

TOWN OF LEICESTER, MA

Americans with Disabilities Act Transition Plan

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Community Opportunities Group, Inc.
Kessler McGuinness & Associates, LLC

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INTRODUCTION

Local governments were required to prepare a plan to comply with the Americans with Disabilities Act of 1990 (ADA), as amended, by July 1992, and to remove structural barriers from public facilities by January 1995. However, many towns still operate programs and services that are inaccessible to people with disabilities. Barriers to participation persist for several reasons: misinformation about disabilities and ADA requirements, the cost of making older buildings comply, and competing priorities.

Planning to comply with ADA sometimes leads communities to place more emphasis on the minimum they must do to comply with the law than what they should do as a matter of basic fairness. ADA plans that focus solely on architectural barriers tend to omit a comprehensive assessment of disability needs and perpetuate the view that if public buildings have barrier-free entrances and meeting rooms, a community has done its part under ADA. Although the law requires a community to document its ADA self-evaluation and transition plan efforts, planning to include people with disabilities should not be regarded as a one-time event. It requires periodic reviews of programs and services, ongoing contact with the disabilities community, and ongoing public education.

Below is a brief summary of the federal accessibility requirements that Leicester is required to address as a unit of local government.

SECTION 504

Section 504 of the Rehabilitation Act of 1973 laid some important groundwork for the Americans with Disabilities Act. Despite their similarities, these laws differ in some important ways and each law reflects the era that produced it. Section 504 followed in the footsteps of the Architectural Barriers Act of 1968 (ABA), which requires all federal government buildings and space leased by federal agencies to comply with architectural access guidelines. The guidelines, known as the Uniform Federal Accessibility Standards (UFAS), have recently been replaced by the new ADA Standards for Accessible Design. ABA is enforced by the federal Architectural and Transportation Barriers Compliance Board, also known as the Access Board, created by Section 502 of the Rehabilitation Act.

Section 504 imposes non-discrimination requirements on (a) any program or activity paid for in whole or in part with federal funds, (b) all Executive-branch agencies and (c) the U.S. Postal Service. As a practical matter, Section 504 applied (and still applies) to nearly all local governments because every state in the nation receives federal funds, and every state was directed to bring all federally assisted state- and sub-state operations into compliance. Moreover, Section 504 specifically targeted local and regional public schools as entities separate from their associated county or local governments. The introduction of Section 504 changed the way the Bureau of the Census collects and reports education data for public schools across the country. In addition, Section 504 covers private entities receiving federal funds from a federal, state or local agency, such as social service programs receiving CDBG funds from a unit of local government.

For any federally assisted program or service, the fundamental requirements of Section 504 include:

- ◆ Reasonable accommodation for employees with disabilities;
- ◆ Program accessibility (although its present-day meaning stems more from HEW regulations adopted in 1977 than from the law itself);
- ◆ Effective communication to accommodate people with hearing or vision disabilities; and
- ◆ Accessible (barrier-free) new construction and alterations. Like ABA, Section 504 relies upon UFAS for accessible design standards.

Toward these ends, Section 504 charged federal funding agencies with responsibility for establishing their own regulations. There is no “central” oversight for Section 504, although the U.S. Department of Justice maintains a Section 504 information clearinghouse.

AMERICANS WITH DISABILITIES ACT

ADA is a uniform civil rights law that applies to all states and local governments regardless of funding source, and to all places of public accommodation. Further, it establishes accessibility requirements for public transportation and telecommunications. ADA prohibits discrimination on the basis of disability in employment (Title I); state and local government programs, services and employment (Title II); public transportation (Title II); public accommodations (Title III); and telecommunications (Title IV). It also prohibits retaliation against people with disabilities seeking to protect their rights under ADA (Title V). For a majority of the nation’s local governments, Title II is the most important component of the law. The applicable administrative regulations appear at 28 CFR 35.

