

# **Town of Ludlow**

## **Self-Evaluation and Transition Plan**

### **June 2025**

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**Prepared by:**

**Center for Living & Working, Inc.**

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**and**

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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.*

# **TOWN OF LUDLOW – SELF-EVALUATION AND TRANSITION PLAN**

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## I. INTRODUCTION

The Center for Living & Working, Inc. in partnership with James M. Mazik, AICP – Consulting Services has prepared this Self-evaluation and Transition Plan (“Accessibility Plan” hereafter) on behalf of the Town of Ludlow 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 Ludlow 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. cities and 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 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 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 all programs, services, and activities of state and local government. 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 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 Ludlow 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 Commission 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 Commission on Disability who will investigate and determine the appropriate action.

The address and contact information for the Commission 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  
Website: <https://www.mass.gov/orgs/massachusetts-office-on-disability>

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.

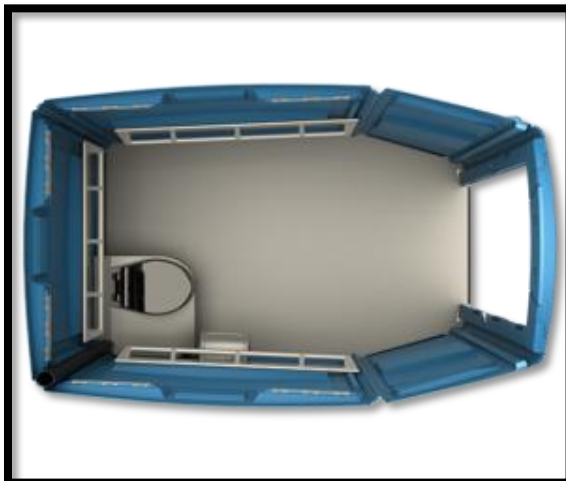
#### Miniature Horses

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; a 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. EMERGENCY EYEWASH STATIONS

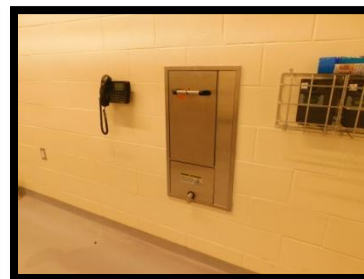
Emergency eyewash and shower equipment are often located in school science classrooms, public works and highway garages, police stations, and fire stations. These facilities should be designed to meet both the Americans with Disabilities Act (ADA) and the American National Standards Institute requirements.

These stations typically have shower pull rings that are not within reach of someone using a wheelchair and eyewash stations that are too high and lack knee clearance.

All emergency equipment must comply with ADA requirements as follow:

- Emergency showers and eyewashes should be mounted for fold-up so they are completely out of the way when not in use. For example, swing-down, sink-mounted eyewashes should be placed at the back or side of the lab sink so that the sink can be used for other operations; however, the spray should automatically start when the head is swung down into position over the sink drain.
- Signage for emergency equipment must be highly visible, even when not in use, so that it can be easily located by the disabled person.
- Sinks and counters should be 34 inches above the floor. This allows the spray outlets of the eyewash to be about 39 inches above the floor. Newer models can even be attached to swing down below the 36-inch sink height, making them easier to reach.
- The activation handles for lowering the eyewash and turning on the shower should not require more than five pounds of force to operate.
- Safety showers that meet ADA requirements must have the pull rod at or below 48 inches. This would accommodate any person using a wheelchair. The center-line of the showerhead should be 37 inches from the wall.
- When a shower/eyewash station is a combination unit, the eyewash should be about 14 inches from the wall to the center-line of the eyewash.
- ADA guidelines state that at least one out of five eyewash or shower stations in a specific area, or at least one, must meet ADA requirements.

Photographic examples of compliant emergency eyewash stations are provided below.



## **XI. ACCESSIBLE ROUTES AND PLAYGROUND SURFACE MATERIALS**

### **ACCESSIBLE ROUTES OF TRAVEL**

Walkways and sidewalks must be firm, stable, and slip resistant with cross slopes of no more than 2.0% and running slopes of no more than 5.0%. Transitions and surface changes must be flush or free of changes in level greater than ¼" or between ¼" and ½" if beveled. Typical surface treatments include asphalt, concrete, stone dust, and stabilized stone dust (stone dust blended with a binding agent or polymer). A new product for use in recreation areas involves compacted shredded bark/wood chips mixed with a polymer stabilizing adhesive product.

### **Asphalt**

Estimated cost per square foot (2022): Up to \$10.00.

- Pros:
- 1) Durable
  - 2) Relatively inexpensive
  - 3) Requires little maintenance
  - 4) Does not readily deteriorate and has a longer live span
- Cons:
- 1) Is not permeable
  - 2) Subject to heaving and grass/weed infiltration in cracks
  - 3) Added cost due to site preparation requirements
  - 4) Requires periodic crack-filling and re-sealing/re-coating



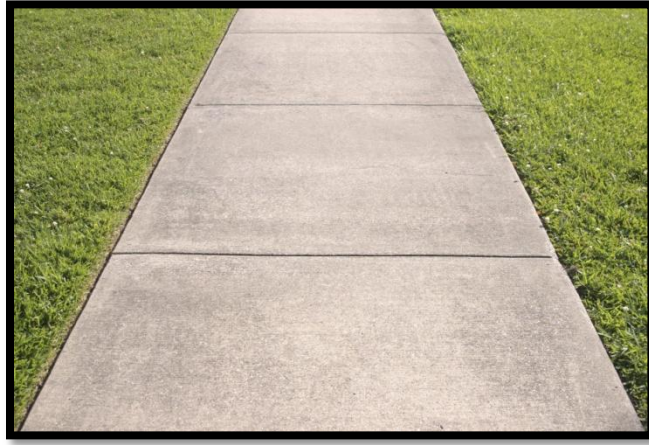
### **Concrete**

Estimated cost per square foot (2022): Up to \$25.00.

- Pros:
- 1) Durable
  - 2) Requires little maintenance
  - 3) Does not readily deteriorate and has a longer live span
- Cons:
- 1) Is not permeable
  - 2) Subject to cracking, edge deterioration, and some heaving



- 3) Is more expensive due to site preparation and construction
- 4) Requires more expensive repair varying from grinding to complete concrete pad replacement



### **Stone Dust**

Estimated cost per square foot (2022): Up to \$5.00.

- Pros:
- 1) Inexpensive and can be installed by municipal work force
  - 2) Permeable
- Cons:
- 1) Requires regular maintenance including the addition of material, compaction, re-grading, and weed removal
  - 2) Subject to deterioration and wash-outs especially on sloped areas
  - 3) If not installed properly and/or regularly maintained, can be problematic for wheelchair users as well as those with arm crutches due to degradation of the surface stability and firmness



### **Stabilized Stone Dust**

Estimated cost per square foot (2022): \$7.00 to \$10.00.

- Pros:
- 1) Relatively inexpensive



- 2) Permeable
- 3) More durable than regular stone dust
- 4) Doesn't heave, weed resistant

- Cons:
- 1) Costs more than regular stone dust
  - 2) Requires metal or wood edging to preserve the integrity of the walkway and limit side erosion
  - 3) May require periodic touch up and restoration



**Compacted Wood Chips/Bark Mixed with an Emulsion**

Estimated cost per square foot (2022): \$7.00 to \$10.00.

- Pros:
- 1) Relatively inexpensive
  - 2) Permeable
  - 3) More durable than regular stone dust
  - 4) Doesn't heave, weed resistant
  - 5) Works on sloping surfaces

- Cons:
- 1) Costs more than regular stone dust
  - 2) Requires metal or wood edging to preserve the integrity of the walkway and limit side erosion
  - 3) May require periodic touch up and restoration



***Note:** Upon application the initial color of the surface is yellow, but then weathers over time to silvery gray.*

## **PLAYGROUND SURFACE MATERIALS**

There are two general options for ADA compliant playground surfaces for the fall zone area and areas other than the accessible route of travel – loose fill materials or synthetic materials. The selection of materials should be based on factors such as height of equipment to the ground fall area, age of users, dispersion of equipment, typical weather conditions, maintenance costs, installation costs, equipment life expectancy, and environmental concerns.

### **LOOSE FILL**

All loose fill surfacing requires daily raking to maintain the required depth of the material to ensure the safety of children. Replenishment is also required as loose fill gets packed down or kicked away. Often this type of maintenance does not take place, creating unsafe playgrounds. In addition, loose fill is often tracked into buildings requiring additional maintenance indoors. Following are the most common types of loose fill:

#### **Pea Gravel, Sand, Regular Wood Chips, and Shredded Rubber/Engineered Wood Fiber**

These materials do meet compliance standards for impact attenuating surfaces (fall zone material), but they do not meet the standard for propulsion and turning requirements in the ASTM standards and are not recognized as ADA-approved materials. Other surfacing materials can be used to create paths to the entry point of the play equipment and render playgrounds compliant (See Accessible Routes of Travel above).

#### **Pea Gravel**

Pros: Pea gravel is inexpensive and easy to maintain. It also allows for good drainage and does not attract animals.

Cons: It can be a hazard if it is thrown by persons in the playground. Some daycare providers have reported that pea gravel fits well in a nostril or an ear, which can result in an unwanted visit to the doctor or emergency room. It also creates a problem for maintenance of the grass and surfaces surrounding the playground. Lawn mowers can throw the gravel significant distances. The material cannot be used if the fall height within the playground is greater than 5 feet.



#### **Sand**

Pros: Sand is a very easy product to maintain through simple raking and leveling. . It is also a preferred material to play in by children.

Cons: Cats often use the sand as a litter box which creates a serious health code concern. Broken glass and other debris can also become buried in sand, invisible to the eye, resulting in potential future injuries. Furthermore, in freezing conditions, sand can become as hard as concrete and can only be used after the sun warms the surface or the material is loosened manually. Sand cannot be used if the fall height within the playground is greater than 4 feet.



#### Regular Wood Chips (not engineered wood fiber)

Pros: This material is inexpensive, readily available, and easily moveable. It is typically also a good fall attenuating surface material. If properly maintained, wood chips can be used as a fall zone for play structures with a fall height up to 10 feet.

Cons: Regular wood chips require constant maintenance. They must be turned over occasionally to prevent decomposing and do not have good drainage qualities. Typically, a significant amount of the material, 25% or more, must be replaced annually.



#### Shredded Rubber and Engineered Wood Fiber

Pros: These products are ADA-approved for impact attenuation and are relatively cost efficient. Shredded Rubber and Engineered Wood Fiber can be used for play structures with a fall height up to 10 feet.



Cons: These materials have the potential to “off-gas” in high temperatures. They are also difficult to keep in the play areas, out of the grass, and out of children’s clothes.



## FULLY ACCESSIBLE SURFACES

### Pour-in-Place, Rubber Mats/Tiles

Pros: These artificial surface materials meet ADA standards and are deemed universally accessible for children with disabilities. The most significant benefit of these surfaces, other than accessibility, is that daily maintenance is usually not required to ensure that safety is maintained. Generally, relatively little effort is required to keep the surfacing materials safe and usable, in normal use zones. While products differ in quality and density, the average pour in place product can provide an ASTM safety rating for fall heights up to 12 feet.

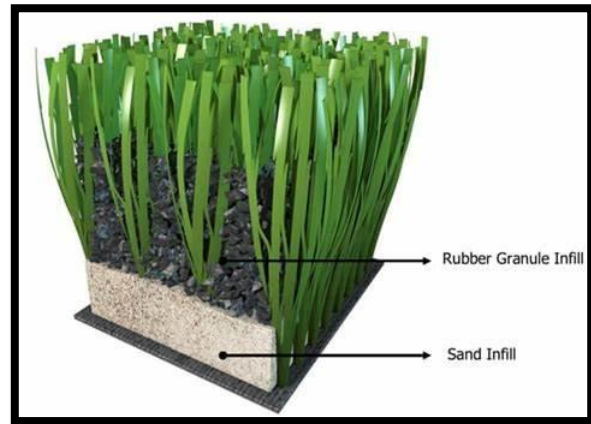
Cons: Over time tile edges may “curl”, creating a tripping hazard. Expansion between tiles also allows debris to accumulate, and the surface of the pour-in-place materials can freeze and separate. Consequently, it is difficult to patch the surface for an extended period of time. The biggest problem with these surfaces is the cost, which is significantly more than other acceptable options. In addition, severe and varying weather conditions may reduce the average life expectancy for the pour-in-place materials.



### Artificial Grass with Rubber in-Fill

**Pros:** A properly and independently certified turf should also have a soft, consistent surface that is ADA accessible for easy wheelchair access. Since the grass won't displace like loose fill, such as sand, rubber chips, or wood chips, the safety rating is easy to maintain, even under play equipment. Artificial grass installed over a proper base can provide an ASTM safety rating for fall heights up to 12 feet.

**Cons:** Although artificial grass with a rubber infill is significantly more expensive than the cost of loose fill material, it is typically less expensive than pour-in-place surfaces.



### Summary

All surfacing materials have advantages and disadvantages. The purchaser and the installer must ultimately assess the safety factors that will influence or the type or types of playground surfaces to be used. Among those factors are the location of the playground; drainage potential; average grade of the surrounding area; cost of installation and maintenance; life expectancy of the surface and infill materials; accessible routes to the playground; normal temperature and weather conditions; security for the playground; amount of use; age of the users; height of equipment; and amount and dispersion of accessible components. To provide a safe and accessible playground that is consistent with accessibility requirements, all of these factors should be reviewed. While expense is a primary concern for the entity or jurisdiction that is investing in a new or renovated playground, it should not be the only limiting factor, with safety, accessibility, and user integration to be equally considered.

## **XII. 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 Ludlow is achieved. A Self-evaluation Recommended Actions Checklist is provided in Appendix G.

#### **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.

#### **Ludlow Self-evaluation**

Commissions on Disability are established by vote of the 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 Ludlow has a current and active Commission on Disability. This is confirmed on MA Office on Disability's website under "*Contact your local Commission on Disability*".

Meetings take place on the 4th Thursday of every month at 6PM at the Ludlow Town Hall. The Commission's webpage includes quick links to the MA Office on Disability, DisabilityInfo.org, and the MA Architectural Access Board.

#### **Recommendation**

It is recommended that the Commission on Disability webpage include ADA related documents such as the completed Self-evaluation and Transition Plan; Town's Grievance Procedure; Public Notification; and related Policies, Procedures, and Practices. In addition, the name and contact information for the ADA Coordinator should be provided.

### **ADA Coordinator (ADA Title II - 28 CFR Part 35.107 (a))**

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.

#### **Ludlow Self-evaluation**

Building Commissioner Brenda (B.J.) Church [bchurch@ludlow.ma.us](mailto:bchurch@ludlow.ma.us) (413) 583-5600 is listed as Ludlow's ADA Coordinator at the MA Office on Disability's website under "*Find your local ADA Coordinator*". BJ Church is also listed as ADA Coordinator on the Commission on Disability meeting notice letterhead, the 2024 Annual Report, and the Board of Selectmen appointment letter dated April 30, 2025.

#### **Recommendation**

Once BJ Church has been sworn in, the name and contact information of the ADA Coordinator should be posted on the Town's website and in the Town Hall. An ADA Coordinator webpage should also be created in addition to the existing Commission on Disability webpage that would include all ADA related documents including the ADA Coordinator Appointment, Public Notice, Non-Discrimination Policy, and the ADA Grievance Procedure (discussed further in this Plan).

### **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.

#### **Ludlow Self-evaluation**

Title II of the ADA requires that public entities notify participants of its non-discrimination policies. The Town's website does not have any Public Notice of Non-Discrimination policies regarding residents or visitors with disabilities, nor is there anything posted on the Town Hall



bulletin boards. The non-discrimination policies posted on these bulletin boards pertain only to employment such as being an equal opportunity employer that does include those with disabilities.

Although no specific method is required to reach the public, the 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. There is an equal opportunity employer policy of non-discrimination paragraph at the top of the Town of Ludlow's employment application form that states:

*"The Town of Ludlow is an equal opportunity employer dedicated to a policy of non-discrimination employment on any basis including race, color, creed, ancestry, religion, sex, national origin, age, marital or veteran status, handicap or disability, sexual orientation or any other legally protected status."*

The employment application is available on the Human Resources web page and the first page of the Town's website employment tab. In addition, there is both an Equal Opportunity and an Americans with Disabilities Act Policy contained in the Personnel Policy Manual available in the Human Resources web page.

#### **Recommendation**

Remove the word "handicap," from the equal opportunity employer policy of non-discrimination paragraph at the top of the Town of Ludlow's employment application form but keep the word "disability".

Post a Public Notice of Non-Discrimination document on the Town of Ludlow's website in the Board of Selectmen page or create an ADA Coordinator page that would include the pertinent ADA Documents such as this Public Notice, Identification of the ADA Coordinator, ADA Grievance Procedure, Notice of Non-discrimination, and Effective Communication as well as in the Commission on Disability page. **A sample Public Notice is provided in 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.

#### Ludlow Self-evaluation

The Town of Ludlow has a Grievance Procedure and a Discrimination Complaint Form for a complainant to fill out and submit to the Commission on Disability Chair and the ADA Coordinator. The Ludlow Commission on Disability also maintains a Disability Complaint Log used to track the name and address of the complainant, date complaint submitted, and brief description of the grievance. However, this Grievance Procedure is not immediately available on the Town's website, unless you contact the Commission on Disability and/or ADA Coordinator.

#### Recommendation

This ADA Grievance Procedure should be formally adopted if it has not been already. The Grievance Procedure should also be posted in the Town Hall and on the Town's website, where it can be easily located. The Grievance Procedure should also be made available to all staff, departments, committees, and boards. **A sample ADA Grievance Procedure is provided in Appendix C, if needed.**

#### **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.

#### Ludlow 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 Ludlow does not appear to have any formal reasonable accommodation or modification of programs or services policies in place. There are no policies available on the Town's website or in Town Hall.

Although there are no formal reasonable modifications in policies, practices, and procedures in place, the ADA Self-Evaluation Survey results from the department heads and committee/commission chairs show that Town staff, committees/boards, and elected officials are willing to assist residents or visitors if they request it.

Almost all the 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?" However, the survey response to the question "Is the public informed that these programs/services are prepared to make reasonable modifications?" was "no, N/A or did not understand the question". Only the Public Schools survey respondent stated "yes, through school committee policy, student/parent handbooks, and our website."

### **Recommendation**

It is recommended that the town adopt a Reasonable Accommodation Policy as well as a Reasonable Accommodation Request Form and incorporate non-discrimination language, essential function requirements, and physical requirements in employment postings and job descriptions (discussed further below).

Post the ADA Reasonable Accommodation Policy as well as the Reasonable Accommodation Request Form on the Town's website in the Board of Selectmen tab, and/or the newly created ADA Coordinator and ADA Commission on Disability tab as suggested in the Public Notice section of this Self-Evaluation. These documents should also be posted in Town Hall.

**A sample Reasonable Accommodation Policy and Reasonable Accommodation Request Form is provided in Appendices D and E.**

### **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.

### **Ludlow 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.

Based on what was available for review, a random sample of five usable job descriptions submitted during the Self-Evaluation process were reviewed. All of these Job Descriptions are good examples of what a job description should contain:

- 1) *Job Environment*
- 2) *Essential Functions*
- 3) *Recommended Minimum Requirements  
such as Education/Experience, Knowledge, Ability,  
and Skill and Physical Requirements.*

However, four out of the five job descriptions contained physical requirements that the person "walk, stand, and sit". Seeing that these are administrative/office jobs, this language can be construed as discriminatory for someone with a physical disability. Only the Animal Control Officer physical requirements were consistent with the type of job that it is. Four out of five of these job descriptions did contain Reasonable Accommodation and Equal Opportunity Employer language (see below).

*"Reasonable accommodations may be made to enable individuals with disabilities to perform essential functions."*

*“The Town of Ludlow is an EOE/AA employer: Pay Equity/Equal Opportunity/Americans with Disabilities Act Employer.”*

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

Recommendation

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. Job descriptions should include Essential Functions, Knowledge, Abilities and Skills, Work Environment and Physical Requirements that include Reasonable Accommodation language. All job descriptions should be formatted similar to the Public Safety Dispatcher, Animal Control Officer, Senior Records Clerk – Police Department, and Executive Assistant to the Chief of Police.

If the Town of Ludlow job descriptions lack reasonable accommodation language, consider adding the *“italicized”* phrases as noted above.

**A sample Reasonable Accommodation Policy and Request Form for adoption by the Board of Selectmen 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.

#### **Ludlow Self-evaluation**

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

- Items placed in front of dispensers, operational buttons, or defibrillators restricting access or reducing clear width.
- Interior and exterior doors with excessive operating forces and closing speeds.
- Missing elements such as tactile designation signage.
- Missing protective equipment or insulation on sink plumbing.
- Items stored under accessible sinks that restrict knee and toe depth.
- Bathroom stall doors that don't fully self-close.
- Debris such as sand and leaves accumulated at the base of curb ramps.
- Gaps and changes in surface levels over ¼" in accessible routes.
- Interior accessible routes that are less than 36" due to placement of furniture.

#### **Recommendation**

It is recommended that facilities are 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.

#### Ludlow Self-evaluation

Based on viewing available policies and materials, it is not clear as to what degree the Town complies with this provision. It does not appear that information of this type is available as part of regular meeting notices and postings and who to contact to arrange for providing accommodations.

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 as there is no mention of their availability on the Town's website or documents.

Based on review of the completed Self-Evaluation question "Briefly describe general office/service communications. Specifically, how is information disseminated and communicated? Are there assistive devices or auxiliary aids (ie. TTY, TDD, sign language interpreter) which are used or available?"

The following survey responders stated their effective communication features are as follows:

The Commission on Disability response was that there is access to available text to speech applications in their digital and print documents.

The Public School response features Parent Square, a program in which emails and text are available in the family's native language. *"Formal documents are presented in multiple languages and interpreters are available to translate English into other languages, including sign language, at meetings".*

The Council on Aging has a personal amplifier available for those with hearing issues.

The Police Department states that the E911 Dispatch Center has all TTY capabilities.

Even though the Hubbard Memorial Library doesn't have any assistive listening devices, they do offer the following:

Audio Books

Large Print Books

Digital Resources like "Libby", a collection of digital media that a patron can borrow using one's library card.

In addition, the library is part of the C.W. Mars network that features more materials in accessible format.

### **Recommendation**

Consideration should be given to print or order some documents, reports, newsletters, minutes, etc. in alternative formats, such as large print, Braille, audio recordings, and documents stored electronically in accessible formats on CDs. Some examples of events when one is likely to produce documents in advance include training sessions, informational sessions, meetings, hearings, and press conferences. In some instances, requests for an alternative format from a person with a disability will be made before the event. Printed material should have clear letter and background contrasts, larger font size (ie. 18 or more), and legible font type (i.e. Calibri or similar).

It is also recommended that the Town of Ludlow add the following to all meeting agendas:

*If you need auxiliary aids and services for effective communication (such as a 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 preferably at least 14 days or earlier before the activity or event.”*

It is also recommended that the Town purchase an assistive listening system, preferably a portable one that can be used for meetings that are open to the public and be available as an accommodation request. The availability of assistive listening devices, including signage, should also be posted at the venues where they can be used.

Availability of Assisted Listening Devices signage should be posted at the venues where they can be used. See two examples below:



### **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 keystrokes 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 include 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/](http://www.w3.org/WAI/fundamentals/accessibility-intro/)
- <https://webaim.org>
- [www.ada.gov/pcatoolkit/chap5toolkit.htm](http://www.ada.gov/pcatoolkit/chap5toolkit.htm)
- [www.webaccessibility.com](http://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](http://www.mass.gov/mcbJohn.Oliveira@state.ma.us)  
617-626-7509 Voice  
617-422-0419 Fax

#### Ludlow Self-evaluation

A visually impaired person using the most recent version of JAWS Screen Reading software (see Note below) was able to navigate the Town of Ludlow’s website. It was found that all links are accessible as well as the actual content.

*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.*

The Town of Ludlow uses Government Websites by CivicPlus, a 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 has problems with its 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.

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).

### **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.

#### **Ludlow Self-evaluation**

The Town of Ludlow offers a **Blackboard Connect** city-to-resident notification system for any messages regarding the safety or welfare of the Ludlow Community. Examples would include severe weather warnings and updates, hazardous traffic or road conditions inside the Town or affecting local routes, and any other situation that could impact the safety, property, or welfare of Ludlow's citizens. Town residents can sign up for this service on the Town's website by clicking on Emergency Alerts available in the Community tab. Blackboard Connect is also available on the Safety Committee webpage under the Government tab.

The Fire Department's webpage features the Student Awareness of Fire Education (SAFE) which provides grants to local fire departments to teach fire and life safety to children in schools. The program teaches students to recognize the dangers of fire and the fire hazards of tobacco products through 23 key fire safety behaviors taught in developmentally appropriate ways, and the Senior SAFE program and partners with Ludlow Public Schools and the Ludlow Council on Aging, to provide life safety information and fire education to children and older adults. The Senior SAFE program targets seniors within the community and aims to educate older adults about the importance of smoke and CO alarm safety, installation of house numbers, and nightlights, replacing alarm batteries, and more.

#### **Recommendation**

It is recommended that the guidance provided in Chapter VII of this document be followed when developing an Emergency Management Plan and more specifically that notification and assistance to people with disabilities be included within the plan.

### **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.

#### **Ludlow Self-evaluation**

According to the Town of Ludlow’s website and verified by the Town Clerk, voting takes place in the following locations:

#### **Voting Location Information**

- Precinct 1: Harris Brook Elementary School, Fuller Rod
- Precincts 2 and 6: Paul R. Baird Middle School, Rooney Road
- Precinct 3: Ludlow High School, Chapin Street
- Precinct 4: East Street School, East Street
- Precinct 5: First Church, Center/Church Streets

These sites are all reasonably accessible subject to the findings in the individual building assessments.

Registered Ludlow residents may also vote by mail by filling out the Massachusetts Vote by Mail Application that’s available on the Town’s website in the Town Services tab or the Town Clerk’s webpage. Absentee ballots are available to registered voters who will be absent on election day, due to religious beliefs that prevent you from voting at your polling location on Election Day or have a disability that prevents you from voting at your polling location.

When the ADA Plan consultants were surveying the Paul R. Baird Middle School, Annual Town elections for Precincts 2 and 6 were taking place in the gymnasium. Each Precinct had their own AutoMARK Voter Assist Terminal that were on, but the AutoMARK screen was facing the public with no privacy shield in place. This placement compromises voter privacy.

AutoMark Voter Assist Terminals are available for voters that have disabilities, including people with visual impairments that enable them to vote independently and in privacy, and are available at all the Town of Ludlow’s voting locations. An AutoMARK Voter Assist Terminal is an optical scan ballot marker designed for use by people who are unable to personally mark an optical scan ballot due to physical, visual impairments or language barriers.

#### **Recommendation**

The AutoMARK Voter Assist Terminal should be set up with a privacy shield and placed close to a back wall with the back of the screen facing the voting public. This ensures voting privacy for the individuals who use it.

### **XIII. ADA TRANSITION PLAN**

In accordance with the ADA Standards and MA 521 CMR, an assessment of the Town of Ludlow'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. 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 (2025-2026)
N	Near Term (2027-2030)
L	Long Term (2031-2034)

### **Costs**

Cost estimates are based on recent projects of similar nature, unit quantity pricing (where appropriate), on-line research, and discussions with contractors, engineers, and architects. 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 those projects requiring specialized skills (Feasibility ranking of 3 or 4), would involve private contractors and include labor, overhead, and profit.

### **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

#### **XIV. MUNICIPAL BUILDING ASSESSMENTS**

Town Hall

Ludlow Community Center/Randall Boys and Girls Club

Public Safety Complex - Police

Public Safety Complex - Fire

Ludlow Senior Center

Hubbard Memorial Library

Department of Public Works Building

Recreation Department Building

Veteran's Center Building

Westover Municipal Golf Course Club House

School Central Office Building

Ludlow Grange Building

Former School Administration Building

Former Head Start Building

East Street Elementary School

Harris Brook Elementary School

Paul R. Baird Middle School

Ludlow High School

## **TOWN HALL**

**Function and Description of Facility and Programs:** The Town Hall is a 3-story, wood frame and brick veneer building that was constructed in 1973. The roughly 16,500 s.f. building, located at 488 Chapin Street, houses the town's municipal offices



**Responsible Party:** Board of Selectmen

**General Description or Obstacle Which Limits Mobility or Access:**

### **Work Under Construction at the Time of Assessment (December 2024)**

#### **Parking**

The parking lot had a base coat of paving with finish paving, striping, and signage to be completed in the spring of 2025. As a result, the parking is proposed to have the required number of parking spaces, as well as compliant accessible parking spaces, access aisles, signage, and route of travel from parking to the building entrance.

#### **Exterior Side Entrance/Egress Door**

The left side entrance currently has an opening force of 22 lbs. and a closing speed of only 3 seconds, both which exceed the maximum allowed. As part of the work to be undertaken on the building, an automatic door opener is proposed which will comply with the opening force and closing speed requirements.

#### Office Counters and Pass-Thru Door

Currently office counters for the Health Department, Town Clerk, Treasurer/Collector, Town Accountant, Planning Department, Building Department, Board of Selectmen's Office, and the Assessor's Office vary up to 44" in height, which is up to 8" too high.

The offices of the Town Clerk, Treasurer/Collector, Town Accountant, Planning Department, Building Department, and Board of Selectmen's Office also have pass-through doors to the private office areas with clear widths of only 27" to 29½", which does not meet the minimum required clear width of 32" for doorways.

The counters and doorways of these offices are slated to be modified resulting in reduced counter heights and the elimination of the pass-thru doors. Plans and specifications have been developed by ArchitectureEL in East Longmeadow, MA. A review of the construction documents indicate that the new counters will comply with the 36" maximum counter height with the elimination of the pass-thru doors to create a 36" clear width to the office areas.

#### Drinking Fountains

Drinking fountains on Levels 1 – 3 are not "high-low" and lack knee clearance. The fountains are scheduled to be removed and replaced with water bottle filling stations that will be within accessible reach range.

#### Bathrooms

The Level 2 bathrooms were "gutted" at the time of assessment, with plans to reconstruct as fully compliant accessible bathrooms. Upon review of the proposed plans, with the exception of the toilet paper dispensers and coat hooks, all met accessibility standards. The coat hooks are set at the 521 CMR standard of 54" a.f.f and not the 2010 ADA Standard of 48" a.f.f. The toilet paper dispensers lacked detail on the distance from the front of the water closet, which s/b 7" to 9" o.c. This information was provided to the town.

Upon completion of the bathroom renovations, a follow up assessment on 3/4/25. With three (3) exceptions the bathrooms were fully compliant. The doors had operating forces in excess of 5 lbs. and closed in less than 6 seconds. The door locking mechanisms require the use of fingers and pinching and twisting.

#### Front Entrance

The front entrance stair railings are not round or oval in shape, are 1" to 2" too low, and lack top and bottom extensions.

There is no directional signage at the front of the building noting the accessible entrances.

#### Rear Accessible Entrance

The Tax Collector's box is 14" too high and lacks maneuvering clearance for a wheelchair due to the column. The Town Clerk's box also lacks wheelchair maneuvering clearance.

### Doors and Doorways

Doors with closers have excessive operating forces and close too fast. Doors lack tactile designation signage. In addition, there is no directional signage for the elevator and accessible entrance/egress. Some doors also have non-compliant knob style hardware. The Ground Level hallway door near the side exit/egress has a glass pane that is 11½" too high under the 2010 ADA Standards. A number of office pass-thru doors have less than the minimum required 32" of clear width.

### Reach Range and Protruding Objects

A number of items including defibrillators, opioid rescue kits, coat racks, drop boxes and brochure holders are not within reach range.

The Level 3 Conservation Commission sign protrudes 11½" into the accessible route of travel at a height of 78¾" a.f.f.

The basement level stairs (2) have reduced headroom of only 55¾".

### Stairs

The stairs (2 stairwells) have railings that are not fully continuous on the interior, are 2" to 3" too low, and lack compliant bottom extensions.

### Employee Lounge

The sink/stove unit is 2" too high and lacks knee clearance. The stove controls require pinching and twisting of the fingers and wrist. A counter next to the stove is 2" too high. A fire extinguisher is 12" too high.

### Route of Travel Clear Widths

A table near the Assessor's counter reduces the route of travel clear width to only 31¼".

### Health Department Sink

The sink is 2" too high and lacks clear width. The towel dispenser and oven are too high. There is only 29" of clear width to the sink due to a partition.

### Basement Women's Bathroom

The upper locking mechanism on the door is 7½" too high and requires the use of fingers and pinching/twisting. As there is a locking mechanism on the door hardware, it does not appear that the upper locking mechanism is required.

The sink piping is not wrapped, guarded, or insulated. The dispensers and mirror are too high. The toilet paper dispenser is too close to the front of the water closet. There is insufficient near wall, far wall and front water closet clear widths. There is only a floor mounted side grab bar, which is also 6" too short. There are no audible-visual alarms. The bathroom lacks overall maneuverability and turning radius.

### Basement Men's Bathroom

The sink is 1½" too high. The sink piping is not wrapped, guarded, or insulated. The dispensers and mirror are too high. The urinal is 3" too high. The toilet paper dispenser is too close to the front of the water closet. There is insufficient near wall, far wall and front water closet clear widths. The water closet seat is 1¼" too high. The water closet flush control is on the wrong side. There is only a floor

mounted side grab bar, which is also 6" too short. There are no audible–visual alarms. The bathroom lacks overall maneuverability and turning radius.

### Level 3 Women's Bathroom

The locking mechanism on the door is 12" too high and requires the use of fingers and pinching/twisting. The sink piping is not wrapped, guarded, or insulated. The dispensers and mirror are too high. The toilet paper dispenser is too close to the front of the water closet. There is insufficient near wall, far wall and front water closet clear widths. There is only a floor mounted side grab bar, which is also 6" too short and ½" too low. There are no audible–visual alarms. The bathroom lacks overall maneuverability and turning radius.

### Level 3 Men's Bathroom

The sink is 1¼" too high and the piping is not wrapped, guarded, or insulated. The dispensers and mirror are too high. The urinal is 3" too high. The toilet paper dispenser is too close to the front of the water closet. The water closet flush control is on the wrong side. There is insufficient near wall, far wall and front water closet clear widths. There is only a floor mounted side grab bar, which is also 6" too short and ½" too low. There are no audible –visual alarms. The bathroom lacks overall maneuverability and turning radius.

