of the ramp, have an upper railing that is ½” too low. The front, side, and rear exterior stairs have railings that do not fully extend at the top and/or bottom. The front stairs have only one middle railing. Interior doors, including the chair lift, either lack tactile designation signage, have signage that is too low, or is mounted in the wrong location. The chair lift doors have excessive operating forces and too fast closing speeds. Coat hooks for children and adults are not within reach range. A number of tables do not provide adequate knee clearance. The main level “high” drinking fountain serves as a protruding object. The front check-out counter is too high. The stacks on Level 2 do not provide the minimum required clear width. Floor grates in the main level reading room exceed the maximum opening of ½”. The Level 2 library director's office is not on an accessible route and

can be reached only by using 2 stairs. The stairs have a railing on one side only, which is too high. The director's office has 3 doors (closet, office, storage/spiral staircase) with non-compliant knob hardware. The Level 2 staff work room has only 27" of clear width, which is 5" too narrow. The staff kitchen has a counter/sink that is too high and lacks knee clearance. The interior stair railings are too high. The basement level and main level bathrooms have a number of areas of non-compliance related to maneuverability, clearances, and heights.

Interior Spiral Staircase

The spiral staircase leading to the 2nd level and to the basement lacks railings. The staircase is closed to the public but lacks formal signage noting as such. It is strongly recommended that the staircase is roped or barricaded in a more formal manner with appropriate tactile noting that it is closed to the public.

Note: At the time of assessment, the accessible route of travel from the parking to the library was only partially cleared of snow, with some areas having only 24" of clear width. It is imperative that a minimum of 36" of clear width be provided at all times on accessible routes of travel.

Goodnow Memorial Library Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<p><u>Parking</u> Signage for the 2 designated accessible spaces is 13½" to 16" too low under the 2010 ADA Standards.</p> <p>None of the spaces are designated as van accessible.</p> <p>The cross slopes vary from 3.4% to 4.0%, which exceeds the maximum allowance of 2.0% for a level surface.</p> <p>See Photo Library 1.</p>	208.2 502.6 502.4	23.2 23.6 23.4	Resurface the parking spaces and access aisles such that the running and cross slopes do not exceed 2.0% and the ground surface is uniform, stable, firm, and slip resistant. The van accessible space s/b 8' wide with a 8' access aisle (the access aisle can be shared with the accessible passenger vehicle space). Van accessible signage should be provided. Signage s/b set so that the bottom of the sign is at least 60" a.f.f. and the top no more than 96" a.f.f. and located no more than 10' from the parking spaces.	1	3	I	\$1,500
<p><u>Exterior Accessible Route</u> There are changes in level surface of up to 1" from the accessible parking to the accessible ramp. This includes the transition from the parking to the brick walkway, along the brick walkway (deterioration and heaving), and at the transition from the brick walkway to the concrete ramp.</p> <p>There is no level landing at the top of the curb ramp near the designated accessible parking.</p> <p>See Photos Library 2 and 3.</p>	403 406	22 21	Modify and/or reconstruct the accessible route so that there are no greater than a ¼" abrupt change in level surface along the entirety of the walkway and that there is a level landing the top of the curb ramp (minimum 3 feet, 5 feet preferred).	1	3	I	Up to \$1,500
<p><u>Exterior Ramp Railings</u> The railings do not fully extend 12" beyond the base of the ramp.</p> <p>The height of the majority of the top railing is 33½" a.f.f., which is ½" too</p>	505.4 505.10	24.5	<p>Modify the railings so they extend 12" beyond the base of the ramp.</p> <p>As the cost to raise the railings ½" would far exceed the benefit gained, it is recommended that a variance be sought to maintain the existing top railing height.</p>	1 1	3 1	N N	\$350+ \$0

short. <i>Note: There are no tolerances allowed for a range of dimensions.</i>							
<p>Exterior Stairs With the exception of the rear stairs with newer railings, none of the exterior stairs (main, side, side/front) properly extend at the bottom of the stairs the slope distance of one tread and then 12" parallel to the ground.</p> <p>The main entrance stairs have only one middle railing.</p> <p>See Photo Library 4.</p>	505.10	27.4.3	Modify and extend the railings the slope distance of one tread then 12" parallel to the ground.	1	3	N	\$1,500+
<p>The main entrance stairs have only one middle railing.</p> <p>See Photo Library 4.</p>	505.2	27.4.1	Provide continuous railings with proper top (12") and bottom extensions on both sides of the stairs. The top of the railing s/b 34" to 38" a.f.f.	1	3	N	Up to \$1,500
<p>Reach Range The following exceed the maximum reach range of 48" a.f.f. under the 2010 ADA Standards for adults:</p> <ul style="list-style-type: none"> Main Level lobby coat rack @ 62" a.f.f. Ground Level coat hooks (7) @ 52" a.f.f. over 22" shelf Ground Level coat hooks (9) @ 61" a.f.f. over 22" shelf <p>See Photo Library 5.</p>	308.2 308.3 308.1	6.5 6.6	<p>Provide at least two coat hooks at no more than 48" a.f.f. in the main level lobby</p> <p>Provide one coat hook at no more than 40" a.f.f. (ages 5 through 8), one coat hook at no more than 44" a.f.f. (ages 9 through 12), and one coat hook at no more than 48" a.f.f. in the ground level and not over a shelf.</p>	4 4	2 2	I I	\$0 \$0
<p>Chair Lift Door The chair lift door at all 3 levels exceeds the maximum operating force and the minimum closing speed. The operating force is 15 lbs. and the closing speed varies from 3 to 4 seconds.</p>	404.2.8 404.2.9	26.8 26.9	Adjust chair lift door(s) such that the push/pull force does not exceed 5 lbs. with door closing speeds of at least 6 seconds.	2	3	I	Up to \$300
<p>Door Signage Some of rooms lack tactile designation signage to identify rooms, offices and storage areas as well as signage that is improperly mounted.</p> <ul style="list-style-type: none"> Chair lift (varies from 42½" a.f.f to 50" a.f.f. for the 3 levels) Ground level emergency exit door – not at exit door and @ 56" a.f.f. Ground level conference room signage is 41" from the latch side Ground level entry door – no signage Main level @ children's reading room (2) – no signage Main level @ Susan A. Davis reading room – no signage Ground level mechanical/storage rooms (3) – no signage <p>See Photos Library 6 and 7.</p>	703	41.1	Install/relocate accessible compliant tactile designation signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Signage must be close to the latch side.	2	2	I	Up to \$245

<p>Tables</p> <p>Tables (work, meeting, and computer rooms) throughout the library do not meet the minimum required knee clearance. This includes the following locations:</p> <ul style="list-style-type: none"> • Ground level work table (25" knee clearance) • 2nd level 3 computer tables (23¾" knee clearance) • 2nd level work/reading table (23¾" knee clearance) <p>See Photo Library 8.</p>	226 306.3 902.3	35	Raise (adjust if optional or "block") one table in each area to achieve the minimum table height of 28" to 34" a.f.f. with at least 27" a.f.f. of knee clearance and 30" clear width. If blocking is not feasible, a separate table at each location would be required.	2	2	I	\$0 to \$375
<p>Main Level Reading Room Floor Grates</p> <p>Eight (8) floor grates have ¾"x1½" openings; one (1) floor grate has a 1"x1" opening; and one (1) floor grate has varied openings with some up to 2½" in size. Grate openings cannot exceed ½" and must be perpendicular to the route of travel.</p> <p>See Photos Library 9 and 10.</p>	302.3	25.4	Replace or modify grates to comply with maximum ½" opening requirement.	4	3	N	Up to \$2,500
<p>Main Level Check-out Counter</p> <p>The main level check-out counter is 1¾" too high.</p> <p>See Photo Library 11.</p>	227 904	12.2	Modify the existing counter or provide a 36" wide counter at no higher than 36" a.f.f. at the existing check-out counter.	2	3	N	Up to \$500
<p>Book Stacks</p> <p>Stacks on the 2nd level in the Adult Non-fiction section provide only 34" to 34¾" of clear width, which is less than the minimum required of 36".</p>	403.5	12.2	As feasible, move stacks to achieve the minimum 36" clear width.	2	2	N	\$0
<p>Protruding Objects</p> <p>The main level "high" drinking fountain at 32¾" a.f.f. is a protruding object as it extends more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f.</p>	307.2	20.6.1	Install a wing wall on the high side of the fountain.	4	2	I	\$100
<p>Interior Stair Railings</p> <p>The interior stair railing extensions vary from 40½" to 41" a.f.f. which is 2½"-3" too high.</p> <p>See Photo Library 12.</p>	505.4	27.4.2	Modify railings (as feasible) such that the extensions are between 34"-38" a.f.f. to the top of the railing.	2	3	N	Up to \$1,000+
<p>Kitchenette/Sink Counter</p> <p>The counter/sink in the staff employee lounge is 2" too high and does not provide knee clearance.</p> <p>The microwave is 16" too high at 64" a.f.f. and not within reach range.</p> <p>See Photo Library 13.</p>	306 606	32	Modify the counter/sinks so that there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping.	4	3	L	Up to \$1,500+
	308.2 308.3	6.5 6.6	Place the microwave on the counter.	4	1	I	\$0

<p><u>Accessible Route (Vertical Access) to the Library Director's Office</u></p> <p>There is no accessible route to the Library Director's Office as it is only accessible via stairs. The existing stairs have a railing on one side only, which is also too high at 39½"–47" a.f.f.</p> <p>See Photo Library 14.</p>	403 505	22 27.4	<p>Install compliant continuous railings at a height of 34" – 38" to the top of the handrails, round or oval in x-section and between 1¼" – 2" in outside diameter, and with extensions at the top 12" parallel to the floor and at the bottom the slope distance of one tread then 12" parallel to the floor (as feasible).</p> <p>As a reasonable accommodation, the Library Director may need to meet with staff or patrons in an alternate room or the office may need to be relocated if necessitated by a reasonable accommodation request of the Library Director.</p> <p>Substantial modifications to the building may require full access to the Director's Office.</p>	2	3	L	Up to \$350+
<p><u>Door Hardware</u></p> <p>Three (3) doors in the Library Director's Office on the 2nd level have non-compliant knob-style hardware.</p> <p>See Photo Library 15.</p>	404.2	26.11	<p>Replace the existing hardware with lever style that is operable with one hand, a closed fist, or loose grip. .</p> <p><i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid range for the doors.</i></p>	4	2	N	Up to \$375
<p><u>Doorways and Clear Widths</u></p> <p>The Level 2 staff room has only 27" of clear width which is 5" too narrow.</p> <p>See Photo Library 16.</p>	404.2.3	26.5	<p>Option #1: If necessary as a reasonable accommodation request, allow a staff person to use other space in the library as a work area.</p> <p>Option #2: Modify the door opening to achieve the 32" minimum required clear width.</p>	4	3	L	\$0 to up to \$1,250+
<p><u>Ground Level Bathroom</u></p> <p>The coat hook is 9" too high under the 2010 ADA Standards.</p> <p>The toilet paper dispenser is 0" o.c. from the front of the water closet.</p> <p>The water closet is 1½" too far from the nearest side wall and 4" too close to the far wall or nearest object.</p> <p>The clearance in front of the water closet is only 30" due to storage items in front of the water closet, which is less than the required 42".</p> <p>The bathroom lacks audible and visual alarms.</p> <p>See Photos Library 17 and 18.</p>	308.2 308.3	30.6	Lower the coat hook to no more than 48" a.f.f.	3	2	I	\$0
	604.7	30.7.6	Relocate the toilet paper dispenser so that it is at least 24" a.f.f., not mounted over the grab bars, and between 7" to 9" o.c. to the front of the water closet.	3	2	I	\$0
	604.2	30.7.2	Relocate the water closet so it is 17½" o.c. from the nearest sidewall (<i>Note: 18" o.c. is required but there is a ½" tolerance</i>) which will result in 40" clearance to the sink). Seek a variance to maintain the 40" front clearance versus 42".	3	3	N	Up to \$500
	604.3	30.7.2	Remove all items from the front of the water closet.	3	1	I	\$0
	702	40	Install audible and visual alarms in compliance with NFPA 72.	3	3	N	Up to \$1,000
<p><u>Main Level Bathroom</u></p> <p>The sink piping is not fully wrapped.</p> <p>The flush control of the water closet is not on the approach or wide side.</p>	606.5	30.9.5	Insulate, wrap, or guard the piping.	3	2	I	\$75
	604.6	30.7.5	Replace the water closet or the tank of the water closet with one that has a flush control on the approach or wide side.	3	3	N	\$100 to \$250

There is only 37½" clearance on the far/approach side of the water closet, which is 4½" too narrow. (Note: A cabinet and waste basket on the side of the water closet further reduces the clear width to only 25").	604.2	30.7.2	Remove the cabinet and waste basket. Consider construction modifications as feasible to attain the minimum required 42" far wall/approach side clear width. If not feasible, seek a variance.	3	1,2	1	\$0 to TBD
The toilet paper dispenser is 0" o.c. from the front of the water closet. See Photos Library 19 and 20.	604.7	30.7.6	Relocate the toilet paper dispenser so that it is at least 24" a.f.f., not mounted over the grab bars, and between 7" to 9" o.c. to the front of the water closet.	3	2	1	\$0

Total up to \$16,670

Goodnow Memorial Library Accessibility Assessment Photos



Photo Library 1



Photo Library 2



Photo Library 3



Photo Library 4

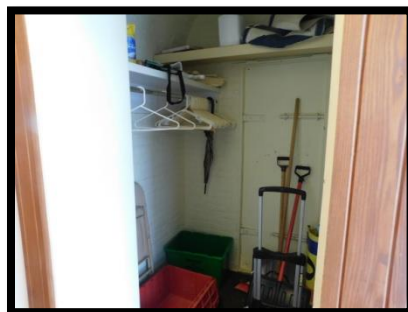


Photo Library 5



Photo Library 6



Photo Library 7



Photo Library 8



Photo Library 9

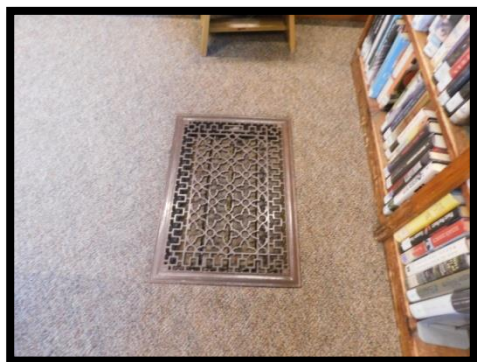


Photo Library 10



Photo Library 11



Photo Library 12



Photo Library 13



Photo Library 14



Photo Library 15

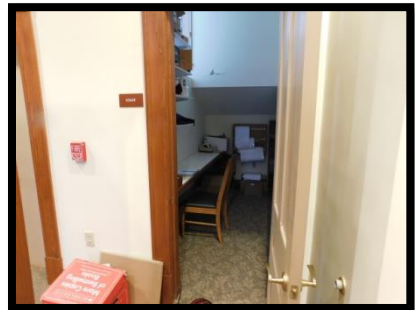


Photo Library 16



Photo Library 17



Photo Library 18



Photo Library 19



Photo Library 20

PRINCETON POLICE DEPARTMENT

Description of Facility and Programs: The Princeton Police Department consists of a Chief, 2 Sergeants, an Administrative Assistant, and a number of patrol officers. Dispatch is handled externally by the Holden Regional Dispatch Center. The Police Station consists of offices, a booking area, locker room, storage rooms and areas, a staff kitchenette, and bathrooms (2 non-accessible, 1 accessible).



Responsible Party: Select Board.

General Description or Obstacle Which Limits Mobility or Access: There is no designated accessible parking. The accessible route of travel to the entrance has a running slope that exceeds the maximum allowed. There is only one railing on the ramped approach. There is no directional signage for the accessible entrance. The front door does not meet the minimum closing speed. Interior doors with closers have excessive operating forces and too fast closing speeds. Interior doors lack tactile designation signage on the latch side of the door and most doors have non-compliant knob-style hardware. Some doors lack adequate maneuvering or pull clearance. Two doors with counters are too high with one serving as a protruding object. The accessible bathroom has a number of areas of non-compliance including coat hooks that are too high, a mirror that is too high, sink piping that is not wrapped, a grab bar that is mounted too low, a toilet paper dispenser that is too close to the water closet, a water closet that is too high, and water closet front clear width that is restricted due to a chair.

Non-public areas

The garage/storage area and “police only” entrance has 3 doors with non-compliant knob-style hardware and no tactile designation signage. Similarly, the stairs leading to the Fire Department apparatus bays and police/fire gym has railings that do not extend the slope distance of one tread and then 12” parallel to the

floor. Doors with glass panes in these areas exceed the maximum viewing height. As these areas are not intended for public use and are limited to police (garage/storage) and police/fire (stairs, gym) personnel who must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform, no modifications are required at the present time. If the current practices and policies change and current non-public interior spaces are open to the general public, physical modifications would be required due to public access or as a result of a reasonable accommodation.

Police Station Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
Parking There is no designated accessible parking space inclusive of access aisle and signage. The designated accessible parking space must also be van accessible.	502 703.7.2	23	Surface, stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards). Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. The slopes should not exceed 2% in any direction.	1	3	N	Up to \$1,500
Directional Signage Outside signage noting the accessible entrance is not provided.	216	41.1.3	Provide directional signage noting which is the accessible entrance and which is the "police only" entrance.	1	2	I	\$100
Accessible Route to Building The running slope of the newer asphalt near the concrete landing for the entrance has an 8' segment with a running slope of up 12%, which exceeds the maximum of 8.3% for a ramp. The ramped approach to the entrance door has only one railing. There is a 1" abrupt change in level surface at the entrance door threshold. See Photos Police 1.	403 405 405.8 505 404.2.5	24.2 24.5 26.10	Modify the existing approach to the entrance door such that the running slope of the ramp does not exceed 8.3%. Provide an additional railing paired at a height of 34" – 38" a.f.f. for the top railing and 18" – 20" for the bottom railing. The railing s/b oval or round in shape with an outside diameter of 1½" to 2" and with 12" extensions at the top and bottom. Modify the threshold to create a beveled transition of no more than ½".	1 1 1	3 3 2	I I I	Up to \$750 Up to \$2,700 Up to \$100
Entrance and Interior Doors The main front entrance door does not comply with the minimum closing speed requirement of 6 seconds under 521 CMR. <u>The measured closing speed was 3 seconds.</u> The interior doors with closers (interior lobby, booking, stairway) do not fully comply with the maximum allowed operating force for an interior door (5 lbs.) and do not fully comply with the minimum closing speed requirement of 6 seconds under 521 CMR. <u>The operating forces ranged from 15 lbs. - 17 lbs. with closing speeds of 3 – 4 seconds.</u>	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 15 lbs for an exterior door and 5 lbs. for an interior door with door closing speeds of at least 6 seconds.	1, 2	2	I	\$0
Door Hardware	404.2	26.11		2	2	I	\$1,650+

<p>The following doors have knob-style hardware:</p> <ul style="list-style-type: none"> • Door to garage • Door to stairs • Door to bathroom near sergeant's office • Door to sergeant's office • Door to officer locker room • Door to staff kitchenette • Door to evidence room • Door to chief's office • Door to bathroom near former communications • Doors to hallway storage/closets (2) <p>In addition, the following lacked hardware:</p> <ul style="list-style-type: none"> • Door to communications from administrative area <p>See Photo Police 2.</p>			<p>Install lever-style or similar accessible compliant hardware on the interior doors.</p> <p><i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i></p>				
<p>Door Signage The following interior doors lack tactile accessible signage:</p> <ul style="list-style-type: none"> • Door to garage • Door to interior from lobby • Door to interior of • Door to stairs • Door to bathroom near sergeant's office • Door to sergeant's office • Door to officer locker room • Door to staff kitchenette • Door to evidence room • Door to chief's office • Door to communications from administrative area • Door to bathroom near former communications • Doors to hallway storage/closets (2) • Door to communications with counter • Door to hallway with counter • Door to hallway accessible bathroom <p>See Photo Police 2.</p>	703	41.1	<p>Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p>	2	2	1	\$595+
<p>Reach Range The following exceed the maximum reach range of 48" a.f.f. under the 2010 ADA Standards for adults:</p> <ul style="list-style-type: none"> • Communications room light switch (52" a.f.f.) • Kitchenette microwave (64" a.f.f.) 	308.2 308.3	6.5 6.6	<p>As may be required as a reasonable accommodation, lower the light switch to no more than 48" a.f.f. and relocate the microwave to the counter or somewhere else within reach range.</p>	2	3,1	L	\$0 to \$350
Door Maneuverability							

The 2 Communications doors (one with counter, one without hardware) have only 4" of maneuvering clearance on the latch pull side of the doors and not the required 18". See Photo Police 3.	404.2.4	26.6	According to police personnel, the door without hardware is normally kept in an open position and the 2 nd communications room door is an area which is used primarily for storage and no longer serves as a communications center. Keep doors open and only modify as may be required as a reasonable accommodation.	2	1	I	\$0
Door Counters The door counters for the following areas are 5¼" to 5½" too high: <ul style="list-style-type: none">• Communications (41¼")• Hallway (41¼") The communications door also is a protruding object as the counter extends 7½" into the accessible route of travel at a height of 41¼" a.f.f. Protruding objects are fixtures or items that extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical headroom clearance reduced to less than 80". See Photo Police 3.	904.4	7.2	Modify the hallway door counter so it is no more than 36" a.f.f. Communications door – see below.	2	3	I	Up to \$750
	307.2	20.6.1	Remove the communications door counter.	2	3	I	\$100
Accessible Bathroom The 2 bathroom coat hooks are both 24½" too high. The sink piping is not wrapped or insulated. The mirror is 4" too high. The side grab bar is 2¼" to 5¼" too low. The toilet paper dispenser is too close to the water closet. The water closet is 19¼" a.f.f. which is ¼" too high. <i>Note: There are no tolerances for a range of dimensions. The height of a water closet must be 17" to 19" a.f.f. to the top of the seat.</i> The clear width in front of the water closet is reduced to 18" due to the placement of a chair. See Photo Police 4.	603.4 308	30.6.1	Lower one coat hook to no more than 48" a.f.f.	3	2	I	\$0
	606.5	30.9.5	Insulate, wrap, or guard the piping.	3	2	I	\$75
	603.3	30.11	Lower the mirror to no more than 40" to the bottom of the reflecting surface.	3	2	I	\$0
	609.4	30.8.2	Raise the side grab bar to a height of 33" to 36" a.f.f. to the top of the gripping surface.	3	2	I	\$0
	604.7	30.7.6 30.8.5	Relocate the toilet paper dispenser so that it is at least 24" a.f.f., not mounted over the grab bars, and between 7" to 9" o.c. to the front of the water closet.	3	2	I	\$0
	604.4	30.7.3	As feasible, replace the seat with a thinner style to gain ¼" less width to achieve the maximum seat height of 19" a.f.f.	3	2	I	\$50
	604.3	30.7.2	Remove the chair to achieve the minimum required 42" front clearance.	3	1	I	\$0

Up to \$8,720+

Police Station Accessibility Assessment Photos



Photo Police 1

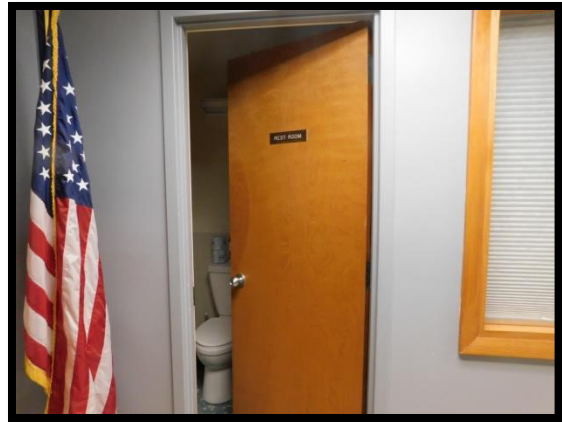


Photo Police 2



Photo Police 3



Photo Police 4

PRINCETON FIRE DEPARTMENT

Description of Facility and Programs: The Princeton Fire Department provides fire suppression and emergency medical services to the town of Princeton and its residents. The Department consists of a Fire Chief, 2 Deputy Chiefs, 2 Captains, 2 Lieutenants, a Chaplain and numerous fire-fighters and EMT's for a total of 36 fire personnel. The Fire Headquarters is located at 8 Town Hall Drive and Station #2 is located in East Princeton. The Fire Headquarters consists of an office, kitchenette, bathroom/lockers, apparatus bays, and an exercise room. Station #2 consists of bathrooms, a meeting room, a kitchenette, and apparatus bays.