ADA and Section 504 clearly have similar requirements and objectives. Over time, amendments to both laws have made Title II and Section 504 nearly identical. However, ADA is subject to one agency’s jurisdiction over most federal rulemaking and all federal enforcement: the U.S. Department of Justice (DOJ). Still, the structure of ADA oversight is complicated and several other agencies have a role to play in Title II, notably the Access Board, the Department of Transportation, the Equal Employment Opportunity Commission (EEOC), HUD, the Department of the Interior, the U.S. Department of Agriculture, the U.S. Department of Health and Human Services, and the Federal Communications Commission (FCC). All of these agencies have authority to adopt ADA guidelines or standards, but only some have authority to adopt ADA regulations. Further, while all have authority to investigate complaints within their respective areas, as defined in the law, DOJ has “umbrella” authority to investigate complaints and take enforcement action on any aspect of ADA. Since 1990, ADA has gradually evolved in response to federal court decisions and changes in the law, regulations and guidelines.

ADA has some practical differences from Section 504. For example, ADA requires all governmental units with 50 or more employees to designate an official responsible for coordinating compliance and investigating complaints. Also, ADA-Title II and Section 504 have somewhat different standards for accessible design, though both standards have special provisions for historically significant buildings. While the new ADA Standards for Accessible

Design are mandatory for Title III-covered entities and federal facilities subject to the ABA, currently cities and towns may choose either the ADA Standards or UFAS. However, these requirements change as of March 15, 2012 when Title II entities will be required to comply with the 2010 ADA Standards for Accessible Design (the 2010 ADA Standards) and the use of UFAS will no longer be an option. (Note: the elevator exemption for two-story commercial buildings in the ADA Standards does not apply to public buildings.) Further, the Commonwealth has its own access code (521 CMR). The more stringent standard – federal or state – determines a public agency's obligations.

Once the Title II regulations went into effect in January 1992, local governments had six months to conduct a self-evaluation similar to the self-assessment required by Section 504, one year to make programs and services accessible, 18 months to develop ADA transition plans for programs requiring building alterations, and three years (until July 1995) to complete all of the structural modifications identified in their transition plans. Local governments that had previously conducted a Section 504 self-assessment were authorized to limit their ADA self-evaluations to programs or services not covered under Section 504. Often, local governments failed to prepare transition plans on time (if at all), and others never implemented their transition plans even when they met the deadline for preparing one. Compliance has occurred through voluntary actions, investigations by federal or state agencies, and enforcement actions initiated by DOJ. For urban and large suburban local governments with active Section 504 programs, Title II covered familiar territory and simply represented an expansion of existing efforts, but for many small towns, ADA seemed like another unfunded mandate and many simply refused to respond.

PROGRAM ACCESSIBILITY

Under ADA and Section 504, local governments have some options for making programs accessible in lieu of making all existing buildings accessible. While new buildings and substantial alteration projects must conform to federal and state access guidelines, a public building that existed prior to ADA does not have to be altered as long as programs in the building can be modified through non-structural means or relocated to an ADA-compliant facility. Furthermore, barrier-free buildings do not guarantee barrier-free programs. For the person with vision loss, the need for a large-print copy of a property tax bill will never be addressed by improvements that make it possible for people with physical and sensory impairments to move independently and safely within a public building.

Not so long ago, many thought that program accessibility could be accomplished by offering special programs for people with disabilities. Separate programs sometimes provide more accommodation, and they may also be the choice of last resort when providing full inclusion requires extensive alterations to an older public building. However, ADA specifically requires accommodations in an "integrated setting," which means that to the maximum extent feasible, programs and services must accommodate people with disabilities in the same setting used by all other people. Even when separate programs are made available, the law protects the right of people with disabilities to choose to participate in a regular program – and they remain entitled to reasonable accommodation.