## Town Hall 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>
<b><u>Front Entrance</u></b> The front entrance stair railings are not round or oval in shape, are 1" to 2" too low, and lack top and bottom extensions.  There is no directional signage at the front of the building noting the accessible entrances.  <i>See Photo Town Hall 1.</i>	505    216	27   41.1.3	Replace the existing railings with ones that are between 34" – 38" a.f.f. to the top of the railing, circular or oval in x-section, 1¼" – 2" in outside diameter, and with extensions at the top (12" parallel to the ground) and bottom as feasible (slope distance one tread then 12" parallel to the ground).  Provide directional signage noting the accessible side and rear entrances.	1   1	3   2	N   I	Up to \$15,000   \$100
<b><u>Rear Accessible Entrance</u></b> The Tax Collector's box is 14" too high and has only 18" of maneuvering clearance for a wheelchair due to the column. The Town Clerk's box also lacks wheelchair maneuvering clearance.  <i>See Photo Town Hall 2.</i>	308 403	6.5 6.6 22	Relocate the drop boxes so they are on an accessible route of travel with a minimum of 36" of clear width to access by a wheelchair. The drop boxes s/b no more than 48" a.f.f. to the opening/operating mechanisms.	1	2	I	\$0
<b><u>Doors and Doorways</u></b> <u>Closing Speeds and Operating Force</u> Doors with closers (including bathrooms) have excessive operating forces and close too fast.	404.2.8 404.2.9	26.9 26.8	Adjust door closers such that the push/pull force does not exceed 5 lbs. for an interior door and 15 lbs. for and exterior door with door closing speeds of at least 6 seconds.	1, 2, 3	1,2 ,3	1,2 ,3	1,2,3

<p><u>Signage</u></p> <p>The following doors lack tactile designation signage:</p> <p>Ground Level</p> <ul style="list-style-type: none"> <li>• Maintenance room</li> <li>• Double doors to maintenance</li> <li>• Human Resources 2<sup>nd</sup> door</li> <li>• Health Dept. interior (4)</li> <li>• Human Resources interior (3)</li> <li>• Animal Control</li> <li>• Hearing Room 2<sup>nd</sup> door</li> </ul> <p>Level 2 (Main Level)</p> <ul style="list-style-type: none"> <li>• Town Clerk from lobby</li> <li>• Town Clerk interior (2)</li> <li>• Treasurer/Collector 2<sup>nd</sup> door from hallway</li> <li>• Treasurer/Collector interior (2)</li> <li>• Town Accountant interior (3)</li> <li>• Procurement interior (2)</li> </ul> <p>Level 3</p> <ul style="list-style-type: none"> <li>• Town Planner interior (2)</li> <li>• Building Inspector interior (2)</li> <li>• Door to #303 Conference Room</li> <li>• Town Administrator</li> <li>• BOS Interior (1)</li> <li>• Assessor's interior (2)</li> </ul> <p>In addition, the following are not on the latch side of the door:</p> <ul style="list-style-type: none"> <li>• Town Clerk from hallway not on latch side</li> <li>• Planning/Consv/Rec not on latch side</li> </ul>	703	41	Install accessible compliant signage on the latch side of each door 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	\$1,600
<p>In addition, there is no directional signage for the elevator and accessible entrance/egress.</p>	216.4 216.3	25.6	Provide tactile directional signage to the elevator. Provide illuminated signage with the Universal Symbol of Accessibility at the accessible egress doors.	2	2,3	N	Up to \$500
<p><u>Door Hardware</u></p> <p>The following doors have non-compliant knob style hardware:</p> <p>Ground Level</p> <ul style="list-style-type: none"> <li>• Health Department interior (4)</li> <li>• Animal Control interior (1)</li> <li>• Machine Room</li> </ul> <p>Level 2 (Main Level)</p> <ul style="list-style-type: none"> <li>• Town Clerk interior (1)</li> <li>• Treasurer/Collector interior (1)</li> <li>• Town Accountant interior (1)</li> <li>• Procurement interior (1)</li> </ul>	404.2	26.11	Replace the existing door knobs with lever style hardware.	2,4	2	N	Up to \$1,125



<p>Level 3</p> <ul style="list-style-type: none"> <li>• Town Planner interior (2)</li> <li>• Building interior (1)</li> <li>• Town Administrator office</li> <li>• Assessor's interior (1)</li> </ul> <p><u>Glass Panes</u> The Ground Level hallway door near the side exit/egress has a glass pane that is 11½" too high under the 2010 ADA Standards</p> <p><u>Doorway Clear Widths</u> Office pass-through doors in the offices of the Town Clerk, Treasurer Collector, Town Accountant, Town Planner, Building Inspector, and Board of Selectmen have clear widths varying from 27" to 29½", which is less than the required 32" minimum.</p> <p>See Photos Town Hall 3, 4, 5, and 6.</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. Rather than modify the door to lower the viewing area to comply with the maximum height restriction, the pane should be blocked or frosted.	2	2	I	\$0
	404.2.3	26.5	As these pass-through doors are limited to staff use only, modifications to widen the doorways to at least 32" would only be required as a result of a reasonable accommodation request.	4	3	L	\$0 to TBD
<p><b><u>Reach Range and Protruding Objects</u></b></p> <p><u>Reach Range</u> A number of items including defibrillators, opioid rescue kits, coat racks, drop boxes and brochure holders are not within reach range as follows:</p> <ul style="list-style-type: none"> <li>• Ground Level Hearing Room coat rack (67½" a.f.f.)</li> <li>• Ground Level opioid rescue kit (64" a.f.f.)</li> <li>• Ground Level defibrillator (62" a.f.f.)</li> <li>• Level 2 Employee Lounge fire extinguisher (60" a.f.f.)</li> <li>• Level 3 Building Department drop box (54" a.f.f.)</li> <li>• Level 3 Planner document holder (61" a.f.f.)</li> <li>• Level 3 Building Department document holders (52" to 78" a.f.f.)</li> </ul> <p><u>Protruding Objects</u> The Level 3 Conservation Commission sign protrudes 11½" into the accessible route of travel at a height of 78¾" a.f.f.</p> <p>The basement level stairs (2) have reduced headroom of only 55¾".</p> <p><i>Note: Anything that protrudes more than 4" into an accessible route of travel between a height of 27" to 80" a.f.f. is a protruding object. In addition, reduced head clearance of less than 80" is a protruding object.</i></p> <p>See Photos Town Hall 7, 8, 9, 10, 11, and 12.</p>	308	6.5 6.6	Items should be lowered such they are no more than 48" a.f.f. to the operating mechanism. At least 2 coat hooks at a height of no more than 48" a.f.f. s/b provided.	2	2	I	\$0
	307.2	20.6.1	Raise the sign 1¼".	4	2	I	\$0
	307.2	20.6.1	Provide a chain or barrier to prevent access into the reduced headroom areas.	4	2	I	\$100

<b><u>Route of Travel Clear Widths</u></b> A table near the Assessor's counter reduces the route of travel clear width to only 31".	403.5	20.3	As required due to a reasonable accommodation request, relocate/remove items as necessary to achieve the minimum required 36" of clear width.	4	2	L	\$0
<b><u>Health Department Sink</u></b> The sink is 2" too high and lacks clear width. The towel dispenser and oven are too high. There is only 29" of clear width to the sink due to a partition.  See Photo Town Hall 13.	804.3.2 308 403.5	32.2 32.7 6.5 6.6 20.3	As this is a limited employee area only, modifications to lower the sink to 34" a.f.f. to the top; lowering the dispenser and oven; and widening the clear width to the sink would only be required as a result of a reasonable accommodation request.	4	2,3	L	\$0 to TBD
<b><u>Employee Lounge</u></b> The sink/counter/stove unit is 2" too high and does not provide knee/toe clearance. The stove controls require pinching and twisting of the fingers.  See Photo Town Hall 14.	804 306 309	32 39.5	Modify the counter/sink/stove unit so that the counter/sink 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.  As necessary through a reasonable accommodation or when the unit needs replacing, provide a stove with the controls on the front panel and which can be operated with a loose grip or closed fist.	3	3	N	Up to \$1,500+
<b><u>Stairs</u></b> The stairs (2 stairwells) have railings that are not fully continuous on the interior, are 2" to 3" too low, and lack compliant bottom extensions.  See Photos Town Hall 15 and 16.	505.3 505.4 505.10	27.4.1 27.4.2 27.4.3	Option #1: Due to the cost to replace the railings in entirety, seek a variance to retain the existing railings with modifications to bring the bottom extensions into compliance.  Option #2: Modify/replace the existing railings such that they are between 34" – 38" a.f.f. to the top of the railing with bottom extensions the slope distance of one tread then 12" parallel to the floor. Railings must be fully continuous.	2  2	1  3	N  L	\$0  TBD
<b><u>Basement Level Bathrooms</u></b> <b><u>Men's and Women's Bathroom</u></b> The sink piping is not wrapped, guarded, or insulated.  The soap and towel dispensers are up to 9" too high.  The mirrors are 10" too high.  The toilet paper dispensers are too close to the front of the water closets.  There are insufficient near wall, far wall and front water closet clear widths.  There is only a floor mounted side grab bar, which is also 6" too short.  There are no audible–visual alarms.  The bathrooms lack overall maneuverability and turning radius.	606.5  308  603.3  604.7  604.2 604.3  604 609  215 702	30.9.5  30.12  30.11  30.7.6  30.7.2  30.8  40.3	Wrap, guard, or insulate the sink piping  Lower the dispensers to a height of no more than 42" a.f.f. to the operating mechanism.  Lower the mirrors to a height of no more than 40" a.f.f. to the bottom of the reflecting surface.  Toilet paper dispensers should be 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser, at least 24" a.f.f., and not located over the grab bars.  Modify the water closets so that they are 18" o.c. to the near wall, 42" o.c. from the far wall or nearest object, and have at least 42" of clearance in front of the toilet.  The grab bars should be mounted on the side and rear wall of the water closet at a height of 33" to 36" a.f.f. to the top of the gripping surface. The rear and side grab bars should be 42" long. The rear grab bar s/b no more than 6" from the interior corner and the side grab bar no more than 12" from the interior corner.  Install audible – visual alarms	3  3  3  3  3	2  2  2  3  3	I  I  I  N  I  N	\$150  \$0  \$0  \$0  Up to \$7,500  Up to \$750  TBD

<u><b>Men's Bathroom Only</b></u> The sink is 1½" too high.  The urinal is 3" too high.  The water closet seat is 1¼" too high.  The water closet flush control is on the wrong side. <b>See Photos Town Hall 17 and 18.</b>	606.3	30.9.2	Lower the sink so it is no more than 34" a.f.f. to the rim.	3	3	N	Up to \$2,500
	605.2	30.10	Lower the urinal so it is no more than 17" a.f.f. to the rim.	3	3	N	Up to \$2,500
	604.4	30.7.3	Lower the water closet so it is 17" to 19" a.f.f. to the top of the seat.	3	3	N	Up to \$3,500
	604.6	30.7.5	Modify/replace the flush control so that it is on the wide or approach side.	3	3	N	Up to \$500
<u><b>Level 2 Renovated Bathrooms</b></u> The door locking mechanisms require the use of fingers and pinching and twisting.	309	39.5	Replace the existing hardware with hardware that can be locked from the interior with a loose grip or closed fist.	3	2	I	\$150
<u><b>Level 3 Bathrooms</b></u> <u><b>Men's and Women's Bathroom</b></u> The sink piping is not wrapped, guarded, or insulated.	606.5	30.9.5	Wrap, guard, or insulate the sink piping	3	2	I	\$150
The soap and towel dispensers are 2" to 9" too high.	308	30.12	Lower the dispensers to a height of no more than 42" a.f.f. to the operating mechanism.	3	2	I	\$0
The mirrors are too up to 1½" too high	603.3	30.11	Lower the mirrors to a height of no more than 40" a.f.f. to the bottom of the reflecting surface.	3	2	I	\$0
The toilet paper dispensers are too close to the front of the water closets.	604.7	30.7.6	Toilet paper dispensers should be 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser, at least 24" a.f.f., and not located over the grab bars.	3	2	I	\$0
There is insufficient near wall, far wall and front water closet clear widths.	604.2 604.3	30.7.2	Modify the water closets so that they are 18" o.c. to the near wall, 42" o.c. from the far wall or nearest object, and have at least 42" of clearance in front of the toilet.	3	3	N	Up to \$7,500
There is only a floor mounted side grab bar, which is also 6" too short and ½" too low.	604 609	30.8	The grab bars should be mounted on the side and rear wall of the water closet at a height of 33" to 36" a.f.f. to the top of the gripping surface. The rear and side grab bars should be 42" long. The rear grab bar s/b no more than 6" from the interior corner and the side grab bar no more than 12" from the interior corner.	3	2	I	Up to \$750
There are no audible–visual alarms.	215 702	40.3	Install audible – visual alarms	3	3	N	TBD
The bathrooms lack overall maneuverability and turning radius.							
<u><b>Women's Bathroom Only</b></u> The locking mechanism on the door is 12" too high and requires the use of fingers and pinching/twisting.	308 309.4	6.5 6.6 39.5	Replace and lower the locking mechanism so that it can be operated with a loose grip or closed fist and is no more than 48" a.f.f.	3	2	I	\$100
<u><b>Men's Bathroom Only</b></u> The sink is 1¼" too high.	606.3	30.9.2	Lower the sink so it is no more than 34" a.f.f. to the rim.	3	3	N	Up to \$2,500
The urinal is 3" too high.	605.2	30.10	Lower the urinal so it is no more than 17" a.f.f. to the rim.	3	3	N	Up to \$3,500
The water closet flush control is on the wrong side. <b>See Photos Town Hall 19 and 20.</b>	604.6	30.7.5	Modify/replace the flush control so that it is on the wide or approach side.	3	3	N	Up to \$500

Total up to \$52,575+

## Town Hall Accessibility Assessment Photos

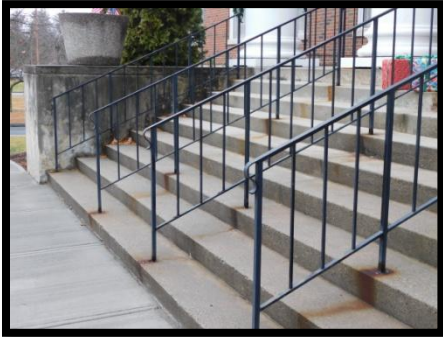


Photo Town Hall 1



Photo Town Hall 2

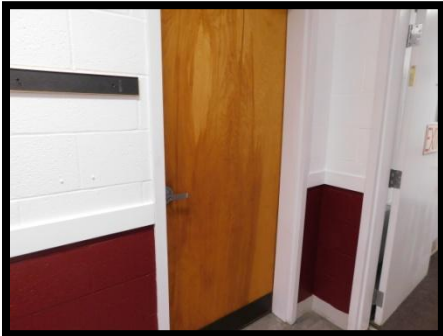


Photo Town Hall 3

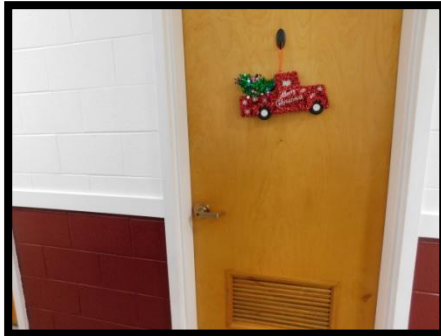


Photo Town Hall 4

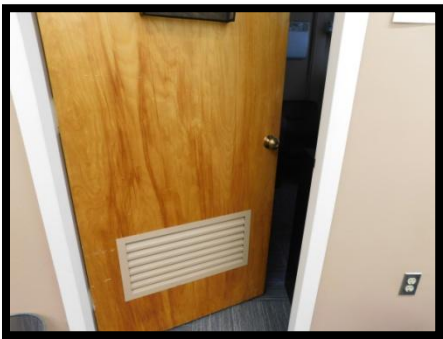


Photo Town Hall 5



Photo Town Hall 6

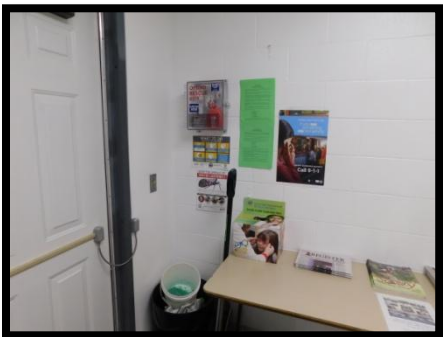


Photo Town Hall 7



Photo Town Hall 8

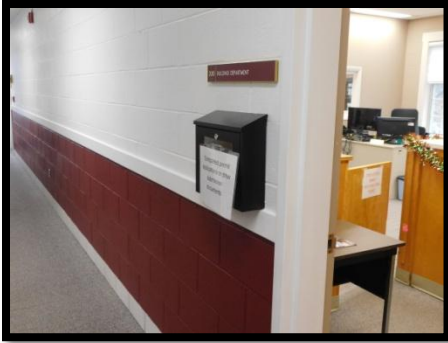


Photo Town Hall 9



Photo Town Hall 10

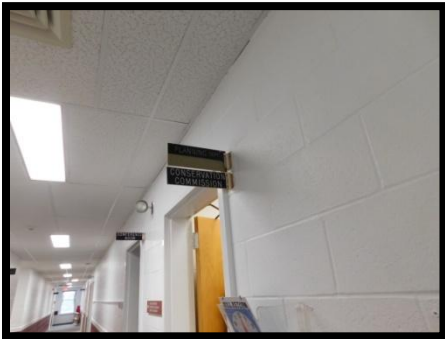


Photo Town Hall 11

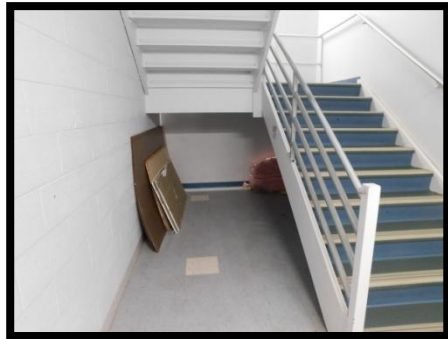


Photo Town Hall 12



Photo Town Hall 13



Photo Town Hall 14



Photo Town Hall 15

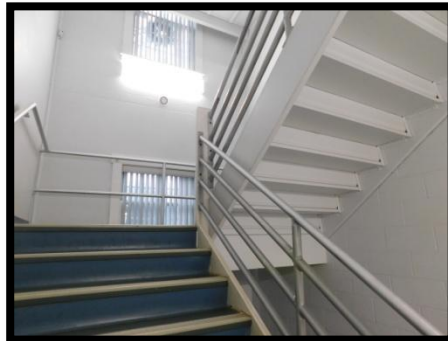


Photo Town Hall 16



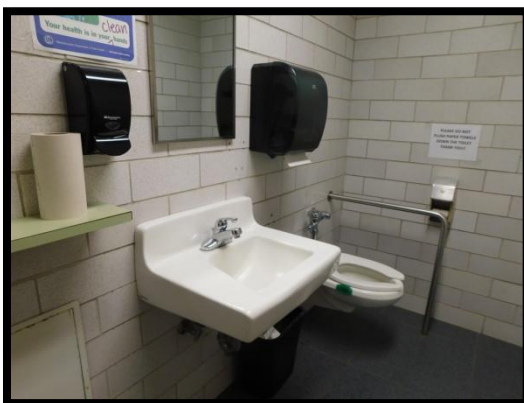


Photo Town Hall 17



Photo Town Hall 18

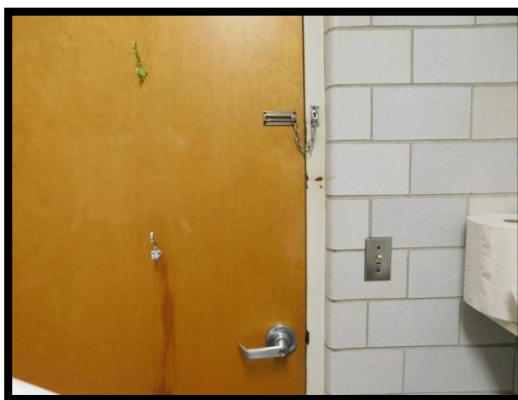


Photo Town Hall 19



Photo Town Hall 20

## **LUDLOW COMMUNITY CENTER/RANDALL BOYS & GIRLS CLUB**

**Function and Description of Facility and Programs:** The Ludlow Community Center/Randall Boys & Girls Club operates out of a 2-story, roughly 40,400 square foot building that was constructed in 2001. The facility provides programs and services to both youth and adults in Ludlow and the surrounding communities. The building consists of administrative offices, 3 Pre-Kindergarten classrooms, a game room, a staff break room, a gymnasium, a pool, locker rooms, a fitness room, 3 youth program rooms, and bathrooms.



**Responsible Party:** Board of Selectmen and Boys & Girls Club Board of Directors

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Parking**

The signage for the 3 side front designated accessible parking spaces is 9" too high and lacks "van accessible" signage.

#### **Accessible Route of Travel to the Main Entrance**

There is a 1" abrupt change in level surface at the transition from asphalt to concrete at the curb ramp. There is a curb ramp at an apparent crosswalk on the approach to the main entrance. As a result, the sidewalk has a cross slope of 5.5% at that location, which exceeds the maximum allowed cross slope of 2.0%.

### Main Entrance

The airphone buzzer is 53½" a.f.f., which is 5½" too high. The operating force is 25 lbs. and the door closes in only 3 seconds.

### Interior Doors and Exterior Doors With Closers

Interior doors exceed the maximum allowed operating force of 5 lbs. and exterior doors exceed the maximum allowed operating force of 15 lbs. Both the interior doors and the exterior doors close in less than the minimum required 6 seconds.

### Door Signage

Nearly all of the tactile designation signage in the building is up to 6" too high with some exceptions. The tactile signage for the pool is on the door, not the latch side, and is 21" too low. The tactile signage for the Membership office is not on the latch side. The tactile signage for the janitor's closet in the Maker Space Room is 8" too low. The tactile signage for the Level 2 Administration Office is too far from door. The tactile designation signage for the Club Blue Room Bathrooms is 1" to ½" too low. The tactile designation signage for the Maker Space Bathrooms is 6½" to 7" too low. The Gymnasium storage door tactile signage is 3" too high and located on the door and not the latch side. The Aquatics Director's Office lacks signage. The Human Services/Director's Office lacks signage. The Level 2 Administrative Suite has eight (8) offices/rooms/doors that lack tactile designation signage. Egress doors lack signage.

The elevator jambs on the main level lack a tactile star.

### Drinking Fountains

Drinking fountains throughout the building are "low" only.

### Preschool Rooms

The classroom sinks lack knee clearance. The towel dispensers are too high and the operating mechanism requires pinching and twisting of the wrist. The first aid kits are not within adult reach range.

### Break Room

The staff lockers require pinching and twisting of the wrist. The towel dispenser is 9" too high and the operating mechanism requires pinching and twisting of the wrist. At the time of assessment, a sink and cabinets were in the process of being installed. Based on the height and type of the base cabinets, the sink and counter will be up to 2" too high and there will be no knee clearance under the sink for a wheelchair.

### Game Room

Rugs are not fully secured and serve as a tripping hazard. The first aid kit is 17" too high and located behind storage.

### Gymnasium

The defibrillator is 15" too high and has storage below which restricts access. The First Aid Kit is 13" too high.

### Pool

The defibrillator is 5" too high and the first aid kit is 27" too high. Both the defibrillator and first aid kit are protruding objects.



At least 2 compliant accessible means of entry are required for swimming pools with 300 linear feet or more of pool wall. As the Boy's and Girl's Club pool has roughly 250 linear feet of pool wall, only 1 accessible means of entry is required. The pool does have a hydraulic lift, however, it was not in service at the time of assessment as the battery was apparently "dead" and staff was not aware how to operate the lift.

#### Club Blue Room/Teen –Esports Room/Maker Space

First aid kits in each room are 20" to 26" too high.

#### Level 2 Administrative Suite

At the time of assessment, a sink, cabinets, and a stove were in the process of being installed in the Conference Room. Based on the height and type of the base cabinets, the sink and counter will be up to 2" too high and there will be no knee clearance under the sink for a wheelchair. The stove has controls on the back and not on the front of the stove. The range hood controls are 14" too high and located on the hood over the stove. A TV monitor protrudes 6" into the accessible route of travel at a height of 55¼" a.f.f.

#### Fitness Center

The defibrillator is 14½" too high and the first aid kit is 19" too high.

#### Women's Locker Room

The shower has a shower head that is fixed at 59" a.f.f. and is not a shower spray unit attached to a flexible metal hose at least 60 inches long and adjustable from 42 inches to 72 inches that can be used both as a fixed shower head and as a hand-held shower. The seat for the shower is not padded. The grab bars are ½" too high.

The lockers have hardware that requires the use of fingers to open and there is no designated accessible locker(s). The locker room benches are only 9½" wide and lack back support. There is not a 36" accessible route to and around the lockers as well as a 5 foot turning diameter near the designated accessible locker(s).

#### Men's Locker Room

The seat for the shower is not padded. The grab bars are 1" too high.

The lockers have hardware that requires the use of fingers to open and there is no designated accessible locker(s). The locker room benches are only 9½" wide and lack back support. There is not a 36" accessible route to and around the lockers as well as a 5 foot turning diameter near the designated accessible locker(s).

#### Bathrooms

Preschool A. The light switch is 12" too high. The mirror is 3½" too high. The water closet is 6½" too far from the near wall. There is only 33" of clear width in front of the water closet due to storage. The grab bars are 4½" to 5" too high. The side grab bar is 6" too far from the interior corner.

Preschool C. The light switch is 12" too high. The towel dispenser is 5" too high and requires pinching and twisting of the wrist. The mirror is 9½" too high. The sink is 3" too high and lacks

knee clearance. The water closet is 6" too high, is 7" too far from the near wall, and 10½" too close to the far wall. The toilet paper dispenser is 10" too high and 5" too close to the water closet. The grab bars are 16½" too high. The side grab bar is 6" too far from the interior corner. A curtain rod at the entry is 65" a.f.f. which reduces the minimum required headroom of 80".

Preschool B Left Side Bathroom. The light switch is 12" too high. The mirror is 4" too high. The towel dispenser is 7" too high and requires pinching and twisting of the wrist. The water closet is 6" too far from the near wall. The grab bars are 4" too high. The side grab bar is 6" too far from the interior corner.

Preschool B Right Side Bathroom. The light switch is 12" too high. The mirror is 3" too high. The towel dispenser is 7" too high and requires pinching and twisting of the wrist. The sink shut-offs are not wrapped. The toilet paper dispenser is 4" too close to the front of the water closet. The water closet is 6½" too far from the near wall. The grab bars are 4" to 4½" too high. The side grab bar is 6" too far from the interior corner.

Game Room Left Side Bathroom. The soap dispenser is 2" too high. The toilet paper dispenser is 4" too close to the front of the water closet. The grab bars are ½" to ¾" too high.

Game Room Right Side Bathroom. The towel dispenser is 5" too high and requires pinching and twisting of the wrist. The soap dispenser is 2" too high. The sink shut-offs are not wrapped. The grab bars are ¼" too high.

Main Level Family Accessible Bathroom. The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The toilet paper dispenser is 5" too close to the front of the water closet. The grab bars are ½" too high. A changing table does not stay closed and remains in an open position, thereby restricting clear width to only 30" at the sink and is also a protruding object.

Main Level Accessible Bathroom. The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The grab bars are ½" too high.

Women's Locker Room Bathroom. The light switch is 3" too high. The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The mirror is 3" too high. The stall door is not self-closing. The stall coat hook is 5" too high. A changing table does not stay closed and remains in an open position, thereby restricting clear width to only 23" and is a protruding object. The water closet is 1" too far from the near wall. The grab bars are ½" to ¾" too high.

Men's Locker Room Bathroom. The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The mirror is 3½" too high. The stall door is not self-closing. The stall coat hook is 8" too high.

Club Blue Room Left Side Bathroom. The towel dispenser is 5" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 45½". The grab bars are ½" too high.

Club Blue Room Right Side Bathroom. The towel dispenser is 5" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 45½". The grab bars are ½" to ¾" too high.

Maker Space Left Side Bathroom. The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 43½". The grab bars are ¾" too high.

Maker Space Right Side Bathroom. The towel dispenser is 5" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 44½". The sink shut-offs are not wrapped. The grab bars are ¾" too high.

Administrative Suite Bathroom. The towel dispenser is 6" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 46½". The soap dispenser is 10½" too high. The sink shut-offs are not wrapped. The grab bars are ½" too high.

Fitness Center Left Side Bathroom. The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 44". The grab bars are ½" too high.

Fitness Center Right Side Bathroom. The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 44". The grab bars are ¾" to 1" too high.

### **Ludlow Community Center/Randall Boys & Girls Club Accessibility Assessment**

<b><u>General Description of Obstacle</u></b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Parking</u></b> The signage for the 3 side front designated accessible parking spaces is 9" too high and lacks "van accessible" signage.  See Photo Community 1.	502.6	23.6	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. "Van accessible" signage should also be provided	1	2	I	\$50
<b><u>Accessible Route of Travel to the Main Entrance</u></b> There is a 1" abrupt change in level surface at the transition from asphalt to concrete at the curb ramp.  There is a curb ramp at an apparent crosswalk on the approach to the main entrance. As a result, the sidewalk has a cross slope of 5.5% at that location, which exceeds the maximum allowed cross slope of 2.0%.  See Photos Community 2 and 3.	403.4  403.3	22.4.1  22.3.1	Modify the route of travel from the parking to the building through grinding, infill, or restoration to eliminate the abrupt change in level surface.  Option #1: Eliminate the crosswalk and curb ramp and reconstruct the sidewalk pad such that the cross slope does not exceed 2.0%.  Option #2: Modify/reconstruct the sidewalk to create a level landing (no more than 2% in any direction) the width of the sidewalk at the top of the curb ramp.	1  1  1	2  3  3	I  I  I	\$50  Up to \$750  Up to \$1,500

<b><u>Main Entrance</u></b> The airphone buzzer is 53½" a.f.f., which is 5½" too high.	308	6.5 6.6	Lower the airphone buzzer to a height of no more than 48" a.f.f. to the operating mechanism.	1	3	I	\$100
<b><u>Interior Doors and Exterior Doors With Closers</u></b> Interior doors exceed the maximum allowed operating force of 5 lbs. and exterior doors exceed the maximum allowed operating force of 15 lbs. Both the interior doors and the exterior doors close in less than the minimum required 6 seconds.	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 exterior doors and 5 lbs. for interior doors.	1	2	I	\$0
<b><u>Door Signage</u></b> The following tactile designation signage in the building is up to 6" too high as follows:  <u>Level 1</u> <ul style="list-style-type: none"> <li>Preschool A (2), Preschool A storage, Preschool A bathroom, Art Room, Preschool C (2), Preschool C bathroom, Preschool B (2), Preschool B bathrooms (2), Break Room, Game Room (3), Human Services/ Director's Office, Hallway door to gym, Gym storage door, Pool mechanical room (2), Staff room, Elevator mechanical room, Stair Level 1 (2), Women's locker room (2), Men's locker room (2), Elevator, Sprinkler room, Level 1 Hallway family bathroom, L1 Hallway bathroom</li> </ul> <u>Level 2</u> <ul style="list-style-type: none"> <li>Elevator, Level 2 Stairs (2), Fitness, Admin office (2), Janitor's closet, Club Blue Room, Teen Room, Maker Space, Maker Space janitor's closet, Admin storage, Admin conference room, Admin bathroom</li> </ul> <p>The tactile signage for the pool is on the door, not the latch side, and is 21" too low.</p> <p>The tactile signage for the Membership Office is not on the latch side.</p> <p>The tactile signage for the janitor's closet in the Maker Space Room is 8" too low.</p> <p>The tactile signage for the Level 2 Administration Office is too far from door.</p>	703	41.1	Install, replace, and/or relocate accessible compliant 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. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Signage s/b located no more than 18" o.c. from the doorway.	2	2	I	Up to \$750

<p>The tactile designation signage for the Club Blue Room Bathrooms is 1" to ½" too low.</p> <p>The tactile designation signage for the Maker Space Bathrooms is 6½" to 7" too low.</p> <p>The Gymnasium storage door tactile signage is 3" too high and located on the door and not the latch side.</p> <p>The Aquatics Director's Office lacks signage.</p> <p>The Human Services/Director's Office lacks signage.</p> <p>The Level 2 Administrative Suite has eight (8) offices/rooms/doors that lack tactile designation signage.</p> <p>Egress doors lack tactile signage.</p> <p>The elevator jambs on the main level lack a tactile star.</p> <p>See Photos Community 4, 5, 6, 7, and 8.</p>	407.2.3.1	28.5	Provide a tactile star 60" o.c. a.f.f. on both jambs of the elevator on the main level.	2	2	I	\$50
<p><b><u>Drinking Fountains</u></b></p> <p>The drinking fountains (5) throughout the building are "low" only.</p> <p>See Photo Community 9.</p>	211	36	<p>Option #1: Discontinue use of the drinking fountains.</p> <p>Option #2 – Provide an additional "high" fountain at each location. The spout heights s/b 38" min a.f.f. to 43" max a.f.f. for the "high" fountains.</p>	2 2	2 3	I N	\$0 Up to \$15,000+
<p><b><u>Preschool Rooms</u></b></p> <p>The classroom sinks lack knee clearance.</p> <p>The towel dispensers are too high and the operating mechanism requires pinching and twisting of the wrist.</p> <p>See Photos Community 10 and 11.</p>	306  308 309	12.4 12.2  6.5 6.6 30.20 39.5	<p>Modify the sinks so they provide a minimum of 27" of knee height clearance.</p> <p>Replace the towel dispensers with ones that have an operating mechanism that can be operated with a loose grip or closed fist. The operating mechanism of the dispensers s/b no more than 36" a.f.f. (Note: Children's reach range is 36" a.f.f.).</p> <p>See Photo Community 12 (Example of Compliant Towel Dispenser).</p>	2  2	3  2	I  I	Up to \$7,500+  \$225
<p><b><u>Reach Range</u></b></p> <p>First aid kits in the 3 Preschool Classrooms, Game Room, Gym, Pool, Club Room, Maker Space, and Fitness Center are up to 27" too high.</p> <p>Defibrillators in the Gym, Pool, and Fitness Center are up to 19" too high.</p> <p>The Break Room towel dispenser is 9" too high and the operating mechanism requires pinching and twisting of the wrist.</p> <p>The Gym defibrillator and Game Room first aid kits have restricted access to the first aid kits due to items stored</p>	308 309	6.5 6.6 39.5	Lower the first aid kits, defibrillators, and the towel dispenser so they are no more than 48" a.f.f. to the operating mechanism. Remove any items restricting access to the first aid kits. Replace the towel dispenser with one that has an operating mechanism that can be operated with a loose grip or closed fist.	2	2	I	\$75

below.  The Pool defibrillator, Pool first aid kit, and Level 2 Conference Room TV monitor are all protruding objects as the extend more than 4" into the accessible route of travel at a height of 27" to 80" a.f.f.  <b>See Photos Community 13 and 14.</b>	307.2	20.6.1	Place items under the defibrillator, first aid kit, and TV monitor for cane detection.	2	2	I	\$0
<b>Break Room</b> The staff lockers require pinching and twisting of the wrist.  At the time of assessment, a sink and cabinets were in the process of being installed. Based on the height and type of the base cabinets, the sink and counter will be up to 2" too high and there will be no knee clearance under the sink for a wheelchair.  <b>See Photo Community 15.</b>	309  804.3.2 606.3 306.3	39.5  32.2 32.6	As may be required due to a reasonable accommodation request, modify lockers so they are operable with a loose grip or closed fist.  Modify the cabinets and sink so that they are no more than 34" a.f.f. at the top of the counter/sink and there is a minimum of 27" knee height clearance at the sink with at least 30" clear width, and guarded, wrapped, or insulated piping.	2  3	2  3	L  I	TBD  Up to \$750+
<b>Game Room</b> Rugs are not fully secured and serve as a tripping hazard.	302.2	29.3	Remove or secure the rugs/carpets.	4	2	I	\$0
<b>Pool</b> At least 2 compliant accessible means of entry are required for swimming pools with 300 linear feet or more of pool wall. As the Boy's and Girl's Club pool has roughly 250 linear feet of pool wall, only 1 accessible means of entry is required. The pool does have a hydraulic lift, however, it was not in service at the time of assessment as the battery was apparently "dead" and staff was not aware how to operate the lift.	1009	19.2	Train staff (maintenance, aquatics director, lifeguards, etc.) on the operation of the lift.  Ensure that the lift is operable at all times. This should include regular contracted maintenance as well as weekly checks for operability.	2	2,3	I	\$0
<b>Level 2 Administrative Suite</b> At the time of assessment, a sink, cabinets, and a stove were in the process of being installed in the Conference Room. Based on the height and type of the base cabinets, the sink and counter will be up to 2" too high and there will be no knee clearance under the sink for a wheelchair.  The stove has controls on the back and not on the front of the stove.  The range hood controls are 14" too high and located on the hood over the stove.	804.3.2 606.3 306.3  804.6.5  308	32.2 32.6  32.8  6.5 6.6	Modify the cabinets and sink so that they are no more than 34" a.f.f. at the top of the counter/sink and there is a minimum of 27" knee height clearance at the sink with at least 30" clear width, and guarded, wrapped, or insulated piping.  Install a stove that has controls on the front of the stove and not the back.  Install range hood controls that are within the maximum reach range height of 48" a.f.f.	3  3  3	3  2  3	I  I  I	Up to \$750+  Up to \$1,000  Up to \$1,000
<b>Locker Rooms</b> <b>Women's Locker Room</b> The shower has a shower head that is fixed at 59" a.f.f. and is not a shower	309.4 608	19.4 31.7	Shower seats must be padded.	2	2,3	I	Up to \$3,000