Fire Headquarters



Station #2

Responsible Party: Select Board.

General Description or Obstacle Which Limits Mobility or Access:

The **Fire Headquarters** is wholly non-compliant as it lacks accessible parking and an accessible route of travel into the building as the entrance is served solely by stairs. The stairs have a railing on one side only. The main entrance door has knob hardware and the door closing speed is too fast. The office area has doors with knob hardware and which lack tactile designation signage. The bathroom/shower is wholly non-compliant due to insufficient maneuverability and lack of clearances, excessive reach ranges due to dispenser heights, sink piping that is not wrapped and faucets that require twisting of the wrist, a water closet that is too low, and other significant issues. The kitchenette has a sink that lacks knee clearance and a stove with the controls located on the top of the appliance.

Main Office Bathroom/Shower, Kitchenette. These areas are limited to firefighters and emergency medical personnel, who must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform. The Department does not employ any civilian staff (non-firefighter/EMS). As no public access is allowed to these areas, no further action or modifications are required at the present time. Modifications would only be required as a reasonable accommodation as may be required.

Garage/Apparatus Area. The garage/apparatus bays can only be accessed internally via stairs from the office area. There are numerous 7" to 9" abrupt changes in level surface to and from this area. Doors have non-compliant knob-style hardware, doors lack tactile designation signage, four (4) doors have glass panes that exceed the maximum viewing height of 43" a.f.f., protruding

objects exist throughout, and doors with closers have excessive operating forces and too fast closing speeds. Phones and other items are also not within reach range.

These areas are limited to firefighters and emergency medical personnel, who must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform. The Department does not employ any civilian staff (non-firefighter/EMS). With one exception, no public access is allowed in these areas. The sole use exception to these areas is the exercise room, which according to staff, subject to approval by the Fire Chief, town personnel may also use the exercise room. As this facility is not on an accessible route of travel, substantial modifications would be required to achieve access including ramps, lifts, reconfiguration of storage and equipment, and the possible loss of a vehicle bay. In order for the exercise room to remain in place “as is”, use of this facility must be restricted solely to Police Officers and Fire Fighter/EMS personnel. If this is done, no further action to this area is required at the present time. If this is not done, then the aforementioned modifications will be required.

Main Fire Station Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
Parking There is no designated accessible parking space inclusive of access aisle and signage. The designated accessible parking space must also be van accessible.	502 703.7.2	23	Surface, stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards). Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. The slopes should not exceed 2% in any direction.	1	3	N	Up to \$1,500
Accessible Route to Building There is no accessible route of travel to the building. See Photo Main Fire 1.	405 505	24	Assuming designated accessible parking is constructed adjacent to the building, construct an accessible route (5% or less running slope) or a ramped approach (up to 8.3% running slope) with paired railings to the front entrance. There must be a 5' level landing for maneuverability at the entrance.	1	3,4	N	TBD – up to \$25,000
Front Entrance Stairs The main entrance stairs have only one railing. The sole railing does not fully extend the slope distance of one tread (only 6") and then 12" parallel to the ground. See Photo Main Fire 2.	505	27	Provide continuous railings with proper top (12") and bottom extensions on both sides of the stairs. The top of the railing s/b 34" to 38" a.f.f. Modify the existing railing as feasible.	1	3	N	Up to \$1,850
Door Closing Speed The main front entrance door does not comply with the minimum closing speed requirement of 6 seconds under 521 CMR. The closing speed was 3 to 4 seconds.	404.2.8 404.2.9	26.8 26.9	Adjust door closer such that the door closing speed is at least 6 seconds.	1	2	I	\$0
Door Hardware The following doors have knob-style hardware:	404.2	26.11	Install lever-style or similar accessible compliant hardware on the interior doors.	1, 2	2	I	\$750+

<ul style="list-style-type: none"> • Front entrance door • Door to bathroom/shower • Door to apparatus bays • Door directly to bathroom • Closet door near bathroom <p>See Photo Main Fire 3.</p>			<p><i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i></p>				
<p>Door Signage The following interior doors lack tactile accessible signage:</p> <ul style="list-style-type: none"> • Door to bathroom/shower • Door to apparatus bays • Door directly to bathroom • Closet door near bathroom <p>See Photo Main Fire 4.</p>	703	41.1	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	1	\$140+

Up to \$29,240+

Main Fire Station Accessibility Assessment Photos



Photo Main Fire 1



Photo Main Fire 2

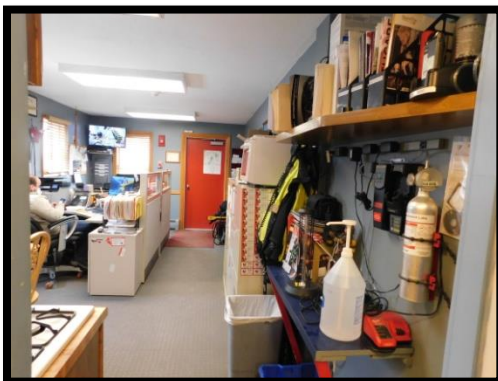


Photo Main Fire 3

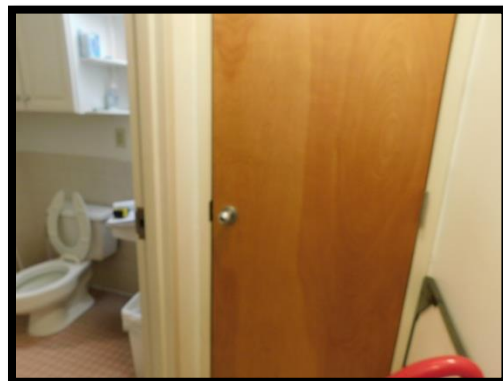


Photo Main Fire 4

Station #2 is also wholly non-compliant as it lacks accessible parking and an accessible route of travel into the building as the entrance is served solely by stairs. There is an apparent walkway that leads from the rear of the building to the front entrance but it is not entirely improved nor is it maintained (snow covered at time of assessment). The front stair railings are too high and do not fully extend at the top and bottom of the stairs. There are also abrupt changes in level surface and surface gaps at the concrete pads. Rear egress stairs have a railing on one side only, which is too high and doesn't fully extend at the bottom of the stairs. The rear egress door closing speed is too fast. Similarly the interior doors (2) to the garage/apparatus bays and the mezzanine storage area have excessive operating forces and too fast closing speeds. Interior doors on the main level have knob hardware and lack tactile designation signage. The 2 doors to garage/apparatus bays and storage area have glass panes that exceed the maximum viewing height. The kitchenette in the large meeting room is too high, the sink lacks knee clearance, and the cabinets lack hardware. The men's bathroom is not accessible and is wholly non-compliant. The women's bathroom is designated as accessible but has dispensers that are too high, sink piping that is not wrapped, sink faucets that are non-compliant, grab bars that are mounted too low, a toilet paper dispenser that is too far from the water closet, a water closet that is too low, and water closet clearance that is restricted due to a bench.

Bathroom/Shower Showers are located within each bathroom and are limited to use by firefighter/EMS personnel. The showers are non-compliant due to maneuverability, clear widths, 4" abrupt change in level surface to access, and the lack of accessibility features. As firefighter and emergency medical personnel must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform, no further action or modifications are required to the showers at the present time. Modifications would only be required as a reasonable accommodation as may be required.

The men's bathroom is not accessible nor is it designated as such. The women's bathroom is designated as accessible. Option #1 would be to designate each bathroom as unisex, with the former men's bathroom remaining as not accessible and the former women's bathroom modified to achieve full accessibility compliance. Option #2 and the more costly option would be to keep the bathrooms as separate men's and women's bathrooms and to make each fully accessible. The recommended action in the detailed assessment below will be based on Option #1.

Garage/Apparatus Area. The garage/apparatus bays can only be accessed internally via stairs from the main level. There are 5" to 8" abrupt changes in level surface to and from this area. Doors have non-compliant knob-style hardware and lack tactile designation signage. Stairs to this area have a railing on one-side only which is not oval or round in shape. Exit/egress doors with closers have excessive operating forces and too fast closing speeds. These areas are limited to firefighters and emergency medical personnel, who must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform. The Department does not employ any civilian staff (non-firefighter/EMS) and no public access is allowed in these areas. No further action is required at the present time.

Station#2 Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<p>Parking</p> <p>There is no designated accessible parking space inclusive of access aisle and signage. The designated accessible parking space must also be van accessible.</p>	502 703.7.2	23	Surface, stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards). Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. The slopes should not exceed 2% in any direction.	1	3	N	Up to \$2,500
<p>Accessible Route to Building</p> <p>There is no accessible route of travel to the building.</p> <p>See Photo Station #2 - 1.</p>	405 505	24	Assuming designated accessible parking is constructed adjacent to the building, construct an accessible route (5% or less running slope) or a ramped approach (up to 8.3% running slope) with paired railings to the front entrance. There must be a 5' level landing for maneuverability at the entrance.	1	3,4	N	TBD – up to \$25,000
<p>Front Entrance Stairs</p> <p>The railings do not fully extend at the top and bottom of the stairs. The railings are 2½" too high.</p> <p>There are varying unbeveled abrupt changes of greater than ¼" in level surface from the transition of the asphalt and concrete and at the concrete pad into the building</p> <p>See Photo Station #2 -2.</p>	505 403 404	27 22 26	<p>Modify the railings so they are 34" – 38" a.f.f. and extend 12" parallel to the ground at the top and the slope distance of one tread then 12" parallel to the ground at the bottom.</p> <p>Modify, infill, grind the concrete to eliminate abrupt changes in level surface and gaps.</p>	1 1	3 2,3	N N	<p>Up to \$3,000+</p> <p>Up to \$250</p>
<p>Side Egress Stairs</p> <p>The railings are on one side only, do not fully extend at the top and bottom of the stairs, and are 2" too high.</p> <p>See Photo Station #2 - 3.</p>	505	27	Provide railings on both sides of the stairs. Railings s/b 34" – 38" a.f.f. and extend 12" parallel to the ground at the top and the slope distance of one tread then 12" parallel to the ground.	1	3	N	Up to \$2,300+
<p>Door Closing Speeds and Operating Forces</p> <p>The front entrance door and side egress door do not comply with the minimum closing speed requirement of 6 seconds under 521 CMR. The closing speeds were 4 to 5 seconds.</p> <p>The interior doors (2) to the mezzanine storage area and apparatus bays have operating forces of 15 lbs. and closing speeds of 4 to 5 seconds.</p>	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the door closing speeds are at least 6 seconds. Adjust the interior door operating forces so they are no more than 5 lbs.	1, 4	2	I	\$0
<p>Door Hardware</p> <p>The following doors on the main level have knob-style hardware:</p> <ul style="list-style-type: none"> • Storage closets (4) • Men's bathroom • Women's bathroom 	404.2	26.11	<p>Install lever-style or similar accessible compliant hardware on the interior doors.</p> <p><i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i></p>	1, 2	2	I	\$1,200

<ul style="list-style-type: none"> Doors to apparatus bays/storage (2) <p>See Photo Station #2 - 4.</p>							
<p>Door Signage</p> <p>The following interior doors lack tactile accessible signage:</p> <ul style="list-style-type: none"> Storage closets (4) Men's bathroom Women's bathroom Doors to apparatus bays/storage (2) Rear egress door <p>See Photo Station #2 - 4.</p>	703	41.1	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$315+
<p>Doors with Glass Panes</p> <p>The following doors have glass panes which exceed the maximum viewing height of 43" at the bottom of the glass.</p> <ul style="list-style-type: none"> Doors (2) to apparatus bays/storage (52½" a.f.f.) <p>See Photo Station #2 - 5.</p>	404.2.11	NA	Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. at the bottom of the glass				
			Option #1: Restrict or block/frost the glass panes.	4	2	I	\$0
			Option #2: Modify the doors to comply with the maximum height of 43" a.f.f.	4	3	L	Up to \$900+
<p>Main Level Reach Range</p> <p>The following exceed the maximum reach range of 48" a.f.f. under the 2010 ADA Standards:</p> <p><u>Light Switches/Outlets</u></p> <ul style="list-style-type: none"> 3 light switches @ 50" - 50 ½" a.f.f. 2 outlets @ 49½" a.f.f. (4 outlet per location) 	308.2 308.3	6.5 6.6	Lower the switches/outlets to a height of no more than 48" a.f.f.	4	3	L	Up to \$1,750+
<p>Kitchenette/Sink Counter</p> <p>The counter/sink in the large meeting room is 2¼" too high and does not provide knee clearance.</p> <p>There is inadequate clear floor space in front of the stove.</p> <p>The cabinet doors lack hardware. Fixtures/hardware, etc. must be operable with a closed fist and not require pinching or twisting of the wrist.</p> <p>See Photo Station #2 - 6.</p>	306 606	32	Replace/modify the counter/sinks so that it is no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping.	3	3	N	Up to \$1,000+
	304.3 305.3	32.1	Remove the wastebasket and move the counter on wheels to achieve 60" diameter clear floor space.	3	1	I	
	309.4	39.5	Install hardware on cabinet doors that can be operable with a closed fist.	3	2	N	\$75
<p>Women's (Proposed Unisex) Accessible Bathroom</p> <p>The sink piping is not wrapped.</p> <p>The sink faucets are non-compliant as they require pinching and twisting of the wrist.</p> <p>The paper towel dispenser is 26" too high.</p>	606.5	30.9.5	Wrap, guard, or insulate the piping.	3	2	I	\$50
	309	30.9.6	Replace the faucets with ones that can be operable with one hand and do not required pinching or twisting of the wrist such as levers or push self-closing valves.	3	2	I	\$100
	308.2 308.3	30.12	Lower the towel dispenser to a height of no more than 42" a.f.f.	3	2	I	\$0

The mirror is 13½" too high.	603.3	30.11	Lower the mirror so that it is no more than 40" a.f.f. to the bottom of the reflecting surface.	3	2	I	\$0
The grab bars are 2" – 2¼" too low.	609.4	30.8.2	Raise the grab bars so they are between 33" and 36" a.f.f. to the top of the gripping surface.	3	2	I	\$0
The toilet paper dispenser is a minimum of 7" too far from the front of the water closet.	604.7	30.7.6	Relocate the toilet paper dispenser so that it is at least 24" a.f.f., not mounted over the grab bars, and between 7" to 9" o.c. to the front of the water closet.	3	2	I	\$0
The water closet is a minimum of 1½" too low.	604.4	30.7.3	Replace the water closet with one that is 17" to 19" a.f.f. to the top of the seat.	3	2	I	\$350
The clearance in front of the water closet is reduced to only 26", which is 16" too narrow, due to a bench.	604.3	30.7.2	Remove the bench to achieve the minimum required 42" clearance in front of the water closet.	3	1	I	\$0
The bathroom lack audible and visual alarms.	702	40	Install audible and visual alarms in compliance with NFPA 72.	3	3	N	Up to \$1,000
See Photos Station #2 – 7 and 8.							

Up to \$39,790+

Station#2 Accessibility Assessment Photos



Photo Station#2 - 1



Photo Station#2 - 2



Photo Station#2 - 3



Photo Station#2 - 4



Photo Station#2 - 5



Photo Station#2 - 6

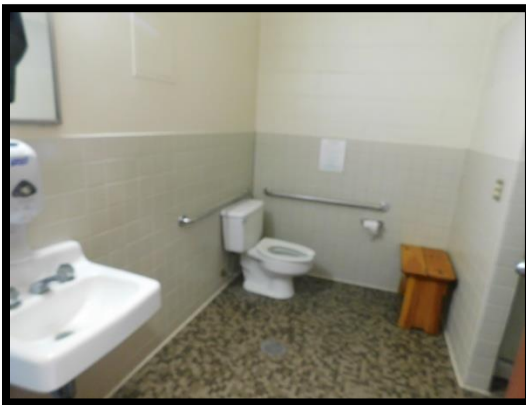


Photo Station#2 - 7



Photo Station#2 - 8

HIGHWAY GARAGE

Description of Facility and Programs: The Princeton Highway Department renders services to residents in the areas of highway maintenance and construction; snow and ice operations; shoulder, ditch and catch basin cleaning; gravel road grading; street sweeping; line painting; sign repair; pot hole patching; culvert replacement; brush chipping; road side mowing and maintenance of all parks, athletic fields, playgrounds and the town common. The building consists of a small open office area which is open to the public and the garage area which is not open to the public and includes the vehicle bays and work areas, a worker break room, and 2 bathrooms.



Responsible Party: Select Board

General Description or Obstacle Which Limits Mobility or Access:

There is no designated accessible parking. There is an abrupt change in level surface at the transition from asphalt to the concrete pad at the front door entrance as well as at the door threshold. The front door does not meet the minimum closing speed. Interior doors with closers have excessive operating forces and too fast closing speeds. Interior doors lack tactile designation signage on the latch side of the door. The main door and interior vestibule doors to the administrative office and to the garage area have glass panes that are too high.

Salt Storage Shed

Gravel/salt is available for Princeton residents. It is recommended that signage be posted near the area where salt is available for residents with contact information for assistance if required for those with a mobility limiting disability. This information should also be posted on the town's website.

Restricted and Non-Public Areas

As noted above, the garage is not open to the public and includes the vehicle bays and work areas, a worker break room, and 2 bathrooms. There are no solely administrative staff that work in the building with the Highway Superintendent and Highway Foreman performing administrative functions in addition to their daily physical highway functions.

A drinking fountain in the garage area is “low” only with adequate knee clearance but also serves as a protruding object in the accessible route of travel. The break room and bathroom doors have excessive operating forces and too fast closing speeds. The break room kitchenette sink/counter is too high, lacks knee clearance, and has dispensers (towel, soap) that exceed the maximum reach range under the 2010 ADA Standards.

The bathrooms are substantially compliant with some exceptions. The tactile designation signage on both the men’s and women’s doors are on the door and not the latch side. The women’s bathroom towel dispenser is 8” too high and the water closet flush control is on the wrong side. The men’s bathroom towel dispenser is 4” too high and soap dispenser is 7” too high. The side grab bar is 18” too short but lacks the space for the required 42” long grab bar unless the wall is extended. The water closet is 3½” too far from the near wall and the toilet paper dispenser needs to be 4” – 6” farther away from the front of the water closet. The shower in the men’s bathroom is for highway personnel only and is non-compliant due to a 5” abrupt change to enter, the lack of maneuverability, and no grab bars.

As these areas (vehicle bays and work areas, break room, bathrooms) are not intended for public use and are limited to highway personnel who must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform, no modifications are required at the present time. If the current practices and policies change and current non-public interior spaces are open to the general public or clerical staff are hired to do office work in the building, physical modifications would be required due to public access or as a result of a reasonable accommodation.

However, due to the limited compliance work for the women’s bathroom, the men’s bathroom could be designated as a non-accessible unisex bathroom and the women’s bathroom as a unisex accessible bathroom. Required modifications would include: new tactile designation signage located on the latch side of each door at a height of 60” a.f.f, adjustments to the door closers to meet the maximum 5 lb. operating force and minimum 6 seconds closing speed requirement, lowering the towel dispenser in the women’s bathroom to a height of no more than 42” a.f.f., and replacing the water tank of the women’s toilet so the flush valve in on the approach side. These modifications could be achieved for roughly \$250.

Department of Public Works Administrative Building Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<p>Parking</p> <p>There is no designated accessible parking space inclusive of access aisle and signage. The designated accessible parking space must also be van accessible.</p> <p>See Photo Highway 1.</p>	502 703.7.2	23	Stripe and designate a van accessible parking space with van accessible signage at a width of either 11’ with a 5’ access aisle or 8’ with and 8’ access aisle (2010 ADA Standards). Signage must be set such that the signage height should be a minimum of 60” high at the bottom (2010 ADAAG Standards) and a maximum of 96” at the top (MAAB 521 CMR) and located no more than 10’ in front of the space.	1	2	I	Up to \$150
Building Access							

There is a 1" abrupt change in level surface from the transition from asphalt to the concrete pad.	403	22	Modify the transition from the asphalt to the cement pad so there is no more than a ¼" unbeveled change in level surface or no more than a ½" beveled change in level surface.	1	2	I	Up to \$100
A roughly ½" unbeveled height differential occurs at the door threshold. See Photo Highway 2.	404.2.5	26.10	Modify the threshold to create a beveled transition of no more than ½".	1	2	I	Up to \$100
Door Operating Forces/Closing Speeds The main front door does not comply with the minimum closing speed requirement of 6 seconds or the maximum operating force of 15 lbs. for an exterior door. The interior vestibule doors to the administrative offices and to the garage area do not comply with the minimum closing speed requirement of 6 seconds or the maximum operating force of 5 lbs. for an interior door.	404.2.8 404.2.9	26.9 26.8	Adjust the door closers such that the closing speed is at least 6 seconds and the operating force does not exceed 15 lbs. for the front door and no more than 5 lbs. for the interior doors.	1	2	I	\$0
Interior Door Signage The following lack compliant accessible designation signage: <ul style="list-style-type: none">• Door to administrative office• Door to garage/bay area	703.4	41.1	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$70
Doors with Glass Panes The following doors have glass panes which exceed the maximum viewing height of 43" at the bottom of the glass. <ul style="list-style-type: none">• Front door (48" a.f.f.)• Door to administrative office (47 ½" a.f.f.)• Door to garage/bay area (48" a.f.f.)	404.2.11	NA	Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. at the bottom of the glass Option #1: Restrict or block/frost the glass panes. Option #2: Modify the doors to comply with the maximum height of 43" a.f.f.	1, 2 1, 2	2 3	I L	\$0 Up to \$1,350+

Total: \$420 - \$1,770

Highway Garage Accessibility Assessment Photos



Photo Highway 1



Photo Highway 2

PRINCETON SENIOR & COMMUNITY CENTER

Function and Description of Facility and Programs: The Princeton Senior & Community Center is located in a leased facility at Post Office Place on Worcester Road. The Center is located on the ground level of a 2-story wooden framed commercial building. The facility consists of an office, an entrance lobby, bathrooms, a kitchen, a large meeting room, 2 smaller rooms, and a small dining area. Programs and services include a newsletter, fitness programs, food assistance and meals on wheels, health programs and assistance, medical equipment for those in need, monthly social events, SHINE, information and referrals, and other social services.