LEICESTER TRANSITION PLAN SUMMARY

Using CDBG funds administered by the Pioneer Valley Planning Commission (PVPC), the Town of Leicester engaged Community Opportunities Group, Inc. (COG), to assist with the self-assessment process and preparation of an ADA Transition Plan. Toward that end, COG retained the services of Kessler McGuinness & Associates, LLC, an accessibility and Universal Design consulting firm, to conduct an inspection of Leicester's municipal facilities ("KMA Survey," Appendix A). In addition, COG met with department heads and representatives from several local committees, distributed a self-assessment questionnaire (Appendix B), offered follow-up technical assistance to staff members, and provided guidance to the newly established Leicester Commission on Disabilities. The Town held a public meeting on December 6, 2011 at the Leicester Senior Center to review the Draft Plan and solicit public comment. This meeting was broadcast on the local cable access channel and copies of the Draft Plan were available at Town Hall and through the Town's website. The newly appointed Commission on Disabilities also held several committee meetings to review the Draft Plan.

Based on information received from the town, COG developed the Leicester ADA Transition Plan, which provides an overview of the town's municipal programs, services, policies, and procedures and identifies opportunities for improving access to local government for individuals with disabilities. The Town has already undertaken several steps towards compliance with ADA requirements, including the appointment of an ADA Coordinator, adoption of a local ADA Grievance Policy, and appointment of a Commission on Disabilities. This Plan provides a framework for the town to address its existing operational, communicative, and architectural barriers and begin to plan for their removal. Educating municipal officials and staff on their obligations under the ADA is an important first step in this process. Through the preliminary training phase of this project, the town identified an existing TTY telephone, which it is now installing in the Town Clerk's office. Once installation and staff training is complete and the public is notified of this service, the town's ability to communicate with individuals with hearing impairments will be greatly improved. The town can address other communication barriers by adopting policies such as an Effective Communications Policy to provide auxiliary aids and services, an Alternative Format Policy to provide documents, publications, and materials in alternative formats such as large print, Braille, audiotape, and computer disk, and an Interpreter Services Policy to provide sign language interpreters when requested.

Due to the complicated and costly nature of some of the architectural barriers that limit program access in Leicester (as identified in Appendix A), Leicester will need to develop a strategy to implement and fund removal of these barriers. Through a broad community participation process, the Commission on Disabilities, the Board of Selectmen, town staff and committees, and individuals with disabilities will need to work together to establish priorities for barrier removal and identify available funding sources, including local appropriations. Some modifications may be achievable with limited cost to the town, such as replacement of existing door hardware with accessible doorknobs and restriping of parking areas for van accessible spaces with installation of appropriate signage. The town may also identify opportunities to relocate programs from inaccessible facilities to other buildings that can offer the same services. In other instances, removal of an existing barrier may be deemed too costly for the present Town budget. In these cases, alternative strategies may be appropriate, such as bringing the service to the person with a disability until such time as the town can afford to mitigate the existing barriers. Ultimately,

Leicester will need to formalize a process to review its architectural and programmatic barriers in order to prioritize strategies it can implement over the next five to ten years to improve access to its municipal programs.

LEICESTER SELF-ASSESSMENT

According to the town's Annual Town Report, Leicester provides municipal programs and services through the following departments, boards, and committees:

Board of Selectmen	Art Council
Town Administrator*	Bandstand Committee
Board of Assessors*	Cable Advisory Committee
Town Accountant*	Hillcrest Country Club Sub-Committee*
Treasurer/Collector*	Historical Commission
Emergency Medical Services*	Public Library*
Fire Department*	Parks & Recreation Committee
Highway Department*	Recycling Committee*
Police Department*	Veterans' Services*
Tree Warden/Pest Control	Animal Control
Code Department*	Council on Aging*
Conservation Commission	Board of Health*
Moose Hill Water Commission	Town Clerk*
Planning Board*	Board of Registrars
Zoning Board of Appeals	Leicester Public Schools*

To initiate this planning process for this project, the Town Administrator invited municipal departments with full- or part-time staff (identified with an asterisk above) to a meeting with COG to review the self-assessment questionnaire and receive instructions and a deadline for completing it. COG asked the Building Inspector, who serves as the town's ADA Coordinator, to review the town's employment and grievance procedures and communications systems. All of Leicester's departments returned self-assessment questionnaires for this plan. Copies of questionnaires received are on file with the town's ADA Coordinator.