<p>spray unit attached to a flexible metal hose at least 60 inches long and adjustable from 42 inches to 72 inches that can be used both as a fixed shower head and as a hand-held shower.</p> <p>The seat for the shower is not padded.</p> <p>The grab bars are ½" too high.</p> <p>The lockers have hardware that requires the use of fingers to open and there are no designated accessible locker(s).</p> <p>The locker room benches are only 9½" wide and lack back support. There is not a 36" accessible route to and around the lockers as well as a 5 foot turning diameter near the designated accessible locker(s).</p> <p><u>Men's Locker Room</u></p> <p>The seat for the shower is not padded.</p> <p>The grab bars are 1" too high.</p> <p>The lockers have hardware that requires the use of fingers to open and there is no designated accessible locker(s).</p> <p>The locker room benches are only 9½" wide and lack back support. There is not a 36" accessible route to and around the lockers as well as a 5 foot turning diameter near the designated accessible locker(s).</p> <p>See Photos Community 16, 17, 18, and 19.</p>	609 610 903	39.5	<p>Spray shower units should be attached to a flexible hose and adjustable so it can be used as a fixed shower head and as hand held.</p> <p>Grab bars must be 33" to 36" a.f.f. to the top of the gripping surface.</p> <p>Locker hardware (5% of lockers or at least one) must be operable with a loose grip or closed fist and within the maximum reach range of 48" a.f.f.</p> <p>There must be a 36" accessible route of travel to and around the lockers and between the benches as well as a 5 foot turning radius at the accessible locker(s).</p> <p>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.</p>				
<p><b><u>Preschool Bathrooms</u></b></p> <p><b><u>Preschool A</u></b></p> <p>The light switch is 12" too high. The mirror is 3½" too high. The water closet is 6½" too far from the near wall. There is only 33" of clear width in front of the water closet due to storage. The grab bars are 4½" to 5" too high. The side grab bar is 6" too far from the interior corner.</p> <p><b><u>Preschool C</u></b></p> <p>The light switch is 12" too high. The towel dispenser is 5" too high and requires pinching and twisting of the wrist. The mirror is 9½" too high. The sink is 3" too high and lacks knee clearance. The water closet is 6" too high, is 7" too far from the near wall, and 10½" too close to the far wall. The toilet paper dispenser is 10" too high and 5" too close to the water closet. The grab bars are 16½" too high. The side grab bar is 6" too far from the</p>	308 604.9 604.3 606.2 309 307.2	30.20 30.18 30.14.2 30.14.3 30.7.2 30.8.5 30.14.5 30.15 30.16.2 39.5 20.6.1	<p>Controls for children, such as light switches, should not exceed 36" in height.</p> <p>Towel dispensers should be replaced with ones that can be operable with a loose grip or closed fist such as those with a lever for an operating mechanism. The height to the operating mechanism should not exceed 36" in height.</p> <p>Mirrors need to be lowered so they are no more than 31" a.f.f. to the bottom of the reflecting surface.</p> <p>Sinks must be no more than 30" a.f.f. to the rim with at least 25" of knee height.</p> <p>Sink piping, including shut-offs, must be fully wrapped, guarded, or insulated.</p> <p>The water closet s/b 11" to 12" to the top of the seat. The water closet should also be 11" to 12" o.c. from the near wall and have 42" of clearance on the far side and in front of the toilet. Water closets will need to be</p>	3	2,3	I,N	Up to \$12,000

<p>interior corner. A curtain rod at the entry is 65" a.f.f. which reduces the minimum required headroom of 80".</p> <p><u>Preschool B Left Side Bathroom</u> The light switch is 12" too high. The mirror is 4" too high. The towel dispenser is 7" too high and requires pinching and twisting of the wrist. The water closet is 6" too far from the near wall. The grab bars are 4" too high. The side grab bar is 6" too far from the interior corner.</p> <p><u>Preschool B Right Side Bathroom</u> The light switch is 12" too high. The mirror is 3" too high. The towel dispenser is 7" too high and requires pinching and twisting of the wrist. The sink shut-offs are not wrapped. The toilet paper dispenser is 4" too close to the front of the water closet. The water closet is 6½" too far from the near wall. The grab bars are 4" to 4½" too high. The side grab bar is 6" too far from the interior corner.</p> <p>See Photos Community 20, 21, 22, and 23.</p>			<p>relocated and/or items removed from the sides and front of the toilets, including waste baskets.</p> <p>The toilet paper dispensers should be centered at 14" o.c. a.f.f. and between 7" to 9" in front of the water closet.</p> <p>Side and rear grab bars need to be lowered and relocated so they are 18" to 20" a.f.f. to the top of the gripping surface and no more than 6" from the interior corners.</p> <p>The curtain rod in the preschool C bathroom should be removed or raised to a height of 80" a.f.f.</p>				
<p><b><u>Adult Bathrooms</u></b></p> <p><u>Game Room Left Side Bathroom</u> The soap dispenser is 2" too high. The toilet paper dispenser is 4" too close to the front of the water closet. The grab bars are ½" to ¾" too high.</p> <p><u>Game Room Right Side Bathroom</u> The towel dispenser is 5" too high and requires pinching and twisting of the wrist. The soap dispenser is 2" too high. The sink shut-offs are not wrapped. The grab bars are ¾" too high.</p> <p><u>Main Level Family Accessible Bathroom</u> The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The toilet paper dispenser is 5" too close to the front of the water closet. The grab bars are ½" too high. A changing table does not stay closed and remains in an open position, thereby restricting clear width to only 30" at the sink and is also a protruding object.</p> <p><u>Main Level Accessible Bathroom</u> The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The grab bars are ½" too high.</p> <p><u>Women's Locker Room Bathroom</u> The light switch is 3" too high. The towel dispenser is 4" too high and requires pinching and twisting of the</p>	<p>308 309 604.7 609.4 606.5 403.5 603.3 604.8.1 604.2 204.1</p>	<p>30.12 6.5 6.6 39.5 30.7.6 30.8.5 30.8.2 30.9.5 20.3 30.11 30.6.1 30.7.2 20.6.1</p>	<p>Soap and towel dispensers should be no higher than 42" a.f.f. to the operating mechanisms.</p> <p>Light switches s/b no more than 48" a.f.f.</p> <p>Towel dispensers should be replaced with ones that can be operable with a loose grip or closed fist such as those with a lever for an operating mechanism.</p> <p>The toilet paper dispensers should be at least 24" o.c. a.f.f. and between 7" to 9" in front of the water closet and not over the grab bars.</p> <p>Grab bars should be between 33" to 36" a.f.f. to the top of the gripping surface.</p> <p>Sink piping, including shut-offs, must be fully wrapped, guarded, or insulated.</p> <p>The changing tables need to be modified so they stay in a closed position or be replaced in entirety to allow for a 36" wide clear width.</p> <p>Mirrors should be no more than 40" a.f.f. to the bottom of the reflecting surface.</p> <p>Hinges on stall doors must be modified/adjusted so that they fully self-close.</p> <p>Stall door coat hooks cannot exceed 48" in height.</p> <p>The women's locker room water closet needs to be moved 1" closer to the near wall so it is 18" o.c. from the wall.</p>	3	2,3	I,N	Up to \$3,800+



<p>wrist. The mirror is 3" too high. The stall door is not self-closing. The stall coat hook is 5" too high. A changing table does not stay closed and remains in an open position, thereby restricting clear width to only 23" and is a protruding object. The water closet is 1" too far from the near wall. The grab bars are ½" to ¾" too high.</p> <p><u>Men's Locker Room Bathroom</u> The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The mirror is 3½" too high. The stall door is not self-closing. The stall coat hook is 8" too high.</p> <p><u>Club Blue Room Left Side Bathroom</u> The towel dispenser is 5" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 45½". The grab bars are ½" too high.</p> <p><u>Club Blue Room Right Side Bathroom</u> The towel dispenser is 5" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 45½". The grab bars are ½" to ¾" too high.</p> <p><u>Maker Space Left Side Bathroom</u>. The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 43½". The grab bars are ¾" too high.</p> <p><u>Maker Space Right Side Bathroom</u> The towel dispenser is 5" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 44½". The sink shut-offs are not wrapped. The grab bars are ¾" too high.</p> <p><u>Administrative Suite Bathroom</u>. The towel dispenser is 6" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 46½". The soap dispenser is 10½" too high. The sink shut-offs are not wrapped. The grab bars are ½" too high.</p> <p><u>Fitness Center Left Side Bathroom</u> The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 44". The grab bars are ½"</p>			<p>Bathrooms with towel dispensers that are protruding objects need to have a fixed object placed under the dispensers for cane detection or the towel dispensers relocated from being in the accessible route of travel.</p>				
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<p>too high.</p> <p><u>Fitness Center Right Side Bathroom</u></p> <p>The towel dispenser is 4" too high and requires pinching and twisting of the wrist. The dispenser is also a protruding object with an 8" protrusion at a height of 44". The grab bars are ¾" to 1" too high.</p> <p>See Photos Community 24, 25, 26, 27, and 28.</p>							
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Total up to \$48,350+

### **Ludlow Community Center/Randall Boys & Girls Club Accessibility Assessment Photos**



Photo Community 1



Photo Community 2



Photo Community 3

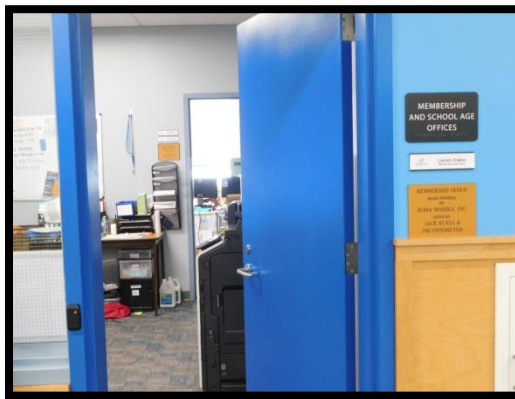


Photo Community 4

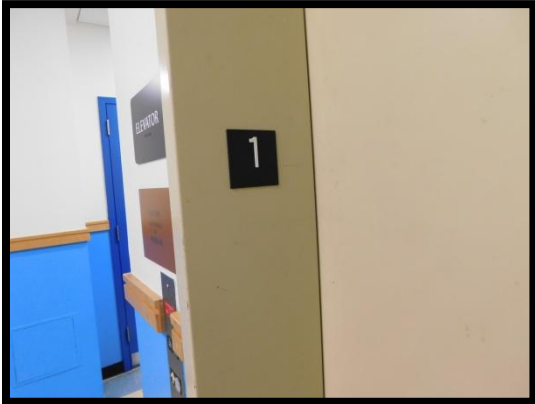


Photo Community 5



Photo Community 6



Photo Community 7



Photo Community 8



Photo Community 9



Photo Community 10



Photo Community 11



Photo Community 12



Photo Community 13

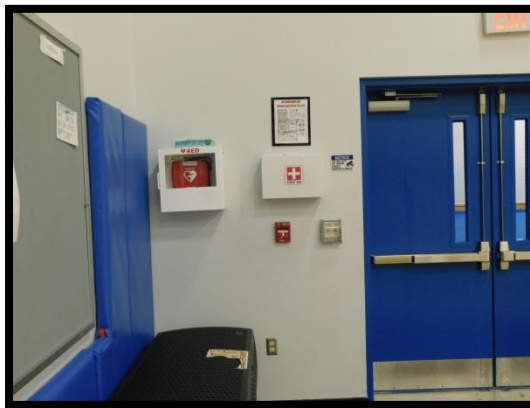


Photo Community 14



Photo Community 15

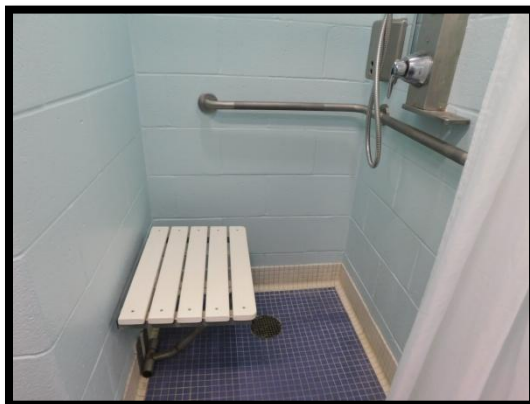


Photo Community 16





Photo Community 17

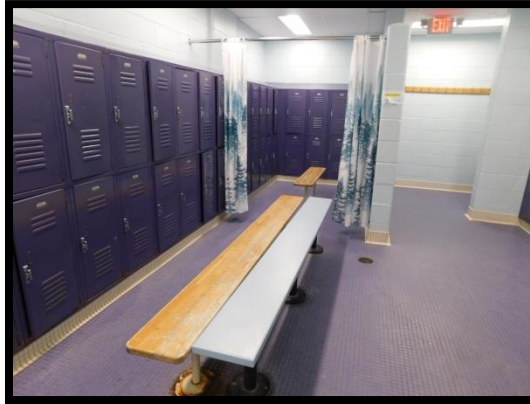


Photo Community 18



Photo Community 19

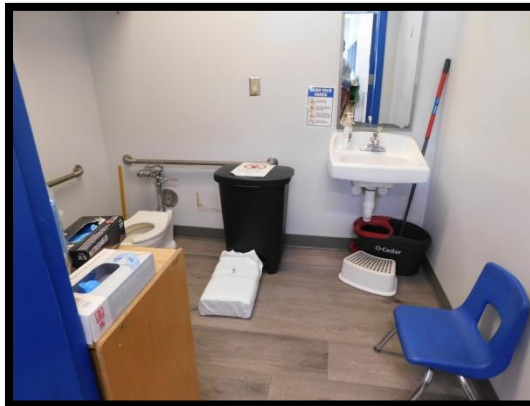


Photo Community 20



Photo Community 21



Photo Community 22

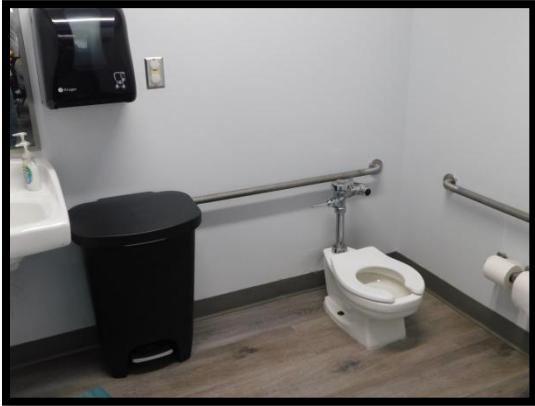


Photo Community 23

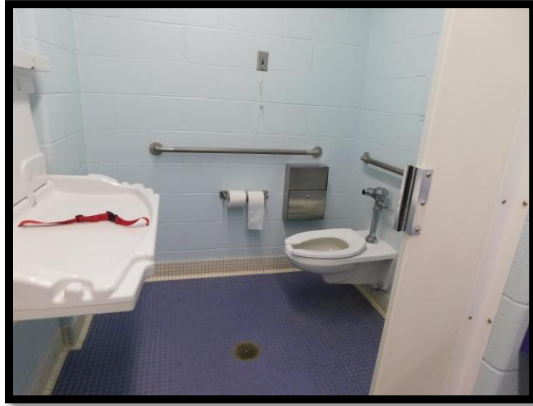


Photo Community 24

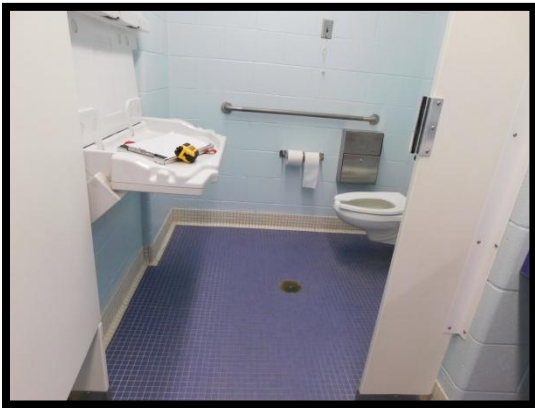


Photo Community 25



Photo Community 26



Photo Community 27



Photo Community 28

## **PUBLIC SAFETY COMPLEX - POLICE**

**Description of Facility and Programs:** The Ludlow Police Department Headquarters is located in the shared Public Safety Complex along with the Fire Department. The main entrance to the building provides access to both Departments with a shared lobby.

The Police Department Headquarters consists of 2 levels. The main level contains the offices, kitchenette, interview rooms, dispatch center, holding cells, booking area, bathrooms, and garage/sally port. The lower level contains the break room, fitness room, and officer showers.



**Responsible Party:** Board of Selectmen

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Parking**

The parking is shared with the Fire Department. There are 2 designated accessible parking spaces with a shared access aisle. The space closest to the building has a running slope of up to 3.2%. There is no "van accessible" signage. See Public Safety Complex - Fire for detailed assessment.

#### **Main Lobby**

The entrance door has an operating force of over 15 lbs. and closes in only 4 seconds.

The "low" drinking fountain has only 26" of knee height.

The Fire Dept. drop box is 6½" too high.

The tactile designation signage for the Police and Fire Departments are 1½" to 2" too low.

Women's Bathroom. The door has an operating force of over 5 lbs. and closes in only 4 seconds. The coat hook is 7½" too high. The sink piping is not wrapped or insulated. The soap dispenser is 6" too high. The mirror is 3" too high. The water closet is 1¼" too far from the near wall and has only 40" front clearance due to a wall mounted dispenser. The grab bars are both 2¼" too low. The toilet paper dispenser is 3" too close to the front of the water closet.

Men's Bathroom. The door has an operating force of over 5 lbs. The coat hook is 8" too high. The sink piping is not wrapped or insulated. The mirror is 3" too high. The side grab bar is 2" too low.

See Public Safety Complex - Fire for detailed assessment.

#### Police Lobby

The entrance door has an operating force of 20 lbs. and closes in only 3 seconds.

Both the Records Counter and the Central Dispatch Counter are 43½" a.f.f., which is 7½" too high. The counters are also protruding objects as they extend more than 4" into the accessible route of travel at a height of 27" to 80" a.f.f.

The Opioid Rescue Kit is 23½" too high.

A table in the lobby provides only 24" of knee height.

#### General Interior

Interior doors with closers have excessive operating forces and close too fast.

Some doors/rooms lack tactile designation signage or have signage on the wrong side of the door.

A defibrillator and a fire blanket in the hallway are 10" to 16" too high.

The kitchenette on the main level has a sink and counter that is 2" too high lacks knee clearance, and has soap and towel dispensers that are 8" to 12" too high.

#### Holding Cells

None of the 7 cells are accessible. The water closet rims are 2" too low, are 3½" too close to the near wall and 12" too close to the front cement sleep area. In addition, the sink lacks knee clearance and the sink and water closet operating buttons require more than 5 lbs of force.

The shower for detainees has a 25½" clear width and a 5" abrupt change in level surface to enter and has no accessible features.

#### Non-Public and Restricted Access Areas

##### Stairs to Lower Level

The outside railing lacks top and bottom extensions.



#### Chief's Office Bathroom

The private bathroom in the Chief's Office is wholly non-compliant due to insufficient water closet clear widths, the lack of maneuverability; non-compliant heights, set-backs, and clearances; the lack of grab bars; the lack of sink pipe insulation; sink faucets that require pinching and twisting of the wrist; and other related items.

#### Main Level "Police Only" Bathrooms

The Men's Bathroom has sink piping that is not wrapped or insulated. The faucets require pinching and twisting of the wrist. The soap and towel dispensers are 3" to 5" too high. The mirror is 9" too high. The toilet paper dispenser is too close to the front of the water closet. The water closet is too low and lacks compliant near side, far side, and front toilet clear widths. The flush control is on the wrong side. There are no grab bars.

The Women's Bathroom has sink piping that is not wrapped or insulated. The faucets require pinching and twisting of the wrist. The towel dispenser is 3" too high. The mirror is 8" too high. The toilet paper dispenser is too far from the front of the water closet. The water closet is too low and lacks compliant far side and front toilet clear widths. There are no grab bars.

#### Basement Level Officer Break Room

The sink is 2" too high and lacks knee clearance. The toaster oven is 12" too high.

#### Basement Level Lockers and Bathrooms

The showers lack accessible features. The benches are 1" too low and lack back support. The locker shelves and coat hooks are not within reach range.

The sinks provide only 25½" of knee clearance and the piping is not wrapped or insulated. The dispensers are too high. The men's urinal is 7½" too high. The water closet stalls have only 24" door clear width and the stall doors open in and not out. The water closets are too low and lack compliant near side, far side, and front toilet clear widths. There are no grab bars.

*The above areas are limited solely to police personnel, who must meet strict physical requirements to perform the essential functions of their jobs. As no public access is allowed to these areas, with the exception of tactile designation signage, no further action or modifications are required. Modifications would only be necessary if these areas were made open to the public or as an employee reasonable accommodation request.*

#### **Commentary on Holding Cells**

##### Section 521 Code of Massachusetts Regulations

**Under 521 CMR**, compliance is dictated by work on a building according to the value of the work in comparison to the full and fair cash value of the building. 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.

**15.1 General:** Detention facilities shall comply with 521 CMR, except as specified or modified in 521 CMR 15. Detention facilities shall include, but not limited to, police stations, prisons, jails..... and other institutional occupancies where occupants are under some degree of restraint or restriction for security reasons.

**15.3 Entrances:** Entrances used by the general public, including those used by both visitors and inmates or detainees, including those that are secured, shall be accessible as required under 521 CMR 25 – Entrances. Exception: Entrances, doors and doorways designed to be operated by security personnel shall be exempt from 521 CMR.

#### 2010 ADA Standards

Because older and smaller jails or holding facilities are often more difficult to retrofit, some police and security departments anticipate achieving full compliance when a new facility is constructed as the cost to retrofit accessible holding cells within an existing facility is typically very expensive. The ADA does not dictate wholesale remodeling of existing facilities but rather focuses on equal access to services and calls for architectural solutions as a last resort. Accommodations that impose undue hardship are not required. An undue hardship may be such that the expenses may be too significant based on the available resources of the department or municipality. Similarly, the ADA looks at what is “readily achievable” or 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. The ADA recognizes that economic and financial conditions vary. When an entity has resources to remove barriers, it is expected to do so; but when revenues 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.

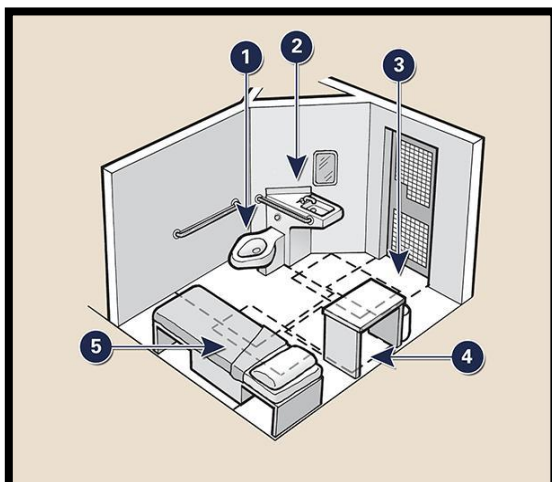
**Under Section 232.2 of the 2010 ADAAG** alterations to cells shall not be required to comply except to the extent determined by the Attorney General (federal).

**Advisory 232.2:** General Holding Cells and General Housing Cells Exception. Although these requirements do not specify that cells be accessible as a consequence of an alteration, Title II of the ADA requires that each service, program, or activity conducted by a public entity, when viewed in its entirety, be readily accessible to and usable by individuals with disabilities. This requirement must be met unless doing so would fundamentally alter the nature of a service, program, or activity or would result in undue financial and administrative burdens.

The Department should also consider pursuing the Attorney General exception. These would be intermediate provisions until the Town and Department can determine the most practical and cost effective way to address the holding cell issue. This could require further architectural planning

followed by design as the simple modification of existing cells not necessarily the most feasible, practical, or cost effective solution. Considerations include space requirements for an accessible compliant cell, required number of regular cells, location of plumbing, bearing walls, realignment considerations, etc. Another option is to make formal arrangements with other local or county jurisdictions that have accessible holding cells such that detainees can be transported and housed at those locations.

For illustrative purposes, a typical room layout and general features of an accessible cell is shown below.



Rendering of ADA Compliant Cell

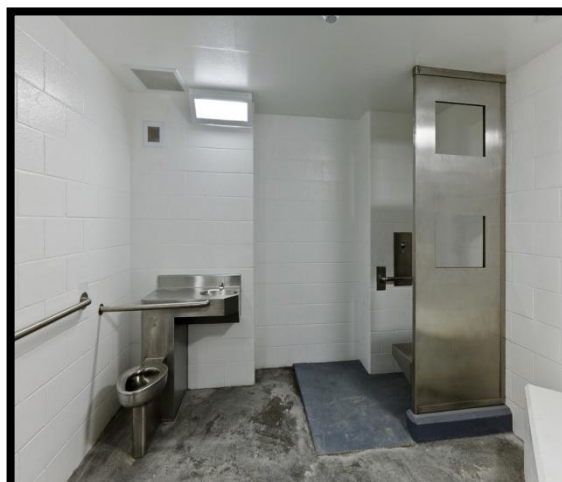


Photo of ADA Compliant Cell

### Holding Cells

None of the 7 cells are accessible. The water closet rims are 2" too low, are 3½" too close to the near wall and 12" too close to the front cement sleep area. In addition, the sink lacks knee clearance and the sink and water closet operating buttons require more than 5 lbs of force.

The shower for detainees has a 25½" clear width and a 5" abrupt change in level surface to enter and has no accessible features.

### Public Safety – Police Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<b>Exterior and Interior Doors</b> Exterior and interior doors with closers do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.) and interior door (5 lbs.) and the minimum closing speed requirement of at least 6 seconds.	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	N	\$0
<b>Reach Range</b> The following are not within reach range under the 2010 ADA Standards: <ul style="list-style-type: none"> <li>Hallway debibrillator (58" a.f.f.)</li> <li>Hallway fire blanket (64" a.f.f.)</li> <li>Lobby opiod rescue kit (71½" a.f.f.)</li> </ul>	308	6.5 6.6	Lower the defibrillator, fire blanket, and opiod rescue kit to a height of no more than 48" a.f.f. to the operating mechanisms.	2	2	I	\$0

See Photos Police 1 and 2.

<b>Counters</b> Both the Records Counter and the Central Dispatch Counter are 43½" a.f.f., which is 7½" too high.  The counters are also protruding objects as they extend more than 4" into the accessible route of travel at a height of 27" to 80" a.f.f.  See Photo Police 3.	306.3	35.5	Modify the counters or provide an additional lower counter that is 36" long and no more than 36" a.f.f.	2	2	I	Up to \$750
	307.2	20.6.1	Place fixed objects at the ends of the counters for cane detection.	2	2	I	\$0
<b>Tables and Seating</b> A table in the lobby provides only 24" of knee height.	306.3	35.5	Provide a table that has the minimum required 27" of knee height as well as a minimum of 19" knee depth and 30" clear width.	2	2	I	Up to \$350
<b>Door Signage</b> Tactile designation signage is not provided at the following locations:  <u>Main Level</u> <ul style="list-style-type: none"> <li>Door to holding cells</li> <li>Detective Bureau</li> <li>Court Office (2)</li> <li>Operations</li> <li>Emergency Exit</li> <li>Logistics S.R.T.</li> </ul> In addition, the following signage is not on the latch side: <ul style="list-style-type: none"> <li>P128 Interview Room</li> <li>P129 Evidence Room</li> <li>P120 Executive Assistant</li> <li>P09 Hot Water</li> </ul> See Photos Police 4, 5, and 6.	703	41.1	Install or relocate 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. 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	\$400
<b>Main Level Kitchenette</b> The kitchenette on the main level has a sink and counter that is 2" too high lacks knee clearance, and has soap and towel dispensers that are 8" to 12" too high.  See Photo Police 7.	804.3.2 306.3 308	32.2 32.6 32.7 6.5 6.6	Modify the counter and sink so that there is no more than 34" a.f.f. at the top and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping. Lower the towel and soap dispensers to a height of no more than 48" a.f.f.	2	3	N	Up to \$2,000
<b>Holding Cells</b> None of the 7 cells are accessible. The water closet rims are 2" too low, are 3½" too close to the rear wall and 12" too close to the front cement sleep area. In addition, the sink lacks knee clearance and the sink and water closet operating buttons require more than 5 lbs of force.  The shower for detainees has a 25½" clear width and a 5" abrupt change in level surface to enter and has no accessible features.  See Photo Police 8.	807	15	Option #1: Seek an arrangement with adjacent local jurisdictions to house disabled detainees.  Option #2: Modify one cell to comply with the water closet clearances, sink knee clearances, and faucet operating forces.]	4 4	1 3,4	I L	\$0 TBD
	807	15	Due to the cost to modify and expand the shower to meet accessibility requirements versus its amount of use, discontinue use of the shower.	4	1	I	\$0

Up to \$3,500+

## **Public Safety Complex – Police Accessibility Assessment Photos**



Photo Police 1



Photo Police 2

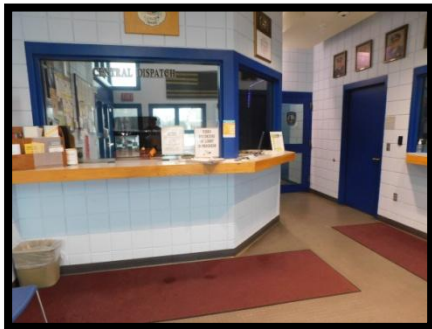


Photo Police 3



Photo Police 4



Photo Police 5

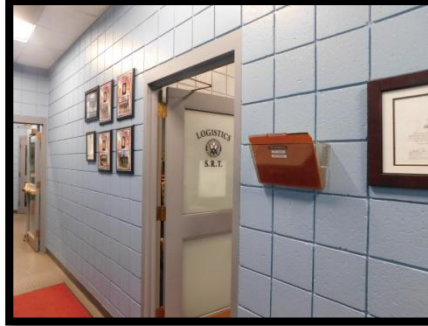


Photo Police 6



Photo Police 7



Photo Police 8

## **PUBLIC SAFETY COMPLEX - FIRE**

**Description of Facility and Programs:** The Ludlow Fire Station/Headquarters is located in the shared Public Safety Complex along with the Police Department. The main entrance to the building provides access to both Departments with a shared lobby.

The Fire Station/Headquarters consists of 2 levels. The upper level contains the offices, break room, conference room, day room/kitchen, bunk rooms, lockers, and bathrooms. The lower level contains the apparatus bays which house the fire apparatus and related equipment.



**Responsible Party:** Board of Selectmen

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Parking**

The parking is shared with the Police Department. There are 2 designated accessible parking spaces with a shared access aisle. The space closest to the building has a running slope of up to 3.2%. There is no "van accessible" signage.

#### **Lobby**

The entrance door has an operating force of over 15 lbs. and closes in only 4 seconds.

The "low" drinking fountain has only 26" of knee height.

The Fire Dept. drop box is 6½" too high.

The tactile designation signage for the Police and Fire Departments are 1½" to 2" too low.

Women's Bathroom. The door has an operating force of over 5 lbs. and closes in only 4 seconds. The coat hook is 7½" too high. The sink piping is not wrapped or insulated. The soap dispenser is 6" too high. The mirror is 3" too high. The water closet is 1¼" too far from the near wall and has only 40" front clearance due to a wall mounted dispenser. The grab bars are both 2¼" too low. The toilet paper dispenser is 3" too close to the front of the water closet.

Men's Bathroom. The door has an operating force of over 5 lbs. The coat hook is 8" too high. The sink piping is not wrapped or insulated. The mirror is 3" too high. The side grab bar is 2" too low.

#### General Interior

Interior doors with closers have excessive operating forces and close too fast.

Some doors/rooms lack tactile designation signage and have knob style hardware. The tactile signage for F132 is 8" too high. The signage for the Multi-Purpose Room and Janitor's Closet is not on the latch side.

The reception counter is 6¼" too high.

The wheelchair platform lift doors have excessive operating forces and close too fast. There are no interior pull devices.

#### Apparatus Bay Entrance

The drop box and outside phone near the entrance for public use are 6" to 12½" too high.

#### Non-Public Areas

General. Items such as a fire extinguisher, phone, and radio on the Upper Level/Office area are up to 7" too high.

F105. The sink in F105 is 2" too high, lacks knee clearance, and has dispensers that are too high.

Bathroom Outside Police Department Door. The door has knob hardware. The bathroom is only 54" x 61". The light switch, dispensers, and mirror are too high. The water closet is 1" too low and lacks compliant near side, far side, and front toilet clear widths. There are no grab bars. The sink piping is not wrapped or insulated.

Break Room/Kitchen. The sink counter is 2" too high and lacks knee clearance. The dining room table has only 25½" of knee height.

Men's Locker Room. There is insufficient clear width between and around the benches and lockers. The lockers have coat hooks and shelving that is in excess of 48" a.f.f. The bench is 1" too short, 8" too narrow, and lacks back support. The dispensers are too high. The sink provides only 24" to 25" of knee height and has faucets that require pinching and twisting of the wrist. The urinal is 7" too high. The water closet stalls have only 24" door clear width. The water closets are too low and lack compliant near side, far side, and front toilet clear widths. There are no grab bars. There is a 4½" abrupt change in level surface to the showers and the

showers lack accessible features. The door to the Bunk Room has only 25" of clear width and lacks tactile signage. The hose tower door has knob style hardware.

Women's Locker Room. The lockers have coat hooks and shelving that is excess of 48" a.f.f. The dispensers are too high. The sink provides only 24" to 25" of knee height and has faucets that require pinching and twisting of the wrist. The water closet stall lacks sufficient clear width. The water closet is too low and lack compliant near side, far side, and front toilet clear widths. There are no grab bars. The shower lacks accessible features. The egress door to the Women's Bunk Room and Lockers lacks tactile designation signage.

Apparatus Bay. The stairs to the Apparatus Bay have railings on one side that lack top and bottom extensions.

There are reduced clear widths throughout the bay area due to equipment and vehicles. A # of items exceed the maximum reach range and there are also some protruding objects. Doors have knob hardware and lack tactile designation signage.

A bathroom lacks tactile designation signage and has only 21" of doorway clear width. The bathroom is wholly non-compliant lacking clear widths and maneuverability as well as any accessible features or components.

The above areas are off limits to the public and limited to firefighter personnel. Firefighters must meet strict physical requirements to perform the essential functions of the job. However, there is one administrative position on Level 2 which does not require the same physical requirements as Firefighters for their jobs. This level is accessible via a wheelchair platform lift. The only accessible bathrooms are located in the lobby area which requires the use of the lift or stairs to get to. If required due to a reasonable accommodation request, it may be necessary to modify/reconfigure one of the bathrooms on the upper level to meet accessibility standards.

If the Apparatus Bay and Level 2 area remain closed to the public, modifications would only be required at the present time to the parking, lobby area, tactile signage, door hardware, door operating forces and closing speeds, reception counter, and wheelchair platform lift. Unless there is a change in policy in facility use or conditions of employment, no further action is required to these areas at the present time unless necessitated through a reasonable accommodation request.