Responsible Party: Select Board/Council on Aging

General Description or Obstacle Which Limits Mobility or Access: The 2 designated accessible parking spaces have signage that is too low. Neither of the spaces is designated as van accessible. Interior room doors/closets lack tactile designation signage. One egress door had non-compliant knob-style hardware. Three doors had glass panes that exceed the maximum height allowed under the 2010 ADA Standards. The double doors to the large meeting room lack the required minimum clear width. Interior and exterior doors with closers have excessive operating forces and too fast closing speeds. The small activity room next to the kitchen has a sink that lacks knee clearance and has faucets that require pinching and twisting of the wrist. The designated "accessible" bathrooms have a few items of non-compliance including coat hooks that are mounted too high, toilet paper dispensers that are too close or too far from the water closet, stored items under sinks or adjacent to the water closet restricting maneuverability, and in the women's closet a chase in front of the water closet restricting clear width and a paper towel dispenser that is too high.

Kitchen

The kitchen area has counters that are too high, sinks that lack knee clearance, stoves with controls on the back of the stove and not the front, and dispensers that are too high. The kitchen is for staff use and volunteers only who must meet minimum physical requirements to perform the essential functions of their duties. As these areas are not open to the public or not for public use, modifications would only be triggered through a reasonable accommodations request.

Princeton Senior & Community Center Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<p>Parking The signage for the 2 designated accessible spaces is 6½” to 7½” too low. Neither space is designated as van accessible.</p> <p>See Photo Senior Center 1.</p>	502 703.7	23	Raise the signage so that each sign is a minimum of 60” high at the bottom (2010 ADAAG Standards) and a maximum of 96” at the top (MAAB 521 CMR) and located in front of the space. Van accessible signage s/b be provided in front of the 11” wide space.	1	2	I	\$25
<p>Door Signage There is no tactile designation signage at the following locations:</p> <ul style="list-style-type: none"> • Director’s office • Double doors to large meeting room (2) • Single door to large meeting room • Exit door from large meeting room • Large meeting room closet • Door to kitchen/dining • Side exit door • Door directly to kitchen • Door to activity room next to kitchen • Door off kitchen • Closet door off kitchen • Exit door off kitchen <p>See Photo Senior Center 2.</p>	703	41.1	Install accessible compliant room designation signage on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60” a.f.f to the centerline of the sign. Tactile characters on signs s/b 48” min. a.f.f.. from baseline of lowest character and 60” max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$455
<p>Door Hardware The exit door off the kitchen has non-compliant knob style hardware.</p> <p>See Photo Senior Center3.</p>	404.2	26.11	Door hardware must be operable with a closed fist or loose grip and shall not require tight grasping or tight pinching of the wrist to operate. Replace the knob-style hardware with lever hardware.	4	2	I	\$125
<p>Doors with Glass Panes The following doors have glass panes which exceed the maximum viewing height of 43” at the bottom of the glass.</p> <ul style="list-style-type: none"> • Door to kitchen/dining (55½” a.f.f.) 	404.2.11	NA	Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. at the bottom of the glass				
			Option #1: Restrict or block/frost the glass panes.	4	2	I	\$0

<ul style="list-style-type: none"> • Door directly to kitchen (54½" a.f.f.) • Door to the room next to the kitchen (54½" a.f.f.) <p>See Photo Senior Center 4.</p>			Option #2: Modify the doors to comply with the maximum height of 43" a.f.f.	4	3	N	Up to \$900
<p>Exterior and Interior Doors</p> <p>Interior doors (with closers) do not fully comply with the maximum allowed operating force for an interior door (5 lbs.). Exterior entrance and egress doors (with closers) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.).</p> <p>Both the exterior and interior doors (with closers) do not fully comply with the minimum closing speed requirement of 6 seconds under 521 CMR.</p> <p>Interior operating forces vary up to 10 lbs.; exterior operating forces vary up to 20 lbs.; and closing speeds vary from 3 to 4 seconds.</p> <p>Interior and exterior door closing speeds are as quick as 3 seconds.</p> <p>The following doors are in non-compliance:</p> <ul style="list-style-type: none"> • Front door by bathrooms (20 lbs. – 4 seconds) • Main entrance door (3 seconds) • Side exit (16 lbs. – 3 seconds) • Interior meeting room exit door (7 lbs. – 4 seconds) • Interior door from meeting room to front entrance (10 lbs. – 4 seconds) • Men’s bathroom (10 lbs. – 3 seconds) • Women’s bathroom (11 lbs. – 3 seconds) 	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 5 lbs. for an interior door and 15 lbs for an exterior door with door closing speeds of at least 6 seconds.	1, 2	2	I	Up to \$100
<p>Doorways and Clear Widths</p> <p>The following have inadequate doorway widths:</p> <ul style="list-style-type: none"> • The double doors to the large meeting room by the Director’s Office are each 29½" in width providing only 28½" of clear width when one door is closed <p>See Photo Senior Center 5.</p>	404.2.3	26.5	When the room is in use for activities and meetings, keep the doors in an open position to achieve the minimum required clear width.	2	1	I	\$0
<p>Hallway Coat Rack</p>	308.2	6.5		4	1,2	I	

The front hallway coat rack is 53¾" a.f.f., which is 5¾" too high under the 2010 ADA Standards.	308.3	6.6	Provide a coat rack at a height of no more than 48" a.f.f. or 3 to 5 wall mounted coat hooks at a height of no more than 48" a.f.f.				Up to \$75
Activity Room Sink The sink does not provide knee clearance and the faucets require pinching or twisting of the wrist. See Photo Senior Center 6.	804.3.2 306.3 309	32.2 32.6 32.7	Replace the sink with one that has a counter/sink height of no more than 34" a.f.f. with a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping. The faucets must comply with operable parts and be lever or push style that can be operable with a closed fist.	4	3	L	Up to \$500
Bathrooms The toilet paper dispensers are 3" o.c. (men's) and 12 ½" o.c. (women's) from the front of the water closet.	309.4 604.7	30.7.6	Relocate the toilet paper dispenser so it is a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser and at least 24" a.f.f. <i>Note: There also must be a at least 1½" clearance below the grab bar to the nearest object or fixture.</i>	3	2	I	\$0
The coat hooks are 16" (men's) and 17" (women's) too high.	308	30.6.2	Lower the coat hooks to no more than 48" a.f.f.	3	2	I	\$0
The women's bathroom side grab bar is 2½" too far from the interior corner.	604.5	30.8	Relocate the side grab bar so it is no more than 12" from the interior corner. The wall mounted disposal container will need to be relocated and not over the grab bars.	3	2	I	\$0
There is only 36½" of clearance in front of the women's water closet.	604.3	30.7.2	The restricted clearance appears to be due to a chase housing duct work and/or plumbing. As the cost to modify would be costly, it is recommended that a variance be sought.	3	2	I	\$0
				3	1	N	\$0
The clear width in front and to the sides of both water closets is reduced to less than the required minimum due to items stored in the bathrooms. Items are also stored under the men's bathroom sink reducing toe clearance. See Photos Senior Center 7 and 8.	604.2 604.3 306.2	30.7.2 30.9.3	Remove all items from the bathroom that restrict clearances.	3	1	I	\$0

Total up to \$2,180+

Princeton Senior & Community Center Accessibility Assessment Photos



Photo Senior Center 1



Photo Senior Center 2

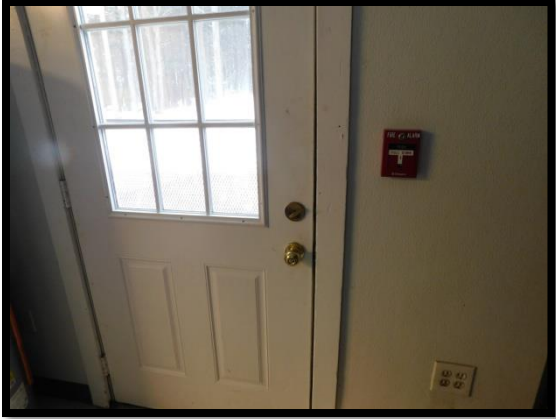


Photo Senior Center 3

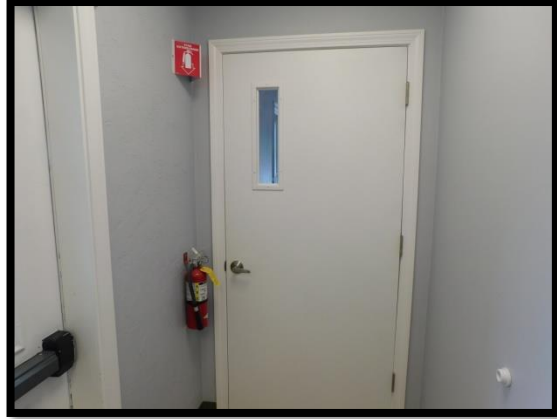


Photo Senior Center 4



Photo Senior Center 5



Photo Senior Center 6



Photo Senior Center 7

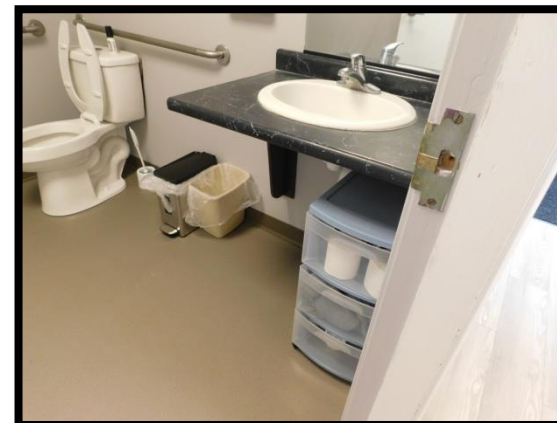


Photo Senior Center 8

PRINCETON MUNICIPAL LIGHT DEPARTMENT

Description of Facility and Programs: The Princeton Municipal Light Department (PMLD) has been providing electrical service to residents and businesses of Princeton for over 100 years. PMLD's mission is to provide a safe, reliable, and economical source of electric power for its customers, to acknowledge and implement the need for renewable energy from within the diversity of available energy sources, and to enhance the benefits of municipal utility ownership for our customers. PMLD has its own elected Board of Commissioners, General Manager and staff that operate separately and autonomously from the Board of Selectmen, Town Administrator and other Town Boards & Committees.

The lobby area is open to the public with the main office, manager's office, and bathrooms are open for public access and use on a limited or case-by-case basis. Non-public areas limited to employees only include the wind storage room, cold storage room, wire room, transformer room, storage room, line room, storage room, stock room, and garage.



Responsible Party: Board of Light Commissioners

General Description or Obstacle Which Limits Mobility or Access: The designated accessible parking space has signage that is too low, lacks striping, and the space is not designated as van accessible. The landing in front of the main entrance is not level. The lobby door to the administrative office has an excessive operating force and too fast closing speed. The lobby door glass pane and the lobby counter are too high. The administrative office has a number of protruding objects as well as items that are not within reach range. Administrative office doors have non compliant knob-style hardware and lack tactile designation signage. The men's bathroom is not accessible and is wholly non-compliant. The women's bathroom is designated as accessible but has a coat hook, towel dispenser, and mirror that are too high; sink piping that is not wrapped; and a water closet that is located too far from the near wall and also has a flush control that is located on the wrong side.

Employee/Staff Only Area

The wind storage room, cold storage room, wire room, transformer room, storage room, line room, storage room, stock room, and garage are not open to the general public. With the exception of the front office administrative staff, PMLD personnel must meet strict physical requirements to perform the essential functions of their job, which a person with a mobility limiting disability would not be able to perform. Therefore, unless the current practices and policies change and current non-public interior spaces are open to the general public, physical modifications would only be required as a result of a reasonable accommodation.

Bathrooms

The men’s bathroom is not accessible nor is it designated as such. The women’s bathroom is designated as accessible. Option #1 would be to designate each bathroom as unisex, with the former men’s bathroom remaining as not accessible and the former women’s bathroom modified to achieve full accessibility compliance. Option #2 and the more costly option would be to keep the bathrooms as separate men’s and women’s bathrooms and to make each fully accessible. The recommended action in the detailed assessment below will be based on Option #1.

Princeton Municipal Light Department Building Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<p><u>Parking</u> There is no striped designated accessible parking space inclusive of access aisle. The designated accessible parking space must also be van accessible. The existing sign is 8” too low.</p> <p>See Photo PMLD 1.</p>	502 703.7.2	23	Stripe and designate a van accessible parking space with van accessible signage at a width of 8’ with an 8’ access aisle (521 CMR Standards). Signage must be set such that the signage height should be a minimum of 60” high at the bottom (2010 ADAAG Standards) and a maximum of 96” at the top (MAAB 521 CMR).	1	2	I	\$100
<p><u>Front Entrance</u> The 90” wide x 60” long front entrance landing has a 4.8% running slope which is not level.</p> <p>See Photos PMLD 2.</p>	404	25.2	Modify the entrance to create a 60” level landing (2.0% or less slope in all directions) at the doorway.	1	3	I	Up to \$1,500
<p><u>Door Operating Force and Closing Speed</u> The interior main entrance lobby door has an operating force of 10 lbs. and a closing speed of 3 seconds.</p>	404.2.8 404.2.9	26.9 26.8	Adjust the door closer such that the closing speed is at least 6 seconds and the operating force does not exceed 5 lbs. for an interior door.	1	2	I	\$0
<p><u>Doors with Glass Panes</u> The interior main entrance lobby door has a glass pane at a height of 52½” a.f.f., which exceeds the maximum viewing height of 43” at the bottom of the glass.</p>	404.2.11	NA	Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. at the bottom of the glass Option #1: Restrict or block/frost the glass panes. Option #2: Modify the door to comply with the maximum height of 43” a.f.f.	4	3	L	\$0 to \$450+

<p>Lobby Counter The lobby counter is 44½" a.f.f., which is 8¾" too high.</p> <p>See Photo PMLD 3.</p>	904.4	7.2	Construct a 36" long by no more than 36" high a.f.f. counter, with a minimum of 27" of knee clearance.	2	3	N	\$250
<p>Reach Range The following exceed the maximum reach range of 48" a.f.f. under the 2010 ADA Standards:</p> <ul style="list-style-type: none"> Office hand sanitizer (50" a.f.f.) Office coat hooks (67" a.f.f.) 	308.2 308.3	6.5 6.6	Lower the hand sanitizer to a height of no more than 48" a.f.f. Provide one coat hook at a height of no more than 48" a.f.f.	4	2	I	\$10
<p>Protruding Objects and Headroom The following are protruding objects as they extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical clearance reduced to less than 80".</p> <ul style="list-style-type: none"> Ornamental lighting near entrance door and ornamental lighting near courtyard (<i>Note: 2 other ornamental lights have fixed objects below</i>) Defibrillator near main entrance <p>See Photo PMLD 4.</p>	307.2	20.6.1	Put fixed objects under the lighting and defibrillator for cane detection	2	1	I	\$0
<p>Door Signage Tactile designation signage is not provided at the following interior doors.</p> <ul style="list-style-type: none"> Door to admin office from lobby Door to garage Door to courtyard Women's bathroom (on door, not latch side) Men's bathroom Door to basement Door to manager's office Door to storage <p>See Photo PMLD 5.</p>	703	41.1	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$280
<p>Door Hardware The following doors have knob-style hardware:</p> <ul style="list-style-type: none"> Door to garage Door to courtyard Women's bathroom Men's bathroom Door to basement Door to manager's office <p>See Photo PMLD 5.</p>	404.2	26.11	Install lever-style or similar accessible compliant hardware on the interior doors. <i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i>	2, 3	2	I	\$900
<p>Accessible Bathroom The coat hook is 18" too high.</p> <p>The sink is 2" too high and the piping is not wrapped or insulated.</p> <p>The mirror is 5¼" too high.</p>	308.2 308.3	30.6.1	Lower the coat hook to no more than 48" a.f.f.	3	2	I	\$0
	606.3	30.9.2	Replace the sink with one that is no more than 34" a.f.f. with piping that is wrapped, insulated or recessed	3	3	N	Up to \$750
	603.3	30.11		3	2	I	\$0

The towel dispenser is 15" too high.	308.2 308.3	30.12	Lower the mirror so that it is no more than 40" a.f.f. to the bottom of the reflecting surface.	3	2	I	\$0
			Lower the dispenser to no more than 42" a.f.f.				
The water closet flush control is on the wrong side.	604.6	30.7.5	Replace the water closet tank with one that has a flush control on the wide or approach side.	3	3	N	\$150
The water closet is 1 1/4" too far from the near wall.	604.2	30.7.2	Relocate the water closet so it is 18" o.c. to the near wall.	3	3	N	Up to \$250

See Photo PMLD 6.

Total up to \$4,640+

Princeton Municipal Light Department Building Accessibility Assessment Photos



Photo PMLD 1



Photo PMLD 2

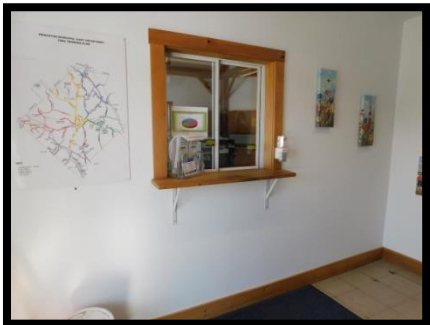


Photo PMLD 3

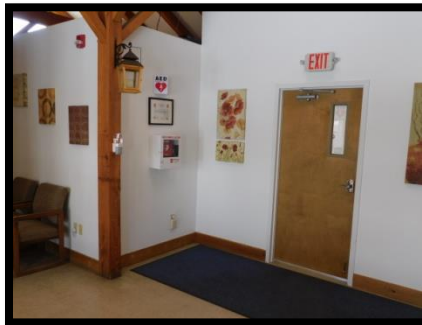


Photo PMLD 4



Photo PMLD 5



Photo PMLD 6

THOMAS PRINCE SCHOOL

Description of Facility: Thomas Prince School was constructed roughly 50 to 60 years ago and expanded in the early 2000's. The school is a one-story masonry building serving grades Kindergarten through 8. In addition to the classrooms, the building houses the administrative and nurse's offices, a cafeteria, a stage, a kitchen, a gymnasium, a library/media center, and bathrooms.



2010 ADA Standards and 521 CMR Standards for Children: Both the 2010 ADA Standards and 521 CMR have advisories and/or varied standards for some items and elements for children according to age (2010 ADA Standards) or grade level (521 CMR). In some cases, there is limited room for interpretation but the guidance is in place as to what is applicable per different range of grade levels or age groups. ADA differentiates according to age level, with those being Ages 3 and 4, Ages 5 through 8, and Ages 9 through 12. 521 CMR differentiates according to grade level, with those being Pre-kindergarten, Kindergarten through 3rd Grade, and 4th Grade through 6th Grade. Grades 7 through 12 would follow the regular ADA or 521 CMR Standards as applied to adults. For the purposes of this assessment, the following standards were applied to the student areas at Thomas Prince School:

<u>2010 ADA Standards</u>	<u>521 CMR Standards</u>
Ages 5 – 8	K – Grade 3
Ages 9 – 12	Grades 4 – 6
Adult	Grades 7 and above

General Description or Obstacle Which Limits Mobility or Access: The front designated accessible parking (2 spaces) lacks signage and does not have a van accessible space. The designated accessible parking near the side main entrance (4 spaces) has signage that is too low and lacks a designated van accessible space. There is no curb ramp to the building from the front parking. Similarly the walkway in front and to the side of the building to the main entrance lacks curb ramps. The sidewalk is also heaving and is deteriorated. As the front entrance is locked, directional signage should be provided guiding visitors to park near the side main entrance to avoid a person with a mobility limiting disability parking in front and then having to traverse over numerous abrupt changes in level surface of up to 5" as well as a deteriorated walkway to access the side main entrance. There is a ½" abrupt change in level surface at the transition from asphalt to concrete at the side main entrance. There is no level landing at the side main entrance door. The airphone buzzer at the side main entrance is too high. Interior and exterior door operating forces and closing speeds exceed that allowed. Interior doors lack tactile designation signage and have non-compliant hardware. There are numerous protruding objects throughout the building. Drinking fountains are not "high-low". Hallway lockers are non-compliant as the hooks and shelving is too high and the opening/closing mechanism requires pinching and twisting of the wrist. Hallway coat hooks and classroom pencil sharpeners exceed the maximum reach range. The door thresholds to the boy's and girl's locker rooms, two bathrooms, and the administrative office are too high and not beveled. The administrative office double doors are too narrow and don't provide the minimum required clear width when one door is in a fixed or closed position. The administrative front lobby counter is too high. The nurse's office sink/counter is too high, lacks knee clearance, has door hardware that is not operable with a closed fist, and dispensers that are too high. Similarly the bathroom in the nurse's office has numerous areas of non-compliance pertaining to heights, clear widths, and setbacks as well as sink piping that is not wrapped and grab bars that are too short. The library check-out counter is too high. The science room has non-compliant workstations that lack knee clearance and an emergency eyewash station that is not accessible as the lower eyewash is too high as is the pull chain for the upper shower head. The boy's and girl's locker rooms have non-compliant lockers, non-compliant benches, and bathrooms with numerous areas of non-compliance. The lower and upper doors for lift to the stage closes too fast. A stage curtain near the lift door restricts use and access. The stairs to the stage have railings on one side only, lack extensions at the top and bottom, and the railing is too low at the top. The kitchen serving line has restricted clear width egress due to the positioning of a dairy cold storage box. Staff bathrooms have numerous areas of non-compliance with 2 bathrooms being wholly non-compliant and others having issues pertaining to heights, setbacks, and clear widths. Similarly, student bathrooms have numerous areas of non-compliance including heights and setbacks, missing hardware, improperly mounted dispensers, and other non-compliant elements. Two student bathrooms are wholly non-compliant.

Note: At the time of assessment, shields were being installed between sinks and urinals due to Covid-19. Installers were informed that a 30" clear width approach need to be maintained for accessible sinks and urinals with a minimum of 29" between the shields at the fixtures.

Phone at Main Side Entrance

A wall mounted telephone at the main side entrance is too high for operable parts (50" – 56" a.f.f.) and is not on a level landing (3.2% cross slope). According to school personnel, this phone is no longer in service. It is recommended that a sign be posted noting the telephone is out of service or remove the phone entirely.

Locker Room Showers

The boy's and girl's showers lack any accessible features. According to school personnel and as witnessed during the assessment, the shower areas are not in service and used solely for storage. Unless the showers are put back into service, no other action is required at the present time.

Desks and Tables

With exception to the science rooms, typically the desks and tables throughout the school generally met knee clearance and table/desk top height requirements, but in those instances where they did not, the tables/desks could be adjusted and raised as needed.

Interior Maneuverability and Accessible Routes of Travel

Due to Covid-19, classroom and library furniture has been rearranged in what appears not to be the norm. As a result, in some cases, maneuverability and the attained of a 36" clear width is not achieved. It is important that a 36" clear width on accessible routes of travel be regularly be maintained. In addition, a stage curtain located at the front of the lift to the stage restricts access and use of the lift. The curtain needs to be kept in a position away from the lift at all times.