Accounting	Library
Ambulance	Park & Recreation Committee
Assessors	Planning
Board of Health	Police Department
Board of Selectmen	Recycling Committee
Code	School Department
Council on Aging	Town Clerk
Fire Department	Treasurer/Collector
Highway	Veterans' Services
Hillcrest Country Club	

SUMMARY OF RESPONSES

**Leicester Town Hall
3 Washburn Square
Leicester, MA 01524**

Board of Selectmen/Town Administrator

The Board of Selectmen's office operates as the central office for public inquiries at Town Hall. The office is staffed on a daily basis by the Town Administrator and Administrative Assistant, and it also contains the town's Human Resources Division. As the town's chief executive, the Board of Selectmen establishes public policy that affects the entire town and oversees a wide range of local government services, including the issuance of permits and licenses, the processing of public bids, and the administration of property and workers compensation insurance. The Board of Selectmen also coordinates town meetings and bi-monthly selectmen's meetings and is responsible for scheduling public use of the Town Hall auditorium and meeting rooms.

In a given year, the Board of Selectmen's office interacts directly with more than 1,000 people, including public officials, town employees, and the general public. While the Board of Selectmen's office is funded entirely with local revenue, the self-assessment questionnaire notes that Leicester does receive federal grants as well.

The Selectmen recognize that the town currently offers very limited accommodations for those with disabilities. Leicester's standard employment application notifies prospective job applicants of the town's non-discrimination policies, but other town service publications do not inform the public of disability accommodation policies or how to request accommodation. Similarly, these other publications are not available in accessible formats.

While the self-assessment questionnaire indicates that the Selectmen can offer accommodations for individuals with mobility impairments at their office in Town Hall, the facility survey completed for this plan identifies barriers that render the building only partially accessible. (See Appendix A.) This includes the top floor of Town Hall, which is only partially utilized due to limited access to this space. The town recognizes that to fully utilize this floor for public programming, accessibility modifications will be required, including installation of an elevator that would serve all levels of the facility. It expects to apply for grant funds in 2012 to complete the structural modifications necessary to make this floor accessible.

In regards to programmatic access, the questionnaire indicates that the Board of Selectmen does not currently provide auxiliary aids to make programs available to people with communication impairments, present written and spoken materials in formats accessible to people with sensory or mental impairments, or offer awareness training sessions to help employees and elected or appointed officials meet the needs of people with disabilities.

In concert with this plan, the town recently reconvened the Commission on Disabilities, which had been inactive for many years.

Board of Health

Leicester's health department, which is staffed by a Health Director, an Assistant, and a Public Health Nurse, provides educational assistance and instruction to more than 300 residents and businesses annually. The department conducts public health clinics and offers vaccinations to the public. The department also addresses complaints for nuisance properties, housing problems, and septic failures. The department is funded through municipal appropriation but also receives federal funds through CDC grants for health related needs. According to the self-assessment survey, the department does not currently provide accommodations for residents with disabilities. However, all health clinics are conducted at the Senior Center to provide accommodations for residents with mobility impairments.

Code Enforcement Department

Leicester's Code Enforcement Department is responsible for building inspection and code enforcement services, including building, electrical, plumbing, and gas inspectional services as well as zoning and building code enforcement. The Department is staffed by a Code Enforcement Officer, two clerks, and several inspectors. The Code Enforcement Officer also serves as the sealer of weights and measures, supervises custodial staff, and has responsibility for four municipal buildings.

The Department interacts with hundreds of residents and building professionals annually, and it is funded with municipal appropriations and permit fees. According to the self-assessment questionnaire, department staff has limited awareness of Section 504 and ADA and their possible impacts on local government programs, services and activities, despite the Code Enforcement Officer's role as the town's ADA Coordinator.

Town Clerk

The Town Clerk serves one of the most public roles in Leicester's municipal government, interacting with residents and local officials on a daily basis. Responsibilities include maintaining vital records, providing various licenses, and overseeing voter registration, local, state and federal elections, and census collection. The Clerk is also responsible for maintaining records for Town Meeting, as well as public notices, meeting minutes of all town boards, commissions and committees, and permitting decisions made by development review boards. The Town Clerk's operating budget is financed entirely with local revenue.