## **Public Safety Complex - Fire Accessibility Assessment**

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<b>Parking</b> The parking is shared with the Police Department. There are 2 designated accessible parking spaces with a shared access aisle. The space closest to the building has a running slope of up to 3.2%. There is no "van accessible" signage.	502.4	23.4	When the parking is resurfaced, ensure that the slopes for the accessible parking do not exceed 2.0% in any direction.  Provide "van accessible" signage.	1  1	3  2	L  I	TBD  \$25



<b><u>Lobby</u></b> The entrance door has an operating force of over 15 lbs. and closes in only 4 seconds.  The “low” drinking fountain has only 26” of knee height.  The Fire Dept. drop box is 6½” too high.  The tactile designation signage for the Police and Fire Departments are 1½” to 2” too low.  See Photo Fire 1.	404.2.8 404.2.9	26.8 26.9	Adjust the door closers such that the closing speed is at least 6 seconds and the operating force is no more than 15 lbs. for exterior doors and no more than 5 lbs. for interior doors.	2	2	I	\$0
	306.3	36.2.1	Modify the fountain to provide a minimum of 27” of knee clearance.	2	3	N	Up to \$1,000
	308	6.5 6.6	Lower the drop box to a height of no more than 48” a.f.f. to the opening.	2	2	I	\$0
	703	41	Raise the signage so that it is 60” o.c. a.f.f.	2	2	I	\$0
<b><u>General Interior</u></b> Interior doors with closers (including bathroom and egress doors) have excessive operating forces and close too fast.  The following doors/rooms lack tactile designation signage: <ul style="list-style-type: none"> <li>Stairwell doors (2) to apparatus bay, conference room near F126, break room (2), hallway closets (2), mechanical roof access, shift captain, shift captain interior (3)</li> </ul> The tactile signage for F132 is 8” too high. The signage for the Multi-Purpose Room and Janitor’s Closet is not on the latch side.  The following doors have knob style hardware: <ul style="list-style-type: none"> <li>Bathroom outside Police Department door, janitor’s closet,</li> </ul> The reception counter is 6¼” too high.  The wheelchair platform lift doors have excessive operating forces and close too fast. There are no interior pull devices.  See Photos Fire 2, 3, and 4.	404.2.8 404.2.9	26.8 26.9	Adjust the door closers such that the closing speed is at least 6 seconds and the operating force is no more than 15 lbs. for exterior doors and no more than 5 lbs. for interior doors.	2, 3	2	I	\$0
	703	41	Install, lower, or relocate tactile 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	\$600
	404.2	26.11	Replace the knob hardware with lever style hardware.	2	2	I	\$150
	904.4	7.2	Construct a 36” long by no more than 36” high a.f.f. counter.	2	2	N	Up to \$350
	404.2.8 404.2.9 309	26.8 26.9 39	Adjust the door closers such that the closing speed is at least 6 seconds and the operating force is no more than 5 lbs. Install interior door pulls.	2	2	I	\$50
<b><u>Apparatus Bay Entrance</u></b> The drop box and outside phone near the entrance for public use are 6” to 12½” too high.  See Photo Fire 5.	308	6.5 6.6	Lower the drop box and phone to no more than 48” a.f.f. to the operating mechanisms.	2	2,3	I	Up to \$250
<b><u>Women’s Bathroom</u></b> The coat hook is 7½” too high.	308	6.5 6.6	Lower the coat hook to a height of no more than 48” a.f.f.	3	2	I	\$0

The sink piping is not wrapped or insulated.	606.5	30.9.5	Wrap or insulate the piping.	3	2	I	\$75
The soap dispenser is 6" too high.	308	30.12	Lower the dispenser to a height of no more than 42" a.f.f. to the operating mechanism.	3	2	I	\$0
The mirror is 3" too high.	603.3	30.11	Lower the mirror to a height of no more than 40" a.f.f. to the bottom of the reflecting surface.	3	2	I	\$0
The water closet is 1¼" too far from the near wall and has only 40" front clearance due to a wall mounted dispenser.	604.2 604.3	30.7.2	Relocate the water closet so it is no more than 18" o.c. to the near wall. Remove the wall mounted dispenser.	3	3	N	Up to \$2,500
The grab bars are both 2¼" too low.	609.4	30.8.2	Raise the grab bars so they are 33" to 36" a.f.f. to the top of the gripping surface.	3	2	I	\$0
The toilet paper dispenser is 3" too close to the front of the water closet.	604.7	30.7.6	Toilet paper dispensers should be 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser, at least 24" a.f.f., and not located over the grab bars.	3	2	I	\$0
<b>Men's Bathroom</b>							
The coat hook is 8" too high.	308	6.5 6.6	Lower the coat hook to a height of no more than 48" a.f.f.	3	2	I	\$0
The sink piping is not wrapped or insulated.	606.5	30.9.5	Wrap or insulate the piping.	3	2	I	\$75
The mirror is 3" too high.	603.3	30.11	Lower the mirror to a height of no more than 40" a.f.f. to the bottom of the reflecting surface.	3	2	I	\$0
The side grab bar is 2" too low.	609.4	30.8.2	Raise the grab bars so it is 33" to 36" a.f.f. to the top of the gripping surface.	3	2	I	\$0
See Photo Fire 6.							

Up to \$5,075+

### **Public Safety Complex - Fire Accessibility Assessment Photos**



Photo Fire 1

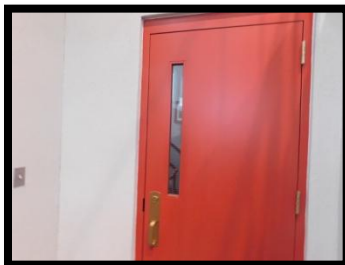


Photo Fire 2

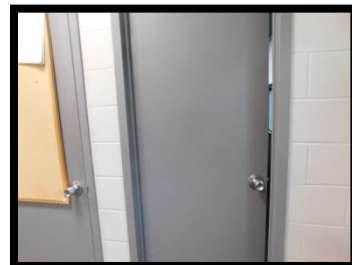


Photo Fire 3

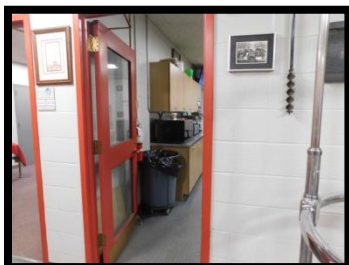


Photo Fire 4



Photo Fire 5

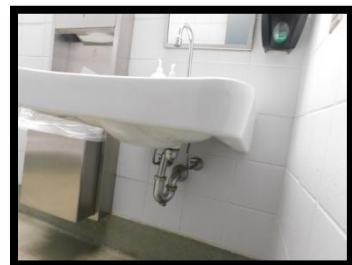


Photo Fire 6

## **LUDLOW SENIOR CENTER**

**Function and Description of Facility and Programs:** The Senior Center/Council on Aging coordinates and operates senior-oriented comprehensive day to day services for Ludlow residents age 60 and over. The Senior Center works on behalf of the older residents of the town to make sure that adequate services and activities are available. Programs are designed to improve and enrich the quality of life for the elderly. They include, but are not limited to, information/referral, nutrition counseling, outreach, transportation, health and foot care clinics, advocacy, daily meals, and numerous social activities. The Senior Center is a one-story, roughly 17,692 sf masonry building that was completed in 2020. The building consists of administrative offices, a small café, a dining/large meeting room, a kitchen, a billiards room, a game room, a small boutique/gift shop, a fitness studio, an exercise room, a wellness room, a small conference room, an arts and crafts room, and bathrooms.



**Responsible Party:** Board of Selectmen and Council on Aging

**General Description or Obstacle Which Limits Mobility or Access:**

Parking

The 13 designated accessible parking spaces have signs that are all 18" too low.

### Tables and Seating

The Café tables (6) have a round base that restricts wheelchair access and reduces knee and toe depth. The Game Room tables (5) have a base that restricts wheelchair access by reducing knee depth to only 5" and clear width to less than 30".

### Drinking Fountains

The drinking fountains near the bathrooms and near Room 7B are all "low" only and not "high-low".

### Doors and Doorways

Interior and exterior doors with closers have excessive operating forces and close too fast.

### Reach Range

Coat hooks (10) in the Game Room are all 15" too high. Coat hooks (6) in the Billiards Room are all 20" too high. Coat hooks (10) in the Fitness Room are all 15" too high.

### Signage

The tactile designation signage for Room 7E is 7½" too low. The bathroom tactile designation signage (5 bathrooms) lack the Universal Symbol of Accessibility.

### Bathrooms

Kitchen Bathroom #12A. There is only 36" of clear width on the far side of the water closet. The toilet paper dispenser is 2" too far from the front of the toilet. The manual water closet flush control is on the wrong side. The coat hook is 5½" too high. The door locking mechanism requires pinching and twisting of the wrist.

Bathroom #19. The coat hook is 6" too high. The paper towel dispenser is located partially over the grabs. The stall door locking mechanism requires pinching and twisting of the wrist. The toilet paper dispenser is 2" too far from the front of the water closet. The manual water closet flush control is on the wrong side.

Men's Bathroom #11. The soap dispenser is 2" too high. The stall door opens in, not out. There is no exterior pull device. . The toilet paper dispenser is 4" too far from the front of the water closet.

Women's Bathroom #13. The soap dispenser is 1½" too high. The stall door opens in, not out. There is no exterior pull device. The toilet paper dispenser is 4" too far from the front of the water closet.

Companion Bathroom #14. The coat hook is 6½" too high. The soap dispenser is located partially over the grab bars. The door locking mechanism requires pinching and twisting of the wrist. The manual water closet flush control is on the wrong side. The water closet is 9½" too close to the sink. The toilet paper dispenser is 3" too far from the front of the water closet.

### Kitchen

The kitchen counters/sinks lack knee clearance and piping is not wrapped or insulated. Various items and utensils are not within reach range. The kitchen food service counter is 2" too high, however food is not served from the counter as food is brought directly to the dining tables by paid and volunteer kitchen staff. The kitchen is for staff use and certified volunteers only who must meet minimum physical

requirements to perform the essential functions of their duties. As this area is not open to the public and not for public use, modifications would only be triggered through a reasonable accommodation request.

## **Ludlow Senior Center Accessibility Assessment**

<b><u>General Description of Obstacle</u></b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Parking</u></b> The 13 designated accessible parking spaces have signs that are all 18" too low.  See Photo Senior 1.	502.6	23.6	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	\$0
<b><u>Door Operating Forces and Closing Speeds</u></b> Exterior and interior doors with closers do not comply with the minimum closing speed requirement of 6 seconds or the maximum operating force of 15 lbs. for an exterior door and 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 exterior doors and 5 lbs. for interior doors.	1	2	I	\$0
<b><u>Signage</u></b> The tactile designation signage for Room 7E is 7½" too low. The bathroom tactile designation signage (5 bathrooms) lack the Universal Symbol of Accessibility.  See Photos Senior 2 and 3.	703	41.1	Raise the 7E signage such that it is 60" o.c. a.f.f.  Add the Universal Symbol of Accessibility to the bathroom signage.	2	2	I	\$100
<b><u>Drinking Fountain</u></b> The drinking fountains near the bathrooms and near Room 7B are all "low" only and not "high-low".  See Photo Senior 4.	211	36	Option #1: Discontinue use of the drinking fountains.  Option #2 – Raise one fountain at each location so that they serve as a "high" fountain. The spout heights s/b 38" min a.f.f. to 43" max a.f.f. for the "high" fountains.	2	3	N	Up to \$3,000+
<b><u>Reach Range</u></b> Coat hooks (10) in the Game Room are all 15" too high. Coat hooks (6) in the Billiards Room are all 20" too high. Coat hooks (10) in the Fitness Room are all 15" too high.  See Photo Senior 5.	308	6.5 6.6	Provide at least one coat hook in each location that is no more than 48" a.f.f.	2	2	I	\$30
<b><u>Tables and Seating</u></b> The Café tables (6) have a round base that restricts wheelchair access and reduces knee and toe depth.  The Game Room tables (5) have a base that restricts wheelchair access by reducing knee depth to only 5" and clear width to less than 30".  See Photos Senior 6 and 7.	226 902 306	35	Provide at least one table at each location that provides the minimum required 19" knee depth, 30" clear width, and 27" knee height.	2	2	I	Up to \$1,000

<p><b>Bathrooms</b></p> <p><u>Kitchen Bathroom #12A</u></p> <p>There is only 36" of clear width on the far side of the water closet. The toilet paper dispenser is 2" too far from the front of the toilet. The manual water closet flush control is on the wrong side. The coat hook is 5½" too high. The door locking mechanism requires pinching and twisting of the wrist.</p> <p><u>Bathroom #19</u></p> <p>The coat hook is 6" too high. The paper towel dispenser is located partially over the grabs. The stall door locking mechanism requires pinching and twisting of the wrist. The toilet paper dispenser is 2" too far from the front of the water closet. The manual water closet flush control is on the wrong side.</p> <p><u>Men's Bathroom #11</u></p> <p>The soap dispenser is 2" too high. The stall door opens in, not out. There is no exterior pull device. The toilet paper dispenser is 4" too far from the front of the water closet.</p> <p><u>Women's Bathroom #13</u></p> <p>The soap dispenser is 1½" too high. The stall door opens in, not out. There is no exterior pull device. The toilet paper dispenser is 4" too far from the front of the water closet.</p> <p><u>Companion Bathroom #14</u></p> <p>The coat hook is 6½" too high. The soap dispenser is located partially over the grab bars. The door locking mechanism requires pinching and twisting of the wrist. The manual water closet flush control is on the wrong side. The water closet is 9½" too close to the sink. The toilet paper dispenser is 3" too far from the front of the water closet.</p> <p>See Photos Senior 9, 10, 11, and 12.</p>	604.3	30.7.2	<p><u>Kitchen Bathroom</u></p> <p>The kitchen bathroom is for staff and certified volunteers only who must meet certain physical conditions to meet the essential functions of their positions. In addition, there are additional bathrooms directly across the hallway from the kitchen. As these bathrooms have minor accessibility deficiencies, they are more accessible than the kitchen bathroom as they have the required water closet far side clear width. No further action is recommended for this bathroom unless required due to a reasonable accommodation request.</p> <p><u>Bathroom #19</u></p> <p>Lower the coat hook to a height of no more than 48" a.f.f. Relocate the towel dispenser so it is no longer over the grab bars. Replace the stall door locking mechanism with a larger lever style that does not require pinching and twisting of the wrist (See Photo Senior 8). Relocate the toilet paper dispenser so it is 7" to 9" o.c. to the front of the water closet. Modify the water closet so the manual flush control is on the wide or approach side.</p> <p><u>Men's Bathroom #11</u></p> <p>Lower the soap dispenser to a height of no more than 42" a.f.f. Reverse/modify the stall door so it opens out, not in. Install an exterior pull device. Relocate the toilet paper dispenser so it is 7" to 9" o.c. to the front of the water closet.</p> <p><u>Women's Bathroom #13</u></p> <p>Lower the soap dispenser to a height of no more than 42" a.f.f. Reverse/modify the stall door so it opens out, not in. Install an exterior pull device. Relocate the toilet paper dispenser so it is 7" to 9" o.c. to the front of the water closet.</p> <p><u>Companion Bathroom #14</u></p> <p>Lower the coat hook to a height of no more than 48" a.f.f. Relocate the soap dispenser so it is no longer over the grab bars. Replace the door locking mechanism with a larger lever style that does not require pinching and twisting of the wrist. Modify the water closet so the manual flush control is on the wide or approach side. Relocate the toilet paper dispenser so it is 7" to 9" o.c. to the front of the water closet. As there are nearby Men's and Women's Bathrooms (#11 and #13), which upon recommended modifications, will be fully accessible complaint, seek a variance to retain the existing location of the water closet and sink.</p>	3	1	I	\$0
	604.7	30.7.6		3	2,3	I	Up to \$750
	604.6	30.7.5		3	2	I	\$100
	308	30.6.1		3	2	I	\$100
	309.4	6.5		3	2,3	I	Up to \$750
	404.2	6.6					
	604.8	39.5					
		30.8.5					
		30.12					
		30.6.1					

Total up to \$6,280+



## Ludlow Senior Center Accessibility Assessment Photos



Photo Senior 1



Photo Senior 2

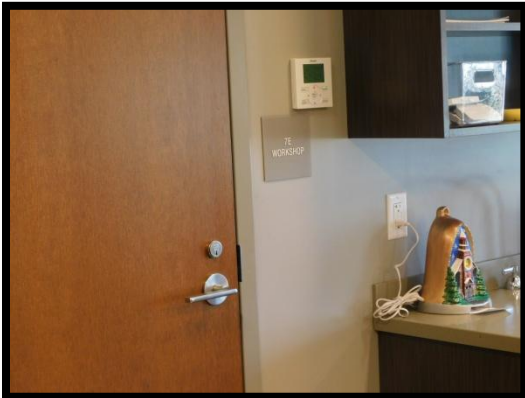


Photo Senior 3



Photo Senior 4



Photo Senior 5

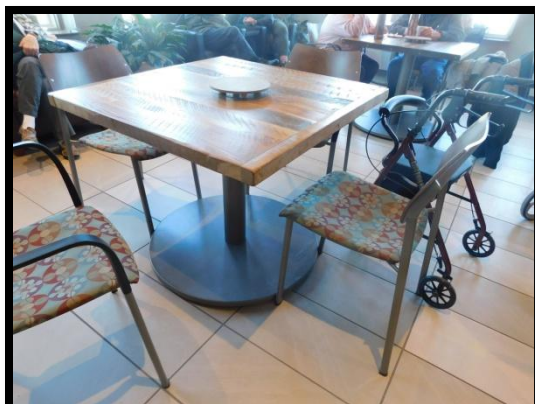


Photo Senior 6



Photo Senior 7



Photo Senior 8 (Recommended Locking Mechanism)



Photo Senior 9

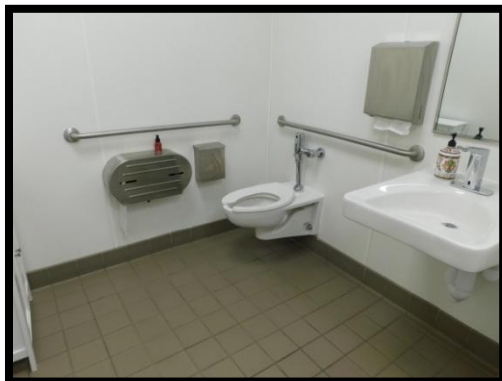


Photo Senior 10



Photo Senior 11



Photo Senior 12



## **HUBBARD MEMORIAL LIBRARY**

**Function and Description of Facility and Programs:** Hubbard Memorial Library is included in the National Register of Historic Places as a part of the Ludlow Village Historic District. Originally constructed in 1888, the building has undergone renovations and expansions including addressing overall accessibility and usability of the library. The 3-level (lower level, main floor, upper level), masonry building is roughly 12,400 s.f. The Lower Level contains adult stacks. The Upper Level contains the children's and young adult rooms, a program room, a conference room, a staff kitchenette, and 2 public non-accessible bathrooms. The Main Level includes circulation, reference, tables for work/reading, periodicals and CD's, computers, a staff area, a staff kitchenette, a staff bathroom, and 2 public accessible bathrooms.



**Responsible Party:** Board of Selectmen and Library Board of Trustees.

### **General Description or Obstacle Which Limits Mobility or Access**

#### **Parking**

There are 2 apparent designated accessible parking spaces that have signage that is 25" to 35" too low. At the time of assessment, the parking area was being resurfaced with the finish coat of paving scheduled for the late spring/early summer 2025. As a result, the spaces were not striped and the running and cross slopes were not measurable.

#### **Picnic Table**

A picnic table is not on an accessible route of travel, has only 26" of knee clearance, and only 7½" of clear width.

#### **Exterior Accessible Route of Travel**

The concrete walkway from the accessible parking to the entrance has areas of abrupt changes in level surface and areas of deterioration. The sloped concrete pad leading to the entrance approach has a running slope of up to 8.2% for approximately 6 feet. In addition, there are cross slopes of 2.6% to 2.8%.

There is also a ½" abrupt change in level surface at the transition in concrete to the sloped walkway into the building.

Although the grates at the base of the sloped walkway in front of the entrance has ½" wide openings, they vary in length from 3½" to 5" and are not perpendicular to the route of travel.

#### Interior - General

Doors with closers have excessive opening forces and close too fast. Interior doors and rooms lack tactile designation signage with some doors also having knob-style hardware. The Main Level librarian office door and the Upper Level staff room have glass panes that are up to 5½" too high. The elevator lacks a tactile star on the jambs of the main level.

Some of the book stacks do not provide the minimum required 36" clear width.

Tables do not meet the minimum required 27" of knee clearance and/or 19" knee depth. Electronic card catalogues are on tables that are up to 5" too high, lack adequate knee depth, and lack adequate clear width for a wheelchair user.

A drinking fountain on the Main Level and Upper Level are "low" only and provide only 23 ½" of knee clearance.

The Main Level check-out counter is 3½" too high.

Some items (wall mounted telephone on the Lower Level, light switches) are too high.

A floor grate on the Main Level has excessive openings that also are not perpendicular to the route of travel.

A rug in the Conference Room is unsecured and serves as a tripping hazard.

#### Staff Area

Main Level. The staff kitchenette is 2" too high and lacks knee clearance. The Librarian's Office has a glass pane that is 48½" a.f.f., which is 5½" too high.

The staff bathroom lacks tactile designation signage. There is only 29½" of clear width into the bathroom and a ½" abrupt change in level surface at the threshold. There are no audible/visual alarms. The sink piping is not wrapped, guarded, or insulated. The paper towel dispenser is 2" too high. The toilet paper dispenser is too close to the front of the water closet. The water closet is 2" too low. The water closet is 2½" too close to the near wall, 23" too close to the far wall or nearest object, and only 32¾" clear width in front of the water closet. The flush control is on the wrong side. There are no grab bars.

Upper Level. The staff kitchenette is 2" too high and lacks knee clearance. The Staff Room/Kitchenette has 2 doors with glass panes that are 5" too high. In addition, there is only 2 ¾" of door pull clearance from the Children's Room to the Staff Room/Kitchenette.

## Stairs

The exterior stair railing on the building side at the entrance is 33" a.f.f., which is 1" too low.

The stairs in the newer addition have railings that are 2" to 3" too low. The railings have bottom extensions that only go 8" the sloped distance of one tread (the treads are 10½" wide) and go only 8" parallel to the floor instead of the required 12".

## Public Bathrooms

There are four (4) bathrooms on the Main and Upper Levels— 2 accessible bathrooms on the Main Level, and 2 non-accessible bathrooms on the Upper Level.

Main Level Accessible Bathroom (Left Side). The bathroom lacks tactile designation signage. There is a ½" abrupt change in level surface at the doorway threshold. The coat hook is 16" too high. There are no audible/visual alarms. The sink piping is not wrapped, guarded, or insulated. The water closet is 4" too far from the near wall and has only 38" of clearance in front of the toilet. The flush control is on the wrong side. The toilet paper dispenser is too close to the front of the water closet. The rear grab bar is 6" too far from the interior corner.

Main Level Accessible Bathroom (Right Side). The bathroom lacks tactile designation signage. There is a ½" abrupt change in level surface at the doorway threshold. The coat hook is 16" too high. There are no audible/visual alarms. The sink piping is not wrapped, guarded, or insulated. The soap dispenser is 4¼" too high. The sink provides only 26" of knee height. The water closet is 1" too close to the near wall and has only 38¼" of clearance in front of the toilet. The water closet is 2" too low. The toilet paper dispenser is too close to the front of the water closet. The rear grab bar is 6" too far from the interior corner.

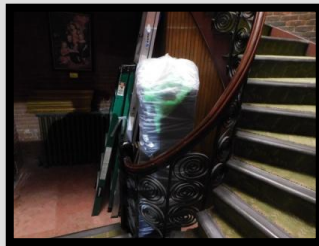
Upper Level Bathroom (Left Side). The bathroom lacks tactile designation signage. There is a ½" abrupt change in level surface at the doorway threshold. There are no audible/visual alarms. The sink piping is not wrapped, guarded, or insulated. The towel dispenser is 1½" too high. The water closet flush control is on the wrong side. There are no grab bars. The water closet is 2" too low, is 1½" too close to the near wall, 7" too close to the far wall or nearest object, and has only 32½" of clearance in front of the toilet. The toilet paper dispenser is too close to the front of the water closet. Overall, the bathroom lacks maneuverability for a wheelchair.

Upper Level Bathroom (Right Side). The bathroom lacks tactile designation signage. There is a ½" abrupt change in level surface at the doorway threshold. There are no audible/visual alarms. The sink has only 26" of knee clearance and the piping is not wrapped, guarded, or insulated. The towel dispenser is 3" too high and the soap dispenser is 2" too high. The water closet flush control is on the wrong side. There are no grab bars. The water closet is 2" too low, is 3" too far from the near wall, 13" too close to the far wall or nearest object, and has only 31¼" of clearance in front of the toilet. The toilet paper dispenser is too close to the front of the water closet. Overall, the bathroom lacks maneuverability for a wheelchair.

## Additional Guidance and Recommended Actions

### Interior Historic Staircase

The original historic staircase is closed to the public and serves solely as an emergency exit. The stairs have risers and treads of varying widths and heights and therefore not “uniform”. The interior wooden railings are 1” too wide, up to 2” too low, and lack compliant bottom extensions. The metal exterior railing is 4” to 5” too low, is not round or oval in shape, and lacks compliant bottom extensions. As the building is within the National Register of Historic Places and has a separate “compliant” staircase, it is recommended that an historic exception be sought to retain the existing stairs without further modification. In order to bring the stairs and railings into compliance, the cost would be extraordinary and far exceed the benefit gained. Furthermore, the historic character and integrity of the stairs and railings would be entirely destroyed.



### Book Drop

Although the exterior “book drop” is compliant as a drive-through book drop, due to its location on a one-way driveway, vehicular use is not possible as the location of the opening contradicts the traffic flow. As a result, one must physically exit their vehicle and maneuver to the drop box to deposit items. In this circumstance, the drop box opening mechanism is 3” too high and the surface directly below the drop box has a storm grate with non-compliant 1½” x 21” openings. It is strongly recommended that the drop box is relocated so that it can be used at all times as a drive-through drop box.



### Upper Level Stage in Small Conference Room

The “stage” in the small conference room does not have vertical access with a roughly 14” change in level surface from the conference room floor. According to staff. This area is not used for performances but rather for display items or storage. If this is the circumstance, then no other action is required unless as requested due to a reasonable accommodation request. If the “stage” is used for performances or readings, then vertical access may be required or the activity relocated. No further action is required at the present time.

## Hubbard 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>
<b><u>Parking</u></b> There are 2 apparent designated accessible parking spaces that have signage that is 25" to 35" too low. At the time of assessment, the parking area was being resurfaced with the finish coat of paving scheduled for the late spring/early summer 2025. As a result, the spaces were not striped and the running and cross slopes were not measurable.  See Photo Library 1.	208.2 502 703.7.2	23	When paving is completed, the accessible parking space and access aisle should have slopes that do not exceed 2.0% in any direction. If the 2 accessible parking spaces share an access aisle, it is recommended that striping should be at 8' in width for both of the parking spaces as well as the access aisle. Signage should be set at a height of a minimum of 60" 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	\$0 – included in contracted work
<b><u>Picnic Table</u></b> A picnic table is not on an accessible route of travel, has only 26" of knee clearance, and only 7½" of clear width.  See Photo Library 2.	226.1 902	19	Provide an additional picnic table which provides the required 27" knee height, 30" clear width, and 19" knee depth and locate on an accessible route of travel.	2	2	I	\$750
<b><u>Exterior Accessible Route of Travel</u></b> The concrete walkway from the accessible parking to the entrance has areas of abrupt changes in level surface and areas of deterioration. The sloped concrete pad leading to the entrance approach has a running slope of up to 8.2% for approximately 6 feet. In addition, there are cross slopes of 2.6% to 2.8%. There is also a ½" abrupt change in level surface at the transition in concrete to the sloped walkway into the building.  Although the grates at the base of the sloped walkway in front of the entrance has ½" wide openings, they vary in length from 3½" to 5" and are not perpendicular to the route of travel.  See Photos Library 3, 4, 5, 6, and 7.	403  302.3	22  22.7	The walkway should be modified and/or reconstructed to eliminate the abrupt changes in level surface and areas of deterioration through grinding or concrete patching. The pads with excessive running and cross slopes should be replaced and set to ensure that the running slopes do not exceed 5.0% and the cross slopes do not exceed 2.0%.  Replace the grates with ones that have the elongated opening perpendicular to the route of travel.	1  1	3  3	N  N	Up to \$500  TBD
<b><u>Exterior Stairs</u></b> The exterior stair railing on the building side at the entrance is 33" a.f.f., which is 1" too low.  See Photo Library 8.	505.4	27.4.2	Option #1: Seek a variance to retain the existing railing due to the cost vs. the benefit gained.  Option #2: Replace or modify the railing so it is 34" to 38" a.f.f. to the top of the gripping surface.	1  1	1  3	I  L	\$0  Up to \$2,500+
<b><u>Doors and Clear Widths</u></b> Doors with closers have excessive opening forces and close too fast.  The following doors and rooms lack tactile designation signage:	404.2.8 404.2.9  703	26.8 26.9  41.1	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.  Install accessible compliant signage on the latch side of each door with appropriate finish and contrast and character height and proportions, raised and brailled	2  2, 3	2  1	I  I	\$0  \$1,000

<u>Main Level</u> <ul style="list-style-type: none"> <li>Storage in entrance foyer</li> <li>Librarian Office</li> <li>Staff Bathroom</li> <li>Emergency Exit</li> <li>Public Bathrooms (2)</li> </ul> <u>Basement Level</u> <ul style="list-style-type: none"> <li>Sprinkler Room</li> <li>Electrical Room</li> <li>Door to Stairs</li> <li>Pump Room</li> <li>Elevator Machine Room</li> <li>Emergency Exit</li> </ul> <u>Upper Level</u> <ul style="list-style-type: none"> <li>Small Conference Room</li> <li>Large Meeting Room</li> <li>Emergency Exit</li> <li>Storage Room Near Elevator</li> <li>Library Staff Room (2)</li> <li>Public Bathrooms (2)</li> <li>Roof Access Door</li> </ul>			<p>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> <p>Bathroom signage must also include the Universal Symbol of Accessibility.</p>				
In addition, the elevator lacks a tactile star on the jambs of the main level.	407.2.3	28.5	Install a tactile star on both sides of the jambs on the Main Level at a height of 60" a.f.f. o.c.	2	2	I	\$100
The following doors have knob-style hardware:	404.2	26.11	Replace with lever style hardware.	4	2	N	Up to \$500
<u>Basement Level</u> <ul style="list-style-type: none"> <li>Sprinkler Room</li> <li>Electrical Room</li> <li>Pump Room</li> <li>Elevator Machine Room</li> <li>Roof Access Door</li> </ul> <u>Door Pull Clearance</u> The Upper Level Library Staff Room has only 2¾" of maneuvering clearance on the latch pull side of the door from the children's area to the staff room due to a metal storage closet.	404.2.4	26.6	There should be a minimum of 18" clearance on the latch pull side of the door for maneuverability. As this is a posted "staff only area", the metal storage cabinet would have to be relocated if requested due to a reasonable accommodation request..	4	2	L	\$0
See Photos Library 9, 10, 11, and 12.							
<u>Accessible Route Clear Widths</u> In addition, the book stacks do not provide the minimum required 36" clear width at the following locations:	403.5	12.2 20.3	As feasible, move the stacks to achieve the required minimum 36" clear width.	2	2	I	\$0
<u>Basement Level</u> <ul style="list-style-type: none"> <li>Between 9737-998.2 and 953.3-973.7 (33½" due to a pole)</li> <li>662.26-782.42 and wall (27")</li> <li>SciFi and Fantasy (34")</li> </ul> See Photos Library 13 and 14.							
<u>Electronic Card Catalogues</u> The following electronic card catalogues are on tables that are up to	308 226	6.5 6.6	Ensure that at each separate location, the card catalogue is placed on a table or desk that provides a minimum of	2	2	I	Up to \$500

<p>5" too high, lack adequate knee depth, and lack adequate clear width for a wheelchair user:</p> <ul style="list-style-type: none"> <li>• Basement Level card catalogue on 37" high table with only 17" of knee depth</li> <li>• Main Level card catalogue near copy/fax on 39" table with only 22" of clear width and 11" of knee depth</li> </ul> <p>See Photo Library 15.</p>	306.3 902.3	35	27" knee clearance, 30" clear width, and 19" knee depth. The height of the table top should be between 28" and 34" a.f.f. to allow the catalogues to be within the maximum reach range height of 48" a.f.f. for a forward approach.				
<p><b>Tables and Seating</b></p> <p>Tables/desks at the following locations do not meet the minimum required knee height and depth:</p> <ul style="list-style-type: none"> <li>• Main Level near magazines/newspapers (2 with only 25" knee height)</li> <li>• Main Level reference desk area (2 with only 25" knee height)</li> <li>• Upper Level small conference room (1 table with insufficient knee depth and 1 table with only 24½" knee height)</li> <li>• Upper Level large program room (4 tables with insufficient knee depth)</li> </ul> <p>See Photo Library 16.</p>	226 306.3 902.3	35	Ensure that at each separate location, at least one desk or table that provides a minimum of 27" knee clearance, 30" clear width, and 19" knee depth. The height of the table top should be between 28" and 34" a.f.f.	2	2	I	Up to \$2,000+
<p><b>Drinking Fountains</b></p> <p>A drinking fountain on the Main Level and Upper Level are "low" only and provide only 23 ½" of knee clearance.</p> <p>See Photo Library 17.</p>	211	36	<p>Option #1: Discontinue use of the drinking fountains.</p> <p>Option #2 – Remove the existing drinking fountains and replace with "hi-low" drinking fountains. The drinking fountains must comply as follows:</p> <p>Protruding objects compliance of no &gt; 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). and with the water flow within 3" from the front edge (36.3). The 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 &gt; 5 lbs force (309.4).</p>	2	3	N	Up to \$10,000+
<p><b>Check-out Counter</b></p> <p>The Main Level check-out counter is 3½" too high.</p>	904.3	12.2.3	Provide a counter that is 36" long and no more than 36" a.f.f.	2	3	N	Up to \$500
<p><b>Reach Range</b></p> <p>Some items (wall mounted telephone on the Lower Level, light switches) are too high.</p>	308	6.5 6.6	As necessitated as a result of a reasonable accommodation request, lower the items to a height of no more than 48" a.f.f. to the operating mechanisms.	4	2,3	L	TBD

<b>Floor Grates</b> A floor grate on the Main Level has excessive openings that also are not perpendicular to the route of travel.  See Photo Library 18.	302.3	22.7	Replace the grate with one that has openings of no greater than ½" and which is perpendicular to the route of travel.	4	2,3	N	Up to \$350+
<b>Carpeting and Rugs</b> A rug in the Conference Room is unsecured and serves as a tripping hazard.	302.2	29.3	Remove or secure the rugs/carpets.	4	2	I	\$0
<b>Staff Sinks</b> The Main Level and Upper Level staff sinks/counters are 2" too high and lack knee clearance.  See Photo Library 19.	804.3.2 606.3 306.3	32.2 32.6	As may be requested as a result of a reasonable accommodation request, the counters and sinks would need to be modified so that they are no more than 34" a.f.f. and there is a minimum of 27" knee clearance at the sinks with guarded, wrapped, or insulated piping.	2	3	L	TBD
<b>Interior Stairs and Railings</b> The newer stairs to connect the 3 levels have bottom extensions that only go the slope distance of 8" (not the full width of a stair tread) and only extend 8" parallel to the floor, not the required 12".  The railings are 31" to 32" a.f.f. to the top of the gripping surface and not the required 34" to 38" a.f.f.	505.10  505.4	27.4.3  27.4.2	Seek a variance to retain the existing railings due to the cost to modify and/or replace the railings which would be in the hundreds of thousands of dollars vs. the benefit gained.	1	1	I	\$0
<b>Main Level Staff Bathroom</b> The staff bathroom lacks tactile designation signage. There is only 29½" of clear width into the bathroom and a ½" abrupt change in level surface at the threshold. There are no audible/visual alarms. The sink piping is not wrapped, guarded, or insulated. The paper towel dispenser is 2" too high. The toilet paper dispenser is too close to the front of the water closet. The water closet is 2" too low. The water closet is 2½" too close to the near wall, 23" too close to the far wall or nearest object, and only 32¾" clear width in front of the water closet. The flush control is on the wrong side. There are no grab bars.  See Photo Library 20.	703 404.2.3 404.2.5 215 702 606.5 308 604.7 604.4 604.2 604.3 604.6 609 604	41.1 26.5 26.10 40.3 30.9.5 30.12 30.7.6 30.7.3 30.7.2 30.7.5 30.8	As this bathroom is used solely by staff and because there are other bathrooms on the floor in close proximity, no other action is required for these bathrooms at the present time, unless necessitated by a reasonable accommodation request. An option at that time includes remodeling the bathroom to allow for full accessibility compliance. However this will result in the loss of much needed library space. Another option would be to close the bathroom to all users requiring that staff use one of the public bathrooms.	3	3,1	L	\$0 to TBD
<b>Main Level Accessible Bathrooms</b>  <u>Left Side and Right Side</u> The bathrooms lack tactile designation signage.  There is a ½" abrupt change in level surface at the doorway thresholds.  The coat hooks are 16" too high.	703  404.2.5  308	41.1  26.10  6.5 6.6	Modify one or both of the toilets as detailed below. If only one bathroom is modified, it must be identified as the accessible bathroom.  Tactile Designation Signage – see above under "Doors and Clear Widths".  Modify the threshold such that there is no more than a ¼" unbeveled abrupt change in level surface or up to a ½" beveled change with no more than 1:2 slope.  Lower the coat hooks to a height of no more than 48" a.f.f.	3	2,3	N	Up to \$7,500 to \$15,000