Storage at Classroom Entrances

Apparently due to Covid-19, most classrooms had a desk or table placed near the interior of the entrance door and below the classroom telephone, pencil sharpener, and light switches. As a result, access to these items is restricted due to the required excessive horizontal reach. As necessary and/or due to a reasonable accommodation request, all desks/tables placed under phones, pencil sharpeners, light switches or similar items would need to be relocated.

Modifications if Necessary Due to a Reasonable Accommodation Request

- The science staff prep room sink for Room #402 lacks knee clearance. Similarly, the 2 kindergarten room (#300 and #302) staff sinks are 2 inches too high at 36" a.f.f., lack knee clearance, and have dispensers that exceed accessible maximum reach range. A sink in a classroom converted to a storage room (#111) has a sink which lacks knee clearance and also 5 light switches that exceed the maximum reach ranch by up to 4 inches. As these areas are used by specific staff and not school-wide staff or students, modifications to the sinks and dispensers would be necessary as required as a result of a request for a reasonable accommodation.
- Room #112 is a former "home economics/life skills" room which has 2 stoves with controls on the back not at the front of the stove, has 3 sinks at a height of 36½" a.f.f. with no knee clearance, dispensers that are too high, and cabinet hardware that is not easily operable with a closed fist. According to school personnel, this room is used solely as an "extended day" room for children waiting to be picked up by parents/care providers and the stove/sinks/cabinets are not in use. Modifications to these areas, including a new stove with controls on the front, a 34" high sink with knee/toe clearance, and compliant cabinet hardware would only be required if the room were put back into its original purpose.
- The pass-through from the staff work room/break room, pass-through between classrooms, administrative office exit to hallway, and the interior entrance to most classrooms lack the minimum required 18" wall clearance on the pull side of the door. This is due to fixed cabinetry or stored items at or near the doorway. As these areas are not fully "public" spaces, modifications would be necessitated by a staff or student reasonable modification request resulting in the removal of items, cabinetry, keeping a door open in a fixed position, reversing the door swing, or installing an automatic door opener.

- The kitchen area has elements of non-compliance (bathroom, reach ranges, knee clearances, clear widths) but most of the activities undertaken require personnel who must meet certain physical requirements which a person with a mobility limiting disability would not be able to perform. Therefore no further action is required at the present time unless dictated by a request for a reasonable accommodation.

Classroom Sinks

Although classroom sinks are not specifically addressed in 521 CMR or the 2010 ADA Standards, there are specifications for children’s sinks in general. None of the classroom sinks have knee or toe clearance and none of the “children only” bubblers meet the spout height for children up to Grade 7. As the cost to modify these sinks would far exceed the benefit gained and would create an undue hardship on the town, compliance options are provided in the detailed assessment including seeking variances to maintain the sinks as they currently exist or undertaking limited and selected modifications.

Specific Children Standards Under ADA and 521 CMR

As noted, Thomas Prince School falls under 3 different ADA/521 Standards – Adult (administration, teacher areas, adult bathrooms, bathrooms/classrooms for Grades 7 and 8), Grades 4 – 6 (Ages 9 – 12), and Grades K – 3 (Ages 5 – 8). The following standards are being assumed for each bathroom:

- Grade 6–8 unisex accessible bathroom near Room #404 – use Adult Standards
- Grade 6-8 boys/girls bathrooms near Room #209 – Use Adult Standards
- Grade 1-5 boys/girls bathrooms near teacher work room/lounge – use General Children Standards where appropriate; use the higher standard for a range for the lower grades and the lower standard for a range for the higher grades (ie. the water closet height range for Grades K-3 is 12” to 15” a.f.f. and 15” to 17” a.f.f. for Grades 4-6, thus assume a water closet height of 15” a.f.f. to the top of the seat).
- Grade 1-5 boys/girls bathrooms near Rooms #100/#102 are wholly non-compliant. Standards to be used to bring in to compliance should follow (c) above.

Item	K – Grade 3	Grades 4 - 6	Grades 7 and above
Water closet location	12”-15” o.c. from nearest sidewall, 42”/42”	15”-18” o.c. from nearest sidewall, 42”/42”	18” near. 42” far, 42” front
Water closet height	12”-15” a.f.f. to top of seat	15”-17” a.f.f. to top of seat	17” to 19” a.f.f.
Urinal	15” max. a.f.f. At least 13½” deep	15” a.f.f. max At least 13½” deep	17” a.f.f. At least 13½” deep/elongated
Toilet paper dispenser height	7”-9” o.c. in front of water closet, 14” - 17” a.f.f., 1½” minimum clearance below grab bar	7”-9” o.c. in front of water closet, 17” – 19” a.f.f., 1½” minimum clearance below grab bar	7”-9” o.c. in front of water closet, at least 24” a.f.f., 1½” minimum clearance below grab bar
Grab bar location	No > 6” from interior corners	No > 6” from interior corners	No > 6” rear/12” side
Grab bar height	20”-25” a.f.f.	25”-27” a.f.f.	33” – 36” a.f.f.
Sink height	No > 30” a.f.f. to rim	No > 30” a.f.f. to rim	No > 34” a.f.f. rim
Sink knee clearance	Minimum 25”	Minimum 25”	Minimum 27”
Sink mirror	No > 31” to bottom of reflecting surface	No > 31” to bottom of reflecting surface	No > 40” a.f.f. to the bottom of the reflecting surface
Dispenser’s in bathroom	18” to 40” a.f.f.	18” to 44” a.f.f.	No > 42” a.f.f.
Control’s in bathrooms	No > 36” a.f.f.	No > 36” a.f.f.	No > 48” a.f.f.
Reach range	18” to 40” a.f.f.	18”-44” a.f.f.	15” -48” a.f.f.
Tables and counters height	26”-30” a.f.f. (ADA) 28” – 34” (521 CMR)	26”-30” a.f.f. (ADA) 28” – 34” (521 CMR)	28” – 34” a.f.f.

Table and counters knee	At least 24" a.f.f (ADA) Not specified (521 CMR)	At least 24" a.f.f (ADA) Not specified (521 CMR)	At least 27" a.f.f. knee
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Thomas Prince School Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
Parking <u>Front Entrance (2 spaces)</u> Both of the 2 spaces at the front entrance lack signage. One space is 8' wide and the 2 nd space is slightly less than 8'. The spaces share a 5' access aisle. Neither of these spaces as currently striped would qualify as van accessible.	502 703.7.2	23	Stripe and designate a van accessible parking space and an accessible passenger vehicle accessible space. The van accessible space s/b at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards). The passenger vehicle space s/b 8' in width and can share an access aisle with the van designated space. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage should also be provided.	1	2	I	\$100
<u>Side Main Entrance (School Side -2 spaces; Field Side – 2 spaces)</u> The spaces have signage that is 4" to 6" too low. None of the spaces, although wide enough, re designated as van accessible. See Photo TPS 1.	502 703.7.2	23	Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' in front of the space. Van accessible signage should also be provided.	1	2	I	\$25
Front Entrance Accessible Route There is no curb ramp and an abrupt change in level surface of 5" at the crosswalk/sidewalk from the accessible parking to the school. Running slopes in this general area exceeds 5.0%. See Photo TPS 2.	405 406 403 705	21 22	Install a curb ramp at the crosswalk and sidewalk. The maximum slope of the main ramp is 8.3% with flared sides not to exceed 10%. There s/b a 4' level landing (no more than 2.0%) at the top of the curb ramp. Detectable warning strips s/b provided. As part of modification work, ensure that the sidewalk area in the vicinity of the ramp does not exceed 5.0%.	1	3	I	Up to \$1,500
Directional Signage Directional signage at the front building entrance directing patrons to the main side accessible entrance is not provided. The front building entrance is typically locked requiring the visitor to use the front sidewalk to travel to the side main entrance. <i>Note: The sidewalk to the side main entrance is not accessible (see below).</i>	216	41.1.3	Provide directional signage noting the accessible side main entrance.	1	2	I	\$100
Route of Travel from Front Entrance to Side Main Entrance The sidewalk from the front entrance to the side main entrance is heaving, has areas of deterioration, and has abrupt changes in level surface of > than ¼". In addition, there are 3 crossings which lack curb ramps. See Photos TPS 3, 4, and 5.	405 406 403 705	21 22	Install 3 curb ramps at the sidewalk-driveway transitions. The maximum slope of the main ramp is 8.3% with flared sides not to exceed 10%. There s/b a 4' level landing (no more than 2.0%) at the top of the curb ramp. Detectable warning strips s/b provided.	1	3	I	Up to \$7,500
Curb Ramp at Side Main Entrance	303	21		1	3	I	

There is a ½" abrupt change in level surface at the transition of the pavement to the concrete curb ramp. There is no detectable warning strip at the curb ramp.	403 705		There should be no more than ¼" abrupt change in level surface at the base of all curb ramps. Detectable warning strips to be installed at each crossing.				Up to \$500
Side Main Entrance Level Landing The 5' landing at the door entrance is not level (2.0% slope or less). The running slopes vary from 3.5% to 3.7%.	404	25.2	Modify the front entrance to provide a minimum 5' level landing (no more than 2.0% in all directions).	1	3	N	Up to \$3,500
Door Entry Airphone/Call Button The door entry call button (intercom) is 55" a.f.f. which is 7" too high under the 2010 ADA Standards.	308.2 308.3	6.5 6.6	Lower airphone/call button to a height of no more than 48" a.f.f. (2010 ADA Standards).	1	3	N	Up to \$350
Exterior Doors Entrance and egress doors with closers do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR. Assessments ranged from 2 to 5 seconds closing speed and up to 28 lbs. operating force.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that push/pull force does not exceed 15 lbs for an exterior door and door closing speed is at least 6 seconds.	1	2	I	Up to \$250
Interior Doors Interior doors with closers (including bathrooms and the stage lift doors) do not fully comply with the maximum allowed operating force for an interior door (5 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR. Assessments ranged from 3 to 5 seconds closing speed to up to 15 lbs. operating force.	404.2.8 404.2.9	26.8 26.9	Adjust door closers such that the push/pull force does not exceed 5 lbs for an interior door and door closing speed is at least 6 seconds.	2	2	I	Up to \$500
Door Hardware The following 58 doors have knob-style hardware: Staff bathrooms (2) near admin. office, door to admin. office next to nurse's office, storage near #112, electrical room near #210, staff dining, kitchen @ staff dining, storage near cafeteria, door to stage lift, cafeteria storage near exit D5, kitchen bathroom, 2 library "no exit" doors, 2 storage/mechanical doors in kitchen, #406 fire exit, #211 interior exit door. Rooms #112, 201, 203, 205, 207, 209 (2), 211, 21, 111 (2 doors), 108, 110, 104, 106, 100, 102, 113, 14, 15, door from #12 to #14, 10, 11, 13, 12, 15. Room pass-through doors #110/108 (2), #108/106, #106/104 (2), #104/100 and storage, #100/104 and storage, #100/102, #211/209, #207/205, #205/203, #203/201. See Photo TPS 6.	404.2	26.11	Install lever-style or similar accessible compliant hardware on the interior doors. <i>Note: Depending on the door and type/quality of hardware, lever hardware may vary from \$75 to \$275 per unit. The estimate provided is at the mid-range (\$150) for the interior doors.</i>	2, 3	2	I	Up to \$8,700+
Door Signage							

<p>The following 178 interior doors lack tactile accessible signage:</p> <p>Library (2), 2 staff bathrooms near Admin. (on door), door to admin. next to nurse, school nurse from hallway, storage near #112, #112, 2 bathrooms near electrical (on door), electrical room, #406, #408, #404, #404 small room, #402, #402 small room, boy's locker room (on door), double doors to gym (2), double doors to courtyard (2), girl's locker room (on door), gym (9 doors) #400, #300, #301, #302, #303, #304, #305, #306, #307, #308, #309, #310, #311, #33, girl's bathroom opposite #309 (on door), boy's bathroom near #309 (on door), #31, #32, #30, storage near D3 exit, electrical room near #21, staff dining, kitchen at staff dining, cafeteria (2), #210, #203, #205, #207, #209 (2), #211, storage near cafeteria opposite #207, electrical room near #207, boy's bathroom near #209 (on door), women's bathroom near #209 (on door), library double door near #209, #111 (2 doors), #17, door to stage lift, cafeteria doors near door to stage lift (2), #108, #110, cafeteria door near #104, boy's bathroom near #104 (on door), girl's bathroom near #104 (on door), storage closet opposite #102, #100, #102, #104, #106, door to cafeteria near exit D5, #113 (2), #10, #11, #13, #12, door to nurse bathroom, #14, #15, door from #12 to #14, #15 fire panel room, admin. exit door to hallway, door to after school room from admin, exit door from nurse to hallway, computer server room from library, 2 library "no exit" doors, door to #113 from library, office in boy's locker room, storage in boy's locker room, exit door in boy's locker room, office in girls' locker room, to kitchen from cafetorium (3), storage/mechanical in kitchen (2), kitchen bathroom, #112 closets (3), #112 exit doors (2), #406 closet, #406 exit, #408 exit, #404 exit, #402 storage/lab, #402 fire exit, #400 fire exit, #400 closets (3), #400 teacher's room, #400 small room, #211, #209, #26 offices (2), #28 to courtyard, #27/28 pass-through, #28 exit, #300 closet, #302 closet, #300/302 bathrooms (2), #111 exit doors (2), #104/100 storage (2), class room pass-through doors (21).</p> <p>See Photo TPS 7.</p>	703	41.1	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	Up to \$6,545+
<p><u>Non-compliant Interior Door Widths and Clear Widths</u></p> <p>The following doorways provide less than the required 32" clear width:</p>	404.2	26.5	Option #1: Keep doors in an open position.	2	2,3	I,N	\$0 to \$20,000

<ul style="list-style-type: none"> • 2 library doors near the admin. office (27½") • Hallway double doors near #112 (27¾") • 2 sets of double doors to cafeteria (27½") • #13 Administration office (21½") • #402 (science room) double doors to exit (28") <p>The clear width to exit the food serving line is only 28" due to the dairy/cold storage refrigeration unit.</p> <p>See Photo TPS 8.</p>	404.2	26.5	<p>Option #2: Modify existing doors and/or door openings to provide one 36" or 34" wide door to comply with the minimum required 32" wide clear opening.</p> <p>Remove/relocate the dairy/cold storage refrigeration unit.</p>	2	2	I,N	\$0
<p>Hallway Protruding Objects</p> <p>The following are considered to be protruding objects as they extend more than 4" into the accessible route of travel between a height of 27" and 80" a.f.f. or have vertical clearance reduced to less than 80":</p> <ul style="list-style-type: none"> • Wall mounted TV screen near library • Trophy display case near admin. office • Trophy shelf near admin. office • Trophy display cases near electrical room (2) • Defibrillator outside gym • Light fixtures near Room #'s 201, 203, 205, and 209 • Hallway porcelain drinking fountains (2) • Cafeteria drinking fountain <p>See Photos TPS 9 and 10.</p>	307.2 308.1	20.6.1	<p>Place fixed objects beneath the TV monitors and defibrillator.</p> <p>Erect wing walls for cane detection at the ends of the trophy cases, trophy, shelves, light fixtures, and drinking fountains if kept in services (see below).</p>	4	1,2	N	Up to \$500
<p>Drinking Fountain</p> <p>The following drinking fountains are non-compliant:</p> <ul style="list-style-type: none"> • Near Grade 6-8 bathrooms and electrical room – "high" only, no knee/toe clearance, 43" a.f.f. spout height. • Gym – "low" only, 35" a.f.f. spout height. • Near #209 and bathrooms – 43" a.f.f. spout height qualifies as a "high" only. • Near #104 and bathrooms - 37" a.f.f. spout height qualifies as a "high" only. • Cafeteria – "low" only, 36" a.f.f. spout height. <p>See Photos TPS 11 and 12.</p>	211 602	36	<p>Option 1: Discontinue use of all drinking fountains.</p> <p>Option 2: Replace the 3 "high" only drinking fountains (2 porcelain, 1 with no knee clearance) with "high-low" drinking fountains. Add "high" drinking fountains in the gym and cafeteria.</p> <p>If Option#2 is enacted, the drinking fountains must comply as follows:</p> <p>Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). The</p>	4	3	N	\$0 to \$8,500

			spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).				
<p>Hallway Coat Hooks</p> <p>Assuming the hallway coat hooks primarily serve Grades K-3, the following exceed the maximum reach range of 40" a.f.f. under the 2010 ADA Standards for children ages 5 through 8 (Grades K-3):</p> <ul style="list-style-type: none"> Approximately 250 coat hooks at 47" to 49" a.f.f. Approximately 300 coat hooks at 57½" to 60" a.f.f. <p>See Photo TPS 13.</p>	308.1	NA	Lower at least 5% of the coat hooks to a height of no more than 40" a.f.f.	4	2	I	\$0
<p>Lockers</p> <p>The hallway (164 total) and boy's/girl's locker room lockers (87 total) do not comply with the reach range requirements for the locker shelving and coat hooks. The operating mechanism to open is non-compliant as it requires pinching and lifting and is inoperable with a closed fist.</p> <p>The hallway lockers have coat hooks that are 65½" a.f.f. and shelving that is 68½" a.f.f. The locker room lockers have coat hooks that are 71" a.f.f. and shelving that is 73½" a.f.f.</p> <p>The maximum reach range for each grade is as follows: Grades K through 3 - 40" a.f.f., Grades 4 through 6 - 44" a.f.f., and Grades 7 and above 48" a.f.f.</p> <p>See Photo TPS 14.</p>	309.4 308.1	39.5	<p>To comply, at least 5% of the lockers provided in each location, but no less than one locker, need to meet the reach range and operable parts standards per applicable age group/grade.</p> <p>The designated accessible locker coat hooks and shelving must be lowered as follows:</p> <ul style="list-style-type: none"> Grades K through 3 – no more than 40" a.f.f., Grades 4 through 6 – no more than 44" a.f.f., and Grades 7 and above no more than 48" a.f.f. <p>Locker operating mechanisms must comply as follows:</p> <ul style="list-style-type: none"> Controls and operating mechanisms must be operable with one hand (closed fist) and must not require grasping, pinching, or twisting of the wrist and require no more than 5 lbs. of force to activate. 	4	3	N	TBD – up to \$2,000
<p>Locker Room Benches</p> <p>The benches in the boy's and girl's locker rooms are too narrow (only 9½" wide) and lack back support.</p>	803 903 305	19.4	At least one accessible bench must be provided in each locker room. The bench seat must be a minimum of 42" long and 20" to 24" deep with back support or affixed to a wall. The back support s/b 42" long minimum from a point 2" above the seat surface to a point 18" above the seat surface. The bench height s/b 17" to 19" a.f.f. A minimum 36" clear width must be maintained between the benches and lockers and around the lockers. In addition, a 5' turning diameter must be maintained near the accessible lockers.	2	2	N	\$1,000
<p>Doorway Thresholds</p> <p>Doorways to the following areas have ½"+ thresholds with bevels in excess of a 1:2 slope:</p> <ul style="list-style-type: none"> Entry to boy's locker room from hallway Entry to girl's locker room from hallway Entry to administration main office 	404.2	26.10	Modify thresholds so that the maximum 1:2 beveled change in level surface is no more than ½".	2, 3	2	N	Up to \$750

<ul style="list-style-type: none"> • Boy's bathroom near teacher's lounge • Girl's bathroom near teacher's lounge 							
<p>Library Check-out Counter The check-out counter is 3" too high under adult standards.</p> <p>See Photo TPS 15.</p>	227 902	12.2	Modify the existing counter or provide a 36" wide counter at no higher than 36" a.f.f. at the existing check-out counter.	2	3	N	Up to \$500
<p>Nurse's Office Sink and Staff Break Rom Sink The counter/sink in nurse's office and the staff break room are both 2" too high and does not provide knee clearance. The door hardware of the nurse's office sink is not operable with a closed fist.</p>	306 606 309.4	32 39.5	Replace/modify the counter/sinks so that they are no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping. Install hardware on the nurse's sink cabinet doors that can be operable with a closed fist.	2	3	N	Up to \$1,500+
<p>Stage Stairs There is a railing on only one side of the stairs. The railing does not fully extend at the top and bottom of the stairs. The top of the railing is 1½" too low.</p> <p>See Photo TPS 16.</p>	505	27	Modify the existing railing and provide a second railing so they are 34" – 38" a.f.f. and extend 12" parallel to the ground at the top and the slope distance of one tread then 12" parallel to the ground at the bottom.	1	3	N	Up to \$750+
<p>Art Room (#404) The art room sink (30" a.f.f.) lacks knee clearance.</p> <p>See Photo TPS 17.</p>	306 804.6	32.7	Modify the sink to provide a minimum of 27" high and 19" deep knee clearance.	2	3	N	Up to \$500
<p>Science Room (#402) The science room has non-accessible science workstations with sinks that are too high, no knee clearance, sink hardware at one sink that requires twisting of the wrist, and fixtures that are too far from the edge.</p> <p>The emergency eyewash station pull chain is too high at 67¾" a.f.f. and the lower fixed eyewash is too high for wheelchair use at 41½" a.f.f. The towel dispenser is too high.</p> <p>See Photos TPS 18 and 19.</p>	606.3 306.3 309 902.3 403.4 308	30.9 35 20.3 NA	<p>Purchase 1 portable ADA Accessible Portable Science Lab for student use that adheres to height, knee/toe clearance, and operable parts requirements.</p> <p>See Photo TPS 20 ADA Accessible Portable Science Lab.</p> <p>Extend/lower the pull chain to a height of no more than 40" a.f.f. and provide a lower eyewash station that is within range for wheelchair use. Lower the towel paper dispenser to a height of no more than 40" a.f.f.</p>	2 4	1 3	N N	\$2,800 Up to \$750+
<p>Science Rooms #407-409 Eyewash The eyewash stations are fixed and are too high for wheelchair use.</p>	308	NA	Lower the Provide an eye wash station that is within reach and use range for a wheelchair user.	4	3	L	Up to \$500
<p>Science Room #100 None of the 14 fixed desks/tables provide adequate knee clearance.</p>	902.4	35.5 35.6	Block one table to provide a minimum of 27" knee clearance with a table height of 28" to 34" a.f.f.	2	2	I	\$0
<p>Adult Reach Range The following exceed the maximum reach range of 48" a.f.f. under the 2010 ADA Standards for adults: <u>Light Switches (50" – 52" a.f.f.)</u></p>	308.2 308.3	6.5 6.6	Lower the light switches and telephones to a height of no more than 48" a.f.f.	4	3	N	Up to \$1,000