There are no audible/visual alarms.	215 702	40.3	Install audible/visual alarms.				
The sink piping is not wrapped, guarded, or insulated.	606.5	30.9.5	Wrap, guard, or insulate the sink piping.				
The left side water closet is 4" too far from the near wall and has only 38" of clearance in front of the toilet. The right side water closet is 1" too close to the near wall and has only 38" of clearance in front of the toilet. The left side flush control is on the wrong side.	604.2 604.3 604.6	30.7.2 30.7.5	Modify the water closets so that they are 18" o.c. to the near wall and have at least 42" of clearance in front of the toilet. The flush control must be on the wide or approach side.				
The toilet paper dispensers are too close to the front of the water closet.	30.4.7	30.7.6	Toilet paper dispensers should be 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser, at least 24" a.f.f., and not located over the grab bars.				
The rear grab bars are 6" too far from the interior corner.	604.5	30.8	Relocate the rear grab bars so that they are no more than 6" from the interior corner.				
<u>Right Side Only</u> The soap dispenser is 4" too high.	308	30.12	Lower the soap dispenser so that it is no more than 42" a.f.f.				
The sink provides only 26" of knee height.	306.2	30.9.3	Raise the sink 1" to provide the minimum required 27" of knee height.				
The water closet is 2" too low.  See Photos Library 21, 22, and 23.	604.4	30.7.3	Install a seat extender such that the height is 17" to 19" a.f.f.				
<b><u>Upper Level Bathrooms (Children and Young Adult)</u></b>							
The bathrooms lack tactile designation signage.	703	41.1	Neither of these bathrooms meet accessibility standards. In order to achieve compliance, it may be necessary to modify the bathrooms and combine the 2 bathrooms into one accessible bathroom. With the exception of the water closet height, the bathroom conditions apply to those for adults, which also applies to "young adults" grades 7 – 12.	3	3	N,L	TBD—up to \$100,000+
There is a ½" abrupt change in level surface at the doorway thresholds.	404.2.5	26.10					
There are no audible/visual alarms.	215 702	40.3					
The sink piping is not wrapped, guarded, or insulated.	606.5	30.9.5	<u>In order to modify as an accessible adult bathroom, the following would be required:</u>  Tactile Designation Signage – see above.				
The left side sink has only 26" of knee clearance, which is 1" too low.	306.2	30.9.3	Modify the threshold such that there is no more than a ¼" unbeveled abrupt change in level surface or up to a ½" beveled change with no more than 1:2 slope.				
The towel dispensers are 1½" too 3" too high. The left side soap dispenser is 2" too high.	308	30.12	Lower the coat hooks to a height of no more than 48" a.f.f.				
The water closet flush control on the left side is on the wrong side.	604.6	30.7.5	Install audible/visual alarms.				
There are no grab bars.	604 609	30.8	Wrap, guard, or insulate the sink piping.				
The left side water closet is 2" too low, is 1½" too close to the near wall, 7" too close to the far wall or nearest object,	604.2 604.3 604.4	30.7.2	Modify the water closets so that they are 18" o.c. to the near wall, 42" from the far wall or nearest object, and have at least 42" of clearance in front of the toilet. The				

<p>and has only 32½" of clearance in front of the toilet. The right side water closet is 2" too low, is 3" too far from the near wall, 13" too close to the far wall or nearest object, and has only 31¼" of clearance in front of the toilet.</p> <p>The toilet paper dispensers are too close to the front of the water closet.</p> <p>Overall, the bathrooms lack maneuverability for a wheelchair.</p> <p>See Photos Library 24, 25, and 26.</p>	604.7	30.7.6	<p>flush control must be on the wide or approach side. Install a seat extender such that the height is 17" to 19" a.f.f.</p> <p>Toilet paper dispensers should be 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser, at least 24" a.f.f., and not located over the grab bars.</p> <p>Relocate the rear grab bars so that they are no more than 6" from the interior corner.</p> <p>Lower the dispensers so they are no more than 42" a.f.f. to the operating mechanisms.</p> <p>Raise the sink 1" to provide the minimum required 27" of knee height.</p> <p>As these bathrooms are located in the Children's and Young Adult Library, although not necessarily required, consideration should be given to making the bathroom compliant with standards for children, not adults. As the Children's Library includes Ages 5 – 12/Grades K-6, the <u>common "overlap" standards</u> for both Age/Grade Levels for the water closet height, water closet clear widths, toilet paper dispenser, soap dispensers, towel dispensers, and grab bars. Requirements for sink height, sink knee clearance, and mirror height are the same for all Age/Grade Levels. In this circumstance, modifications would be as required:</p> <p>The sink should be no greater than 30" a.f.f. at the rim with at least 25" of knee clearance.</p> <p>The mirror should be no more than 31" a.f.f. to the bottom of the reflecting surface.</p> <p>Coat hooks, light switches, and dispensers should be no more than 36" a.f.f. to the operating mechanisms.</p> <p>The toilet paper dispenser should be 17" o.c. a.f.f. and 7" to 9" o.c. to the front of the water closet.</p> <p>The grab bars should be at a height of 25" a.f.f. to the top of the gripping surface. The rear and side grab bars should be no more than 6" from the interior corner.</p> <p>The water closet seat should be 15" a.f.f. to the top of the seat.</p> <p>The water closet should be 15" to the near wall with 42" of clear width at the approach side and front of the toilet.</p>				
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Total up to \$133,700+

## **Hubbard 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

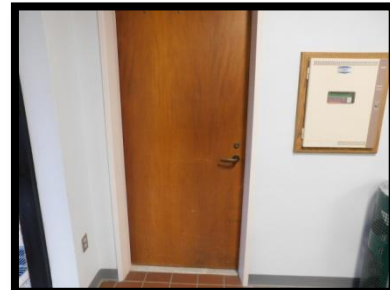


Photo Library 9



Photo Library 10

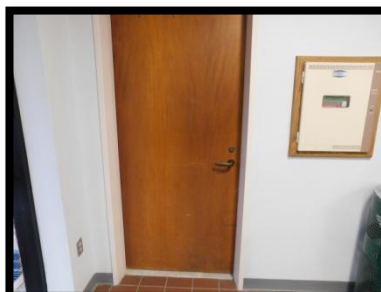


Photo Library 11



Photo Library 12



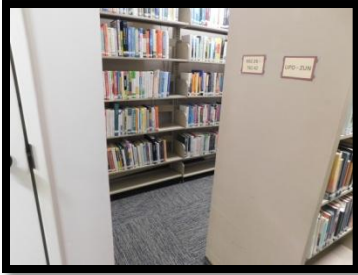


Photo Library 13



Photo Library 14



Photo Library 15



Photo Library 16



Photo Library 17



Photo Library 18



Photo Library 19



Photo Library 20



Photo Library 21



Photo Library 22



Photo Library 23



Photo Library 24



Photo Library 25

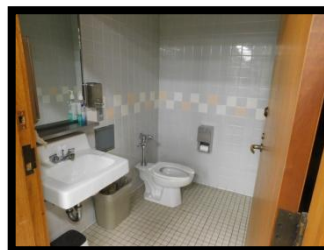


Photo Library 26

## **DEPARTMENT OF PUBLIC WORKS (DPW) BUILDING**

**Description of Facility and Programs:** The Ludlow Department of Public Works (DPW) consists of numerous divisions providing diverse services to the residents of Ludlow. This includes Highway, Sanitary Sewer, Forestry, Parks, Cemeteries, Engineering and Facilities, Solid Waste Collection and Distribution/Recycling Center/Transfer Station.

The DPW Building is a one-story, roughly 15,800 s.f. building constructed in 1978 that houses the administrative offices of the various divisions as well as a large apparatus bay, shop area, a locker room, employee lunch room, and bathrooms. There are also a number of outbuildings, storage sheds, and a salt storage shed on the site. These areas have controlled access behind the main DPW building and are not open to the public.



**Responsible Party:** Select Board

### **General Description or Obstacle Which Limits Mobility or Access:**

#### Parking

The 2 designated accessible parking spaces lack striping. The signage is 2" and 4" too low. Neither space is designated as "van accessible".

#### Doors

Exterior and interior doors with closers have excessive operating forces and close in less than 6 seconds.

Interior doors lack tactile designation signage with some doors also having knob hardware and insufficient door pull clearance on the latch side of the door.

#### Women's Bathroom

The sink piping shut-offs are not wrapped. The faucets require pinching and twisting of the wrist. The towel dispenser is 2" too high. The stall door lacks an interior pull device. The coat hook is 7" too high. The side grab bar is 2" too low. The toilet paper dispenser is 3" too close to the front of the water closet.

A shower in the bathroom has a broken seat and side and rear grab bars that are 1" to 2" too high. It does not appear that this shower is used by staff. If the shower is put back into use, the seat would need to be re-attached and the grab bars lowered to a height of 33" to 36" a.f.f. to the top of the gripping surface. No further action to the shower is required at the present time.

#### Men's Bathroom

The sink piping shut-offs are not wrapped. The towel dispenser is 15" too high. The toilet paper dispenser is too close to the front of the water closet and is located over the grab bars. The water closet flush control is on the wrong side. The water closet is 1½" too close to the near wall. The side grab bar is 2¾" too low.

#### Areas Not Open to the Public

Men's Employee Bathroom/Lockers. Sink piping is not wrapped or insulated. The soap dispenser is 2" too high, the towel dispenser is 4" too high, the mirror is 15¼" too high, and the urinals (2) are 6" too high. A mirror and shelf on the accessible route of travel is a protruding object with a 6" protrusion at a height of 47" a.f.f. Water closet stalls are 29" x 52" with no maneuverability and no accessible features. A shower has a 4" abrupt change in level surface to enter with no accessible features. The shower is currently used solely for storage. Lockers require the use of fingers and pinching and twisting of the wrist to open with hooks and shelving that exceeds the reach range height of 48".

Lunch Room. The lunch room sink counter is too high and lacks knee clearance. Dispensers are too high. Doors lack tactile designation signage and have knob-style hardware. An eyewash station and first aid kit near the lunch room are near within reach range and/or usability for a person in a wheelchair.

Apparatus Bay and Shop Area. There is a 6" abrupt change in level surface into the shop area and into the apparatus bays. The doors lack tactile designation signage, have knob style hardware, and glass panes that are 17" too high (*Note: The doors are not on an accessible route of travel so the glass pane height is not a factor*).

The shop water closet stall is 31" x 56" with no maneuverability and no accessible features. A sink lacks knee clearance and dispensers are too high. A shower has a 4" abrupt change in level surface to enter with no accessible features. T

Mezzanine. The stairs to the mezzanine from the apparatus bay have open risers, railings that are rectangular and not round or oval in shape, and railings that lack bottom extensions. The stairs to the mezzanine/storage area from the office area have railings that are 2" too low and lack bottom extensions on the upper segment of railings. Doors in the mezzanine/storage area have knob hardware and lack tactile designation signage.

As all highway personnel must meet strict physical requirements for the essential functions of their job, unless the current practices and policies change and current non-public interior spaces are open to the general public and/or public business is conducted in these areas, physical modifications would be limited to those required as a result of a reasonable accommodation request. No modifications to these areas are required at the present time.

## DPW 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>
<b><u>Parking</u></b> The 2 designated accessible parking spaces lack striping. The signage is 2" and 4" too low. Neither space is designated as "van accessible".  See Photo DPW 1.	502	23	Stripe the spaces and a shared access aisle. The spaces and access aisle s/b 8 feet wide. Signage should be a minimum of 60" a.f.f. to the bottom of the sign and no more than 96" to the top. "Van accessible" signage s/b provided.	1	2	I	\$150
<b><u>Doors</u></b> Exterior and interior doors with closers (including bathrooms) have excessive operating forces and close in less than 6 seconds:  The following interior doors lack tactile designation signage: <ul style="list-style-type: none"> <li>• Engineering</li> <li>• Director's Office</li> <li>• Director's Office Closet</li> <li>• Administration</li> <li>• Administration Conference</li> <li>• Admin Conference Closet</li> <li>• Operations Office</li> <li>• Former Director's Office</li> <li>• Admin Egress Door</li> <li>• Admin Office to Stairs</li> <li>• Egress Doors (3)</li> <li>• Closets (2)</li> <li>• Door to Bays/Shop (2)</li> <li>• Men's Bathroom</li> <li>• Women's Bathroom</li> <li>• Employee Bathroom/Locker Room</li> </ul>	404.2.8 404.2.9	26.9 26.8	Adjust door closers such that the push/pull force does not exceed 5 lbs. for an interior door and 15 lbs. for and exterior door with door closing speeds of at least 6 seconds.	1, 2, 3	2	I	\$0
The doors (2) to the Apparatus Bay and Shop Area have knob style hardware.	703	41	Install accessible compliant signage on the latch side of each door 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).  Bathrooms require the Universal Symbol of Accessibility.	2, 3	2	I	\$1,000
The door from Engineering to the Lobby/Hallway has 0" clearance on the latch pull side of the door.  See Photos DPW 2, 3, and 4.	404.2	26.11	Replace the knob hardware with lever style hardware.	4	2	I	\$150
	404.2.4	26.6	A minimum of 18" of door pull clearance is required. As this is an interior employee office door, modifications would only be required due to a reasonable accommodation request, which could involve door reframing and modification on the installation of an automatic door opener.	4	3	L	TBD
<b><u>Women's Bathroom</u></b> The sink piping shut-offs are not wrapped.	606.5	30.9.5	Insulate the shut-offs.	3	2	I	\$25
The faucets require pinching and twisting of the wrist.	309	30.9.6	Replace the faucets with lever style.	3	3	I	\$250
The towel dispenser is 2" too high.	308	30.12	Lower the dispenser to a height of no more than 42" a.f.f. to the operating mechanism.	3	2	I	\$0
The stall door lacks an interior pull device.	604.8.1	30.6.1					
The coat hook is 7" too high.	308	306.1	Lower the coat hook to a height of no more than 48" a.f.f.	3	2	I	\$0

The side grab bar is 2" too low.	609.4	30.8.2	Raise the grab bar so that it is 33" to 36" a.f.f. to the top of the gripping surface.	3	2	1	\$0
The toilet paper dispenser is 3" too close to the front of the water closet.  See Photos DPW 5, 6, and 7.	604.7	30.7.6	Relocate the toilet paper dispenser so it is 7" to 9" o.c. to the front of the water closet.	3	2	1	\$0
<b>Men's Bathroom</b> The sink piping shut-offs are not wrapped.	606.5	30.9.5	Insulate the shut-offs.	3	2	1	\$25
The towel dispenser is 15" too high.	308	30.12	Lower the dispenser to a height of no more than 42" a.f.f. to the operating mechanism.	3	2	1	\$0
The toilet paper dispenser is too close to the front of the water closet and is located over the grab bars.	604.7	30.7.6 30.8.5	Relocate the toilet paper dispenser so it is 7" to 9" o.c. to the front of the water closet and not over the grabs.	3	2	1	\$0
The water closet flush control is on the wrong side	604.6	30.7.5	Replace the water tank or the water closet in entirety such that the flush control is on the wide or approach side.	3	3	1	Up to \$750
The water closet is 1½" too close to the near wall.	604.2	30.7.2	Relocate/modify the water closet so that it is 18" o.c. to the near wall.	3	3	1	Up to \$2,500
The side grab bar is 2¾" too low.  See Photo DPW 8.	609.4	30.8.2	Raise the grab bar so that it is 33" to 36" a.f.f. to the top of the gripping surface.	3	2	1	\$0

Total up to \$4,850

### DPW Accessibility Assessment Photos



Photo DPW 1

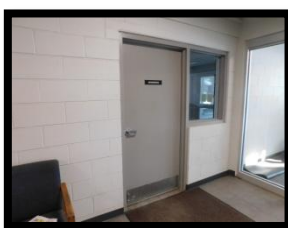


Photo DPW 2



Photo DPW 3

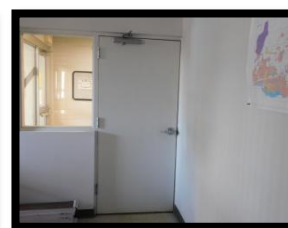


Photo DPW 4

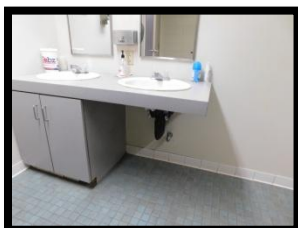


Photo DPW 5



Photo DPW 6

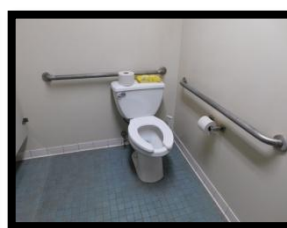


Photo DPW 7



Photo DPW 8



## **RECREATION DEPARTMENT BUILDING**

**Function and Description of Facility and Programs:** The Recreation Department Building is a one –story masonry structure totaling roughly 2,450 square feet. The building consists of a large open area, an office, 2 bathrooms, and storage rooms.



**Responsible Party:** Board of Selectmen and Recreation Commission.

### **General Description or Obstacle Which Limits Mobility or Access**

#### **Parking**

There are no designated accessible parking spaces.

#### **Exterior Accessible Route of Travel**

There is a 1½” to 2” abrupt change in level surface at the transition from asphalt to concrete walkway/ramp.

The running slope at the top of the ramp for a distance of 2 feet has a running slope of 8.6%.

The railings don’t go 12” parallel to the ground at the top and bottom of the ramp.

#### **Interior - General**

Doors with closers have excessive opening forces and close too fast.

Interior doors and rooms lack tactile designation signage (including bathrooms and egress doors) with some doors also having knob-style hardware. There is no signage noting the accessible egress. The 3 storage rooms and Director’s Office all have doorway clear widths of 30” to 30½”.

The 2 wall mounted sanitizers are both 48" a.f.f. to the operating mechanisms, which is compliant for adults. However, as children also use this facility, it is recommended (not required) that one of the sanitizers be lowered to a height of no more than 36" a.f.f. to the operating mechanism.

Three (3) fire pulls are 53" to 65" a.f.f. to the operating mechanism.

#### Exterior Egress Stairs

The railings on both of the stairs (2) do not extend the length of the stairs and lack bottom extensions.

#### Women's Bathroom

The sink piping is not wrapped, guarded, or insulated. The water closet flush control is on the wrong side. The toilet paper dispenser is located over the grab bars and is too close to the front of the toilet. The water closet is 1" too close to the near wall. The side and rear grab bars are only 30½" to the top of the gripping surface. The metal transition strip at the doorway is bent, not fully secured, and more than ¼" in height resulting in a tripping hazard.

#### Men's Bathroom

A trash barrel behind the door restricts the doorway clear width to only 30". The mirror is 3¾" too high. The sink piping is not wrapped, guarded, or insulated. The toilet paper dispenser is located over the grab bars and is too close to the front of the toilet. The water closet is 2½" too close to the far wall. The side and rear grab bars are only 30¾" to the top of the gripping surface.

### **Recreation Department Building Accessibility Assessment**

<b><u>General Description of Obstacle</u></b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Parking</u></b> 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	Stripe and designate at least one accessible parking space. If only one space provided, it s/b a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' wide parking space with an 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. Van accessible signage s/b provided.	1	2	I	Up to \$250
<b><u>Exterior Accessible Route of Travel</u></b> There is a 1½" to 2" abrupt change in level surface at the transition from asphalt to concrete walkway/ramp.	403.4	22.4	Modify the asphalt and concrete through grinding and/or infill to eliminate the abrupt changes in level surface.	1	2	I	\$0
The running slope at the top of the ramp for a distance of 2 feet has a running slope of 8.6%.	405.2	24.2	Due to the cost to modify the ramp vs. the benefit gained, seek a variance to retain the existing running slope.	1	1	I	\$0
The railings don't go 12" parallel to the ground at the top and bottom of the ramp.  See Photo Recreation 1.	505.10	24.5	Modify the railings such that they have 12" extensions parallel to the ground at the top and bottom of the railings.	1	3	N	Up to \$1,000+

<b><u>Doors and Clear Widths</u></b> Doors with closers have excessive opening forces and close too fast.  Twelve (12) interior doors (office, storage, basement, bathrooms, egress) lack tactile designation signage.  There is no directional signage for the accessible egress.  Three (3) storage room doors, one (1) door to the basement, and the men's bathroom door have knob style hardware.  The 3 storage rooms and Director's Office all have doorway clear widths of 30" to 30½".  See Photos Recreation 2, 3, and 4.	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.	2	2	I	\$0
	703	41.1	Install accessible compliant signage on the latch side of each door 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).  Bathroom signage must also include the Universal Symbol of Accessibility.	2, 3	1	I	\$600
	216.4 216.3	25.6	Provide tactile directional signage at the non-accessible egress denoting the front entrance as the accessible egress. Provide illuminated signage with the Universal Symbol of Accessibility at the accessible egress door.	4	2,3	I	\$250+
	407.2.7	26.11	Replace with lever style hardware.	2, 3	2	I	\$300
	404.2.3	26.5	As may be required due to a reasonable accommodation request, widen the doorways and replace the doors such that the clear width is at least 32".	2	3	L	TBD
<b><u>Reach Range</u></b> The 2 wall mounted sanitizers are both 48" a.f.f. to the operating mechanisms, which is compliant for adults. However, as children also use this facility, it is <u>recommended (not required)</u> that one of the sanitizers be lowered to a height of no more than 36" a.f.f. to the operating mechanism to address Children Ages 3 – 12, as well as Adults (Age 13 and up).  Three (3) fire pulls are 53" to 65" a.f.f. to the operating mechanism.	308	6.5 6.6	Lower one sanitizer to a height of no more than 36" to the operating mechanism.	2	2	I	\$0
	308	6.5 6.6	Lower at least one fire pull to a height of no more than 48" a.f.f. to the operating mechanism.	4	3	N	Up to \$350+
<b><u>Exterior Egress Stairs</u></b> The railings on both of the stairs (2) do not extend the length of the stairs and lack bottom extensions.  See Photo Recreation 5.	505	27.4	Modify/replace the railings on both stairs such that the railings extend the full length of the stairs with bottom extensions the slope distance of one tread then 12" parallel to the ground.	2	3	N	Up to \$3,500
<b><u>Bathrooms</u></b> <b><u>Men's and Women's Bathrooms</u></b> The sink piping is not wrapped, guarded, or insulated.  The toilet paper dispensers are located over the grab bars and are too close to the front of the water closet.	606.5	30.9.5	Wrap or insulate the piping.	3	2	I	\$150
	604.7	30.7.6 30.8.5	The toilet paper dispensers should be 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	3	2	I	\$0

24" a.f.f. and not located over the grab bars.							
The side and rear grab bars are only 30½" to 30¾" to the top of the gripping surface.	609.4	30.8.2	Raise the grab bars so they are 33" to 36" a.f.f. to the top of the gripping surface.	3	2	I	\$0
<u>Women's Only Bathroom</u> The water closet flush control is on the wrong side.	604.6	30.7.5	Modify the piping and flush control so it is on the wide or approach side.	3	3	N	Up to \$750
The water closet is 1" too close to the near wall.	604.2	30.7.2	Modify the water closet so it is 18" o.c. from the near wall.	3	3	N	Up to \$2,000
The metal transition strip at the doorway is bent, not fully secured, and more than ¼" in height resulting in a tripping hazard.	403.4 303.2	22.4	Replace or secure the metal transition strip so it is not a tripping hazard or serves as an abrupt change in level surface.	3	2	I	\$25
<u>Men's Bathroom</u> A trash barrel behind the door restricts the doorway clear width to only 30".	404.2.3	26.5	Remove and relocate the trash barrel.	3	2	I	\$0
The mirror is 3¾" too high.	603.3	30.11	Lower the mirror so it is no more than 40" a.f.f. to the bottom of the reflecting surface.	3	2	I	\$0
The water closet is 2½" too close to the far wall.	604.3	30.7.2	Due to the cost to reconstruct the bathroom to achieve the 42" required clearance, seek a variance to retain the existing water closet location.	3	1	I	\$0
See Photos Recreation 6, 7, and 8.							

Total up to \$9,275+

### Recreation Department Building Accessibility Assessment Photos



Photo Recreation 1



Photo Recreation 2

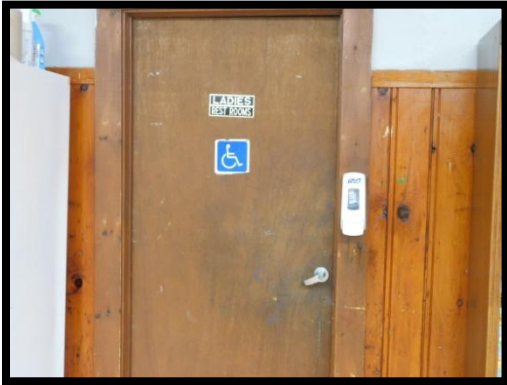


Photo Recreation 3



Photo Recreation 4



Photo Recreation 5



Photo Recreation 6



Photo Recreation 7

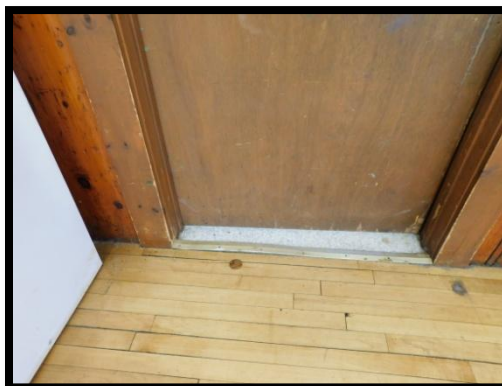


Photo Recreation 8



## **VETERAN'S CENTER BUILDING**

**Description of Facility and Programs:** The Veteran's Center is located at 487 Holyoke Street in a commercial plaza. The building is a one-story masonry building which includes a number of offices, bathrooms, and a large meeting room/food storage area.



**Responsible Party:** Board of Selectmen

### **General Description or Obstacle Which Limits Mobility or Access:**

#### Parking

The designated space lacks signage.

#### Main Entrance

There is a ½" unbeveled abrupt change in level surface at the transition from asphalt to concrete walkway.

The drop box is 13" too high. The ring doorbell is 5 ½" too high.

#### Doors and Doorways

Eleven (11) interior doors, including the egress door and staff bathroom, lack tactile designation signage. The public bathroom signage is not on the latch side of the door.

The egress door in the meeting room has an operating force in excess of 30 lbs. and closes in only 4 to 5 seconds.

#### Bathrooms

Public Bathroom. The towel and soap dispensers are up to 8½" too high. A cabinet in front of the water closet restricts the clear width. The side and rear grab bars are up to 1" too high.

Employee Bathroom. The first aid kit and towel and soap dispensers are all too high. The water closet is 1½” too close to the near wall. A cabinet in front of the water closet restricts the clear width to only 26½”. The side and rear grab bars are up to 1” too high.

### **Veteran’s Center Building Accessibility Assessment**

<b><u>General Description of Obstacle</u></b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Parking</u></b> The designated accessible space lacks signage.  See Photos Veteran’s 1.	502 703.7.2	23	Provide signage that 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 no more than 10’ in front of the space. “Van accessible” should also be provided.	1	2	I	\$100
<b><u>Main Entrance</u></b> There is a ½” unbeveled abrupt change in level surface at the transition from asphalt to concrete walkway.  The drop box is 13” too high. The ring doorbell is 5 ½” too high.  See Photo Veteran’s 2 and 3.	403.4  308	22.4.1  6.5 6.6	Modify the route of travel from the parking to the building through grinding, infill, or restoration to eliminate the abrupt change in level surface.  Lower the drop box and ring doorbell to a height of no more than 48” a.f.f.	1  1	2  2	I  I	\$50  \$0
<b><u>Doors and Doorways</u></b> Eleven (11) interior doors, including the egress door and staff bathroom, lack tactile designation signage. The public bathroom signage is not on the latch side of the door.           The egress door in the meeting room has an operating force in excess of 30 lbs. and closes in only 4 to 5 seconds.  See Photo Veteran’s 4.	703           404.2.8 404.2.9	41.1           26.9 26.8	Install or relocate accessible compliant signage on the latch side of each door 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). Bathroom signage must include the Universal Symbol of Accessibility.  Adjust the door closer such that the closing speed is at least 6 seconds and the operating force is no more than 15 lbs.	2, 3           2	2           2	I           I	\$550           \$0
<b><u>Bathrooms</u></b> <b><u>Public Bathroom</u></b> The towel and soap dispensers are up to 8½” too high.  A cabinet in front of the water closet restricts the clear width to less than 42”  The side and rear grab bars are up to 1” too high.  <b><u>Employee Bathroom</u></b> The first aid kit and towel and soap dispensers are all too high.	308  604.3  609.4  308	30.12  30.7.2  30.8.2  30.12 6.5 6.6	Lower the dispensers to a height of no more than 42” a.f.f.  Remove the cabinet.  Lower the grab bars so they are no more than 33” to 36” a.f.f. to the top of the gripping surface.  Lower the first aid kit to a height of no more than 48” a.f.f. Lower the towel and soap dispensers to a height of no more than 42” a.f.f.	3  3  3  3	2  2  2  2	I  I  I  I	\$0  \$0  \$0  \$0

The water closet is 1½" too close to the near wall	604.2	30.7.2	Modify the water closet so it is 18" o.c. from the near wall.	3	3	1	Up to \$3,500
A cabinet in front of the water closet restricts the clear width to only 26½".	604.3	30.7.2	Remove the cabinet.	3	2	1	\$0
The side and rear grab bars are up to 1" too high.	609.4	30.8.2	Lower the grab bars so they are 33" to 36" a.f.f. to the top of the gripping surface.	3	2	1	\$0
See Photos Veteran's 5 and 6.							

Total up to \$4,200

### **Veteran's Center Building Accessibility Assessment Photos**



Photo Veteran's 1



Photo Veteran's 2



Photo Veteran's 3



Photo Veteran's 4



Photo Veteran's 5



Photo Veteran's 6



## **WESTOVER MUNICIPAL GOLF COURSE CLUB HOUSE**

**Function and Description of Facility and Programs:** The one-story Westover Municipal Golf Course Club House consists of parking, a pro shop, office/meeting room, bar, dining area, kitchen, bathrooms, and storage rooms. There is also an outdoor sitting area on a concrete surface with picnic tables.



**Responsible Party:** Board of Selectmen, Municipal Golf Commission

### **General Description or Obstacle Which Limits Mobility or Access**

#### **Parking**

The apparent van accessible space lacks signage. The remaining passenger vehicle spaces have signage that is 12" to 24" too low.

The parking is located at the rear of the building and roughly 250 feet from a rear entrance/egress door.

#### **Exterior Accessible Route of Travel**

The accessible route of travel to the rear of the building is roughly 250 feet long. The route of travel is an asphalt paved way with paired railings. The initial approximately 42 feet has a running slope of up to 6.0%. There is no level landing at 30 feet. The lower railing has segments that are up to 22" a.f.f.

#### **Front Entrance**

There are 3 separate abrupt changes in level surface at the main entrance – 3½", 4" and 3" for a total of 10½". The double doors provide only 28" of clear width, which is further reduced to only 23½" at the crash bar when one door is in an open position.

#### **Outside Picnic Tables**

The 3 picnic tables on the concrete patio at the rear of the building lack knee depth.

### Interior - General

Doors with closers have excessive opening forces and close too fast.

Interior doors and rooms lack tactile designation signage (including bathrooms and egress doors) with some doors also having knob-style hardware. There is no signage noting the accessible egress.

The Pro Shop Office and Egress Door near the women's bathroom have doorway clear widths of 28" to 30".

Light switches, fire pulls, a score card drop box, and a defibrillator are all too high and vary from 51" to 56" a.f.f. to the operating mechanism.

The defibrillator and the opioid rescue kit are both protruding objects.

The Pro Shop counters are 2½" to 3¾" too high. The Bar counter is 9½" too high.

### Women's Bathroom

The sharps disposal is 14" too high and is also a protruding object. The air dryer is 2" too high and is also a protruding object. The light switch is 4" too high.

The sink piping is not wrapped, guarded, or insulated.

The accessible water closet stall door is not self-closing, lacks an interior pull device, and the locking mechanism requires the use of fingers and pinching and twisting of the wrist. There is no coat hook.

The toilet seat cover dispenser is 7" too high and located behind the water closet. The toilet paper dispenser is located over the grab bars and is 4" too far from the front of the water closet.

The side grab bar is 5" too low and is 5½" too far from the interior corner. There is no rear grab bar.

### Men's Bathroom

The doorway clear width is only 29". A partition and air dryer at the interior of the bathroom near the entrance restricts the accessible route clear width to only 32".

The sharps disposal is 11½" too high. The soap dispenser is 3" too high. The light switch is 6" too high.

The sink provides only 26¼" of knee height. The sink piping is not wrapped, guarded, or insulated.

The accessible water closet stall door is not self-closing, lacks an interior pull device, and the locking mechanism requires the use of fingers and pinching and twisting of the wrist. There is no coat hook.

The toilet seat cover dispenser is 8" too high and located behind the water closet.

The water closet is 3½" too far from the rear wall and is 16¼" too close to the front stall partition.

There is no rear grab bar.

## Westover Municipal Golf Course Club House 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><b><u>Parking, Exterior Accessible Route of Travel, and Main Entrance</u></b></p> <p>The apparent van accessible space lacks signage. The remaining passenger vehicle spaces have signage that is 12" to 24" too low.</p> <p>The parking is located at the rear of the building and roughly 250 feet from a rear entrance/egress door.</p> <p>The accessible route of travel to the rear of the building is roughly 250 feet long. The route of travel is an asphalt paved way with paired railings. The initial approximately 15 to 20 feet has a running slope of to 8.6% to 10%. There is no level landing at 30 feet, which is the maximum length for a ramp. The lower railings are 22½" to 23" a.f.f. to the top of the gripping surface. The upper railings are 38½" to 39" a.f.f. to the top of the gripping surface. The railings lack extensions.</p> <p>There are 3 separate abrupt changes in level surface at the main entrance – 3½", 4" and 3" for a total of 10½". The double doors provide only 28" of clear width, which is further reduced to only 23½" at the crash bar when one door is in an open position.</p> <p>See Photos Westover 1, 2, 3, 4, and 5.</p>	<p>502 208.3 405 505 403 404 206</p>	<p>23 23.3.1 24 22 25.2 26.5 26.10</p>	<p>Parking spaces complying with Sections 502 and 23 that serve a particular building or facility shall be located on the shortest accessible route from parking to the accessible entrance.</p> <p>The existing accessible parking signage s/b at least 60" to the bottom of the signs and no more than 96" to the top. Van accessible signage s/b provided at the van accessible space.</p> <p>The existing route of travel to the rear building s/b brought into compliance, however, accessible parking near the front entrance coupled with entry modifications are required.</p> <p>The accessible route of travel to the rear entrance should be reconstructed such that the running slopes in excess of 5.0% up to 8.3% do not extend more than 30 feet without a 5 foot level landing. The initial 15 to 20 feet of the route of travel needs reconstruction such that the running slopes do not exceed 8.3%. The lower ramp railings should be set at a height of 18" to 20" a.f.f. to the top of the gripping surface and the upper ramp railings should be set at a height of 34" to 38" a.f.f. to the top of the gripping surface. 12" railing extensions parallel to the ground are required at the top and bottom of the ramp.</p> <p>Construct two accessible parking spaces near the main entrance of the club house. It is recommended that the spaces are 8' wide with a shared 8' access aisle so both spaces are van 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 no more than 10' in front of the space. Van accessible signage s/b provided</p> <p>The front entrance needs to be modified including the approach and the doorway. The existing doors need to be replaced with a 36" wide door.</p> <p>Modify the entrance to eliminate the abrupt changes in level surface at the approach to the doorway as well as at the threshold. This would most likely involve the construction of a sloped approach into the building (5.0% or less running slope) or a ramp with railings that adheres to Sections 405 and 505 of the 2010 ADA Standards and Section 24 of 521 CMR.</p>	1	3	N	Up to \$120K
<p><b><u>Outside Picnic Tables</u></b></p> <p>The 3 picnic tables on the concrete patio at the rear of the building lack knee depth.</p>	<p>226.1 902</p>	<p>19</p>	<p>Provide an additional picnic table which provides the required 27" knee height, 30" clear width, and 19" knee depth.</p>	2	2	I	\$1,000
<p><b><u>Door Operating Forces and Closing Speeds</u></b></p> <p>The Level 2 egress door and door to #214 have excessive operating forces and close too fast.</p>	<p>404.2.8 404.2.9</p>	<p>26.8 26.9</p>	<p>Adjust the door closers such that the closing speed is at least 6 seconds and the operating force is no more than 15 lbs. for the egress door and no more than 5 lbs. for door #214.</p>	2	2	I	\$0

<b>Interior - General</b> Doors with closers have excessive opening forces and close too fast.  Approximately 17 interior doors and rooms lack tactile designation signage (including bathrooms and egress doors).  There is no signage noting the accessible egress.  The following doors have knob-style hardware. <ul style="list-style-type: none"> <li>Pro shop mechanical, pro shop office, storage in hallway to women's bathroom, large storage room behind women's bathroom, women's bathroom, egress door at women's bathroom, storage in women's bathroom, storage door in hallway to men's bathroom, egress near men's bathroom, egress in locker/storage room</li> </ul> The Pro Shop Office and Egress Door near the women's bathroom have doorway clear widths of 28" to 30".  Light switches, fire pulls, a score card drop box, and a defibrillator are all too high and vary from 51" to 56" a.f.f. to the operating mechanism.  The defibrillator and the opioid rescue kit are both protruding objects as they extend more than 4" into the accessible route of travel at a height of 27" to 80" a.f.f.  The Pro Shop counters are 2½" to 3¾" too high. The Bar counter is 9½" too high.  See Photos Westover 6, 7, 8, 9, and 10.	404.2.8 404.2.9	26.8 26.9	Adjust the door closers such that the closing speed is at least 6 seconds and the operating force is no more than 15 lbs. for the exterior doors and 5 lbs. for the interior doors.	1, 2, 3	2	I	\$0
	703	41	Install accessible compliant designation signage on the latch side of each door 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. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Bathroom signage must include the Universal Symbol of Accessibility.	2, 3	2	I	\$850
	216.4 216.3	25.6	Provide tactile directional signage at the non-accessible egress denoting the front entrance as the accessible egress. Provide illuminated signage with the Universal Symbol of Accessibility at the accessible egress doors.	2	2,3	I	\$250
	404.2.7 309.4	26.11	Replace with lever style hardware.	2, 3	2	I	\$750
	404.2.3	26.5	Modify the egress door and doorway such that the clear width is at least 32". Modify the Pro Shop Office door as may be required as a result of a reasonable accommodation request.	2	3	N	Up to \$3,500
	308	6.5 6.6	Lower the items so they are no more than 48" a.f.f. to the operating mechanism.	2	2,3	N	TBD
	307.2	20.6.1	Place a fixed object under the defibrillator and the opioid rescue kit for cane detection.	2	2	I	\$0
	902 904 226	7.2 17.4	Construct a 36" long by no more than 36" high a.f.f. counter at the Pro Shop or provide a 28" to 34" high table with 27" knee height adjacent to the counter. Ensure that at least one table next to the bar has a minimum of 27" knee height, 19" knee depth, 30" clear width, and is 28" to 34" a.f.f. to the top of the table.	2	2	N	Up to \$350

<b>Women's Bathrooms</b> The sharps disposal is 14" too high and is also a protruding object. The air dryer is 2" too high and is also a protruding object as it extends more than 4" into the accessible route of travel at a height of 27" to 80" a.f.f. The light switch is 4" too high.  The sink piping is not wrapped, guarded, or insulated.  The accessible water closet stall door is not self-closing, lacks an interior pull device, and the locking mechanism requires the use of fingers and pinching and twisting of the wrist. There is no coat hook.  The toilet seat cover dispenser is 7" too high and located behind the water closet.  The toilet paper dispenser is located over the grab bars and is 4" too far from the front of the water closet.  The side grab bar is 5" too low and is 5½" too far from the interior corner. There is no rear grab bar.  See Photos Westover 11, 12, and 13.	308 307.2	6.5 6.6 30.12 20.6.1	Lower the air dryer so it is no more than 42" a.f.f. to the operating mechanism. Lower the sharps disposal and light switch so they are no more than 48" a.f.f.  Place a fixed object under the air dryer for cane detection.	3  3	2,3  2	N  I	Up to \$750+  \$0
	606.5	30.9.5	Wrap or insulate the piping.	3	2	I	\$75
	604.8 309.4 603.4	30.6.1 39.5 30.6.1	Modify/adjust the stall door so that it fully self-closes. Install an interior pull device and a coat hook. The coat hook s/b no more than 48" a.f.f. Replace the locking mechanism with one that can be operated with a closed fist or loose grip.	3	2	I	Up to \$150
	205 308	30.12	Relocate the toilet seat cover dispenser so it is on an accessible route of travel, no more than 48" a.f.f., and not over the grab bars.	3	2	I	\$0
	604.7	30.7.6 30.8.5	Toilet paper dispensers should be 7" minimum and 9" maximum in front of the water closet measured to the centerline of the dispenser, at least 24" a.f.f., and not located over the grab bars.	3	2	I	\$0
	609.4 604.5	30.8	Both 42" long side and rear grab bars are required. The grab bars should be mounted at a height of 33" to 36" a.f.f. to the top of the gripping surface. The rear grab bar s/b located no more than 6" from the interior corner and the side grab bar no more than 12".	3	2	I	\$175
<b>Men's Bathroom</b> The doorway clear width is only 29". A partition and air dryer at the interior of the bathroom near the entrance restricts the accessible route clear width to only 32".  The sharps disposal is 11½" too high. The soap dispenser is 3" too high. The light switch is 6" too high.  The sink provides only 26¼" of knee height.  The sink piping is not wrapped, guarded, or insulated.  The accessible water closet stall door is not self-closing, lacks an interior pull device, and the locking mechanism requires the use of fingers and pinching and twisting of the wrist. There is no coat hook.  The toilet seat cover dispenser is 8" too high and located behind the water closet.  The water closet is 3½" too far from the near wall and is 16¼" too close to the front stall partition.	404.2.3 403.5	26.5 20.3	Modify/reconstruct the doorway so the clear width is at least 32". Replace the existing partition with a shorter partition to achieve the minimum required 36" clear width.	3	3	N	Up to \$2,500
	308	6.5 6.6 30.12	Lower the soap dispenser so it is no more than 42" a.f.f. to the operating mechanism. Lower the sharps disposal and light switch so they are no more than 48" a.f.f.	3	2,3	I	Up to \$750+
	306.3	30.9.3	Modify/raise the sink so it provides a minimum of 27" of knee height.	3	3	I	Up to \$2,000
	606.5	30.9.5	Wrap or insulate the piping.	3	2	I	\$75
	604.8 603.4 309.4	30.6.1 39.5 30.6.1	Modify/adjust the stall door so that it fully self-closes. Install an interior pull device and a coat hook. The coat hook s/b no more than 48" a.f.f. Replace the locking mechanism with one that can be operated with a closed fist or loose grip.	3	2	I	Up to \$150
	205 308	30.12	Relocate the toilet seat cover dispenser so it is on an accessible route of travel, no more than 42" a.f.f., and not over the grab bars.	3	2	I	\$0
	604.2 604.3	30.7.2	Modify the accessible stall and relocate the water closet so that the water closet is 18" o.c. to the near wall, 42" o.c. to the far wall or nearest object, and has 42" clear width in front of the toilet.	3	3	N	Up to \$3,500+

There is no rear grab bar.  See Photos Westover 14, 15, and 16.	604.5	30.8	Install a 42" long rear grab bar. The grab bar should be mounted at a height of 33" to 36" a.f.f. to the top of the gripping surface and located no more than 6" from the interior corner.	3	2	1	\$175
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Total up to \$137,000+

### **Westover Municipal Golf Course Club House Accessibility Assessment Photos**



Photo Westover 1



Photo Westover 2



Photo Westover 3



Photo Westover 4



Photo Westover 5

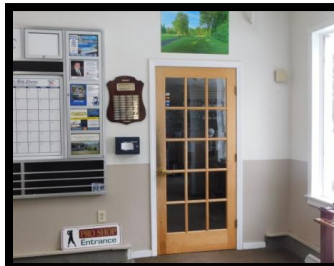


Photo Westover 6

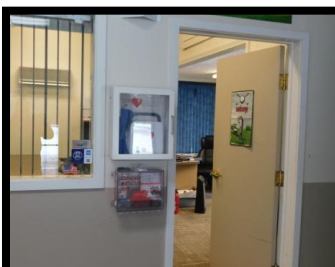


Photo Westover 7

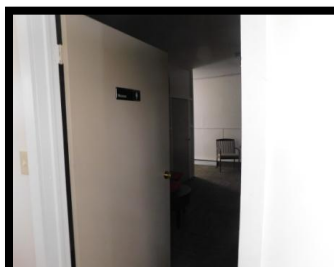


Photo Westover 8

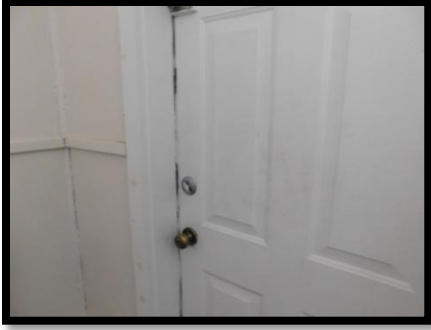


Photo Westover 9

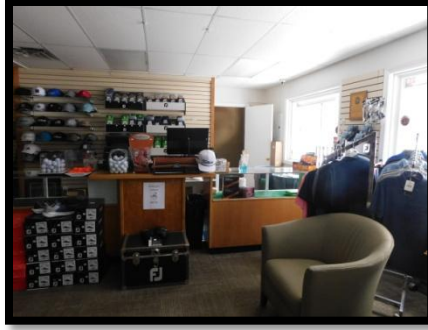


Photo Westover 10



Photo Westover 11



Photo Westover 12

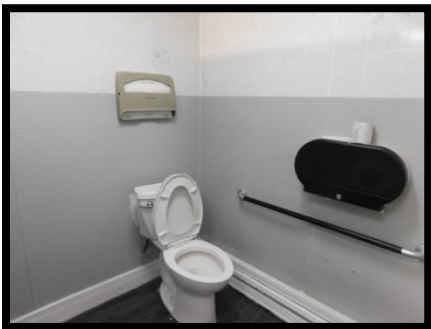


Photo Westover 13

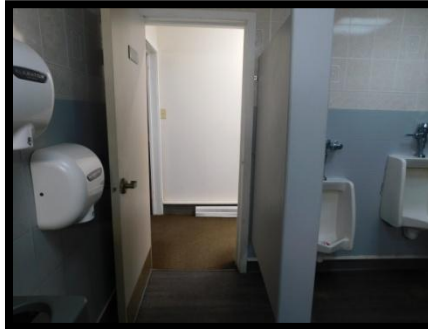


Photo Westover 14

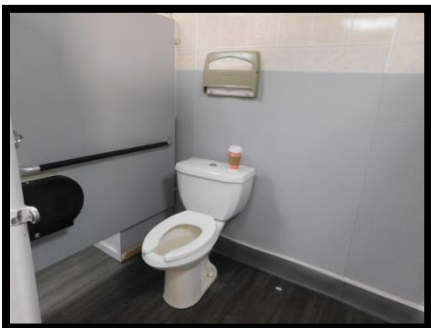


Photo Westover 15

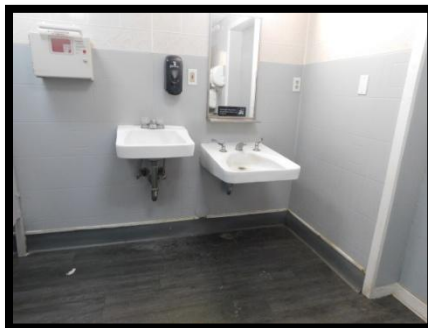


Photo Westover 16



## **SCHOOL CENTRAL OFFICE BUILDING**

**Description of Facility and Programs:** The Ludlow School Central Office Building is located adjacent to Harris Brook Elementary School on Fuller Street. The building is a 2-story, roughly 6,400 sq. ft. masonry structure that was constructed in 2021.



**Responsible Party:** Board of Selectmen and School Committee

### **General Description or Obstacle Which Limits Mobility or Access:**

#### **Main Entrance**

The air phone buzzer is 7" too high.

#### **Level 1**

The entrance lobby alarm box is a protruding object with a 5½" protrusion at a height of 46½" a.f.f.

The defibrillator is 9" too high.

The door by the machine room lacks tactile designation signage.

A # of doors have glass panes that are 1½" too high, but have adjacent side glass panels that allow for viewing, so no further action is required.

The bathroom door has an operating force of 15 lbs. and closes in only 5 seconds. The sink is 1" too high and has piping that is not wrapped, guarded, or insulated.

#### **Level 2**

The egress door and door to #214 have excessive operating forces and close too fast.

An outside picnic table has only 10¼" of knee depth.

The following interior doors lack tactile designation signage: #202 interior door to conference room, #206 legal compliance interior door, custodian closet next to #214, and #210 conference room to superintendent's office.

The signage for #202 (superintendent's office) is 15" too low.

The door to #201 has a glass pane that is 1" too high and lacks side glass panes.

Bath Room (left side). The bathroom door has an operating force of 15 lbs. and closes in only 4 seconds. The toilet paper dispenser is 3" too close to the front of the water closet. The sink piping is not wrapped, guarded, or insulated.

Bath Room (right side). The bathroom door has an operating force of 15 lbs. and closes in only 5 seconds. The sink piping is not wrapped, guarded, or insulated.

### **School Central Office Building Accessibility Assessment**

<b><u>General Description of Obstacle</u></b>	<b><u>2010 ADAAG</u></b>	<b><u>MAAB 521 CMR</u></b>	<b><u>Type of Action to be Taken</u></b>	<b><u>P</u></b>	<b><u>F</u></b>	<b><u>TF</u></b>	<b><u>Cost Estimate</u></b>
<b><u>Reach Range</u></b> The main entrance air phone buzzer is 7" too high.  The Level 1 defibrillator is 9" too high.  <a href="#">See Photo Central 1.</a>	308  308	6.5 6.6  6.5 6.6	Lower the air phone buzzer and the defibrillator to a height of no more than 48" a.f.f. to the operating mechanisms.	2	2.3	I	\$0 to TBD
<b><u>Protruding Objects</u></b> The entrance lobby alarm box is a protruding object with a 5½" protrusion at a height of 46½" a.f.f.  <a href="#">See Photo Central 2.</a>	307.2	20.6.1	Place a fixed object for cane detection under the alarm box.	2	2	I	\$0
<b><u>Doors with Glass Panes</u></b> The door to #201 has a glass pane that is 1" too high and lacks side glass panes.  <a href="#">See Photo Central 3.</a>	404.2.11	NA	Frost or block the glass pane.	2	2	I	\$0
<b><u>Doors and Doorways</u></b> The following doors lack tactile designation signage:  <u>Level 1</u> <ul style="list-style-type: none"> <li>Door by machine room</li> </ul> <u>Level 2</u> <ul style="list-style-type: none"> <li>#202 interior door to conference room</li> <li>#206 legal compliance interior door</li> <li>Custodian closet next to #214</li> <li>#210 conference room to superintendent's office.</li> </ul> In addition, The signage for #202 (superintendent's office) is 15" too low.  <a href="#">See Photo Central 4.</a>	703	41.1	Install or relocate accessible compliant signage on the latch side of each door 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	\$250

<b>Door Operating Forces and Closing Speeds</b> The Level 2 egress door and door to #214 have excessive operating forces and close too fast.	404.2.8 404.2.9	26.8 26.9	Adjust the door closers such that the closing speed is at least 6 seconds and the operating force is no more than 15 lbs. for the egress door and no more than 5 lbs. for door #214.	2	2	I	\$0
<b>Picnic Tables</b> An outside picnic table has only 10% of knee depth.  <b>See Photo Central 5.</b>	226.1 902	19	Provide an additional picnic table which provides the required 27" knee height, 30" clear width, and 19" knee depth.	2	2	I	\$1,000
<b>Bathrooms</b> The Level 1 and Level 2 bathroom doors (2) have operating forces of 15 lbs. and close in only 4 to 5 seconds.  The Level 1 sink is 1" too high.  The Level 1 and Level 2 bathrooms (2) have piping that is not wrapped, guarded, or insulated.  The Level 2 left side bathroom toilet paper dispenser is 3" too close to the front of the water closet.	404.2.8 404.2.9  606.3  606.5  604.7	26.8 26.9  30.9.2  30.9.5  30.7.6	Adjust the door closers such that the closing speed is at least 6 seconds and the operating force is no more than 5 lbs.  Lower the sink to a height of no more than 34" a.f.f. to the sink rim.  Wrap, guard, or insulate the piping.  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  3  3	2  3  2	I  N  I	\$0  Up to \$1,500  \$225  \$0

Total up to \$2,875

### **School Central Office Building Accessibility Assessment Photos**

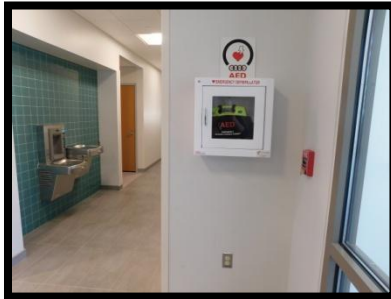


Photo Central 1



Photo Central 2



Photo Central 3

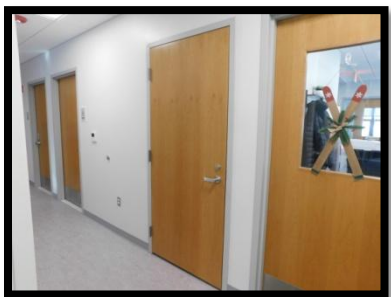


Photo Central 4



Photo Central 5



Photo Central 6

## **LUDLOW GRANGE BUILDING**

**Description of Facility and Programs:** The Ludlow Grange Building is a 2-story wooden frame structure that was built in 1783. The building is within the Ludlow Center Historic District which is listed on the National Register of Historic Places.



**Responsible Party:** Board of Selectmen

### **General Description or Obstacle Which Limits Mobility or Access:**

#### Parking

The designated accessible parking lacks striping and has running slopes of up to 4.5%. The signage is 3" too low.

#### Accessible Route of Travel

The paver and asphalt route of travel from the parking area to the building front entrance has cross slopes of 2.0% to 4.8%. The route of travel to the side door is grass only.

#### Entrance

The stairs have risers that are not uniform and vary from 6½" to 8" in height. The railings are 32" a.f.f. to the top of the gripping surface, which are 2" too low. In addition, the railings are not round or oval in shape and lack bottom extensions.

The main entrance door has only 29" of clear width when one door is an open and fixed position. The door has knob-style hardware.

There is no compliant means of access into the building.

## Main Level

The main level has 12 doors that lack tactile designation signage and 9 doors, including the front door and rear egress door with knob style hardware.

The interior double doors, door to the kitchen, front rooms (3), and egress by the kitchen have non-compliant clear widths that vary from 28" to 31".

Seven (7) doorways, including the interior double doors have unbeveled threshold heights of 1/2" or more. In addition, there is a 5¼" abrupt change in level surface at the kitchen egress.

The front room coat rack is 21" too high. A wall mounted fire extinguisher near the kitchen is more than 48" a.f.f. The front rooms have ceiling lights with pull strings that are not within reach range and require the use of fingers and twisting of the wrist.

The kitchen counters and sink vary in height from 34½" to 36" a.f.f. The sink lacks knee clearance and the cabinets lack hardware. The kitchen pass-through serving windows and counters are 36½" a.f.f., which are 2½" too high for a food service counter.

The former bathroom behind the kitchen has been "gutted" and remains open and unfinished.

## Level 2

The front stairs between the Main Level and Second Level have risers that are 8", which are 1" too high. The railings are 2" to 3" too low and lack top and bottom extensions.

The stage has stairs that lack railings. The rear egress from the stage lacks railings and has 8" risers. There is no vertical access to the stage from the assembly area.

Four (4) doors lack tactile designation signage and have knob-style hardware, including 2 doors on the stage.

A number of lights have lights with pull strings that are not within reach range and require the use of fingers and twisting of the wrist.

There is no compliant vertical access to the second level.

## Ludlow Grange 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>
<b><u>Parking</u></b> The designated accessible parking lacks striping and has running slopes of up to 4.5%. The signage is 3" too low.  <a href="#">See Photo Grange 1.</a>	502 703.7.2	23	Pave, stripe, and designate at least one van accessible parking space The van accessible space s/b at a width of either 11' with a 5' access aisle or 8' wide parking space with an 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. Van accessible signage s/b provided at the van accessible space. Slopes for the parking and access aisles should not exceed 2.0% in any direction.	1	3	N	Up to \$3,000+

<b><u>Accessible Route of Travel</u></b> The paver and asphalt route of travel from the parking area to the building has cross slopes of 2.0% to 4.8%. The route of travel to the side door is grass only.  See Photos Grange 2 and 3.	403	22 20.2	An accessible route of travel needs to be provided to all areas available to the public. Construct an accessible route of travel either to the side or front door.  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.	1	3	N	Up to \$5,000+
<b><u>Exterior Front Entrance</u></b> The stairs have risers that are not uniform and vary from 6½" to 8" in height. The railings are 32" a.f.f. to the top of the gripping surface, which are 2" too low. In addition, the railings are not round or oval in shape and lack bottom extensions.  The main entrance door has only 29" of clear width when one door is an open and fixed position.  There is no compliant means of access into the building.  See Photos Grange 3, 4, and 5.	504.2 505  404.3  404.2.5 206.2.1	27.2 27.4  26.5  26.10 20.1	If the front stairs remain, the stone steps s/b replaced with ones that are uniform and no greater than 7" in height. 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, 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.  Install a door opener such that both doors open at the same time to achieve the required 32" clear width. Replace the door hardware with lever style or similar such that the door can be opened with a loose grip or closed fist.  In order to achieve accessibility, either the stairs will need to be replaced with a ramp or a ramp provided at the side entrance in accordance with Sections 405 and 505 of the 2010 ADA Standards and Section 24 of 521 CMR.  Actual costs will vary according to construction type and materials.	1	3,4	N	TBD – up to \$50K+
<b><u>Door Hardware</u></b> The main level has 9 doors, including the front door and rear egress door with knob style hardware. The second level has 4 doors with knob-style hardware.  See Photo Grange 6.	404.2	26.11	Replace the hardware with lever style or similar compliant door hardware.	1, 2	2	N	\$1,625
<b><u>Door Signage</u></b> The main level has 12 doors that lack tactile designation signage and the second level has 4 doors that lack tactile designation signage.  See Photo Grange 7.	703	41.1	Install accessible compliant tactile designation signage so that it is located on the latch side of each door 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).  Accessible bathrooms must also include the Universal Symbol of Accessibility.	2, 3	2	N	Up to \$800



<b>Doors and Doorways</b> <u>Main Level</u> The interior double doors, door to the kitchen, front rooms (3), and egress by the kitchen have non-compliant clear widths that vary from 28" to 31".  Seven (7) doorways, including the interior double doors have unbeveled threshold heights of 1/2" or more. In addition, there is a 5/4" abrupt change in level surface at the kitchen egress.  See Photos Grange 8, 9, 10, and 11.	404.2.3	26.5	Seek a variance from the minimum required 32" doorway clear width due to the historic nature of the building.	2	1	I	\$0
	404.2.5	26.10	Modify the threshold so it is no more than 1/4" unbeveled or 1/4" to 1/2" beveled with a no more than 1:2 slope.	3	2	N	Up to \$1,500+
<b>Reach Range</b> <u>Main Level</u> The front room coat rack is 21" too high. A wall mounted fire extinguisher near the kitchen is more than 48" a.f.f. The front rooms have ceiling lights with pull strings that are not within reach range and require the use of fingers and twisting of the wrist.  <u>Second Level</u> A number of lights have lights with pull strings that are not within reach range and require the use of fingers and twisting of the wrist.  See Photos Grange 12, 13, 14, and 15.	308	6.5 6.6	Provide a coat rack or coat hooks that are no more than 48" a.f.f. Lower the fire extinguisher to a height of no more than 48" a.f.f. Modify the lights/light switches to be within the 48" reach range and operable with a loose grip or closed fist and not require the use of fingers and pinching.	2	2,3	N	\$0 to TBD
<b>Main Level Kitchen</b> The kitchen counters and sink vary in height from 34 1/2" to 36" a.f.f. The sink lacks knee clearance and the cabinets lack hardware. The kitchen pass-through serving windows and counters are 36 1/2" a.f.f., which are 2 1/2" too high for a food service counter.  See Photos Grange 16 and 17.	804.3.2 306.3	32.2 32.6 32.7	Modify the counters and sinks so that they are no more than 34" a.f.f. at the top and there is a minimum of 27" knee clearance at the sink with guarded, wrapped, or insulated piping. Cabinet hardware should be installed that can be operable with a closed fist and not require use of the fingers. Provide at least one food serving counter at the pass-through windows at a height of no more than 34" a.f.f.	2	3	L	Up to \$12,000
<b>Interior Stairs</b> The front stairs between the Main Level and Second Level have risers that are 8", which are 1" too high. The railings are 2" to 3" too low and lack top and bottom extensions.  The stage has stairs that lack railings. The rear egress from the stage lacks railings and has 8" risers.  See Photos Grange 18, 19, and 20.	504 505	27	Due to the historic nature of the building as well as the cost and extensive alterations to bring into compliance, seek a variance to retain the existing interior stairs and railings.	2	1	I	\$0
			The stage appears to be solely used for storage. Continue to use the stage for storage or for the display of items and restrict use as a performance area. Public access to the stage and rear stairs would be prohibited. As a result, modifications would only be required as a result of a reasonable accommodations request.	2	1	I	\$0
<b>Stage</b> There is no vertical access to the stage from the assembly area.  See Photo Grange 21.	206	20 14.6	Option #1: Close and prohibit future use of the stage.	2	1	I	\$0
			Option #2: Provide a vertical lift or an inclined wheelchair lift (as allowable) to achieve access to the stage from the assembly area.	2	3	L	Up to \$15,000



<b><u>Bathroom</u></b> The former bathroom on the main level behind the kitchen has been “gutted” and remains open and unfinished.  See Photo Grange 22.	603 604 606 609	30	The bathroom(s) must be constructed in accordance with Sections 603, 604, 606, and 609 of the 2010 ADA Standards and Section 30 of 521 CMR.	3	3	L	TBD
<b><u>Accessible Route of Travel between Levels</u></b> There is no compliant vertical access to the second level.	402 403	20	If items are on display on the second level, then accommodations must be made to provide for similar or equal viewing on the first level through a print catalogue or digital/computer catalogue. No public meetings or events should occur on the 2 <sup>nd</sup> Level. If meetings and events occur on the 2 <sup>nd</sup> level, then access via a platform lift or elevator may be required.	2	2	N	TBD

Total of \$88,925+

### **Ludlow Grange Building Accessibility Assessment Photos**



Photo Grange 1



Photo Grange 2

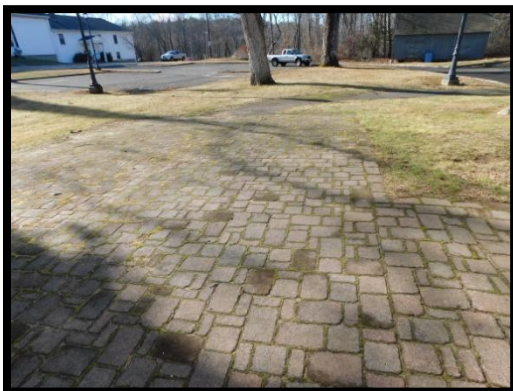


Photo Grange 3



Photo Grange 4

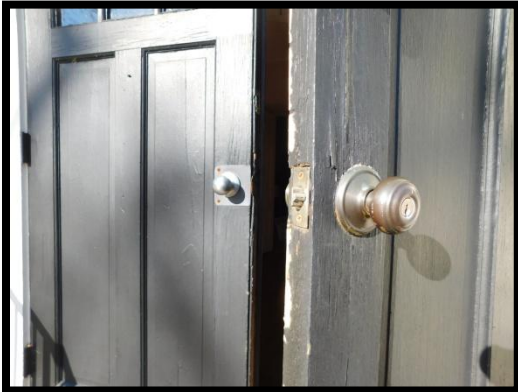


Photo Grange 5

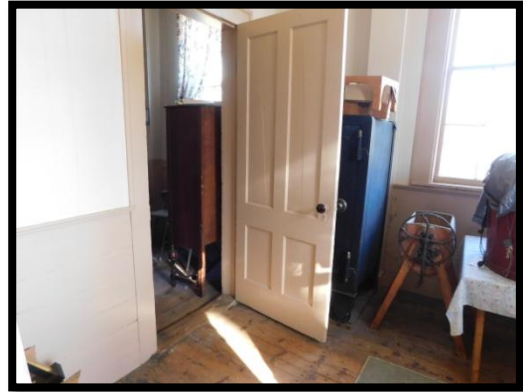


Photo Grange 6



Photo Grange 7



Photo Grange 8



Photo Grange 9



Photo Grange 10



Photo Grange 11



Photo Grange 12



Photo Grange 13



Photo Grange 14



Photo Grange 15

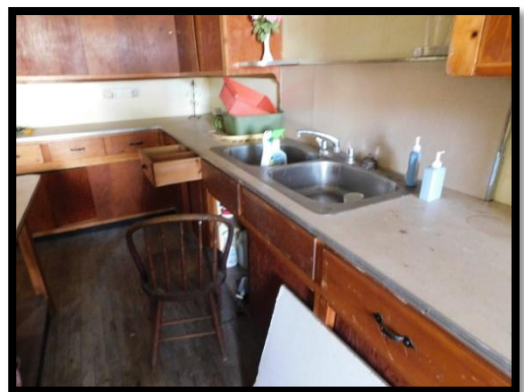


Photo Grange 16



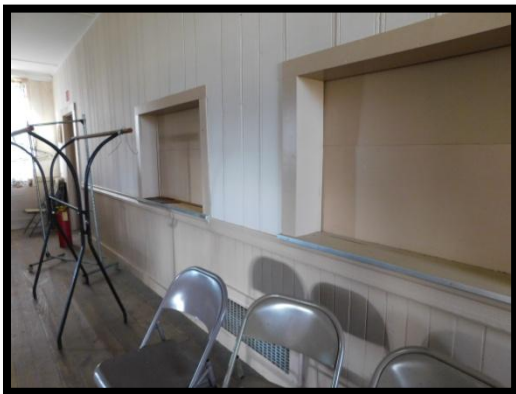


Photo Grange 17

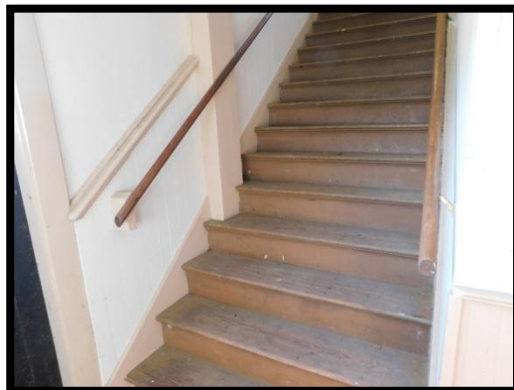


Photo Grange 18



Photo Grange 19



Photo Grange 20



Photo Grange 21



Photo Grange 22

## **FORMER SCHOOL ADMINISTRATION BUILDING**

**Function and Description of Facility and Programs:** The Former School Administration Building is located at 63 Chestnut Street. The building is a 2-story 12,068 s.f. masonry building that was built in 1882. There is also a partially finished basement. The building is currently vacant.



**Responsible Party:** Board of Selectmen

**General Description or Obstacle Which Limits Mobility or Access:** The building is predominately non-compliant under both the 2010 ADA Standards for Accessible Design and the 521 CMR Massachusetts Architectural Access Board Regulations.

### Parking

The sole accessible parking space lacks signage and is for a passenger vehicle only.

### Exterior Stairs

The side entrance exterior stairs have railings that are not round or oval in shape, are only 31" a.f.f. to the top of the gripping surface, and lack compliant bottom extensions. The risers are not uniform as they vary in height from 6½" to 8½" and also exceed the maximum riser height of 7" under the 2010 ADA Standards. The stairs adjacent to the ramp lack railings and the risers vary from 7½" to 8" in height. [See Photos School 1 and 2.](#)

### Exterior Ramp

The ramp lacks extensions 12" beyond the top of the ramp near the entrance. [See Photo School 3.](#)

### Doors

Doors with closers exceed the maximum operating force of 5 lbs. for an interior door and 15 lbs. for an exterior door. In addition, the doors do not take at least 6 seconds to close.

Fifty-three (53) doors in the building (Level 1, Level 2, and basement) have non-compliant knob-style hardware. Fifty-seven (57) doors in the building lack tactile designation signage. Two (2) doors on Level 1 have locking mechanism that require pinching and twisting of the wrist and fingers. [See Photo School 4.](#)

Fourteen (14) doorway thresholds have ½" or more unbeveled changes in level surface.

At least twenty-five (25) doorways, including hallway doors, have less than the required 32" doorway clear width.

Three (3) doors on Level 2 have glass panes that are too high. (*Note: Under the 2010 ADA Standards doors on an accessible route of travel cannot have glass panes that are higher 43" a.f.f. to the bottom of the pane).*

### Interior Stairs

The 2 side entrance stairs have railings on one side only or none at all. The railing lacks a bottom extension, is 4" too low, is not round or oval in shape, and is ½" too wide. Both stairs have risers that are ½" too high. [See Photo School 5.](#)

The 2 main set of stairs between Levels 1 and 2 have railings that are 5" too low, not round or oval in shape, ½" too wide, not fully continuous, and lack top and bottom extensions. [See Photo School 6.](#)

The 2 sets of stairs to the basement have railings that are 4" too low, ½" too wide, not round or oval in shape, and lack bottom extensions where feasible. In addition, the stairs are a protruding object in the basement due to reduced headroom on the accessible route of travel. [See Photo School 7.](#)

### Floor Grates

Four (4) floor grates on Level 1 have grate openings that exceed the maximum allowed opening of ½". [See Photo School 8.](#)

### Drinking Fountains

Drinking fountains on Levels 1 and 2 are "high" only and not the required "high – low" type of fountain. [See Photos School 9 and 10.](#)

### Reach Range

Fire extinguishers, fire alarm pulls, telephones, dispensers, and light switches exceed the maximum reach range of 48" a.f.f.