Administration (#12), administration/reception, nurse's office, hallway by lift, stage area by lift. <u>Telephones (50" – 56" a.f.f.)</u> Room #'s 110, 106, 104, 102, 100.							
Children Reach Range Classroom pencil sharpeners, towel dispensers and soap dispensers exceed maximum reach range. Reach range per grade level are as follows: <ul style="list-style-type: none"> • K-3 no more than 40" a.f.f. • 4-6 no more than 44" a.f.f. • 7-8 no more than 48" a.f.f. See Photo TPS 21.	308.1	NA	Lower pencil sharpeners, soap dispensers, and towel dispensers according to the maximum height per grade level. Items should not be located over an obstruction to restrict access.	4	2	I	\$0
Classroom Sinks Classrooms #211, 209, 207, 205, 203, and 201 have sinks with counter heights of 27½" – 28" a.f.f., spout heights of 32" – 32½" a.f.f., spout locations that are 7" – 7½" from the front edge, and lack knee clearance. Classroom sinks in Rooms #211 and #209 require pinching and twisting of the wrist. Classrooms #110, 106, 100 have sinks with counter heights of 28" a.f.f., spout heights of 32½" a.f.f., spout locations that are 3" from the front edge, and lack knee clearance. Classrooms #308, 310, 313, 311, 309, 304, 306, 300, 302, 307, 305, 303, and 301 have sinks with counter heights of 26" a.f.f., spout heights of 28" a.f.f., spout locations that are 3" from the front edge, and lack knee clearance. Drinking fountains for children's use only should not have spout heights that exceed 30" a.f.f. Drinking fountains in general should have spouts or the water flow within 3" from the front edge. See Photos TPS 22 and 23.	602 309 308.1	36 30	Modify classroom sinks to provide a minimum of 27" knee clearance with piping that is guarded, insulated, or recessed. Faucets must be lever style or push button with an operable force of no more than 5 lbs. The spout height for children's use should not exceed 30" a.f.f. The spout height for adult use (Grades 7 and 8) should not exceed 36" a.f.f. Spouts s/b located no more than 3" from the front edge or have the flow of water no more than 3" from the front edge.	4	3	L	Up to \$15,000+
Faculty/Staff Bathrooms The staff bathrooms near the Administrative Office are substantially non-compliant lacking adequate clear widths, lacking grab bars, do not meet height requirements, and related issues. See Table 2 TPS Adult Bathrooms Areas of Non-Compliance. The men's and women's accessible bathrooms in the staff break room are moderately compliant, however they have a number of items which do not meet current standards relating to grab	See Table 1	See Table 1	The bathrooms do not have adequate clear widths due to the current configuration and placement of stall partitions. Consider making the men's bathroom a unisex accessible single user stall by removing the interior partitions and urinal. Remaining fixtures will need to comply with Table 1: Adult Bathroom Facilities Compliance Requirements. The women's bathroom would have to be converted to a regular unisex bathroom. Both bathrooms will need to be modified to adhere to Table 1: Adult Bathroom Facilities Compliance Requirements. The major area of non-compliance apart from grab bar heights, is the women's water closet set- backs which will require moving the water closet 10½" closer to the near wall.	3	3	N	Up to \$50,000
	See Table 1	See Table 1		3	3	N	Up to \$3,500

bar height, dispenser location, and set-backs, among other things. The women's water closet does not meet near wall and far wall set-backs and will need to be located. See Table 2 TPS Adult Bathrooms Areas of Non-Compliance. See Photos TPS 24, 25, and 26.							
Grades 6 – 8 Student Bathrooms Assume Standards for Grades 7 and above (Adult). The unisex accessible bathrooms across from Room #404 have numerous areas of non-compliance including grab bars that are too low; coat hooks and mirrors that are too high; questionable fixtures and hardware; as well as other items. See Table 3 TPS Grades 6-8 Bathrooms Areas of Non-Compliance. The boy's and girl's bathrooms near Room #209 have numerous areas of non-compliance including grab bars that are too low; coat hooks, light switches, and mirrors that are too high; hardware that is missing and/or difficult to use; stall doors that don't self-close, as well as other items. See Table 3 TPS Grades 6-8 Bathrooms Areas of Non-Compliance.	See Table 1	See Table 1	Bathrooms will need to be modified to adhere to Table 1: Adult Bathroom Facilities Compliance Requirements.	3	3	N	Up to \$1,250
Nurse's Office Bathroom Assume Standards for Grades 4-6 (Ages 9-12). The bathroom area is partially compliant but has sink piping that is not wrapped, a mirror that is too high, a rear grab bar that is too high, grab bars that are not long enough, inadequate clear widths at the water closet due to the sink, and dispensers not located properly and over the grab bars. See Table 5 TPS Grades 4-6 and Nurse's Office Areas of Non-Compliance. See Photos TPS 27.	See Table 3	See Table 3	The bathroom will need to be modified to adhere to Table 4: Grades 4-6 Bathroom Facilities Compliance Requirements. The major areas of non-compliance pertain to the grab bar height and lengths, sink piping, dispenser heights and locations, and the water closet clearance.	3	3	N	Up to \$1,500
Grades 4 - 6 Student Bathrooms Assume Grades 4 – 6 Standards for the locker room bathrooms, bathrooms near the teacher's lounge across from Room #309, and bathrooms across from Rooms #100/102. The locker room bathrooms and bathrooms near the teacher's lounge have varying degrees of non-compliance pertaining to clear widths, heights, set-backs, and stall doors. See Table 5 TPS Grades 4-6 and Nurse's Office Areas of Non-Compliance. The bathrooms across from Rooms #100/102 are wholly non-complaint and	See Table 3	See Table 3	The locker room bathrooms and bathrooms near the teacher's lounge will need to be modified to adhere to Table 4: Grades 4-6 Bathroom Facilities Compliance Requirements.	3	3	L	Up to \$1,500
	See Table 3	See Table 3	Option#1: Discontinue use of the bathrooms.	3	4	N	Up to \$75,000

lack sufficient clear width in the existing foot prints for accessible compliance unless major structural modifications are made. See Photos TPS 28, and 29.			Option #2: Consider making one bathroom a single user accessible stall and the second bathroom as a single user non-accessible stall. Option #3: Create a unisex accessible stall in the vicinity of the existing non-accessible bathrooms.				
Kindergarten Accessible Bathroom There is no tactile designation signage. The light switch is 9" too high. The coat hook is 23" too high. The mirror is 11½" too high. The sink is 1¾" too high. The sink piping is not wrapped, insulated or guarded. The grab bars are 6¾" to 11¾" too high. The water closet flush control is on the near side not the approach side. The water closet is 3" to 6" too far from the near wall. The water closet seat is 2½" to 5 ½" too high. The toilet paper dispenser is 3¾" too high. There are no audible/visual alarms. See Photo TPS 30.	703.4 604.9 605 606 308 215 702	41.1 30 40.3	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Under 521 CMR, signage s/b 60" a.f.f to the centerline of the sign. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Lower the light switch and coat hook to no more than 40" a.f.f. Lower the mirror to no more than 31" a..f.f. Lower the sink to no more than 30" a.f.f. Wrap, guard, or insulate the sink piping. Lower the grab bars to 20" to 25" a.f.f. to the top of the gripping surface. Replace and relocate the water closet so that the flush control is on the approach or wide side, the height of the water closet seat is 12" to 15" a.f.f., and the water closet is located 12" to 15" o.c. from the near side wall. Lower the toilet paper dispenser so that it is 14" to 17" a.f.f. Install audible/visual alarms.	3	2,3	N	Up to \$1,500

Estimated Total Cost: Up to \$219,870+

Table 1. Adult Bathroom Facilities Compliance Requirements

	2010 ADAAG	MAAB 521 CMR
Doorway/Entrances		

Signage	703.4	Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Latch side of door. See exceptions.	41.1	Latch side of door; approach w/in 3"; 60" a.f.f. to centerline of sign.
Hardware	404.2.7	Operable with a closed fist or loose grip	26.11.1	Operable with one hand; roughened surface for hazard areas (26.11.4).
Hardware height	404.2.7	34" to 48" a.f.f.	26.11.2	36" to 48" a.f.f.
Door closing speed	404.2.8.1	5 sec. min. from 90 degrees to 12 degrees from the latch.	26.9	At least 6 seconds.
Door opening force	404.2.9	Interior hinged / sliding/folding-5 lbs	26.8.1	Exterior hinged-15 lbs; interior hinged / sliding/folding-5 lbs.
Doorway width	404.2.3	Clear width of 32" minimum.	26.5	Clear opening of 32" min.
Threshold	404.2.5	Not > 1/2" high. Raised thresholds comply with 302 and 303 (between 1/4" and 1/2" s/b beveled w/slope no > 1:2(50%)).	26.10	Not > 1/2" high, beveled w/no > 1:2 slope. Sliding door thresholds not > 3/4" high and beveled w/no > 1:4 slope.
Handrails - clearance	505.5	1 1/2" minimum.	27.4.7	1 1/2" from wall. Recessed if max 3" recess and 18" above handrail.
Single User Toilet Room				
Door	213 404.2.3 603.2	In-swing allowed if min. 30"x48" c.f.s. beyond swing of the door (603.2). 32" min. clear width (404.2.3).	30.4	In-swing allowed if self closing device and min. 30"x48" c.f.s. beyond swing of the door.
Clear floor space	604.3.1	60" x 56" minimum.	30.5, 6.3	Clear floor space required (30.5); 60" diameter or a 36" x 60" "T" (6.3).
Toilet Stalls				
# standard accessible stalls	213.3.1	At least one.	30.6	One must be provided
# alternate accessible stalls	213.3.1	If 6 or > stalls/urinals at least one alternate accessible stall must ALSO be provided	30.6	If 6 or > stalls at least one alternate accessible stall must ALSO be provided
Standard Accessible Stall				
Size	604.8.1.1	60" wide x 56" deep for wall hung water closets; 60" wide x 59" deep for floor mounted water closets.	30.6.1	60" wide x 72" deep.
Water closet location	604.2	On rear wall.	30.6.1	On 60" wall.
Door width	404.2.3	32" minimum clear opening, swings out.	30.6.1	32" clear opening, swings out or slides
Door hinge and closing	604.8.1.2 404.2.7	Self-closing hinge; pull device on both sides (604.8.1.2); operable parts 34" min. to 48" max. a.f.f. (404.2.7).	30.6.1	Self-closing hinge; pull device on both sides; lock at approx. 36" a.f.f.
Door swing	404.2	Door must swing out.	30.6	Door must swing out or slide.
Latch side clear space	604.8.1.2	42" min. clear space for side approach to door; door opening s/b 4" max. on side wall or partition farthest from water closet. If door on side, opening s/b 4" max. from front partition.	30.6.1	18" clear space on latch side of door.
Coat hook	603.4 308	Forward (308.2)/side (308.3) reach 15" to 48" max. a.f.f.	30.6.1	Max. 54" a.f.f.
Grab bar location	604.5	Provided on side wall closet to water closet and rear wall. Side wall bar 42" long, 12" max. from rear wall and extending 54" min. from rear wall. Rear wall bar s/b 36" long min. and extend from center of water closet 24" min on transfer side and 12" min on opp. side.	30.8	2 grab bars, 42" long, 1 on back wall above water closet, one on side wall closet to water closet. See Grab bars.
Water Closets				
Clear floor space (no stall)	NA	NA (Stall 60" wide x 56" deep)	30.7.1	30" x 48"
Location	604.2	Centerline s/b 16" to 18" max from nearest sidewall, except that water closet s/b 17" min to 19" max from	30.7.2	Centerline s/b 18" from nearest sidewall, at least 42" from farthest sidewall, and 42" clearance from front of water closet to nearest wall/fixture

		the side wall in an ambulatory accessible compartment.		
Height	604.4	17"-19" a.f.f. to top of seat.	30.7.3	17"-19" a.f.f. to top of seat.
Flush control	604.6 308	Hand operated or automatic (604.6). 15" min. to 48" max reach range (308).	30.7.5	Mounted on wide side no > 44" a.f.f.
Toilet paper dispensers	604.7 309.4	7" min and 9" max in front of water closet measured to centerline of dispenser. Outlet s/b 15" min and 48" max a.f.f. S/not be behind grab bars and be a continuous flow (604.7). Minimum 1½" clearance below the grab bar. Operable parts per 309.4.	30.7.6 30.8.5	Mounted on side wall closest to toilet, centerline of roll s/b min. of 24" a.f.f. Dispensers shall not be mounted above grab bars.
Grab Bars				
Grab bar location	609.4 604.5	See Standard Accessible Stalls.	30.8.1	Side grab bar s/b no >12" from interior corner; rear grab bar s/b no > 6" from interior corner.
Grab bar height	609.4	33" – 36" a.f.f. to top of gripping surface.	30.8.2	33" – 36" a.f.f.; tank/flushometer variances of height and length.
Grab bar thickness	609.2	Circular x-sect. outside diameter 1¼" min. to 2" max.; Non-circular x-sect. 2" max. and perimeter of 4" min. and 4.8" max.	30.8.3	1 ¼" – 1 ½" diameter.
Grab bar material	NA	NA	30.8.4	Non-rusting, acid-etched or roughened.
Spacing	609.3	1 ½" between wall & grab bar. Space between grab bars & projecting objects above s/b 12" min.	30.8.3 30.8.5	1 ½" between wall and grab bar. Nothing mounted above.
Sink				
Clear floor space	606.2 305	Forward approach clear floor space of 30"x48"(305.3).	30.9.1 6.3	60" diameter, no more than 19" underneath the sink. 30"x48" forward approach.
Height	606.3	Rim no > 34" a.f.f.	30.9.2	Rim no > 34" a.f.f. Sink min. 17" from wall to front of the sink.
Knee clearance	306.2 306.3	Knee clearance is 9" to 27" a.f.f; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2).	30.9.3	27" min. from floor to underneath; 8" from front to back (deep). Minimum of 9" of toe clearance. Toe clearance as part of c.f.s. a max. of 6" of the 48" of c.f.s. may extend into the toe space.
Depth	NA	NA	30.9.4	Not > 6 ½".
Piping	606.5	Insulated, protected, no sharp/abrasive surfaces.	30.9.5	Recessed, insulated or guarded.
Faucets	606.4 309	Operable w/one hand w/max 5 lbs force required (309). Metering faucets must be open 10 secs min (606.4).	30.9.6	Operable w/one hand. If self-closing valves, must be open min. 10 seconds
Urinals				
Required #	213.3.3	Where more than 1 urinal provided, at least one s/b accessible.	30.10	If one or more urinals, at least one must be accessible.
Height	605.2	Stall or wall hung; rim maximum of 17" a.f.f.; 13½" deep from outer face of rim to back of fixture.	30.10.1	Stall or wall hung; elongated rim; maximum of 17" a.f.f.
Clear floor space	605.3 305	Forward approach clear floor space of 30"x48" (305.3).	30.10.2 6.3	Front approach 30"x48" and 60" diameter turning radius (6.3); 29" clearance between urinal shields (30.10.2).
Flush control	605.4 308 309	Hand operated or automatic (309.4); 15" min – 48" max a.f.f. reach range (308).	30.10.3 39.5	Hand operated, automatic; no > 44" a.f.f.
Mirror				
Height	603.3	If over lavatory/countertop, bottom of mirror reflecting surface no > 40" a.f.f.; if not over lav/counter no > 35"	30.11	Bottom of mirror reflecting surface no > 40" a.f.f.

		a.f.f. if full length, top s/b 74" min a.f.f.		
Dispensers				
Location	205	S/b located on an accessible route.	30.12	One of each device w/in zone of reach
Operation	309.4	Operable w/one fist; no > 5 lbs force.	30.12 39.5	Operable w/one fist; no > 5 lbs force (39.5).
Height	308.2 308.3	Side (308.3) and forward (308.2) reach 15" – 48" a.f.f.	30.12	42" max. a.f.f.
Controls and Receptacles				
Location	205	S/b located on an accessible route.	30.13 39.00 6.5, 6.6	One of each on an accessible route (30.13); all controls s/b at least 18" from an interior corner (39.00); forward reach 15"–48" a.f.f. (6.5); side reach 9"–54" (6.6).
Height	308.2 308.3	Side (308.3) and forward (308.2) reach 15" – 48" a.f.f.	6.5, 6.6	Forward reach max. of 48" a.f.f. Side reach max. of 54" a.f.f..
Operation	309.4	Operable w/one fist; no > 5 lbs force.	30.13 39.5	Operable w/one fist; no > 5 lbs force (39.5).
Clear floor space	305	Forward approach clear floor space of 30"x48" (305.3).	6.4 39.2	Minimum 30"x48" (6.4, 39.2).
Signage				
Location	703.4	Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Latch side of door. See exceptions.	41.2.1	Wall adjacent to latch side of door or nearest adjacent wall. Reach allowance s/b within 3" of signage.
Height	703.4	Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character.	41.2.2	60" a.f.f. to centerline of sign.
Character proportion	703.5.4	Characters s/b selected from fonts where the width of the uppercase letter "O" is 55% min and 110% max of the height of the uppercase letter "I".	41.3	Width to ht. (3:5-1:1) and stroke-width- height (1:5-1:10).
Character height	703.5.5	Sized according to viewing distance. See Table 703.5.5.	41.4	Sized according to viewing distance.
Brailled characters	703.3 703.4	Grade 2 Braille. Domed or rounded shape (703.3). See Table 703.3.1 for Braille dimensions. Height (703.4).	41.5	Letters/numbers raised 1/32"; upper case; Grade 2 Braille; raised characters 5/8" but no > 2".

Table 2: TPS Adult Bathrooms Area of Non-Compliance

Compliance Item	Staff @ Admin (M)	Staff @ Admin (W)	Men's Break Room	Women's Break Room
Compliant Hardware	No	No		
Door width 32"				
Threshold < ½"				
Tactile Signage	No	No	On door	On door
Closing < 6 seconds				
Door Force < 5 lbs.				
Light switch 48" a.f.f.	No	No		
Sink 34" max.				
Knee 27" min.				
Pipes insulated	No	No		
Faucets operable				
Faucets < 5 lbs force				
Metered faucets open 10 seconds				
Mirror 40" a.f.f. max.	No	No	No	No
Soap 42" a.f.f. max.				
Towel 42" a.f.f. max.	No		(1)	No
Urinal 17" a.f.f.	No	NA		
Toilet 18" o.c. near		No		No
Toilet 42" o.c. far		No		No (32")
Toilet 42" in front			No (2)	No (3)
Toilet 17"-19" a.f.f. seat	No	No		
Flush valve on approach side			No	
Flush valve 44" a.f.f. 521/ 48" ADA				
TP 7"-9" o.c. to front	No	No	No	No
TP centered 24" minimum a.f.f.				
TP min 1½" clearance below the grab bar				
Grab bars 42" long	None	None		
Grab bars 33"-36" a.f.f.			No	No
Side grab bar no > 12" from interior				
Rear grab bar no > 12" from interior				
Coat hook 48" a.f.f.	No	No	None	
Stall door self-closing	No	No		
Pull device on both sides of stall door	No	No		
Compliant locking mechanism				

Protruding Objects				
Audible/visual alarms	None	None	None	None
Other				

Notes:

- (1) *A table under the towel dispenser restricts access. Remove the table.*
- (2) *Only 40" clearance exists in front of the water closet due to the baseboard heating. Seek a variance as may be required.*
- (3) *A desk in front of the water closet reduces the clear width to only 23". Removing the desk will result in 41¼" clear width, which is within tolerance.*

Table 3: TPS Grades 6-8 Bathrooms Area of Non-Compliance

Compliance Item	Unisex BR Across #404 Right of Fountain	Unisex BR Across #404 Left of Fountain	Boy's Near #209	Girl's Near #209
Compliant Hardware				
Door width 32"				
Threshold < ½"				
Tactile Signage	No (on door)	No (on door)	No (on door)	No (on door)
Closing < 6 seconds	No	No	No	No
Door Force < 5 lbs.	No	No	No	No
Light switch 48" a.f.f.			No	No
Sink 34" max.				
Knee 27" min.				
Pipes insulated				
Faucets operable				
Faucets < 5 lbs force				
Metered faucets open 10 seconds				
Mirror 40" a.f.f. max.	No	No	No	No
Soap 42" a.f.f. max.		No		
Towel 42" a.f.f. max.			(3)	
Urinal 17" a.f.f.				
Toilet 18" o.c. near	(1)			
Toilet 42" o.c. far				
Toilet 42" in front	(2)	(2)		
Toilet 17"-19" a.f.f. seat				
Flush valve on approach side		No		No
Flush valve 44" a.f.f. 521/ 48" ADA				
TP 7"-9" o.c. to front	No	No		
TP centered 24" minimum a.f.f.	No	No		
TP min 1½" clearance below the grab bar			No (over grabs)	No (over grabs)
Grab bars 42" long				
Grab bars 33"-36" a.f.f.	No	No	No	No
Side grab bar no > 12" from interior				
Rear grab bar no > 12" from interior				
Coat hook 48" a.f.f.	No	None	No	No
Stall door self-closing			No	No
Pull device on both sides of stall door			No (interior only)	No (interior only)
Compliant locking mechanism	None			(4)

Protruding Objects				
Audible/visual alarms	None	None	None	None
Other				

Notes:

- (1) *A metal fixture mounted at the rear of the water closet could interfere with wheelchair transfers. Remove the metal fixture.*
- (2) *A desk in front of the water closet reduces the clear width to only 32". Removing the desk will result in the minimum required 42" clear width.*
- (3) *The towel dispenser protrudes 8" into the accessible route of travel at a height between 27" and 80" a.f.f. Relocate the dispenser.*
- (4) *Locking mechanism compliant, but difficult to use. Needs lubrication or replacement.*

Table 4. Children Age 9 – 12 (4 – 6th Grade) Standards

2010 ADAAG		MAAB 521 CMR		
Description	Citation	Requirement	Citation	Requirement
Children’s Bathroom				
Toilet Centerline	604.9	Centerline s/b 15” min. to 18” max. from the side wall.	30.14	Centerline s/b 15" to 18" from the nearest sidewall for kindergarten to third grade and 42” from the centerline of the water closet to the opposite wall or closest edge of next fixture.
Toilet Seat Height	604.9	15” to 17” a.f.f. to top of seat	30.14	15” to 17” a.f.f. to top of seat
Toilet Flush controls	604.9	Hand operated or automatic. 36” maximum a.f.f. located on wide side. Exception – ambulatory accessible compartments.	30.14	Controls for flush valves on water closets used by children shall be mounted on the wide side of water closet within 20” to 30 “ a.f.f.
Toilet Paper Dispenser Height	604.9	Outlet of dispenser s/b 17” to 19” a.f.f.; 7” min to 9” max in front of water closet measured to the centerline of the dispenser; clearance of 1 ½” min below the grab bar.	30.14	17" to 19" a.f.f.
Urinal	605	Stall or wall-hung. Rim 17” max. a.f.f. and be 13 ½” deep.	30.17	Stall-type or wall-hung with an elongated rim at a max of 15" a.f.f. Flush controls s/b be hand operated or automatic, and s/b mounted no more than 44" a.f.f.
Grab Bar Height	604.9	25” to 27” a.f.f. to top of gripping surface.	30.15	25” to 27” a.f.f. to top of gripping surface
Grab Bar Thickness	609.2	No variation.	30.15	1¼" to 1½" (K to 6 th grade)
Grab Bar Spacing	609.3	No variation.	30.15	No variation.
Grab Bar Location	604.5	No variation.	30.15	Two grab bars each 42” long mounted no more than 6” from interior corner. See exception for tank height and flushometer.
Children’s Sink Height	606	31” max af.f.	30.16	Sinks shall be mounted with the rim no higher than 30" aff
Children’s Sink Knee Clearance	606	Minimum 24” af.f. for children ages 6 – 12 if rim no > 31” a.f.f.	30.16	A clearance of at least 25” a.f.f. to the bottom of the apron shall be provided. Knee and toe clearance s/b at least 30 wide and 19 deep.
Children’s Mirror Height	NA	No variation - equivalent facilitation (103).	30.18	The top of any shelf and or bottom of any mirror which is provided above a sink shall be set with the bottom edge of the reflecting surface no higher than 31" aff.
Children’s Reach Range	308	16” low min to 44” high max	30.19 30.20	30.19 (Dispensers): Towel dispensers, drying devices, or other