### Classroom and Hallway Sinks

Three (3) hallway sinks and two (2) classroom sinks lack the minimum required 27" knee height and 9" minimum toe depth. If piping was exposed, it was not wrapped, guarded, or insulated. The Level 2 staff room sink is 2 ¾" too high. The Basement hallway sink has faucets that require pinching of the fingers and twisting of the wrist. [See Photos School 11, 12, and 13.](#)

## Bathrooms

Level 1 Inclusive Room Bathroom. The sink lacks knee clearance. The water closet lacks compliant near side and far side clear width. The toilet paper dispenser is too close to the front of the water closet. There is only a side grab bar, which is also 10" too short. The light switch is 2" too high. [See Photo School 14.](#)

Level 2 Bathroom. There is only 25" of clear width at the doorway. The locking mechanism requires the use of fingers and pinching and twisting of the wrist. The sink lacks knee clearance. The water closet is 1" too low, lacks compliant near side and far side clear width, and has the flush control on the wrong side. The toilet paper dispenser is behind the water closet. The side grab bar is 10" too short. [See Photo School 15.](#)

Basement Bathrooms. There is one single user stall bathroom in the basement and 2 larger bathroom areas each with 4 individual stalls. The single user stall has only 30" of clear width at the doorway; a sink with no knee clearance; a mirror that is too high; a toilet paper dispenser that is too far from the front of the water closet; a water closet rim that is too high; insufficient near side, far side, and front water closet clear widths; and no grab bars. The individual stalls in the larger bathroom areas are wholly non-compliant due to insufficient water closet clear widths, dispenser locations and heights, toilet seat heights, and the lack of grab bars. [See Photo School 16, 17, and 18.](#)

## Internal Routes of Travel

There is no internal accessible route of travel between levels – Basement, Level 1, and Level 2. Vertical access is required via an elevator, limited use elevator, or a wheelchair platform lift. Under most construction options, additional compliance requirements would be triggered and in the case of an elevator or limited use elevator, full code compliance under 521 CMR due to the cost of the renovations vs. the value of the building would also be required. Vertical access modifications will also trigger additional structural, electrical, mechanical, fire alarm and plumbing alterations and modifications depending on location and what is required. An electrical upgrade would also be in order to accommodate the powering of the equipment. It will also may be necessary to stabilize the building with any future renovations, expansions, and modifications.

Accounting for unforeseen costs (15% contingency), demolition, finishes, general conditions including overhead and profit (20%), architect oversight, compliance with prevailing wage, and historic rehabilitation considerations (as applicable), construction costs will be considerable. This does not account for and include the costs for the previously identified areas of accessible non-compliance pertaining to the parking, exterior and interior stairs and railings, interior doors, bathrooms, and various other items.



**Former School Administration Building Accessibility Assessment Photos**



Photo School 1



Photo School 2

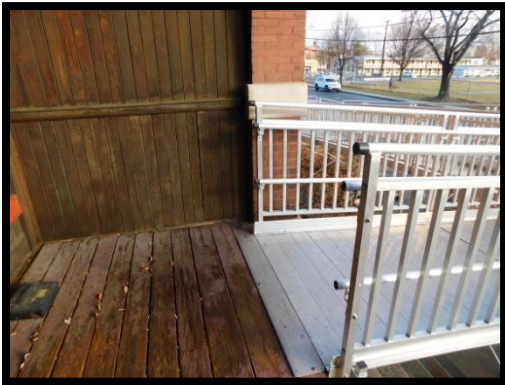


Photo School 3



Photo School 4

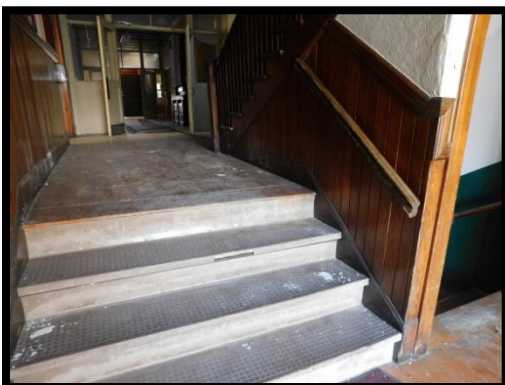


Photo School 5



Photo School 6



Photo School 7



Photo School 8



Photo School 9



Photo School 10



Photo School 11

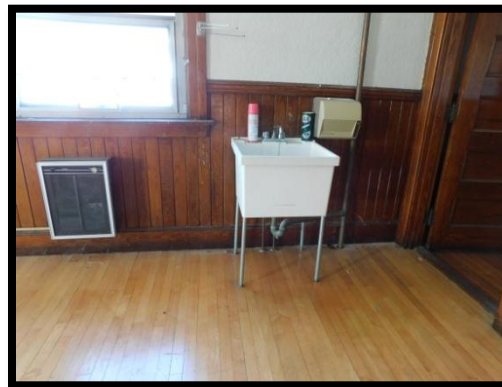


Photo School 12



Photo School 13

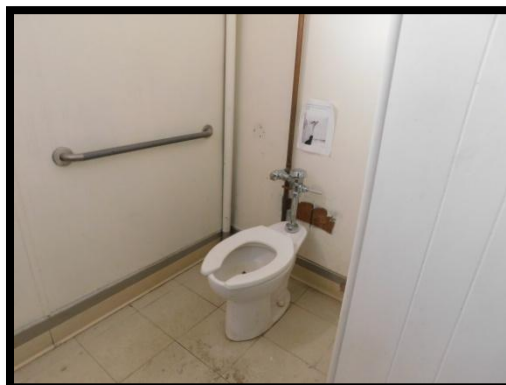


Photo School 14

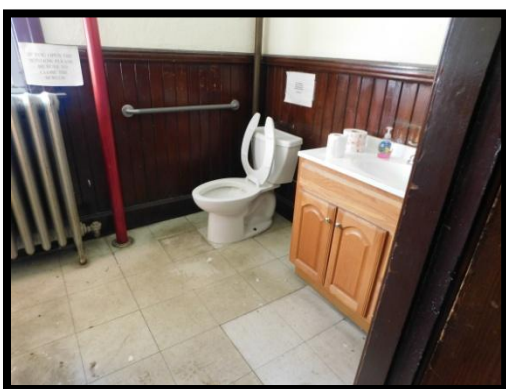


Photo School 15

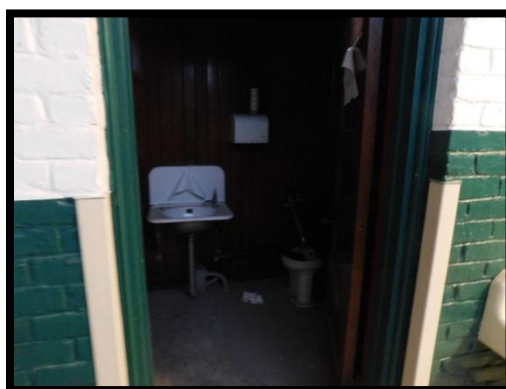


Photo School 16



Photo School 17

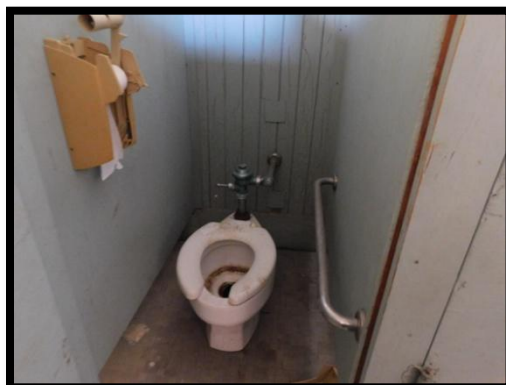


Photo School 18



## **FORMER HEAD START BUILDING**

**Function and Description of Facility and Programs:** The Head Start Building is located at 54 Winsor Street. The building is a 2-story 12,068 s.f. masonry building that was built in 1882. There is also a partially finished basement. The building is currently vacant. An elevator does provide vertical access to all 3 levels of the building.



**Responsible Party:** Board of Selectmen

**General Description or Obstacle Which Limits Mobility or Access:** The building is moderately compliant under both the 2010 ADA Standards for Accessible Design and the 521 CMR Massachusetts Architectural Access Board Regulations.

### **Parking**

There are 2 designated accessible parking spaces for the buildings, which are located near the entrance to the elevator. One space has cross slopes of up to 4.4%, signage that is not located in front of the space and which is 5" too high. The 2<sup>nd</sup> space lacks signage. The shared access aisle has a cross slope of 3.4%. [See Photos Head Start 1 and 2.](#)

### **Exterior Stairs**

The entrance on Park Place has risers that are not uniform and vary from 7½" to 8" in height. There is only one railing in the middle of the stairs which is 1" too low.

The Winsor Street entrance and entrance adjacent to Exit 7 Theater have risers that are not uniform and vary from 7" to 8" in height. The railings are 3" too low and are not round or oval in shape. The stairs adjacent to Exit 7 Theater has railings that lack bottom extensions. [See Photos Head Start 3 and 4.](#)

### Doors

Doors with closers exceed the maximum operating force of 5 lbs. for an interior door and 15 lbs. for an exterior door. In addition, the doors do not take at least 6 seconds to close.

Fifty-four (54) doors in the building lack tactile designation signage. In addition, the elevator jambs on the Main Level lack the required “tactile star”. [See Photo Head Start 5.](#)

Four (4) doors on Level 1, seven (7) doors on Level 2, four (4) doors in the Basement have glass panes that are too high. (*Note: Under the 2010 ADA Standards doors on an accessible route of travel cannot have glass panes that are higher 43” a.f.f. to the bottom of the pane*). [See Photo Head Start 6.](#)

Four (4) doorway thresholds have ½” or more unbeveled changes in level surface.

Eight (8) doorways have less than the required 32” doorway clear width.

### Interior Directional Signage

The entrance/exits that are not accessible by persons in wheelchairs lack signage clearly indicating the location of the accessible entrance/exit. The accessible egress also lacks the universal symbol of accessibility.

### Interior Stairs

The 2 side entrance stairs have railings that lack top and bottom extensions and which are 3” to 5” too low. Both stairs have risers that are ½” too high. [See Photo Head Start 7.](#)

The 2 main set of stairs between Levels 1 and 2 have railings that are 4” too low, not fully continuous in the interior, are not round or oval in shape, ½” too wide, , and lack top and bottom extensions. [See Photo Head Start 8.](#)

The 2 sets of stairs to the basement have railings that are 4” too low, ½” too wide, not round or oval in shape, and lack bottom extensions where feasible. In addition, the stairs are a protruding object in the basement due to reduced headroom on the accessible route of travel. [See Photo Head Start 9 and 10.](#)

### Floor Grates

The floor grate on Level 1 near the hallway double doors on Level 1 has grate openings that are ½ X 1½” and is not perpendicular to the route of travel. [See Photo Head Start 11.](#)

### Drinking Fountains

Drinking fountains on Levels 1 and 2 are “low” only with only 19” to 21” of knee clearance and not the required “high – low” type of fountain. In addition, piping below the Level 1 drinking fountain is not wrapped, guarded, or insulated. [See Photo Head Start 12.](#)

### Reach Range

Fire extinguishers, fire alarm pulls, telephones, dispensers, cook hooks, and and light switches exceed the maximum reach range of 48” a.f.f.

### Protruding Objects

Two (2) light fixtures in the stairwells between Levels 1 and 2 are 76" a.f.f. with 7" protrusions. A Level 1 wall mounted fire extinguisher in the hallway protrudes 5" into the accessible route of travel at a height of 48" a.f.f. A Basement Level mechanical box near the elevator protrudes 10" into the accessible route of travel at a height of 49½" a.f.f. *Note: 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".* See Photos Head Start 13 and 14.

### Classroom and Hallway Sinks

Four (4) Level 1 and Level 2 hallway and/or classroom sinks lack clearance. A Basement Level hallway sink is 2" too high and lacks knee clearance. See Photos Head Start 15 and 16.

### Bathrooms

Level 1 Hallway Bathroom. The tactile designation signage is on the door and not the latch side. The toilet paper dispenser is too close to the front of the water closet. There is only 40¾" clear width in front of the water closet. The rear grab bar is 1½" too far from the interior corner.

Level 1 Room Bathroom. There is no tactile designation signage. There is only 30" of clear width at the doorway. The sink, mirror, soap dispenser, and towel dispenser are all too high. The sink piping is not wrapped, guarded, or insulated. The sink faucets require pinching of fingers and twisting of the wrist. The water closet is 2" too low, has insufficient near side and far side clear width, has the flush control of the wrong side, and lacks grab bars. See Photo Head Start 17.

Level 2 Hallway Bathroom. The tactile designation signage is on the door and not the latch side. The bathroom appears to meet the standards for children in Grades 4-6. If so, then the following would be in non-compliance. The toilet paper dispenser is too close to the front of the water closet. The coat hook, light switch, and mirror are all too high. See Photo Head Start 18.

Basement Girl's Bathroom. There is no tactile designation signage. The bathroom appears to be designed for children in Grades K-3. The sink piping is not fully wrapped, guarded, or insulated. The accessible stall has a door that is not self-closing, lacks an interior pull device, and has a coat hook that is 16" too high. There is only 36" of front water closet clear width. The toilet paper dispenser is too high, located over the grab bars, and is too close to the front of the water closet. The side grab bar is 6" too far from the interior corner. See Photo Head Start 19.

Basement Boy's Bathroom. There is no tactile designation signage. The bathroom appears to be designed for children in Grades K-3. The sink piping is not fully wrapped, guarded, or insulated. The urinal is 1" too high. The accessible stall has a door that is not self-closing, lacks an interior pull device, and has a coat hook that is 18" too high. There is only 36" of front water closet clear width.

Basement Staff Bathroom Near Girl's Bathroom. The tactile designation signage is on the door and not the latch side. There is only 29½" clear width at the doorway. The light switch and coat hook are too high. The sink piping is not wrapped, guarded, or insulated. The water closet lacks

sufficient far side and front clear width. The sink also restricts the rear grab bar usage. The soap dispenser is partially over the grab bars. The toilet paper dispenser is too close to the front of the water closet. The bathroom lacks overall wheelchair maneuverability. See Photo Head Start 20.

Basement Staff Bathroom Near Boy's Bathroom. The tactile designation signage is on the door and not the latch side. The bathroom lacks overall wheelchair maneuverability. The water closet is 1" too low; lacks sufficient near, far, and front clear width; and lacks grab bars. The light switch and coat hook are too high. The sink piping is not wrapped, guarded, or insulated. See Photos Head Start 21 and 22.

### **Former Head Start Building Accessibility Assessment Photos**



Photo Head Start 1



Photo Head Start 2



Photo Head Start 3

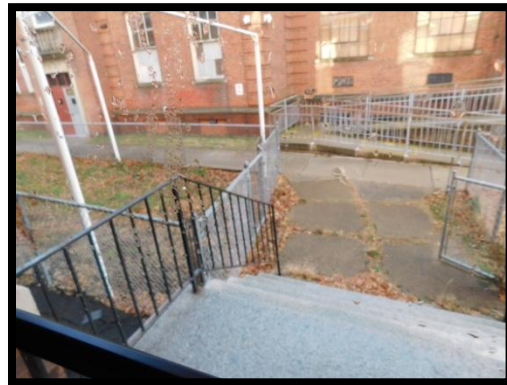


Photo Head Start 4



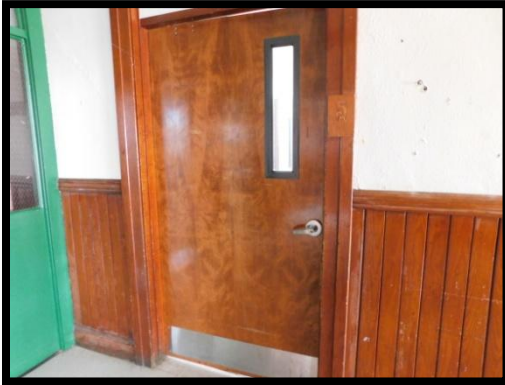


Photo Head Start 5

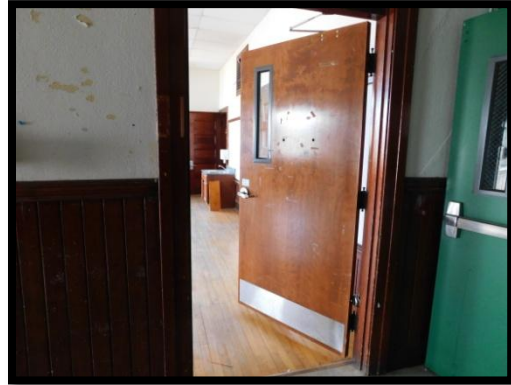


Photo Head Start 6



Photo Head Start 7

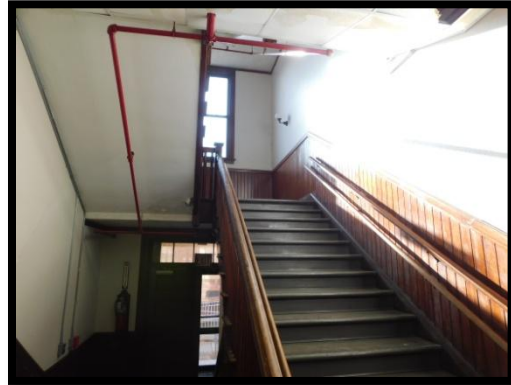


Photo Head Start 8

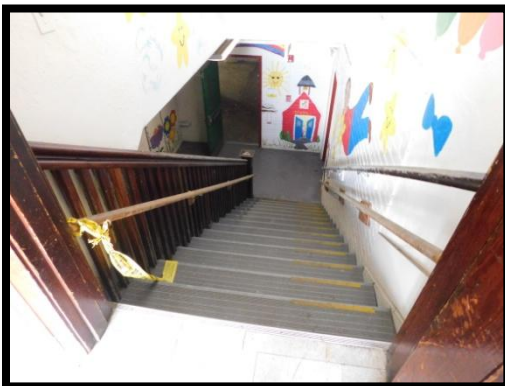


Photo Head Start 9



Photo Head Start 10



Photo Head Start 11



Photo Head Start 12

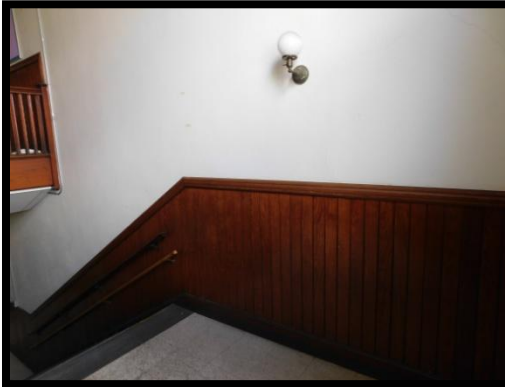


Photo Head Start 13



Photo Head Start 14



Photo Head Start 15

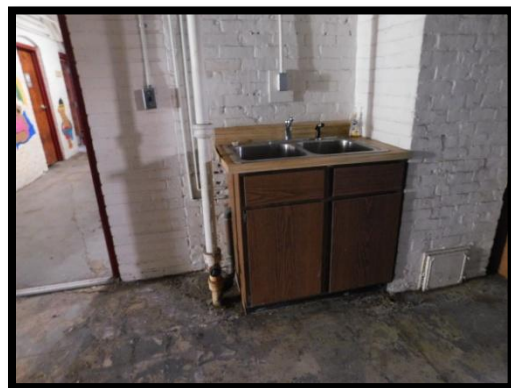


Photo Head Start 16



Photo Head Start 17



Photo Head Start 18



Photo Head Start 19



Photo Head Start 20

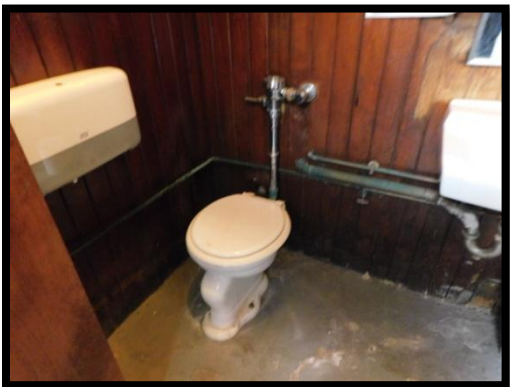


Photo Head Start 21



Photo Head Start 22



## **EAST STREET ELEMENTARY SCHOOL**

**Description of Facility:** East Street Elementary School is a masonry 2-story building which serves as a public school for Pre-kindergarten to Grade 1. The roughly 72,800 s.f. building was originally constructed in 1921 and had subsequent additions in 1959 and 1992.



**Responsible Party:** Board of Selectmen and School Committee

**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 3<sup>rd</sup> Grade, and 4<sup>th</sup> Grade through 6<sup>th</sup> 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 and adult areas at the East Street School.

	<u>2010 ADA Standards</u>	<u>521 CMR Standards</u>
Student Common Areas/Hallway Bathrooms	Ages 5 - 8	Grades K – 3
Student Pre-K Bathrooms	Ages 3 - 4	Pre-Kindergarten
Adult Only Areas and Bathrooms	Adult	Adult

#### Bathroom Standards for Pre-K (Ages 3 – 4)

Toilet Centerline	11" to 12" o.c. to the near wall 42" o.c. to the far wall or nearest object 42" in front of the water closet
Flush control	On wide or approach side
Toilet Seat Height	11" to 12½" a.f.f. to the top of the seat
Toilet Paper Dispenser Height	14" a.f.f.
Urinal	15" a.f.f. (maximum) to the rim
Grab Bar Height	18" a.f.f. to 20" a.f.f. to the top of the gripping surface
Grab Bar Location	No greater than 6" from the interior corner
Sink Height	No greater than 30" a.f.f. to top
Sink Knee Clearance	At least 25" a.f.f.
Mirror Height	No greater than 31 a.f.f. to the bottom of the reflecting surface
Reach Range (dispensers, coat hooks)	No greater than 36" a.f.f. (see below)

#### Bathroom Standards for K - 3 (Ages 5 – 8)

Toilet Centerline	11" to 15" o.c. to the near wall 42" o.c. to the far wall or nearest object 42" in front of the water closet
Flush control	On wide or approach side
Toilet Seat Height	12" to 15" a.f.f. to the top of the seat
Toilet Paper Dispenser Height	14" to 17" a.f.f.
Urinal	15" a.f.f. (maximum) to the rim
Grab Bar Height	20" a.f.f. to 25" a.f.f. to the top of the gripping surface
Grab Bar Location	No greater than 6" from the interior corner
Sink Height	No greater than 30" a.f.f. to top
Sink Knee Clearance	At least 25" a.f.f.
Mirror Height	No greater than 31 a.f.f. to the bottom of the reflecting surface
Reach Range (dispensers, coat hooks)	No greater than 36" a.f.f. (see below)

#### **Bathroom Reach Range Standards for Children**

##### 2010 ADA Standards

Section 308.1 of the 2010 ADA Standards provides guidance on reach ranges according to age in areas used primarily by children. The guidance for the reach range for Students Ages 3 through 4 is 20" (low minimum) to 36" (high maximum). The guidance for the reach range for Students Ages 5 through 8 is 18" (low minimum) to 40" (high maximum).

##### 521 CMR

Section 30.19 of 521 CMR (Children's Dispensers) states that "towel dispensers, drying devices, or other types of devices and dispensers shall have at least one of each device mounted within the *zone of reach*, and at least one of each device shall be located within reach of a person using the accessible sink.

- Section 5.00 (Definitions) defines *zone of reach* as an "operable mechanism is within reach if it meets either criteria outlined in 521 CMR 6.5 (Forward Reach) or 521 CMR 6.6 (Side Reach)".
- Section 6.5 (Forward Reach) identifies the maximum high forward reach as 48" a.f.f. and minimum low forward reach as 15" a.f.f.

- Section 6.6 (Side Reach) identifies the maximum high side reach as 54" a.f.f. and minimum low forward reach as 9" a.f.f.

Section 30.20 of 521 CMR (Children's Controls and Receptacles) states that "if controls, receptacles, or other equipment are provided, then at least one of each shall be mounted no higher than 36 inches above the floor to the centerline of the operable portion of the control".

Section 30.6 of 521 CMR (Adult Toilet Stalls) requires that a coat hook be provided in accessible stalls at a maximum of 54" above the floor (30.6.1.d).

Section 30.12 of 521 CMR (Adult Dispensers) states that "towel dispensers, drying devices, or other types of devices and dispensers shall have at least one of each device mounted within the zone of reach" and as referenced in Figure 30i. Figure 30i identifies the reach range height for dispenser as 42" a.f.f. to the centerline of the operable portion of the dispenser.

#### Reach Range Variations

Based on the above, the reach range for bathroom dispensers varies up to **36" a.f.f.** for Pre-K Students and up to **40" a.f.f.** for Kindergarten and Grade 1 Students under the ADA Standards but under 521 CMR is **42" a.f.f.** for adults. The reach range for dispensers for children's bathrooms is **48" a.f.f. (forward reach) to 54" a.f.f. (side reach)** based on 521 CMR Sections 30.19, 5.0, 6.5, and 6.6. The reach range for controls and receptacles in children's bathrooms is **36" a.f.f.** based on 521 CMR Sections 30.20

According to these conflicting standards, the reach range for a Pre-K and K Student's dispensers could be mounted up to 8" higher under 521 CMR. This clearly does not appear to be the intent of either Standard as common sense would dictate that a children's reach range should be lower than an adult's reach range.

#### Recommendation

**Considering the intent of the Standards and Regulations to have lower heights and ranges for children according to age or grade level, it is recommended that the dispenser heights and coat hooks in children's bathrooms should follow Section 30.20 of 521 CMR which would result in heights of no more than 36" a.f.f. to the centerline of the operable portion of the dispenser or the coat hook.**

#### **General Description or Obstacle Which Limits Mobility or Access:**

##### Parking

The van accessible spaces (shared 8 foot access aisle) has signage that is 5" to 7" too high. One space lacks "van accessible" denotation. The signage for the passenger vehicle accessible space has signage that is 22" too low.

##### Doors and Doorways

Doors with closers have excessive operating forces and close too fast. Doors lack tactile designation signage, have signage that is too high, or which is not on the latch side of the door. In addition, there is no directional signage for accessible entrance/egress. Doors with glass panes are up to 13 ½" too high under the 2010 ADA Standards.

### Reach Range and Protruding Objects

Items for adults (fire pulls, telephones, light switches, etc.) are not within the maximum 48" a.f.f. reach range height. Items for children (sanitizers, dispensers, coat hooks, hallway lockers, etc.) are not within the maximum 40" a.f.f. reach range height for K – Grade 1.

Hallway fire extinguisher signs, hallway valves, defibrillators, etc. are protruding objects into the accessible route of travel.

### Drinking Fountains

Drinking fountains are low only, not "high-low". A number of fountains have less than the minimum required 27" knee clearance under 521 CMR.

### Ramps

The Level 1 ramp near Room #107 is 2 feet 6 inches too long and has top railings that are ¼" to ½" too low. However, the ramp has running slopes that 5.0% or less so no further action is required.

The ramp near Entrance E has an upper railing that is ½" too low. As the cost to modify the railing would exceed the benefit gained, a variance should be sought, if so required.

### Stairs

The stairs to Level 2 near the elevator/Exit B from Level 1 has railings that are 3" to 4" too low.

The stairs to the Cafetorium Stage have risers that are ½" too high and lack railings. The stairs to the computer lab from the library have railings that are 1" too low, and non-compliant bottom extensions. The stairs to the Gym Stage have a railing on one side only which is also 3" too low and lacks top and bottom extensions.

### Accessible Routes of Travel

There is no accessible route of travel from the assembly area to the Cafetorium Stage. There is no accessible route of travel from the assembly area to the Gym Stage.

### Library

The clear width at a column reduces the clear width of the accessible route of travel to 18" and 19".

### Staff Room

The sink is 2" too high and lacks knee clearance.

### Courtyard

There is a 2" to 3" abrupt change in level surface from the concrete pad to the courtyard. There is no accessible route of travel to the picnic tables. Three (3) tables lack clear width and one (1) table is ½" too low for knee clearance and has only 12" of knee depth.

### Classrooms

A number of rugs in classrooms are loose and not fully secured and serve as a tripping hazard. Telephones and light switches are too high for adults. Sinks lack knee clearance and have bubblers that are too far from the leading edge of the cabinet. Dispensers are too high for students. Some classrooms have reduced pull clearance on the latch side of the door due to stored items.



Typically the desks and tables in classrooms did meet 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 or adjustable/compliant desks could be brought into a classroom to address an accommodation for knee clearance and/or clear width.

### Bathrooms

There are a total of 32 bathrooms (including the kitchen staff bathroom) in the building. This includes ten (10) Men's/Women's bathrooms on Level 1, two (2) Men's/Women's bathrooms on Level 2, eleven (11) Girl's/Boy's K-3 bathrooms on Level 1, four (4) Girl's/Boy's K-3 bathrooms on Level 2, and four (4) Pre-K bathrooms on Level 1. None of the bathrooms are accessible compliant. It was not clear if the alarms in the bathrooms were both audible and visual. If the building is fully wired, then audible and visual alarms will be required in each bathroom as well. There needs to be at least one accessible bathroom in each separate area where there is a non-accessible bathroom.

### Kitchen Area

The kitchen area itself has numerous elements of non-compliance (reach ranges, knee clearances, clear widths, etc.) but most of the activities undertaken require personnel who must meet certain physical requirements to meet the essential functions of their job. In addition, the bathroom lacks signage; has piping that is not wrapped and lacks knee depth; has a mirror that is 8" too high; a toilet paper dispenser that is too close to the water closet; and lacks grab bars. As this area is closed to the public and require personnel who must meet certain physical requirements to perform the essential functions of their position, unless dictated by a request for a reasonable accommodation, no further action is required at the present time.

### **Classroom Sinks and Classroom Sinks with Bubblers**

Typically school classrooms have sinks and/or sinks with bubblers (a.k.a. drinking fountains) in the classroom to allow children to wash their hands or to get a drink of water without leaving the classroom.

### 2010 ADA Standards

The 2010 ADA Standards addresses this as follows:

- Drinking fountains shall comply with Sections 307 (protruding objects) and 602 (drinking fountains).
- Clear floor space must adhere to Section 305 (generally 30" wide and a forward approach) with knee and toe clearance adhering to Section 306 (generally 9" a.f.f. toe clearance and 27" a.f.f. knee clearance). Section 606.2 allows a knee clearance of a minimum of 24" a.f.f. at lavatories and sinks used primarily by children ages 6 through 12 where the rim or counter surface is 31" maximum a.f.f.

Exception: A parallel approach complying with Section 305 is permitted for children's use (5 years and younger per Section 606.2) where the spout is 30" maximum a.f.f. and is 3½" maximum from the front edge.

- The spout outlet cannot exceed 36 inches a.f.f. (Section 602.4) and cannot be more than 5" from the front edge (Section 602.5).

- The spout shall provide a flow of water 4 inches high minimum with the angle of the water stream measured horizontally to the front face of the unit. For spouts located less than 3 inches from the front edge, the angle shall be 30 degrees maximum. For spouts located between 3 and 5 inches from the front edge, the angle shall be 15 degrees maximum (Section 602.6).
- Controls shall comply with Operable Parts (Section 309.4) such that they are operable with one hand and do not require tight grasping, pinching, or twisting of the wrist. The operating force cannot exceed 5 lbs.

#### 521 Code of Massachusetts Regulations

The 521 Code of Massachusetts Regulations addresses this as follows:

- a) Section 12 specifically addresses sinks in classrooms under Section 12.4. Classroom countertops and sinks shall comply with 521 CMR 12.2.2 b, 12.2.2 c, and 12.2.2 d. These subsections require adherence to clear floor space (30" wide), knee clearance (30" wide, 27" high, 19" deep), and height (28" to 34" a.f.f.). In addition, Section 12.5 requires that drinking fountains in classrooms adhere to the requirements of Section 36.00 drinking fountains.
- b) Section 36.2 requires minimum clearances of 27" a.f.f. (knee), 30" (width), and 17" to 19" (depth). In addition, there must be a minimum of 30" wide clear width at the approach to the drinking fountain.
- c) Drinking fountain spouts must adhere to Section 36.3 which requires spouts to be located at the front of the unit with the water flow in a trajectory that is parallel or nearly parallel to the front of the unit. The spout shall provide a flow of water at least 4 inches high and the spout height be no more than 36" a.f.f. For a "square" bowl, the requirements are for the spout to be at the front of the bubbler (sink) and have a parallel water flow trajectory. A round or oval bowl should have the spout positioned such that the flow of water is within 3 inches from the front edge.
- d) Controls shall be operable with one hand and not require tight grasping, pinching, or twisting of the wrist. The operating force cannot exceed 5 lbs. (Section 36.5).

#### Assessment and Comment

As noted above, there are both similarities and differences between the 2010 ADA Standards and 521 CMR. Two of the larger variations are the exception allowed under the ADA Standards for a parallel approach to the sink/bubbler for children 5 years of age and younger and what would also appear to be a farther allowed spout setback from the front edge. As both 521 CMR and the 2010 ADA Standards apply, the stricter of the two standards must be adhered to.

Based on an assessment of the East Street School rooms and classrooms, it does not appear that the sink bubblers are in compliance. The sinks with bubblers lack knee clearance and the spout locations are roughly 7" to 9" from the outside edge with water flows apparently more than 3" from the outside edge, both which would exceed that allowed under the 2010 ADA Standards and 521 CMR. It should be noted that most, but not all, of the classroom sink bubblers were not in service at the time of assessment.