<p>Children's Reach Range continued</p>			<p>types of devices and dispensers shall have at least 1 of each device mounted within the <i>zone of reach</i>, and at least 1 of each device shall be located within reach of a person using the <i>accessible</i> sink.</p> <p>30.20 (Controls and Receptacles): If controls, receptacles, or other equipment are provided, then at least one of each shall be mounted no higher than 36" a.f.f. to the centerline of the operable portion of the control.</p>
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Table 5: Grades 4-6 and Nurse's Office Areas of Non-Compliance

Compliance Item	Nurse	Boy's Locker BR	Girl's Locker BR	Boy's Near #306	Girl's Near #309	Boy's Near #102	Girl's Near #102
Compliant Hardware							
Door width 32"						No	No
Threshold < ½"		No	No	No	No		
Tactile Signage				No (on door)	No (on door)	No (on door)	No (on door)
Closing < 6 seconds				No	No	No	No
Door Force < 5 lbs.				No	No	No	No
Light switch 44" a.f.f.				No	No	No	No
Sink 30"		No	No		No		
Knee 25"						No	No
Pipes insulated	No		No	No		No	No
Faucets operable							
Faucets < 5 lbs force							
Metered faucets open 10 seconds				No			
Mirror 31" a.f.f.	No	No	No	No	No	No	No
Soap 40" a.f.f.		(2)					
Towel 40" a.f.f.				(5)		No	
Urinal 15" a.f.f.		(3)		No		No	
Toilet 15" -18" o.c. near		No		No		No	No
Toilet 42" o.c. far	No (27½")	No				No	No
Toilet 42" in front						No	No
Toilet 15"-17" a.f.f. rim		No	No	No	No	No	No
Flush valve on approach side			No	No		No	No
Flush valve 20" – 30" a.f.f. 521/ 36" ADA							
TP 7"-9" o.c. to front	No (1)		No	No	No	No	No
TP centered 17" – 19" a.f.f.	No		No	No	No	No	No
TP min 1½" clearance below the grab bar							
Grab bars 42" long	No					None	None
Grab bars 25"-27" a.f.f.	No (rear)	No	No	No	No		
Side grab bar 6" max. from interior							
Rear grab bar 6" max from interior							
Coat hook 44" a.f.f.		No (broken)	No	No	No	None	None
Stall door self-closing		No (4)	No (4)	No	No	No	No
Pull device on stall door				No (interior only)	No (interior only)	No	No

Compliant locking mechanism			None				
Protruding Objects							
Audible/visual alarms	None	None	None	None	None	None	None
Other							

Notes:

1. *Toilet paper dispenser and disposal box located over the grab bars. Must relocate so they are not over the grabs and in accordance with the requirements in Table 3.*
2. *Soap dispenser over 24" obstruction and behind towel dispenser. Relocate so it can be easily reached.*
3. *Only 24" clear width at urinal.*
4. *Stall doors open out, not in.*
5. *The paper towel dispenser restricts the 30" clear width approach to the sink. Relocate the dispenser.*

Thomas Prince School Assessment Photos



Photo TPS 1



Photo TPS 2



Photo TPS 3



Photo TPS 4



Photo TPS 5

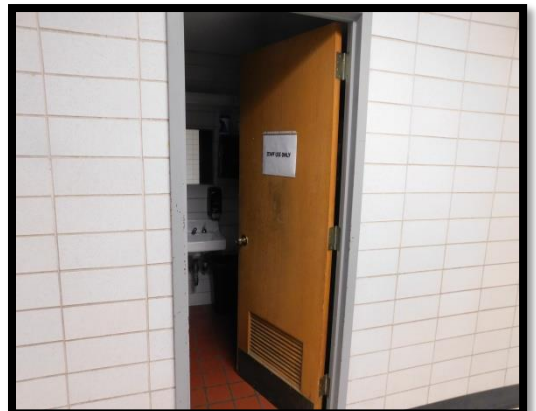


Photo TPS 6



Photo TPS 7

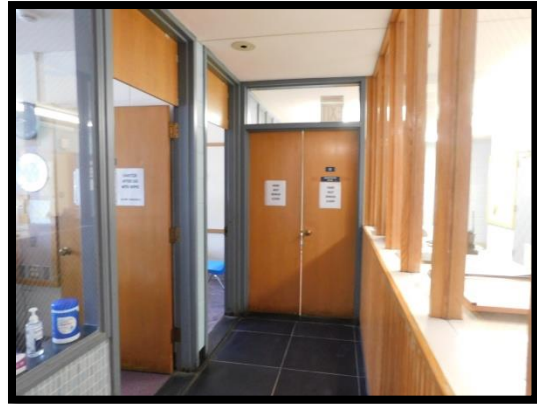


Photo TPS 8

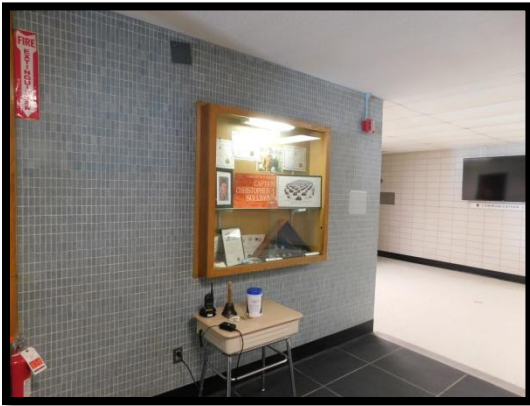


Photo TPS 9

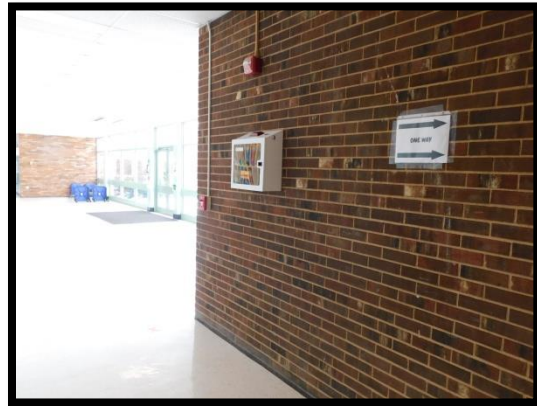


Photo TPS 10



Photo TPS 11



Photo TPS 12



Photo TPS 13



Photo TPS 14



Photo TPS 15

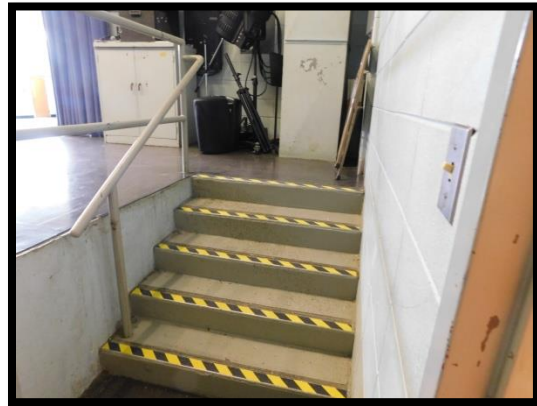


Photo TPS 16



Photo TPS 17



Photo TPS 18



Photo TPS 19



Photo TPS 20

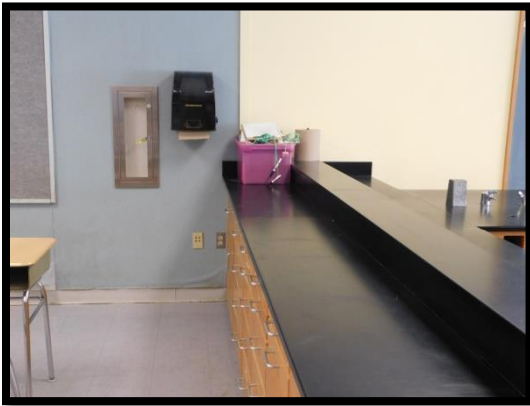


Photo TPS 21

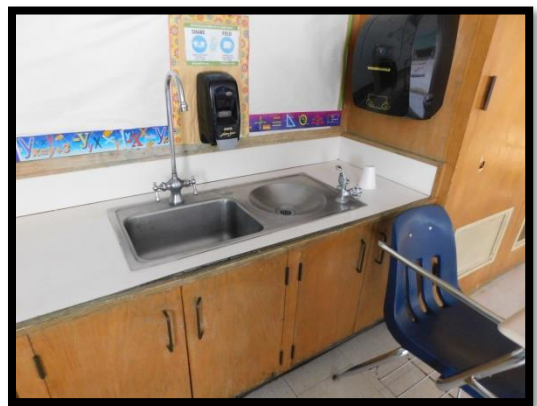


Photo TPS 22



Photo TPS 23

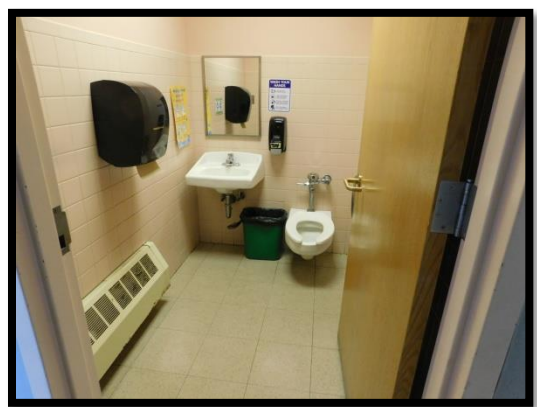


Photo TPS 24

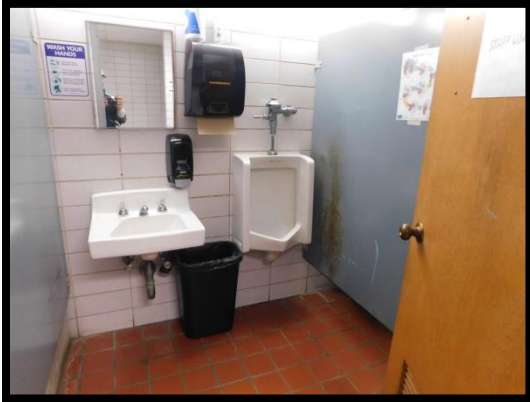


Photo TPS 25



Photo TPS 26



Photo TPS 27



Photo TPS 28



Photo TPS 29

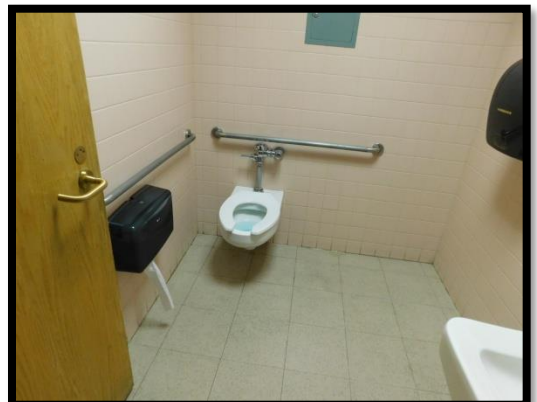


Photo TPS 30

XIII. ACTIVE AND PASSIVE RECREATIONAL FACILITIES ASSESSMENTS

PREFACE

Active Recreational Facilities and Public Spaces

Passive Recreation and Conservation Areas

Walkways

Playgrounds

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GOODNOW PARK

TOWN COMMON

KRASHES FIELD COMPLEX

CENTER SCHOOL AREA

SAWYER FIELD

THOMAS PRINCE ELEMENTARY SCHOOL FIELDS AND GROUNDS

PREFACE

Active Recreational Facilities and Public Spaces

Public spaces, recreational facilities and playgrounds are within the jurisdiction of ADA and 521 CMR and therefore must conform to those standards pertaining to accessible routes, reach ranges, height, knee and toe clearance, operating force, running and cross slopes, clear width, maneuverability and similar standards for ancillary features (bathroom, benches, picnic tables, water fountains, parking, etc.). At a minimum, an accessible route must be provided up to the play or recreation area and then to any play equipment, facilities, bleachers, field, or other amenity or feature.

Passive Recreation and Conservation Areas

Passive recreation and conservation areas are not fully addressed under 521 CMR and the 2010 ADA Standards unless there are developed facilities or services provided at a site. This would include such things as picnic tables, grilling stations, benches, and constructed walkways. If parking is provided and access is available, then parking must also be compliant. An unimproved trail through a wooded area or field would not need to be made “accessible” unless formal construction modifications or improvements were undertaken at that site. In most cases, compliance with 521 CMR and the 2010 ADA Standards in conservation and passive recreation areas, would be technologically infeasible or would result in excessive and unreasonable costs without any substantial benefit to persons with disabilities.

Walkways

Walkways in recreation areas include, but are not limited to walks, sidewalks, overpasses, bridges, tunnels, underpasses, plazas, courts, and other pedestrian pathways. Sidewalks on streets and ways are also considered walkways, with the exception that if the slope of the natural topography exceeds 5% (1:20) a ramp is not required.

Playgrounds

Playgrounds standards are new under the 2010 ADA Standards. Although there are changes being discussed under 521 CMR, currently Massachusetts simply requires an accessible route to and around the play area and to the play equipment. The 2010 ADA Standards are much more expansive and incorporates ground-level components, elevated components, component standards and surface types. Note: There is a difference between “ADA Compliant” and “Fully Accessible”. Compliant play structures are generally accessible and are made with the physically disabled in mind. However, fully accessible structures are made specifically for those with disabilities and are typically far more expensive. The language of the ADA makes a distinction between “elevated” and “ground” components. Roughly 25% of a play structure’s components must be on the ground level for it to be ADA compliant. A fully accessible structure has roughly 50% of its components as “ground”. In a fully accessible play system, every component is wheelchair accessible, including elevated areas achieved through the use of ramps.

Although the 2010 ADA Standards do not mandate elevated play equipment, if there is elevated play equipment, then accessible ground level equipment must also be provided.

In addition, the entire play area does not need to be on an accessible surface, but rather the routes of travel to both the play area and the accessible play components must comply with Section 402. Accessible Route and Section 302 Floor or Ground Surfaces (stable, firm, slip resistant) of the 2010 ADA Standards and Section 20 (Accessible Route) and Section 29 (Floor Surfaces) of 521 CMR.

The accessible route connecting ground level components within a play area should be 60" wide with some variation allowed depending on length of travel route and size of play area. The accessible route is preferred, but does not have to be, of the same material or structure as the general route of travel.

Under the 2010 ADA Standards, apart from the actual accessible pathway, there are two types of ground surfaces within the play area. Ground surfaces on accessible routes must comply with the American Society for Testing and Materials (ASTM F 1951) and the ground surfaces located within the "use zone" must comply with ASTM F 1292. Ground surfaces must be inspected and maintained regularly to ensure continued compliance with the ASTM Standards. The type of surface selected and play area use level will determine the frequency of inspection and maintenance activities.

Representative Examples of ADA Compliant and Accessible Playgrounds and Play Components



ASTM F 1951 establishes a uniform means to measure the characteristics of surface systems in order to provide performance specifications to be used when selecting materials for use as an accessible surface under and around playground equipment (not the accessible route). Surface methods that comply with this standard and are located in the use zone must also comply with ASTM F 1292 for “impact attenuating” to provide a safe fall area around play equipment.

Within a play area that is not part of an accessible route, turning area or use zone, acceptable materials can include loose fill such as pea gravel, sand, and wood chips. Depending on the fall height of a play structure, materials such as pea gravel, sand, wood chips, shredded rubber and engineered wood fiber all provide different levels of impact attenuation.

For fully accessible surfaces, pour in place products, rubber mats and tiles, and artificial grass with rubber in-fill all meet ADA standards but are significantly more expensive.

In Massachusetts, public hearings have recently been held to hear comment on sweeping changes to 521 CMR. Significant changes are proposed that would align 521 CMR more with the 2010 ADA Standards including playgrounds and play areas. The proposed surface related changes are noted below:

Proposed Changes in 521 CMR

59.4 Accessible Routes

An accessible route shall be provided to reach playground equipment and around the perimeter of the playground to play components.

59.4.1 The ground surface of use zones, accessible routes and turning spaces within play areas shall be firm, stable and slip resistant, permanent, and constructed of materials such as rubber resilient surfacing, urethane rubber composites or similar; and comply with commonly accepted impact attenuation criteria for safety surfacing materials within the use zones of play area equipment. Loose fill surfaces and aggregate surfaces including wood fiber, bark mulch, wood chips, shredded rubber, shredded foam, etc. are not acceptable for accessible routes within the playground. Molded rubber mats, if utilized, require adhesion to a permanent surface beneath.

Active and Passive Recreational Areas Categories of Assessment

For the purposes of this assessment, Templeton’s active and passive recreation areas are divided into the following four (4) categories:

1. Conservation Areas
2. Passive Recreation Areas
3. Active Recreation Areas
4. School Recreational Facilities

1. Conservation Areas

These properties are either “land locked”; have no improvements and serve solely as wildlife habitat, flood plain, or watershed land; or are off limits to the public. This includes the following sites:

- Calamint Hill Conservation Area
- Goodnow Park

2. Passive Recreation Areas

These properties have minimal improvements and/or may serve as assembly areas or green spaces. This includes the following sites:

- Town Common

3. Active Recreation Areas

These properties have a variety of formal site amenities which may or may not include parking, benches, picnic tables, improved walkways, playing and/or practice fields, play equipment, basketball courts, tennis courts, bathroom facilities including portable toilets, concession facilities, and other amenities. This includes the following sites:

- Krashes Field Complex
- Center School Area
- Sawyer Field

4. School Recreational Facilities

These are school related fields, playgrounds, and related amenities, structures, and buildings. This includes the following sites:

- Thomas Prince Elementary School Fields and Grounds

Active and Passive Recreational Facilities Accessibility Improvements Cost Estimates

The cost estimates provided for each recreational facility are rough parameters of cost based on pricing for similar work as well as estimated costs for certain types of modifications. Actual costs on some items may vary considerably due to unforeseen conditions and/or design alternatives. If the required modifications require design solutions, additional architectural and/or engineering fees may be required. In addition, if the work must be formally bid to private contractors, additional costs (bonds, insurance, prevailing wage) will also increase the overall cost. Depending on complexity, suggested base costs could increase up to an additional 30.5% as a total project cost.

CALAMINT HILL CONSERVATION AREA

Description of Facility: A 134 acre passive recreational facility with access off Calamint Hill Road. The area is intended to remain in an undeveloped condition for the benefit of the environment and for public enjoyment.



Responsible Party: Conservation Commission, Parks and Recreation Department

General Description or Obstacle Which Limits Mobility or Access: There are 4 trails on the site, but none are formally maintained to a standard that would be considered to be an accessible route of travel. The parking for the facility is an unimproved and unstable gravel surface and therefore non-compliant. No signage or striping is provided.

Recommended Action: Should the town initiate formal improvements to this property to enhance overall site accessibility and usage, then compliant accessible parking, signage, and limited accessible routes of travel would need to be provided. No action is required at the present time.

GOODNOW PARK

Description of Facility: Located behind the Town Hall Annex, this area is an undeveloped passive recreational facility. There are remnants of trails for what once served as a Disc Golf Course.



Responsible Party: Parks and Recreation Department

General Description or Obstacle Which Limits Mobility or Access: There are trails on the site, but none are formally maintained to a standard that would be considered to be an accessible route of travel. Most of the trails, which appear to be part of the Disc Golf Course are overgrown and barely usable. There is no formal parking for the facility but the Town Hall Annex and adjacent Bagg Hall has designated accessible parking.

Recommended Action: Should the town initiate formal improvements to this property to enhance overall site accessibility and usage, then compliant accessible parking, signage, and limited accessible routes of travel would need to be provided. No action is required at the present time.

TOWN COMMON

Function and Description of Facility and Programs: The town common area serves as a passive recreational area, green space, and location for civic events. The common area contains a gazebo, a bench and historical marker, and an armed forces bench/monument.



Responsible Party: Select Board, Parks and Recreation Department

General Description or Obstacle Which Limits Mobility or Access: The gazebo is not accessible to those with mobility limiting disabilities. There is no accessible route of travel to the gazebo and the gazebo itself can only be accessed by stairs with 2 steps. The gazebo stairs lack railings. There are no accessible routes to the bench and monuments.

Town Common Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<u>Gazebo</u> The transition from the ground surface to the concrete floor of the gazebo has a 2" abrupt change in level surface.	402 403	20 22	Modify the ground to concrete transition to eliminate the abrupt change in level surface.	2	2	N	\$100
The stairs lack railings See Photos Town Common 1 and 2.	505	27.4	Provide railings on both sides of the stairs (2sets) that are oval or round in cross-section and no greater than 2" in outside diameter, 34" to 38" a.f.f. and with 12" extensions at the top and extensions at the bottom of one tread (sloped) then 12" parallel to the ground.	2	3	N	Up to \$1,000
<u>Accessible Route of Travel</u> There is no accessible route of travel to the gazebo, stone bench and historical	402 403	20 22	Create accessible walkways compliant with width (48" wide with minimum 36" clear width) and slope	2	3	N	

marker, and armed forces bench/monument.	221.2 802.1	14 19	requirements (2% maximum cross, 5% maximum running) to the gazebo. Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Create a wheelchair area next to the benches. The wheelchair spaces should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.				\$1,500 to \$4,500
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See Photos Town Common 3 and 4.

Total up to \$5,600

Town Common Accessibility Assessment Photos



Photo Town Common 1



Photo Town Common 2



Photo Town Common 3



Photo Town Common 4

KRASHES FIELD COMPLEX

Function and Description of Facility and Programs: The Krashes Field Complex consists of 2 parking areas, 3 soccer fields, a basketball court, a small playground area, a horse shoe pit, a field house with a snack bar and bathroom facilities, picnic tables, and unimproved trails.



Responsible Party: Parks and Recreation Department

General Description or Obstacle Which Limits Mobility or Access: There is no designated accessible parking. The portable toilet is not on an accessible route of travel and is not fully “ADA compliant”. The field house stairs lack railings and the accessible route to the snack bar and bathroom facilities has a 1” abrupt change in level surface at the transition from the asphalt to the brick walkway. The snack bar counter is too high. The field house bathroom facilities have a number of areas of non-compliance related to maneuverability, clearances, heights, and operability. There are no accessible routes of travel to and around the fields, playground, horseshoe pit, and other amenities. The paved access to the upper field is locked which restricts usability. The running slope of the route of travel to the upper field varies up to 10.2%, which exceeds the maximum allowed. None of the picnic tables are accessible. Non-compliant wood chips are the primary surface throughout the playground and none of the play components are accessible.

Everett W. Needham Field House

Kitchen/Snack Bar. The door to the kitchen/snack bar area has a glass pane which exceeds the maximum height allowed. The sinks are not accessible due to inadequate knee clearance, unwrapped or unguarded sink piping, and hardware that requires pinching and twisting of the wrist.

Upper Level. The upper level of the field house has a door with a glass pane that exceeds the maximum height allowed. The stairs only have a railing on one side. The sole railing lacks an extension at the top of the stairs. As the upper level is closed to the public, no further action is required to this area at the present time.