## East Street School Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<b>Parking</b> The van accessible spaces (shared 8 foot access aisle) has signage that is 5" to 7" too high. One space lacks "van accessible" denotation. The signage for the passenger vehicle accessible space has signage that is 22" too low.	502.6	23.6	Provide "van accessible" signage at the space without signage. The signage must be set such that the height is 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	\$15
<b>Exterior and Interior Doors</b> Exterior and interior doors with closers (including bathrooms) do not fully comply with the maximum allowed operating force for an exterior door (15 lbs.), interior door (5 lbs.) and minimum closing speed requirement of 6 seconds under 521 CMR.	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, 3	2	I	\$0
<b>Door Signage</b> <u>Tactile designation signage is not provided at the following locations:</u>  Level 1 <ul style="list-style-type: none"> <li>• 2<sup>nd</sup> door to #106</li> <li>• Closet by Quiet Room</li> <li>• Storage across from #103</li> <li>• #115</li> <li>• No tactile star on jambs of the elevator</li> <li>• Hallway and classroom egress doors</li> <li>• Doors to courtyard from hallway</li> <li>• Closet near cafeteria</li> <li>• Storage near cafeteria</li> <li>• Staff room across from cafeteria</li> <li>• Cafeteria door behind stage</li> <li>• Gym storage</li> <li>• Gym stage (4)</li> <li>• Guidance to #101</li> <li>• #101 to Guidance</li> <li>• Quiet Room interior</li> <li>• #106 closet</li> <li>• OT Storage</li> <li>• #123 Pre-K no signage to bathrooms</li> <li>• #124 Pre-K no signage to bathrooms</li> <li>• #125 Pre-K no signage to bathrooms</li> <li>• #126 Pre-K no signage to bathrooms</li> <li>• Classroom pass-through doors</li> <li>• Level 1 Classroom closets (16)</li> </ul>	703	41.1	Install, replace, and/or relocate accessible compliant 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. Under 521 CMR, signage s/b 60" a.f.f. to the centerline of the sign. 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 \$3,300+



<p><b>Glass Panes</b></p> <p>The following doors have glass panes that are 44" to 56½" a.f.f., which are too high under the 2010 ADA Standards:</p> <p><u>Level 1</u></p> <ul style="list-style-type: none"> <li>#104, #102, double doors at Egress F, #101, #102, Guidance, Conference Room, Computer Lab, Nurse's Office, Exam Room, AV storage, Office across from stage (2), #114, #115, #116, #118, #119, #120, #123, #124, double doors near #125, #125 #126, #127, #128, Quiet Room, Nurse's Office, Exam Room, 2 offices by Nurse</li> </ul> <p><u>Level 2</u></p> <ul style="list-style-type: none"> <li>#215 (2), #216, #217, #218, #219, #220, #221, #222, #223, Hallway double doors</li> </ul> <p>See Photos East 6 and 7.</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. Rather than modify the door to lower the viewing area to comply with the maximum height restriction, the panes should be blocked or frosted.	2	2	I	\$0
<p><b>Protruding Objects</b></p> <ul style="list-style-type: none"> <li>Level 1 fire extinguisher sign by Library (8" protrusion at 74¼" a.f.f)</li> <li>Five (5) Level 1 hallway fire extinguisher signs (8" protrusion at 73" to 74" a.f.f)</li> <li>Level 1 valve across from #103 (6½" protrusion at 74" a.f.f)</li> <li>Level 1 valve across from computer lab (5" protrusion at 76" a.f.f)</li> <li>Level 1 defibrillator box near door to courtyard (8½" protrusion at 58½" a.f.f)</li> <li>Three(3) level 2 fire extinguisher signs (8" protrusion at 74" a.f.f)</li> </ul> <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".</p> <p>See Photos East 8, 9, and 10.</p>	307.2	20.6.1	<p>Raise the fire extinguisher signs so they are at least 80" a.f.f. to the bottom of the signs.</p> <p>Place fixed objects under the valves or remove the valves.</p> <p>Place a fixed object for cane detection under the defibrillator box.</p>	2	2	I	\$0
<p><b>Drinking Fountains</b></p> <ul style="list-style-type: none"> <li>Two drinking fountains (2) on Level 1 by cafeteria are both low (29" knee – 36" spout, 24" knee – 30"</li> </ul>	211	36	<p>Option #1: Discontinue use of the fountains.</p> <p>Option #2 – Add a "high" drinking fountain per each location and raise the fountains with 24" knee clearance</p>	2	3	N	Up to \$30,000+

<p>spout)</p> <ul style="list-style-type: none"> <li>Two drinking fountains (2) on Level 1 by cafeteria are both low (28" knee – 35" spout, 24" knee – 30" spout)</li> <li>One drinking fountain on Level 1 by #118 is low only (27" knee – 36" spout)</li> <li>One drinking fountain on Level 2 is low only (27" knee – 35" spout)</li> </ul> <p>See Photo East 11.</p>			<p>so that they have a minimum of 27" of knee clearance. The drinking fountains must comply as follows:</p> <p>Protruding objects compliance of no &gt; 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). and with the water flow within 3" from the front edge (36.3). The 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 &gt; 5 lbs force (309.4).</p>				
<p><b>Stairs</b> <u>Entrances/Exits G and F</u> The stairs lack railings.</p> <p><u>Cafeteria Stage</u> The stairs from the assembly area to the stage and from the side of the stage have risers that are 7½" high, which are ½" too high. The stairs lack railings.</p> <p><u>Library</u> The stairs to the computer lab from the library have railings that are 1" too low. The exterior railing does not go the slope distance of one tread then 12" parallel to the floor.</p> <p><u>Stairs to Level2 Near Elevator and Near Exit B</u> The top railings are 3" to 4" too low.</p> <p>See Photos East 12, 13, 14, and 15.</p>	504 505	27	<p>Modify/replace/install railings on both sides of stairs such that they are between 34" – 38" a.f.f. to the top of the railing with bottom extensions the slope distance of one tread then 12" parallel to the floor. Railings must be fully continuous.</p> <p>Seek a variance to retain the existing stairs to the cafeteria stage.</p>	1, 2	3	L	TBD – up to \$50,000+
<p><b>Ramp</b> The ramp past #107 is 2'-6" too long. The upper railings are ¼" to ½" too low.</p> <p>The ramp near Entrance E has top railings on the upper segment that are ½" too low.</p>	405 505	24	<p>As the ramp running slopes do not exceed 5.0%, thereby not classifying it as a ramp, no further action is required.</p> <p>Seek a variance to retain the existing railings.</p>	2	1	I	\$0
<p><b>Court Yard</b> There is a 2" to 3" abrupt change in level surface from the concrete pads to the courtyard.</p> <p>None of the 4 picnic tables are on an accessible route of travel. Three tables lack clear width and one table has only 12" of knee depth.</p> <p>See Photo East 16.</p>	403 221 902 306	22 20 14.4 19.5	<p>An accessible route of travel needs to be provided to all areas available to the public. 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 &gt; than ¼" unbeveled or between ¼" and ½" beveled w/a slope of no &gt; 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>Provide an accessible picnic table on an accessible route of travel. The accessible picnic table must have a minimum of 30" clear width, 27" knee height, and 19" knee depth.</p>	2	2	N	Up to \$2,000

<b>Adult Sinks and Related Dispensers</b> <u>Level 1 Staff Room</u> The sink is 2” too high and lacks knee clearance. In addition, the cabinets have knob style hardware.	606.3 306.3 309	32.7 39.5	Modify the counter and sink so that the counter/sink 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. Install cabinet hardware that is operable with a closed fist or loose grip.	2	3	N	Up to \$2,500
<u>Nurse’s Office</u> The sink is 1” too high and has piping that is not wrapped, guarded or insulated.  See Photo East 17.	606.3 306.3	32.7	Modify the counter and sink so that the counter/sink 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.	2 2	3	N	Up to \$2,500
<u>Library</u> The stack clear width at the column is reduced to 18” on one side and 19” on the opposite side.  See Photo East 18.	403.5	12.2 20.3	Re-arrange the stacks to achieve the required minimum 36” clear width.	2	2	I	\$0
<u>Cafetorium and Gym Stages</u> There is no accessible route of travel from the place of assembly to the stages  See Photo East 19.	206	20.00 14.6	A vertical lift, inclined wheelchair lift, or ramp must be provided to achieve access to the stages from the assembly area. If the Gym stage is used solely for storage, as it appeared at the time of assessment, then access would not be required unless as a result of a reasonable accommodation request.	2	3	N	\$15,000 to \$30,000+
<u>Door Pull Clearance</u> A # of classrooms have less than 18” of maneuvering clearance on the latch pull side of the doors due to stored items such as desks, cabinets, etc.	404.2.4	26.6	There should be a minimum of 18” clearance on the latch pull side of the door for maneuverability. Remove the items restricting clear width.	2	2	I	\$0
<u>Unsecured Classroom Rugs</u> Classrooms have rugs/carpets that are not fully secured and serve as a tripping hazard.	302.2	29.3	Remove or secure the rugs/carpets.	4	2	I	\$0
<u>Adult Reach Range</u> The following items are not within the maximum height 48” adult reach range: <ul style="list-style-type: none"><li>Staff Room phone (58” a.f.f.)</li><li>Nurse’s Office defibrillator</li><li>Level 2 fire pull near stairs (52” a.f.f.)</li><li>Level 1 fire pulls near Exits A and B (52” to 53” a.f.f.)</li><li>Hallway and Classroom light switches (50” to 52” a.f.f.)</li><li>Classroom #126 first aid kit (68” a.f.f.)</li><li>Classroom #215 phone (59” a.f.f.)</li><li>Level 1 defibrillator near library (62” a.f.f.)</li></ul> See Photo East 20.	308	6.5 6.6	Lower the fire pulls, defibrillators, and the first aid kit to a height of no more than 48” a.f.f.  Lower the phones and light switches as may be required due to a reasonable accommodation request.	2  2	3  3	N  L	\$0 to TBD  TBD



<b><u>Student Reach Range</u></b> The following items are not within the maximum height 40" children reach range for K to Grade 1: <ul style="list-style-type: none"> <li>Hallway lockers (up to 58" a.f.f. shelves and up to 38" coat hooks)</li> <li>Classroom sink dispensers (soap dispensers, towel dispensers, sanitizers up to 46" a.f.f.)</li> <li>Level 1 hallway sanitizer near #104 (48" a.f.f.)</li> <li>Hallway coat hooks vary in height from 48" to 67" a.f.f.</li> </ul> See Photos East 21 and 22.	308.1	6.5 6.6	Dispensers and sanitizers s/b lowered to a height of no more than 40" a.f.f.  At least 5% of the lockers in each area need to have shelves and coat hooks lowered to a height of no more than 40" a.f.f.  At least 5% of the classroom coats hooks in each classroom need to be lowered to a height of no more than 36" a.f.f.	2	2	I	\$0
<b><u>Rooms and Classrooms</u></b> <b><u>Classroom Sinks and Bubblers</u></b> Classroom children sinks lack knee clearance. Sinks with bubblers are set back 7" to 9" from the outside edge. This includes Classrooms #103 - #105, #107 - #122, #127, #123 - #126, #215 - #222.  See Photos East 23 and 24.	602 306	36 12.4 12.2	Option 1: Place all of the classroom sink bubblers "out of service". As required as a result of a reasonable accommodation request, modify the sinks to provide a minimum of 27" of knee clearance with wrapped, guarded, or insulated piping.  Option 2: Modify the bubblers so that they are no more than 5" from the front edge and project a flow of water within 3" from the front edge. Modify the sinks to provide a minimum of 27" of knee clearance with wrapped, guarded, or insulated piping.	2  2	2  3	N.L  L	TBD  TBD – up to \$320,000
<b><u>Bathrooms</u></b> There are a total of 32 bathrooms (including the kitchen staff bathroom) in the building. This includes ten (10) Men's/Women's bathrooms on Level 1, two (2) Men's/Women's bathrooms on Level 2, eleven (11) Girl's/Boy's K-3 bathrooms on Level 1, four (4) Girl's/Boy's K-3 bathrooms on Level 2, and four (4) Pre-K bathrooms on Level 1. None of the bathrooms are accessible compliant. It was not clear if the alarms in the bathrooms were both audible and visual. If the building is fully wired, then audible and visual alarms will be required in each bathroom as well.  A detailed description of areas of non-compliance for each bathroom is provided below.	603 604 605 606 306 308 215 702	30 40.3	There needs to be at least one accessible bathroom in each separate area where there is a non-accessible bathroom. The standards and requirements for compliance are provided in Tables 1, 2, and 3.	3	2,3	I, N, L	TBD – up \$500,000

Up to 942,665+ to TBD

## **Bathrooms**

### **Pre-K Bathrooms.**

*Room 123/124 shared bathrooms (2).* The light switches are 12" too high. The sinks are 5" to 5½" too low. The sink piping is not insulated. The mirror in the bathroom on the left side is blocked with paper such that the bottom of the reflection area is 10½" too high. The towel dispensers are 5" too high. The water closets are 5" to 6½" too far from the near wall and 27½" to 29" too close to the far wall. The toilet paper dispensers are 4" too high and too close to the front of the water closet. The left side bathroom has only a side grab bar. The grab bar is 6" too short and 7½" too high. The right side bathroom lacks grab bars. The flush controls are on the wrong side.

*Room 125/126 shared bathrooms (2).* The light switches are 15" too high. The sinks are 5½" to 6" too low. The sink piping is not insulated. The towel dispensers are 3" to 4½" too high. The left side water closet is 4" too far from the near wall. Both bathroom water closets are 21" to 25½" too close to the far wall. The left side bathroom has only a side grab bar. The grab bar is 12¾" too high and 4" too far from the interior corner. The right side bathroom lacks grab bars.

### **K-3 Bathrooms**

*Level 2 Boy's Near Janitor's Room.* The light switch is 14" too high. The mirror is 12" too high. The soap dispenser is 6" too high. The sink shut-offs are not fully wrapped. The stall door opens in and not out, is not self-closing, lacks interior and exterior door pulls, and lacks a coat hook. The toilet paper dispenser is 19" too high, located over the grab bars, and too far from the front of the water closet. The water closet is 3" too high and 3½" too far from the near wall. The side and rear grab bars are 6½" too high and 1" too far from the interior corner.

*Level 2 Girl's Near Janitor's Room.* The mirror is 11½" too high. The stall door opens in and not out, is not self-closing, and lacks interior and exterior door pulls. The coat hook is 20" too high. The toilet paper dispenser is 7" too high and is also too close to the front of the water closet. The water closet is 3" too high and 1½" too far from the near wall. The side and rear grab bars are 6¼" to 6½" too high and 1" too far from the interior corner.

*Level 2 Boy's Near #215/#217.* The light switch is 14" too high. The towel dispenser is 11" too high. The mirror is 12" too high. The sink piping is not fully insulated. The toilet paper dispenser is too close to the front of the water closet. The water closet flush control is on the wrong side. The water closet is 3½" too high and 3½" too far from the near wall. The side and rear grab bars are 1" and 1¼" too high and 1" too far from the interior corner. A door stop on the floor is an abrupt change, a tripping hazard, and an obstruction for wheelchair use.

*Level 2 Girl's Near #215/#217.* The light switch is 15" too high. The mirror is 12" too high. The sink piping is not fully insulated. The toilet paper dispenser is too close to the front of the water closet. The water closet is 3½" too high and 2½" too far from the near wall. The side and rear grab bars are 1" too high and 1" too far from the interior corner. A door stop on the floor is an abrupt change, a tripping hazard, and an obstruction for wheelchair use.

*Level 1 Boy's Near Guidance.* The towel dispenser is 2" too high and partially over the grab bars. The soap dispenser is 3" too high. The toilet paper dispenser is 2" too close to the front of the water closet. The water closet is ½" too high and 4" too far from the near wall.

*Level 1 Adaptive Near Guidance.* The towel dispenser is 2" too high. The soap dispenser is 3" too high. The sink shut-offs are not fully insulated. The toilet paper dispenser is 1" too high and 3" too far from the front of the water closet.

*Level 1 Boy's Near #102.* The light switch is 10" too high. The towel dispenser is 3" too high. The soap dispenser is 5" too high. The sink piping is not fully wrapped. The stall door opens in, not out. The door is not self-closing, and has a coat hook that is 12" too high. The water closer seat is 1½" too high.

*Level 1 Girl's Near #102.* The light switch is 10" too high. The towel dispenser is 3" too high. The soap dispenser is 4½" too high. The mirror is 1" too high. The stall door opens in, not out. The door is not self-closing, and has a coat hook that is 12" too high. The water closer seat is 1" too high.

*Level 1 Quiet Room.* There is only 27¼" clear width at the doorway. The door also has knob-style hardware. The sink is 7¼" too high and has only 22 ½" of knee clearance. The toilet paper dispenser is 19" too high and located behind the water closet. The towel dispenser is 18" too high, the coat hook is 30" too high, and the light switch is 14" too high. The water closet is 1" too high, is 8" too far from the near wall, 16" too close to the far wall, and has only 16" clear width in front of the toilet. The flush control is on the wrong side. There are no grab bars.

*Level 1 OT Bathroom.* There is only 27" clear width at the doorway. The sink is 4 ½" too high and has piping that is not insulated. The mirror is 17" too high. The bathroom is only 40" x 54" and lacks maneuverability. There are no grab bars. The water closet is 2" too high, is 3½" too far from the near wall, 20½" too close to the far wall, and has only 25½" clear width in front of the toilet. The toilet paper dispenser is too close to the front of the water closet.

*Level 1 Classroom #117.* The tactile designation signage is not on the latch side of the door. The light switch is 14" too high. The towel dispenser is 10" too high. The coat hook is 28" too high. The sink is 2" too high and has piping that is not insulated. The mirror is 11½" too high. The toilet paper dispenser is 7" too high and is too close to the front of the water closet. The water closet is 5" too far from the near wall. Stored items reduce the far side and front water closet clear width to less than 42". The flush control is on the wrong side. There is only one grab bar on the side of the water closet, which is 5½" too high.

*Level 1 Boy's Near #110.* The light switch is 14" too high. The towel and soap dispensers are 8" too high. The mirror is 10" too high. The sink is 1½" too high and the piping is not fully wrapped. The urinal has only 23¼" of clear width between the partitions, which is 6¾" too narrow. The stall door is not self-closing, lacks an interior pull device, and has a coat hook that is 17" too high. The water closet seat is 2½" too high. The water closet is 3½" too far from the near wall. The toilet paper dispenser is 3" too high. The side and rear grab bars are 9½" too high.

*Level 1 Girl's Near #110.* The light switch is 14" too high. The towel and soap dispensers are 8" too high. The mirror is 10" too high. The sink is 1½" too high and the piping is not fully wrapped. The stall door is not self-closing, lacks an interior pull device, and has a coat hook that is 18" too

high. The water closet seat is 3" too high. The water closet is 2" too far from the near wall. The toilet paper dispenser is 3" too high and 3" too far from the front of the water closet. The side and rear grab bars are 9½" to 10" too high.

*Level 1 Boy's Near #116.* The light switch is 14" too high. The towel dispenser is 5" too high. The soap dispenser is 6" too high. The mirror is 11" too high. The stall door opens in not out, is not self-closing, lacks an exterior pull device, and lacks a coat hook. The locking mechanism requires use of the fingers and pinching and twisting of the wrist. The water closet seat is 3" too high. The water closet is 3" too far from the near wall. The toilet paper dispenser is 7" too high and 3" too close to the front of the toilet. The side and rear grab bars are 6" too high and 1" too far from the interior corner.

*Level 1 Girl's Near #116.* The light switch is 14" too high. The coat hook is 25" too high. The soap dispenser is 4¼" too high. The mirror is 11¾" too high. The stall door opens in not out, is not self-closing, lacks an exterior pull device, and lacks a coat hook in the stall. The water closet seat is 3¼" too high. The water closet is 4½" too far from the near wall and 2" too close to the far wall. The toilet paper dispenser is 7" too high and 5" too close to the front of the water closet. The side and rear grab bars are 6" too high and 1" too far from the interior corner.

#### Adult Bathrooms

*Level 2 Men's Near Janitor's Room.* The mirror is 2" too high. The towel dispenser is 3" too high. The sink shut-offs are not insulated. The side and rear grab bars are 1" to 1¼" too low.

*Level 2 Women's Near Janitor's Room.* The mirror is 2" too high. The towel dispenser is 4" too high. The soap dispenser is 2" too high. The sink shut-offs are not insulated. The side and rear grab bars are 1" too low. The water closet is 1" too close to the near wall.

*Level 1 Men's Near #102.* The toilet paper dispenser is 7" too low.

*Level 1 Women's Near #102.* The toilet paper dispenser is 7" too low.

*Level 1 Hallway Bathroom Near OT.* The toilet paper dispenser is 7" too low.

*Level 1 Faculty Bathroom in Hallway Near OT.* The door has knob-style hardware. This single user bathroom lacks maneuverability and clear widths and is wholly inaccessible and non-compliant. The sink piping is not insulated. The towel dispenser, mirror, and light switch are all too high. There is only 22" of clearance on the far side of the water closet and only 14" of clear width in front of the toilet. There are no grab bars. The toilet paper dispenser is too close to the front of the toilet.

*Level 1 Hallway Bathroom Near OT.* The towel dispenser is 3" too high. The soap dispenser is 5" too high. The toilet paper dispenser is located over the grab bars and is too close to the front of the water closet. The sink has only 24" of knee clearance and the sink piping is not wrapped, guarded, or insulated. The mirror is 8¼" too high. The flush control of the water closet is on the wrong side. The water closet is 1" too low and is 24" too close to the far wall or nearest object. There is only a side grab bar, which is 1" too high.

*Level 1 Faculty Bathroom Between #123/#124.* Both the towel and soap dispensers are 3" too high. The mirror is 2½" too high. The sink piping is not insulated. The toilet paper dispenser is too close to the front of the water closet. The water closet has only 24" of clear width on the approach side. The water closet flush control is on the wrong side. There are no grab bars.

*Level 1 Nurse.* The coat hook is 14" too high. The glove dispenser is 17" too high. The toilet paper dispenser is too close to the front of the water closet. A cabinet reduces the water closet approach side clear width to only 31".

*L1 Unisex Left Side Bathroom Near Cafeteria.* The sign is 8" too high. The mirror is 2½" too high. The sink piping is not insulated. The towel dispenser is 5" too high. The soap dispenser is 3" too high. The toilet paper dispenser is too close to the front of the water closet. The water closet seat is 1½" too low. The water closet is 1" too far from the near wall, 6½" too close to the far wall or nearest object, and has the flush control on the wrong side. There are no grab bars.

*L1 Unisex Right Side Bathroom Near Cafeteria.* The sign is 6" too high. The mirror is 2½" too high. The sink piping is not insulated. The towel dispenser is 6" too high. The water closet seat is 1½" too low. The water closet is 2" too close to the near wall, 11" too close to the far wall or nearest object, and has only 20" of clearance in front of the toilet. There are no grab bars.

*L1 Bathroom Near Elevator.* The clear width to the sink is reduced to only 15" due to the placement of a desk. The towel dispenser is 3" too high, with use and access restricted by the desk. The soap dispenser is 2¾" too high. The mirror is 2¾" too high. The side and rear grab bars are 1¼" to 1½" too low.

See Photos East 25 thru 38.

**TABLE 1. PRE-K (AGES 3 - 4) BATHROOM STANDARDS**

<b>2010 ADAAG</b>			<b>MAAB 521 CMR</b>	
<b>Description</b>	<b>Citation</b>	<b>Requirement</b>	<b>Citation</b>	<b>Requirement</b>
<b>Children's Bathroom</b>				
<b>Toilet Centerline</b>	604.9	Centerline s/b 12" from the side wall.	30.14	Centerline s/b 11" from the nearest sidewall and 42" from the centerline of the water closet to the opposite wall or closest edge of next fixture.
<b>Toilet Seat Height</b>	604.9	11" to 12" a.f.f. to top of seat	30.14	11½" to 12½" a.f.f. to top of seat
<b>Toilet Flush controls</b>	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.
<b>Toilet Paper Dispenser Height</b>	604.9	Outlet of dispenser s/b 14" 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	14" a.f.f.
<b>Urinal</b>	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.
<b>Grab Bar Height</b>	604.9	18" to 20" a.f.f. to top	30.15	18" to 20" a.f.f. to top
<b>Grab Bar Thickness</b>	609.2	No variation.	30.15	1"
<b>Grab Bar Spacing</b>	609.3	No variation.	30.15	No variation.
<b>Grab Bar Location</b>	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.
<b>Children's Sink Height</b>	606	No variation - equivalent facilitation (103). Parallel approach complying w/305 (30"x48" clear space) permitted for children 5 and younger.	30.16	Sinks shall be mounted with the rim no higher than 30" a.f.f.
<b>Children's Sink Knee Clearance</b>	606	No variation - equivalent facilitation (103). Parallel approach complying w/305 (30"x48" clear space) permitted for children 5 and younger	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.
<b>Children's Mirror Height</b>	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.
<b>Children's Reach Range</b>	308	20" low min to 36" high max	30.20	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.  This also applies to dispensers.

**TABLE 2. K – GRADE 3 (AGES 5 - 8) BATHROOM STANDARDS**

<b>2010 ADAAG</b>			<b>MAAB 521 CMR</b>	
<b>Description</b>	<b>Citation</b>	<b>Requirement</b>	<b>Citation</b>	<b>Requirement</b>
<b>Children's Bathroom</b>				
<b>Toilet Centerline</b>	604.9	Centerline s/b 12" to 15" from the side wall.	30.14	Centerline s/b 11" to 15" from the nearest sidewall and 42" from the centerline of the water closet to the opposite wall or closest edge of next fixture.
<b>Toilet Seat Height</b>	604.9	12" to 15" a.f.f. to top of seat	30.14	12" to 15" a.f.f. to top of seat
<b>Toilet Flush controls</b>	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.
<b>Toilet Paper Dispenser Height</b>	604.9	Outlet of dispenser s/b 14" to 17" 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	14" to 17" a.f.f.
<b>Urinal</b>	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.
<b>Grab Bar Height</b>	604.9	20" to 25" a.f.f. to top	30.15	20" to 25" a.f.f. to top
<b>Grab Bar Thickness</b>	609.2	No variation.	30.15	1¼" to 1½"
<b>Grab Bar Spacing</b>	609.3	No variation.	30.15	No variation.
<b>Grab Bar Location</b>	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.
<b>Children's Sink Height</b>	606	31" max. a.f.f. Parallel approach complying w/305 (30"x48" clear space) permitted for children 5 and younger.	30.16	Sinks shall be mounted with the rim no higher than 30" a.f.f.
<b>Children's Sink Knee Clearance</b>	606	Minimum 24" a.f.f. for children ages 6 – 12 if rim no > than 31" a.f.f. Parallel approach complying w/305 (30"x48" clear space) permitted for children 5 and younger	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.
<b>Children's Mirror Height</b>	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.
<b>Children's Reach Range</b>	308	18" low min to 40" high max	30.20	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.  This also applies to dispensers.



**TABLE 3. ADULT BATHROOM STANDARDS**

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. form 90 degrees to12 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 > ½" high. Raised thresholds comply with 302 and 303 (between ¼" and ½" s/b beveled w/slope no > 1:2(50%)).	26.10	Not > ½" high, beveled w/no > 1:2 slope. Sliding door thresholds not > ¾" high and beveled w/no > 1:4 slope.
Handrails - clearance	505.5	1 ½" minimum.	27.4.7	1 ½" 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 the side wall in an ambulatory accessible compartment.	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
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 mounted (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	Mounted on side wall closest to toilet, centerline of roll s/b min. of 24" a.f.f.
			30.8.5	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	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	Hand operated, automatic; no > 44" a.f.f.

<b>Mirror</b>				
Height	603.3	If over lavatory/countertop, bottom of mirror reflecting surface no > 40" a.f.f.; if not over lav/counter no > 35" a.f.f. if fill length, top s/b 74" min a.f.f.	30.11	Bottom of mirror reflecting surface no > 40" a.f.f.
<b>Dispensers</b>				
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.
<b>Controls and Receptacles</b>				
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).
<b>Signage</b>				
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".

## East Street School Accessibility Assessment Photos



Photo East 1



Photo East 2

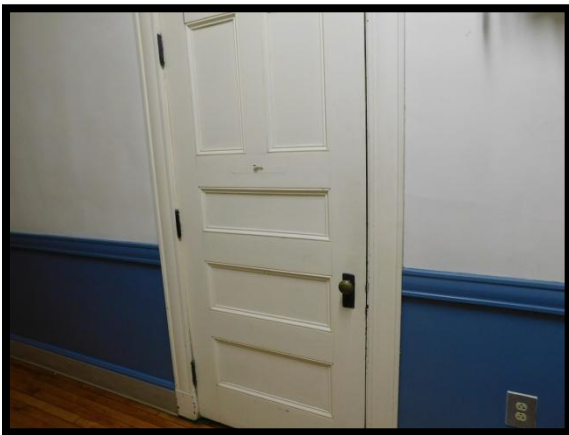


Photo East 3



Photo East 4



Photo East 5



Photo East 6

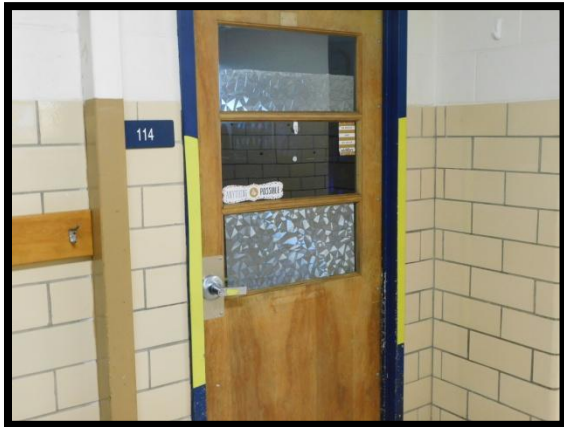


Photo East 7



Photo East 8

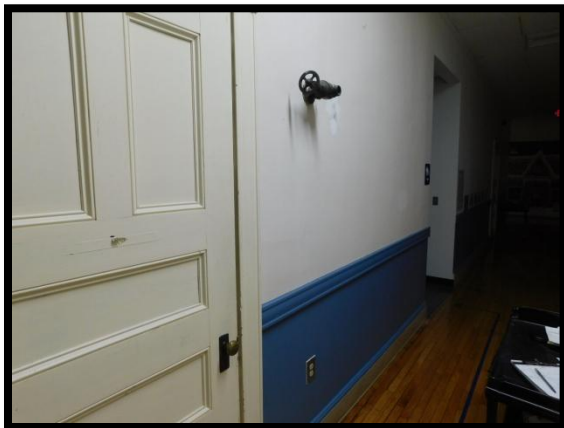


Photo East 9



Photo East 10



Photo East 11

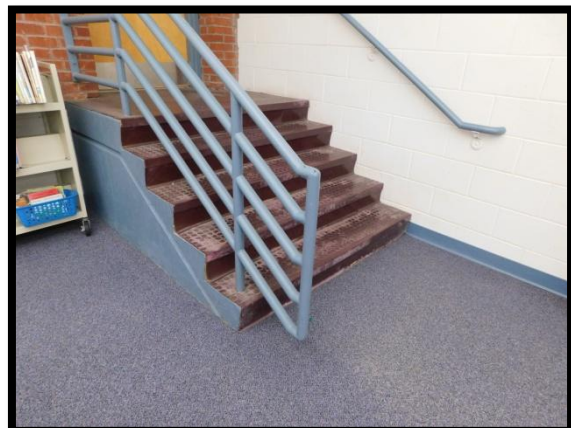


Photo East 12





Photo East 13



Photo East 14

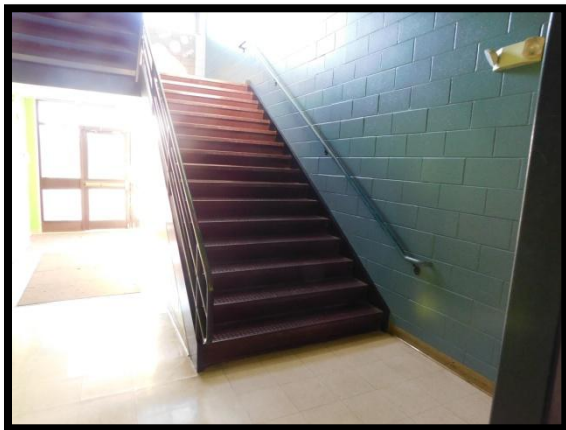


Photo East 15



Photo East 16

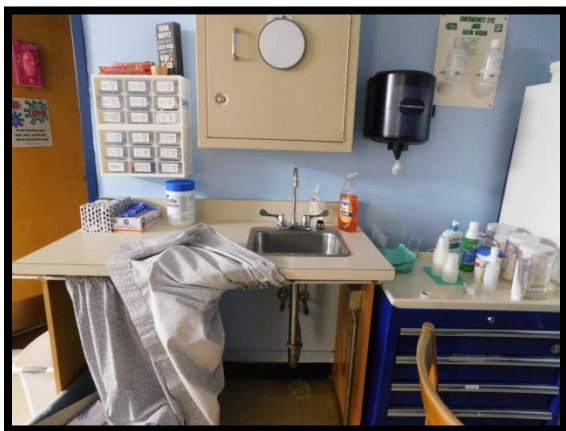


Photo East 17



Photo East 18



Photo East 19

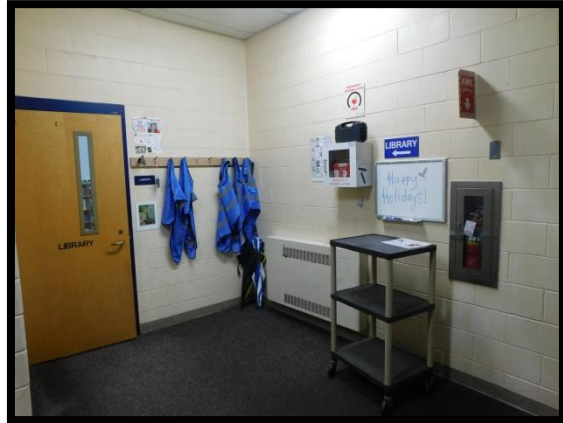


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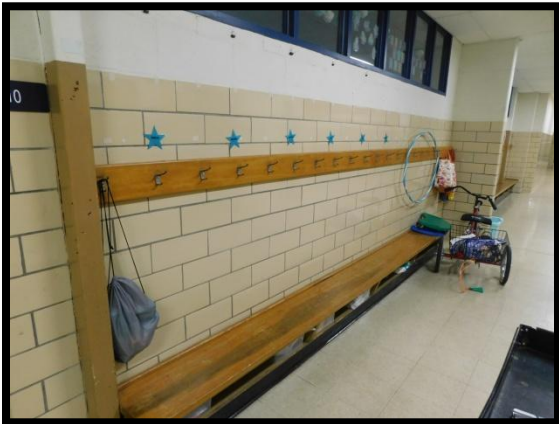


Photo East 21



Photo East 22



Photo East 23



Photo East 24



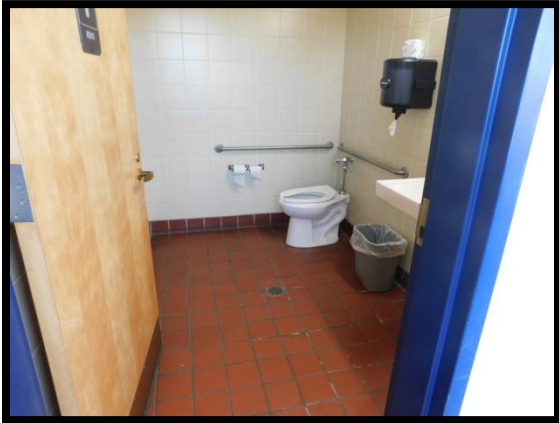


Photo East 25



Photo East 26



Photo East 27



Photo East 28



Photo East 29



Photo East 30



Photo East 31



Photo East 32



Photo East 33

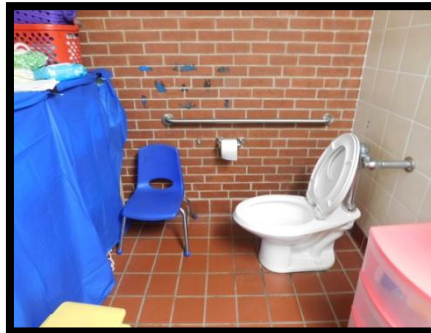


Photo East 34

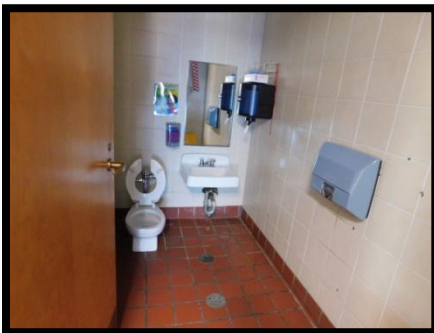


Photo East 35



Photo East 36

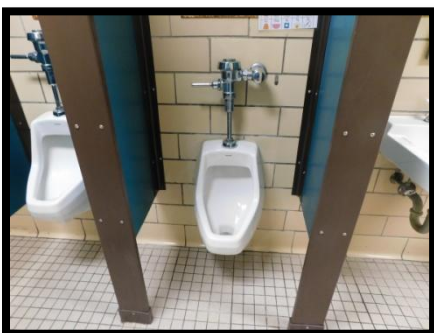


Photo East 37

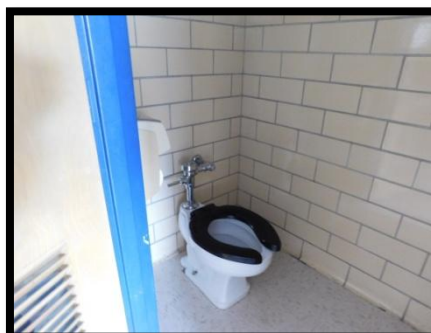


Photo East 38