Krashes Field Complex Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<p>Parking There are no designated accessible parking spaces. The parking lot does not have a firm, level, and slip resistant surface.</p> <p>As no spaces are formally striped, it appears that the 2 parking areas could accommodate up to 80 spaces. If this is the case, then a minimum of 4 accessible parking spaces, one being van accessible, would be required. If the areas accommodate only 51 – 75 spaces, then only 3 accessible spaces would be required (with one being van accessible).</p>	502 703.7	23	<p>Create a minimum of one van accessible space and 3 passenger vehicle spaces as follows:</p> <p>Construct with asphalt and stripe and designate a van accessible parking space and 3 passenger vehicle accessible parking space with van and passenger accessible signage. The van space s/b at a width of 8' with a 8' access aisle and the passenger space s/b at width of 8' with a 5' access aisle; signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space; slopes should not exceed 2% in any direction. Access aisles can be shared.</p>	2	3	N	Up to \$10,000
<p>Portable Accessible Toilet The "accessible" toilet is not ADA compliant as both the soap and paper towel dispensers are 8" to 13" above reach range and are also located above the grab bars; the top of the toilet seat is 1¼" too high; the water closet is 2" too close to the rear wall and 9" too close to the wall in front of the toilet; the grab bars are ¼" too low (<i>Note: There are no tolerances for a range of dimensions</i>); the door lacks an internal pull device and has a closing speed that is 4 to 5 seconds too fast.</p> <p>The portable toilet is not on an accessible route of travel.</p> <p>See Photo Krashes 1.</p>	308.2 308.3 604.7 309.4 604.4 604.2 609.4	30.12 30.7.6 30.8.5 30.7.2 26.9 30.8.2	<p>Replace the existing "accessible" toilet with an "ADA Compliant" toilet such that soap/towel dispensers are no more than 42" a.f.f.; the toilet paper dispenser s/b a minimum of 24" a.f.f. and s/b 7" min. to 9" max. in front of the water closet measured to the centerline of the dispenser; the height of the water closet s/b 17" to 19" a.f.f. to the top of the seat; the water closet s/b 18" from the nearest sidewall, at least 42" from the farthest sidewall, and 42" from the front of the water closet to the nearest wall or fixture; the door must have pull devices on both sides and a door closing speed that is at least 6 seconds; and grab bars must be between 33" to 36" a.f.f. to the top of the gripping surface.</p> <p>The portable toilet must be located on an accessible route of travel and on a level (2.0% or less slope) surface.</p>	3	2	I	TBD
<p>Field House Stairs The stairs lack railings.</p>	505	27.4	Provide railings on both sides of the stairs that are oval or round in cross-section and no greater than 2" in outside diameter, 34" to 38" a.f.f. and with 12" extensions at the top and extensions at the bottom of one tread (sloped) then 12" parallel to the ground.	2	3	N	Up to \$1,500
<p>Field House Concession Stand/Kitchen The concession counter is 8" too high for that of a food service counter.</p> <p>The door to the kitchen area has glass that is 5¾" too high under the 2010 ADA Standards and are not blocked or frosted</p>	904.5 404.2.11	17.6.2 NA	<p>Create a 36" wide counter no higher than 34" a.f.f. below the existing counter.</p> <p>Doors, gates, and side lights adjacent to doors or gates, containing panels that permit viewing through the panels shall have the bottom of at least one panel located 43 inches maximum a.f.f. Rather than modify the door to lower the viewing area to comply with the maximum height restriction, the panes should be blocked or frosted.</p>	2 4	2 2	N N	Up to \$250 \$0

<p>None of the wash sinks (3) provide knee clearance and all have piping that is not wrapped or insulated. One of the sinks has non-compliant hardware that requires pinching and twisting of the wrist.</p> <p>See Photos Krashes 2 and 3.</p>	804.3.2 306.3 309	32.2 32.5 32.6 32.7	Replace one sink so that it meets the minimum required 27" knee clearance; has piping that is wrapped, insulated, or guarded; and has hardware that is operable with a closed fist.	4	3	N	Up to \$750
<p>Picnic Tables None of the picnic tables (4 at field house, one at side soccer field/playground) have sufficient knee depth clearance.</p>	226.1 902	19	At least 5% or at least one table must be accessible at each separate location. Purchase 2 accessible picnic tables and locate on an accessible route of travel. The table surface s/b 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.	2	2	N	\$1,500
<p>Accessible Route to Concessions and Bathrooms There is a 1" abrupt change in level surface on the accessible route</p> <p>See Photo Krashes 4.</p>	403.4	22.4.1	Modify, infill, or grind the transition area so that the change in level surface is no greater than ¼" or up to ½" with a no > than 1:2 bevel.	2 3	2	I	\$100
<p>Route of Travel to Fields and Amenities</p> <p><u>Front Soccer Field</u> The access to the field is restricted due to a locked chain. There is no accessible route of travel to and around the field.</p> <p>402 303 403</p> <p>19 20 22</p> <p>An accessible route of travel needs to be provided to all areas available to the public. Modify the locked entrance to allow for wheelchair access at all times. Construct an accessible route of travel to and around the field that is compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p> <p>2 3</p> <p>N</p> <p>\$5,000 to \$10,000</p> <p><u>Side Soccer Field, Playscape, and Horseshoe Pit</u> The access to the field and other amenities is restricted due to a locked chain, however there is roughly 36" of partially paved clear width on one side of the chain. The paved way to the edge of the field has a running slope of up to 7.4% for the initial 20+/- feet of the walkway. There is no accessible route of travel to and around the field, playground, or horseshoe pit.</p> <p>402 303 403</p> <p>19 20 22</p> <p>An accessible route of travel needs to be provided to all areas available to the public. Modify the locked entrance to allow for wheelchair access at all times. Construct an accessible route compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). If not feasible for the approach with the excessive running slope, paired railings will be required in compliance with S.405 of the 20101 ADA Standards and S.24.5 of 521 CMR. Construction options for the remainder of the accessible route includes compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p> <p>2 3</p> <p>N</p> <p>\$10,000 to \$20,000</p> <p>No accessible routes exist within the playscape area. There are no accessible play components. Non-compliant woodchips is the surface treatment for the entirety of play area. <i>Note: Woodchips may only be considered as a possible option for the fall zone ground surface.</i></p> <p>402 403 1008.2</p> <p>19 20 22</p> <p>Construct an accessible route compliant with width and slope (2% cross, 5% running) requirements to and around the perimeter of the play area (4' wide minimum) and to the play structure elements. The accessible route must be stable, firm, and slip resistant. Construction options include compacted stone dust, asphalt, concrete, poured in place products, etc. Costs will vary depending on product used. "Fully accessible" playscape and ground components should also be considered. Play area ground</p> <p>2 3</p> <p>N</p> <p>\$1,000 to \$2,000</p>							

<p><u>Upper Soccer Field and Amenities</u> The access to the field is restricted due to a locked chain. The paved route of travel to the upper field area has running slopes that vary up to 10.0% which exceeds the maximum of 5.0% for a walkway. Accessible routes over 5.0% up to 8.3% require railings. The accessible route to the flagpole and stone bench has a running slope that varies up to 12.0%. There is no accessible route of travel to the trex bench. Both benches as well as the bleachers lack level adjacent wheelchair areas. There is no accessible route of travel to and around the soccer field.</p> <p>See Photos Krashes 5, 6, 7, and 8.</p>	402	19	surfaces immediately around play components and in the fall zone must comply with ASTM F 1951 and ASTM F 1292. Depending on the type, age, and quality of woodchips, they may be considered acceptable as a fall zone ground surface.				
	303	20	Access to Upper Field and Amenities: Option 1: Modify the locked entrance to allow for wheelchair access at all times. Construct an accessible route/ramp to the upper field area either as part of or adjacent to the existing roadway. The accessible route/ramp must be at least 4' between paired railings, cannot exceed 30' in length without a level landing, and cannot exceed the maximum 8.3% running slope and 2.0% cross slope. Construction must be in full compliance with S. 405 of the 2010 ADA Standards and S. 24 of 521 CMR.	2	4	L	TBD – up to \$100K+
	403	22	Option 2: Modify the locked entrance to allow for wheelchair access at all times. Construct a new van accessible parking space with access aisle and signage compliant with both the 2010 ADA Standards and 521 CMR at the soccer field and allow vehicle access to the that area.	2	3	N	Up to \$10,000
	802.1	14	Access to Flagpole and Stone Bench: Modify the existing accessible route of travel to the flagpole, memorial, and bench so that the running slopes do not exceed 5.0% without railings or no more than 8.3% with railings. Create an approach and wheelchair level area at the bench. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.	2	3	N	Up to \$2,500+
221.2		Access to Trex Bench: Construct an accessible route compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). to the bench. Create an approach and wheelchair level area at the bench. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.	2	3	N	Up to \$500	
		Access to Field Area: Construct an accessible route of travel to and around the field that is compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used. Create a level wheelchair area at the bleacher seating as described above.	2	3	N	\$5,000 to \$10,000	
Bathrooms							
<u>Men's and Women's</u>							
The doors close 2 to 3 seconds too fast.	404.2.8	26.9		3	2	I	\$0

The door locking mechanisms require pinching and twisting of the wrist.	404.2	26.11	Adjust door closers such that the door closing speeds are at least 6 seconds.	3	2	I	\$150
The side and rear grabs are 6" too short.	604.5	30.8	Replace locking hardware with ones that can be operated with a closed fist or loose grip.	3	2	I	\$500+
<u>Women's Bathroom Only</u> The water closet is 1" too far from the nearest side wall.	604.2	30.7.2	Replace the grab bars with ones that are 42" in length.	3	3	I	Up to \$750
<i>Note: The sink water faucet was not in operation at the time of assessment. Compliance would need to adhere to that described for the men's sink faucet below.</i>			Relocate the water closet so that it is 18" o.c. to the near side wall.				
<u>Men's Bathroom Only</u> The toilet paper dispenser is 4" too close to the front of the water closet.	604.7	30.7.6	Relocate the toilet paper dispenser so it is a minimum of 7" and a maximum of 9" in front of the water closet measured to the centerline of the dispenser and at least 24" a.f.f.	3	2	I	\$0
The flush control of the water closet is on the wrong side.	604.6	30.7.5	Replace the water closet or the tank of the water closet with one that has a flush control on the approach or wide side.	3	3	I	\$125 to \$350
The metered sink water faucet requires 10 lbs. of operating force and stays on for only 1 second.	606.4 309	30.9.6	Modify/adjust the faucet so that it requires no more than 5 lbs. to operate and stays open for at least 10 seconds.	3	3	I	\$100

Estimated Total Cost: Up to \$170,950+

Krashes Field Accessibility Assessment Photos



Photo Krashes 1

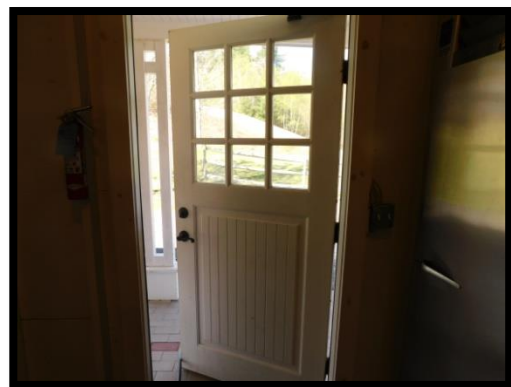


Photo Krashes 2



Photo Krashes 3



Photo Krashes 4



Photo Krashes 5



Photo Krashes 6



Photo Krashes 7



Photo Krashes 8



Photo Krashes 9

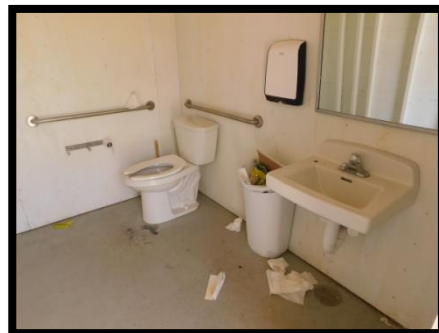


Photo Krashes 10

CENTER SCHOOL RECREATION AREA

Function and Description of Facility and Programs: The Center School recreation Area consists of an older playground with a jungle gym, monkey bar, and swings; a picnic table, 4 benches, a baseball field, horseshoe pits, and a walking trail.



Responsible Party: Parks and Recreation Department

General Description or Obstacle Which Limits Mobility or Access: There is no designated accessible parking near the recreation area. There is accessible parking for the building but it is too far from the Center School Recreation Area entrance, lacks an access aisle, has excessive running and cross slopes, and has non-compliant signage. There are no accessible routes of travel to the recreation area from the asphalt parking and to the playground equipment, horseshoe pit, benches, picnic table, and baseball field. A stone dust walking trail surrounds the Center School Recreation Area. There are areas along the entirety of the stone dust accessible route of travel within the park that are getting overgrown with grass and weeds and becoming slightly deteriorated and uneven. The accessible route of travel around the recreation area perimeter needs to be routinely maintained including weeding, adding of additional stone dust, and compacting to ensure full compliance with the standard of “*firm, stable, and slip resistant*”. The picnic table is not accessible. There are no level areas for wheelchairs adjacent to the benches. The playground has non-compliant surfaces below play equipment and there are no accessible play components.

Center School Recreation Area Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<p>Parking There is no designated accessible parking at the entrance to the recreation area.</p>	302 502 703.7	23	<p>Create a compliant van accessible parking space near the entrance to the recreation area as follows:</p> <p>Repave, stripe and designate a van accessible parking space at a width of 8' with an 8' access aisle. Van accessible signage must be provided. Accessible signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of each space. Slopes cannot exceed 2.0% in any direction.</p>	1	3	N	Up to \$1,500
<p>Picnic Tables The sole picnic table has insufficient knee depth clearance.</p>	226.1 902	19	<p>Purchase 1 accessible picnic table and locate on an accessible route of travel. The table surface s/b 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.</p>	2	2	N	\$750
<p>Route of Travel to Fields and Amenities</p> <p><u>Accessible Route of Travel to the Recreation Area</u> The paved walkway from the asphalt parking to the recreation area has running slopes that vary up to 8.4%, which exceeds the maximum of 5.0% without railings and 8.3% with railings.</p> <p><u>Baseball Field, Play Equipment, Horseshoe Pit, Picnic Table, Benches</u> There is no accessible route of travel to and the baseball field, play equipment, horseshoe pit, picnic table, and bench.</p> <p>There are no accessible play components. Non-compliant grass and dirt/gravel is the surface treatment for the entirety of play areas.</p>	402 303 403 405 402 303 403 1008	19 20 22 24 19 20 22 19	<p>Modify the existing asphalt walkway so that the running slopes do not exceed 8.3%. Install roughly 40 feet of railings for the segment that exceeds a running slope of 5.0%. The railings should be paired at 34" – 38" a.f.f. to the top of the upper railing and 18" – 20" a.f.f. to the top of the bottom railing, have an outside diameter of 1½" - 2", oval or round in shape, with 12" extensions at the top and bottom of the "ramp".</p> <p>An accessible route of travel needs to be provided to all areas available to the public. . Construct an accessible route of travel to the baseball field, play equipment, horseshoe pit, picnic table, and bench. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p> <p>"Fully accessible" playscape and ground components should be considered. Play area ground surfaces immediately around play components and in the fall zone must comply with ASTM F 1951 and ASTM F 1292. Depending on the type, age, and quality of woodchips, they may be considered acceptable as a fall zone ground surface.</p>	2 2 2	3 3 3	N N N	Up to \$12,500 \$2,500 to \$5,000 \$1,500 to \$5,000

None of the benches provide level adjacent wheelchair areas.	802.1 221.2	14	Create an approach and wheelchair level area at the benches. The space should be 36" wide x 60" deep per wheelchair. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach.	2	3	N	Up to \$750
<u>Accessible Route Around Perimeter of Recreation Area</u> The stone dust walkway around the perimeter of the recreation area has abrupt changes in level surface, is deteriorated, and has reductions in clear width to less than 36".	402 303 403	19 20 22	Reclaim the existing walkway to provide a stable and level surface with a no greater than ¼" change in level surface and a clear width of a minimum of 36" (48" wide walkway with a 36" minimum clear width).	2	3	N	Up to \$5,000

See Photos Center 1, 2, 3, and 4.

Estimated Total Cost: Up to \$30,500+

Center School Recreation Area Accessibility Assessment Photos



Photo Center 1



Photo Center 2



Photo Center 3



Photo Center 4

SAWYER FIELD

Function and Description of Facility and Programs: Sawyer Field is a neighborhood recreational facility with a playground, a baseball field, a sandbox, and a picnic table. The play equipment is older and consists of a slide, swings, and a climbing structure.



Responsible Party: Parks and Recreation Department

General Description or Obstacle Which Limits Mobility or Access: There is no designated accessible parking. There is no accessible route of travel to the park or to the play equipment, picnic table, and baseball field. The picnic table is not accessible. The slides and climbing structure have non-compliant surfaces below play equipment and there are no accessible play components.

Sawyer Field Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<p><u>Parking</u> There is no designated accessible parking.</p> <p>See Photo Sawyer 1.</p>	302 502 703.7	23	<p>Create a compliant van accessible parking space near the entrance to the recreation area as follows:</p> <p>Stripe and designate a van accessible parking space at a width of 8' with an 8' access aisle. Van accessible signage must be provided. Accessible signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of each space. Slopes cannot exceed 2.0% in any direction.</p>	1	3	N	Up to \$250
<p><u>Picnic Tables</u> The sole picnic table has insufficient knee depth clearance.</p>	226.1 902	19	<p>Purchase 1 accessible picnic table and locate on an accessible route of travel. The table surface s/b 28" to 34" a.f.f. to the top surface with at least 27" knee clearance, 30" clear width, and 19" depth.</p>	2	2	N	\$750

Route of Travel to Field and Amenities							
<p><u>Accessible Route of Travel to the Field and Play Components</u></p> <p>There is no accessible route of travel to the baseball field and play equipment (slide, climbing structure, sand box). The sand box has a 12" abrupt change in level surface to access and the picnic table has a 1½" abrupt change in level surface to access.</p>	403	22	<p>An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel to the baseball field, play equipment, slide, and sand box. The accessible route of travel must be compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2). Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p>	2	3	N	Up to \$10,500+
	1008	19		<p>"Fully accessible" playscape and ground components should be considered – at a minimum an accessible swing. Play area ground surfaces immediately around play components and in the fall zone must comply with ASTM F 1951 and ASTM F 1292. Depending on the type, age, and quality of woodchips, they may be considered acceptable as a fall zone ground surface.</p>	2	3	N
<p>There are no accessible play components. Non-compliant grass and dirt/gravel is the surface treatment for the entirety of the play areas.</p> <p>See Photos Sawyer 2, 3, and 4.</p>							

Estimated Total Cost: Up to \$16,000+

Sawyer Field Accessibility Assessment Photos

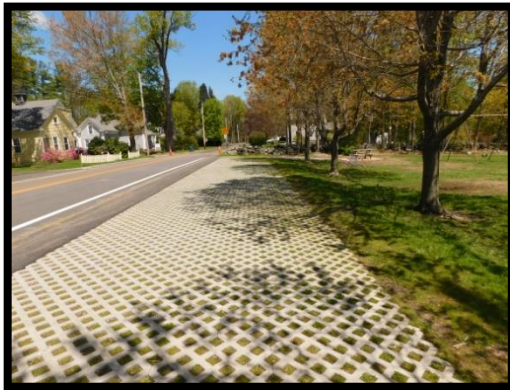


Photo Sawyer 1



Photo Sawyer 2



Photo Sawyer 3



Photo Sawyer 4

THOMAS PRINCE ELEMENTARY SCHOOL FIELDS AND GROUNDS

Function and Description of Facility and Programs: The Thomas Prince Elementary School Fields and Grounds consists of 2 baseball fields, a pitching cage, 1 soccer field, a basketball court, 2 playground areas, a track and field area, a concession stand, and picnic tables. A portable toilet is located near the front baseball field. There are also unimproved trails on part of the property.

Parking for the recreation facility is addressed in the Thomas Prince Elementary School building assessment.



Responsible Party: Select Board, School Committee

General Description or Obstacle Which Limits Mobility or Access: The portable toilet is not on an accessible route of travel and is not fully “ADA compliant”. The concession stand has abrupt changes in level surface to one of the counters and to the inside of the building. The concession counters (3) are too high. There are no accessible routes of travel to and around the fields, playgrounds, picnic tables, baseball dugouts, bleacher seating, and other amenities. The picnic tables at the track and field area are not accessible. Non-compliant wood chips are the primary surface throughout the playgrounds and none of the play components are accessible.

Thomas Prince Elementary School Fields and Grounds Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<p>Portable Accessible Toilet</p> <p>The “accessible” toilet is not ADA compliant as both the soap and toilet paper dispensers are 12½” to 16½” above reach range and are also located above the grab bars; the top of the toilet seat is 1½” too high; the water closet is 1½” too close to the rear wall and 10” too close to the wall in front of the toilet; the grab bars are ½” too low (<i>Note: There are no tolerances for a range of dimensions</i>); the door lacks an internal pull device and has a closing speed that is 4 to 5 seconds too fast.</p> <p>The portable toilet is not on an accessible route of travel.</p> <p>See Photo TPS 1.</p>	308.2 308.3 604.7 309.4 604.4 604.2 609.4	30.12 30.7.6 30.8.5 30.7.2 26.9 30.8.2	<p>Replace the existing “accessible” toilet with an “ADA Compliant” toilet such that soap/towel dispensers are no more than 42” a.f.f.; the toilet paper dispenser s/b a minimum of 24” a.f.f. and s/b 7” min. to 9” max. in front of the water closet measured to the centerline of the dispenser; the height of the water closet s/b 17” to 19” a.f.f. to the top of the seat; the water closet s/b 18” from the nearest sidewall, at least 42” from the farthest sidewall, and 42” from the front of the water closet to the nearest wall or fixture; the door must have pull devices on both sides and a door closing speed that is at least 6 seconds; and grab bars must be between 33” to 36” a.f.f. to the top of the gripping surface.</p> <p>The portable toilet must be located on an accessible route of travel and on a level (2.0% or less slope) surface.</p>	3	2	I	TBD
<p>Snack Shack</p> <p>The concession counters (3) are 11½” too high for that of a food service counter.</p> <p>There is a 1” abrupt change in level surface to one of the counters and there is 13½” change in level surface to access the inside of the concession stand. There is no accessible route of travel to the concession stand.</p> <p>See Photos TPS 2 and 3.</p>	904.5 403 404	17.6.2 22 26	<p>Create 36” wide counters no higher than 34” a.f.f. below the existing counters.</p> <p>Modify the approach to the wooden platform at the concession counter so that the level surface change is no greater than ¼” or up to ½” with a bevel no > than 1:2. Construct an accessible route of travel as well as a ramped approach compliant with S.505 of the 2010 ADA Standards and S. 24 of 521 CMR to access the interior of the building.</p>	2 2	2 2,3	N L	Up to \$750 Up to \$10,000
<p>Picnic Tables</p> <p>None of the picnic tables (3) at the outer fields for track and field have compliant knee depth.</p>	226.1 902	19	<p>At least 5% or at least one table must be accessible. Purchase 1 accessible picnic table and locate on an accessible route of travel. The table surface s/b 28” to 34” a.f.f. to the top surface with at least 27” knee clearance, 30” clear width, and 19” depth.</p>	2	2	N	\$750
<p>Route of Travel to Front and Side Baseball Fields (2) and Soccer Field</p> <p>There is no accessible route of travel to and around the fields, bleacher seating, picnic tables, pitching cage or dugouts. There are no level wheelchair areas next to the bleachers. The baseball dugouts (4) have up to a 6” abrupt change in level surface to access.</p> <p>The ball field bleachers/seating (3) lack a level surface area for wheelchairs.</p>	402 303 403 221.2 802.1	19 20 22 14 19	<p>An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel to and around the fields and to the bleacher seating, picnic tables, dugouts, and batting cage that is compliant with width (48” per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼” unbeveled or between ¼” and ½” beveled w/a slope of no > 1:2).</p> <p>Create an approach and wheelchair viewing area at each bleacher. Space should be 36” wide x 60” deep per wheelchair. If paired, spaces can be reduced to 33” in width. If a front/rear approach, the depth can be reduced to 48” as opposed to 60” for a side approach.</p>	2 2	3 3	L L	\$5,000 to \$10,000 Included in above

<p>The existing gates (2) to the front ball field do not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate</p> <p>See Photos TPS 4, 5, and 6.</p>	404.2	NA	<p>Construction options for the accessible route of travel and level wheel chair areas include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.</p> <p>Remove gates or install smooth plating at base of gate</p>	2	2	L	\$100
<p>Playgrounds (2)</p> <p>The larger playground has asphalt around one-half and not the full perimeter of the playground. The asphalt route of travel around the kindergarten playground is heaving and deteriorated. There is an abrupt change in level surface of up to 4" to access the kindergarten play area. No accessible routes exist within the play areas. The only accessible play component in either play area is an accessible swing in the larger playground. Non-compliant woodchips is the surface treatment for the entirety of play areas. <i>Note: Woodchips may only be considered as a possible option for the fall zone ground surface.</i></p> <p>See Photos TPS 7, 8, and 9.</p>			<p>Provide an accessible route around the entirety of the larger play area and repair/reconstruct the accessible route of travel around the kindergarten play area. Modify the timber surrounding the kindergarten play area to create access by removing the abrupt change in level surface.</p> <p>Construct an accessible route compliant with width (4' wide minimum) and slope (2% cross, 5% running) requirements to the play structure elements. The accessible route must be stable, firm, and slip resistant. Construction options include compacted stone dust, asphalt, concrete, poured in place products, etc. Costs will vary depending on product used. "Fully accessible" playscape and ground components should also be considered in both play areas. Play area ground surfaces immediately around play components and in the fall zone must comply with ASTM F 1951 and ASTM F 1292. Depending on the type, age, and quality of woodchips, they may be considered acceptable as a fall zone ground surface.</p>	2	3	L	\$5,000 to \$45,000
<p>Outer Track and Field Area</p> <p>There is no accessible route of travel to the outer field area, to and around the fields, or picnic tables.</p> <p>See Photo TPS 10.</p>	402 303 403	19 20 22	<p>Option 1: Create an accessible route of travel to and around the outer field area and related amenities that is compliant with width (48" per 521 CMR) and slope (2% max. cross, 5% max. running) requirements as well as changes in level surface (no > than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no > 1:2).</p> <p>Option 2: Construct a new van accessible parking space with access aisle and signage compliant with both the 2010 ADA Standards and 521 CMR at the soccer field and allow vehicle access to the that area. Provide an accessible route to and around the field area and amenities as described above.</p>	2	3	L	\$10,000 to \$20,000 \$8,000 to \$14,000

Estimated Total Cost: Up to \$99,850+

Thomas Prince Elementary School Fields and Grounds Accessibility Assessment Photos



Photo TPS 1



Photo TPS 2



Photo TPS 3



Photo TPS 4



Photo TPS 5



Photo TPS 6



Photo TPS 7



Photo TPS 8



Photo TPS9



Photo TPS 10

XIV. PRINCETON SIDEWALKS AND CURB RAMPS

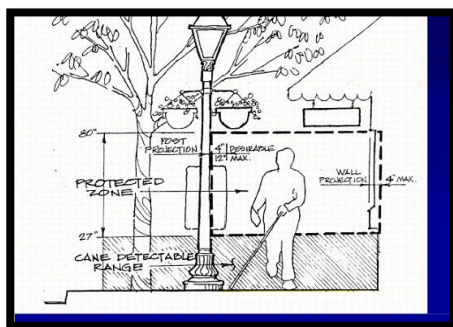
Description of Assessment Area: The assessment of public sidewalks, curb ramps, and crosswalks within the town focused on the East Princeton “round about” area and the Town Common/Center Area.

Regulatory Compliance: Sidewalks and curb ramps must adhere to the rules and regulations of the Massachusetts Architectural Access Board as provided in 521 CMR, and the requirements of the Americans with Disabilities Act as provided for in the regulations of the United States Access Board and as required by the United States Department of Transportation, Federal Highway Administration. These federal requirements are principally listed in the 2010 Americans with Disabilities Act Accessibility Guidelines (“ADAAG”) and the Public Right of Way Accessibility Guidelines (“PROWAG”). In addition, in March 2012, the Massachusetts Department of Transportation issued “Notes on Walks and Wheelchair Ramps for Designers and Construction Engineers” to be used as further guidance on this matter. These notes are a supplement to and not a replacement for the 521 CMR, PROWAG, and ADAAG Regulations.

General Standards for Compliance: In summary, the guidance and regulations under the 2010 ADAAG, PROWAG, 521 CMR, and MA DOT Notes on Sidewalks and Ramps is as follows:

Sidewalks

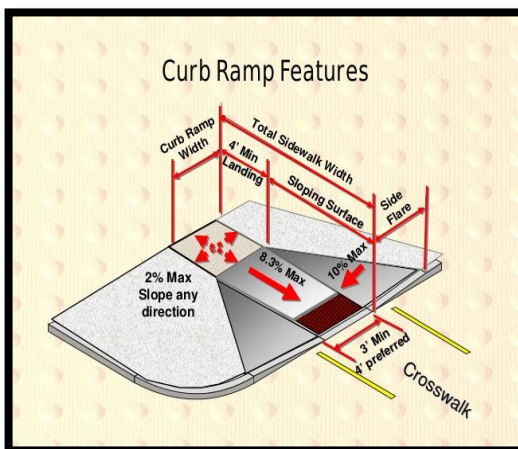
- A minimum of a 4 feet wide sidewalk (excluding the curb) with a 3 feet minimum unobstructed width. If the sidewalk is not 5 feet wide, then a 5 feet by 5 feet level passing space should be provided every 200’. *Citation: ADAAG S. 403.5; 521 CMR S. 22.2; PROWAG.*
- If the slope of the natural topography exceeds 1:20 (5%), a ramp is not required for a sidewalk. *Citation: ADAAG S. 403.3; 521 CMR S. 22.3; PROWAG.*
- The finished cross slope of any walkway or sidewalk should not exceed 1:50 (2.0%). *Citation: ADAAG S. 403.3; 521 CMR S. 22; PROWAG.*
- Walkway and sidewalk surfaces shall be firm, stable, and slip resistant. Openings in the route of travel (grates, etc.) can be no more than ½” wide. The “long” opening should be perpendicular to the route of travel. There shall be no abrupt changes in level surface of more than ¼”, unless beveled up to ½”. *Citation: ADAAG S. 403, 303, 302; 521 CMR S. 22.4, 22.5, 22.7; PROWAG.*
- Objects between 27” and 80” above the finish surface may not protrude more than 4” into the entire pedestrian circulation route. *Citation: ADAAG S. 204; 521 CMR S. 20.6; PROWAG.*
- All sidewalks/accessible routes of travel must be maintained and kept in a good quality condition including being kept free of snow and ice or other debris which would restrict access.



Curb Ramps

- Whenever sidewalks, walkways, or curbs on streets and ways are constructed, reconstructed, or repaired, curb cuts are required. Citation: ADAAG S. 406; 521 CMR S. 21.1; PROWAG.
- Curb cuts shall occur whenever an accessible route crosses a curb. Citation: ADAAG S. 405, 406; 521 CMR S. 21; PROWAG.
- Curb cuts are required at each corner of an intersection and typically are perpendicular to the street. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Curb cut wheelchair ramps should be placed within the general pedestrian flow to the greatest degree possible, to provide pedestrians the safety to see and be seen before crossing the street. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Paired reciprocal curb cut wheelchair ramps are preferred, however, apex ramps serving two directions may be used when intersection geometry precludes the use of paired ramps. The crosswalk should lead directly to the adjoining curb cut wheel chair ramp and sidewalk and not terminate in the roadway, a parking lot, or other area that is not part of the defined pedestrian flow. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The maximum running slope of a curb ramp shall be 1:12 (8.3%). Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The maximum cross slope of a curb ramp shall be 1:50 (2%). Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The maximum slope of a flared side shall be 1:10 (10%). Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- The minimum width of a curb ramp shall be 36 inches under ADAAG and 521 CMR but 48 inches under PROWAG, exclusive of flared sides. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Transitions from curb cuts to walks, gutters, or streets shall be flush or free of changes in level greater than $\frac{1}{4}$ " or between $\frac{1}{4}$ " and $\frac{1}{2}$ " if beveled. Citation: ADAAG S. 303, 403; 521 CMR S. 21; PROWAG.
- Grading and drainage shall be designed to minimize pooling of water, accumulation of debris, accumulation of ice or flow of water across the base of the curb cut. Citation: 521 CMR S. 21; PROWAG.
- A level landing (no more than 2.0% in all directions) at the top of the curb ramp is required. The level landing or turning area should be 4 feet deep by the width of the ramp at the curb line (minimum 3 feet, 5 feet preferred). The preferred level landing dimension, as feasible, is 5 feet x 5 feet. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Diagonal or corner type curb ramps with returned curbs or other well-defined edges shall have the edges parallel to the direction of pedestrian flow. The bottom of diagonal curb ramps shall have a clear space 48 inches minimum outside active traffic lanes of the roadway. Diagonal curb ramps provided at marked crossings shall provide the 48 inches minimum clear space within the markings. Diagonal curb ramps with flared sides shall have a segment of curb 24 inches long minimum located on each side of the curb ramp and within the marked crossing. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.

- Detectable warnings with truncated domes are required at all street crossings under PROWAG. Citation: PROWAG.
- Fixed objects shall not be placed in any part of a wheelchair ramp. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG.
- Catch basins should be located immediately upgrade at the wheelchair ramp entrance. Citation: ADAAG S. 406; 521 CMR S. 21; PROWAG
- Accessible pedestrian signals should provide both visual and audible information. The push button face should be parallel to the sidewalk and mounted within reach range (15 inches to 48 inches above finish ground). The side reach should be within 10 inches and there should be no forward reach obstruction. The button must be operable with a closed fist with no more than 5 lbs. of pressure to operate. The push button location should be between 1½ feet and 6 feet from the edge of the curb, shoulder, or pavement and no more than 5 feet from the crosswalk. Citation: PROWAG; 521 CMR S. 21.



Responsible Party: Highway Department and Select Board

General Description or Obstacle Which Limits Mobility or Access: The following is a general summary of major findings of non-compliance. All sidewalks and curb ramps, unless technically infeasible, must adhere to the state and federal standards as detailed above.

East Princeton Area Sidewalks and Curb Ramps (Route 140/31 Round About)

Although the sidewalks are in very good to excellent condition, the running slopes of the sidewalks at the transition to the 2 driveways (6.2% to 6.6%) at “Captain Bob’s” and at Wachusett Drain Service (5.3% to 6.3%) exceed the maximum allowed as the natural topography does not exceed 5.0%. The curb ramp and crosswalk at Mechanics Hall ends in a driveway on the opposite side and another crossing on Route 140 ends at granite curbing on the opposite side. Trash receptacles placed on the sidewalk on Route 140 block the accessible route and restricts the clear width of the sidewalk. Residents should be reminded on trash pick-up day not to put their trash receptacles on the sidewalks to ensure that people of all abilities have use of the walkways. Although there are mailboxes on Route 140 that are mounted in the sidewalk in

various locations, there remains sufficient 36" clear width within the sidewalk and the mailboxes and posts do not serve as protruding objects.



Town Common/Center Area Sidewalks and Curb Ramps:

With limited exception, most of the curb ramps on Mountain Road, Hubbardston Road, and around the Common lack detectable warning strips. These are as follows:

- Mountain Road and Allen Hill Road (1 side)
- Mountain Road near Manor Apartments (both sides)
- Mountain Road and Prospect Street (both sides)
- Hubbardston Road at Common (1 side – at Common)
- Mountain Road and Routes 31 and 62 (both sides)
- Across Mountain Road at Gazebo (both sides)
- Mountain Road and Gregory Hill Road (both sides)
- Worcester Road at Prince of Peace Church (both sides)
- Across Gregory Hill Road (both sides)
- Across Hubbardston Road to Town Hall Drive (both sides)

The crosswalk and curb ramp at Prospect Street and Mountain Road has a 1" to 2" abrupt change in level surface at the transition from the road to the curb ramp, deteriorated concrete, and no compliant level landing.

The crosswalk and curb ramp across Mountain Road near the Gazebo is deteriorated at the Common side with an up to 1" abrupt change in level surface at the transition from the road to the curb ramp. Neither side has a level landing as the slopes vary from 3.0% to 3.3%.

The crosswalk and curb ramp across Mountain Road near Gregory Hill Road has a 1" abrupt change in level surface at the transition from the road to the curb ramp on the Gregory Hill side. The Common side lacks a level landing as the slopes vary up to 3.2%.

The crosswalk and curb ramp across Hubbardston Road to Town Hall Drive lack level landings on both sides as the slopes vary from 2.6% to 3.4%.

The crosswalk and curb ramp at Worcester Road near Prince of Peace Church has an up to ¾" abrupt change in level surface at the transition from the road to the curb ramp on the church side and a landing that has a running slope of 2.5%.

The crosswalk and curb ramp across Gregory Hill Road lacks a level landing on the Church side with an up to 4.8% running slope. The Common side has a 3.6% cross slope at the landing with an up to 1" abrupt change in level surface at the transition from the road to the curb ramp.



XV. APPENDICES

Appendix A: Survey Form

Appendix B: Public Notice

Appendix C: Grievance Procedure

Appendix D: Reasonable Accommodations Policy

Appendix E: Reasonable Accommodations Request Form

Appendix F: Funding Sources for Barrier Removal Planning, Design and Construction Projects

Appendix A: Survey Form

10. Does the program/service provide any separate activities for people with disabilities? If yes, describe.

11. Are there any circumstances in which a person with a disability would be prohibited from participating in regular activities because of the provision of separate activities?

12. Employment Practices.

a. Please list the number of full- and part-time employees.

b. Has any of these staff declared a disability? If yes, describe.

c. Have you been asked to provide a reasonable accommodation? If so, please describe the request and what accommodation was provided.

d. Are there any required formal tests as a condition of employment? If yes, describe.

e. Do any of the positions have formal job descriptions? If so, state which position and attach a copy of the job description as well as a sample job ad.

Appendix B: Public Notice

Town of Princeton
Public Notice Under
The Americans With Disabilities Act

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (“ADA” hereafter), the Town of Princeton will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment. The Town of Princeton does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the United States Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication. The Town of Princeton will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Town programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to persons with speech, hearing and/or vision impairments.

Modifications to Policies and Procedures. The Town of Princeton will make all reasonable modifications to policies and programs to ensure that persons with disabilities have an equal opportunity to enjoy all of its programs, services, and activities.

Procedure and Contact. Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the town of Princeton should contact the ADA Coordinator as soon as possible but no later than 72 hours before a scheduled event.

The ADA does not require the Town to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints and requests concerning the accessibility of programs, services and activities of the Town should be directed to:

Sherry A. Patch, ADA Coordinator
Address: 6 Town Hall Drive, Princeton, MA 01541
Phone: (978) 464-2102
Fax: (978) 464-2106
Email: townadministrator@town.princeton.ma.us

The Town of Princeton will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids and services or reasonable modifications of policy.

Appendix C: Grievance Procedure

Town of Southwick
Grievance Procedure Under
The Americans With Disabilities Act

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (“ADA”). This may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the Town of Southwick.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem.

Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to the Town’s ADA Coordinator:

Sherry A. Patch, ADA Coordinator
Address: 6 Town Hall Drive, Princeton, MA 01541
Phone: (978) 464-2102
Fax: (978) 464-2106
Email: townadministrator@town.princeton.ma.us

Within 15 calendar days after receipt of the complaint, the ADA Coordinator or his/her designee will meet with the complainant to discuss the complaint and the possible resolutions.

Within 15 calendar days of the meeting, the ADA Coordinator or his/her designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the Town of Southwick and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or his/her designee does not satisfactorily resolve the issue, the complainant and his/her designee may appeal the decision of the ADA Coordinator within 15 calendar days after receipt of the response to the Select Board.

Within 15 calendar days after receipt of the complaint, the Select Board will meet with the complainant to discuss the complaint and the possible resolutions.

Within 15 calendar days of the meeting, the Select Board will respond in writing, and where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Coordinator or his/her designee and appeals to the Select Board and responses from both will be retained by the Town Clerk for a period of at least 3 years.

Appendix D: Reasonable Accommodation Policy

Town of Princeton

Reasonable Accommodation Policy

In accordance with the Americans with Disabilities Act, the Town of Princeton has adopted the following policy to address requests for reasonable accommodations made by people with disabilities in its employment, services, activities, policies, procedures, rules, and regulations.

Citizens, employees or applicants for employment of the Town of Princeton with qualified disabilities should address any requests for accommodation to the Town's ADA Coordinator using the "*Reasonable Accommodation Request Form*" available on the town's website or from the Office of the Town Administrator.

Written requests should be sent to: (Note: : Alternative means of filing a request such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing).

ADA Coordinator

Sherry A. Patch, ADA Coordinator

Address: 6 Town Hall Drive, Princeton, MA 01541

Phone: (978) 464-2102

Fax: (978) 464-2106

Email: townadministrator@town.princeton.ma.us

If the Town of Princeton can grant the accommodation, the requestor will be notified within two weeks of receipt of the request and no further action will be required by the requestor. The request will then be implemented by the appropriate Town Department.

If the Town of Princeton cannot grant the accommodation request, the requestor will be notified in writing of the decision, along with notification of the right to file a grievance under the Town's Grievance Procedure.

Appendix E: Reasonable Accommodation Request Form

TOWN OF PRINCETON
REQUEST FOR REASONABLE ACCOMMODATION FORM

The Town requests the completion of this form to assist it in assessing your request for a reasonable accommodation. This initial information will be part of an interactive process with you as we explore your request. This form will be kept separate from your personnel file. The responses may generate the need for additional medical information.

TO BE COMPLETED BY REQUESTOR

Print Name _____ Date _____

Phone (work) _____ (personal) _____

Town employee Application for Employment Other (please explain) _____

Dept/Div _____ Job Title _____

APPLICANT

A. What limitation(s) is interfering with your job application process?

B. How does your limitation(s) interfere with your ability to participate in your job application process?

C. Describe any suggested accommodation(s) that you believe will assist you in addressing the above-referenced limitation(s): _____

D. Explain how the requested accommodations(s) will assist you: _____

E. If applicable, identify the source and/or cost (if known) for providing the accommodation(s):

EMPLOYEE

A. What limitation(s) is interfering with your job performance or accessing a benefit of employment?

B. What job function(s) or benefits of employment are you having difficulty performing or accessing because of that limitation(s)? _____

C. How does your limitation(s) interfere with your ability to perform your job function(s) or access a benefit of employment? _____

D. Describe any suggested accommodation(s) that you believe will assist you in addressing the above-referenced limitation(s): _____

F. If applicable, identify the source and/or cost (if known) for providing the accommodation(s):

Requestor's Signature _____
Date _____

**RETURN THIS FORM TO THE
PRINCETON ADA COORDINATOR**

Appendix F: Funding Sources for Barrier Removal Planning,
Design and Construction Projects

FUNDING SOURCES FOR BARRIER REMOVAL PLANNING, DESIGN, AND CONSTRUCTION PROJECTS

Note: This list of funding is not all inclusive and other local, private, state, and federal funding may be available to address accessibility related projects.

MA Office on Disability Municipal Americans with Disabilities Act Improvement Grant Program

There are two grant types available:

Planning Grant. These grants are for updating or creating a Self-Evaluation and/or Transition Plan as required under the Administrative Requirements of Title II of the ADA.

Project Grant. These grants are for removal of architectural or communication barriers that are present in a municipality. Design plans or applicant salaries are not eligible project grants. Project Grants are solely to remove barriers or to make physical/communication improvements at municipal properties or municipally owned facilities. Funds awarded cannot be used to make improvements to private businesses, private property, non-profit organizations, private homes, or other non-municipal properties.

Community Development Block Grant Funds (CDBG)

CDBG Funds can be accessed directly from the federal Office of Housing and Urban Development (HUD) if a municipality is an entitlement community or a designated central city. Non-entitlement communities (such as Princeton) can apply for CDBG funds on an annual state-wide competitive basis from the Massachusetts Department of Housing and Community Development. Eligible accessibility related projects include feasibility and planning projects; design and engineering for barrier removal; and physical construction improvements to remove architectural barriers, including but not limited to, sidewalks, curb ramps, building and facility access and building and facility modifications. Funding may also be awarded for accessible related communication and transportation improvements and purchases such as integrated and fixed ALS devices and COA/Municipal accessible vans.

MassWorks Infrastructure Program

The MassWorks Infrastructure Program is a competitive grant program that provides a flexible source of capital funds to municipalities and other eligible public entities primarily for public infrastructure projects that support and accelerate housing production, spur private development, and create jobs throughout the Commonwealth. Although not specifically designed to address accessibility planning or barrier removal - housing projects would be required to include a percentage of units as accessible units and surface infrastructure projects would be required to construct compliant sidewalks and curb ramps as part of the overall construction project.

MA Chapter 90 Funding

Municipalities may, upon MA DOT approval, use their allocated Chapter 90 funds for street and sidewalk improvements which would require compliance with the 2010 ADA Standards, 521 CMR, and PROWAG pertaining to sidewalk cross slopes, level changes, sidewalk widths, curb ramps, and pedestrian crossing signals.

MA Complete Streets Program

The MassDOT Complete Streets Funding Program provides technical assistance and construction funding to eligible municipalities. Eligible municipalities must pass a Complete Streets Policy and develop a Prioritization Plan. Similar to the MassWorks Program, although not specifically designed to address accessibility projects, surface infrastructure projects would be required to construct compliant sidewalks and curb ramps as part of the overall construction project.

Inherent in the development of a Complete Street is meeting the most current accessibility guidelines outlined by the Americans with Disabilities Act (ADA) and the Massachusetts Architectural Access Board (AAB), which are upheld by Code of Massachusetts Regulations 521 (521 CMR).

MA Community Preservation Act (CPA)

If a municipality has adopted through town meeting the CPA program, approved projects would have to adhere to applicable standards under ADA and 521 CMR. CPA funding is often used for historic building restoration and rehabilitation projects. Depending on the nature of the work and as part of the overall building project, funding may be attributed towards access into a building as well as interior improvements such as vertical access (lift, elevator), bathroom modifications, and related accessibility improvements.