According to the self-assessment for this department, the elected or appointed officials and employees affiliated with the Town Clerk's office are not familiar with Section 504 and ADA and their possible impacts on local government programs, services, and activities, particularly as they relate to Town Meeting and elections. In many instances, services provided by the Clerk's office are not accessible to individuals with disabilities, although staff tries to accommodate individuals with mobility impairments whenever possible. Town Meeting is not accessible to those with visual or hearing impairments, although the town has never received a request for accommodations in the past. The town's election process is accessible. The town utilizes automark voting machines for the hearing and visually impaired and voting booths are physically accessible to residents with mobility impairments. All four town precincts vote in the

auditorium at Town Hall. However, the Clerk's office does not publicize the availability of these services.

Presently, public informational materials provided by the Clerk's office are not available in accessible formats. However, through this planning process, the town identified a TTY telephone that was donated several years ago and is in the process of installing the machine in the Clerk's office. Once the phone is installed, staff will require training in how to use the machine and the service must be promoted to the public through municipal stationary and other informational literature.

Treasurer/Collector

Leicester's Treasurer/Collector department is staffed by three employees and is responsible for the town's tax collections (real estate, personal property, and motor vehicle excise); municipal payroll and benefits for current and retired employees; municipal cash management. The department is also responsible for disseminating information to the general public by phone and in person, and works closely with other town finance officials. The Treasurer/Collector's operating budget is financed entirely with local revenue.

According to the Treasurer/Collector's self-assessment, officials and employees affiliated with this department are not familiar with the requirements of Section 504 and ADA. Public information materials are not available in accessible formats, and there are no systems in place to communicate with people with disabilities. However, the Treasurer/Collector notes that Town Hall is accessible to people with mobility impairments.

Town Accountant

A Town Accountant is primarily an "internal" service provider, i.e., a department that works with other town departments more than with the general public. In Leicester, the Town Accountant provides accounting services for all town departments and the Leicester Public Schools. This department has little direct contact or communication with the general public.

The self-assessment survey completed by the Accounting Department indicates that staff is unaware of Section 504 and ADA and believe that accessibility accommodations are not applicable to their services since they do not interact directly with the general public.

Town Assessor

Leicester's Town Assessor works with the public on various tax and assessment related issues. According to the Assessor, the office assists approximately 1,500 individuals each year. The office is funded through municipal appropriations, although fees are collected for the creation of abutters' lists. The self-assessment survey completed by the Assessor acknowledges a lack of understanding of Section 504 and ADA by department staff and notes that limited accessibility accommodations are offered through this department. However, the department does provide informational material in large print format and hosts tax exemption presentations at the Senior Center, which is accessible for those with mobility impairments.

Office of Veteran's Services

Leicester's Veteran's Agent provides assistance to local veterans from his office in Town Hall. Assistance needs vary by veteran and can include assistance with accessing health care services, education benefits, fuel assistance, burials, and Welcome Home Bonus programs as well as identifying employment opportunities. The Agent also assists veterans with obtaining lost service records, replacement medals, and notary public services. According to the returned questionnaire, the Agent is aware of Section 504 and ADA and their possible impacts on local government programs, services, and activities but does not currently advertise the department's services so that people with visual, speech, or hearing impairments can learn about the program independently. However, the Agent does schedule programs at the Leicester Senior Center to accommodate veterans with mobility impairments.

Planning Department

The Office of Planning is responsible for the review of construction permit applications, public hearings associated with these applications, and long-range planning activities. While interaction with the public varies each year depending on development trends and construction activity, the Planning Office serves several hundred people each year. Funded primarily through local appropriations, the department does charge user fees for permit applications and has applied for and received federal grants in the past. Public meetings and the department's office are located in the ground floor level of Town Hall, which is accessible from the parking area. However, as noted earlier, Town Hall is not fully accessible. The department does not provide additional accessibility accommodation for those with visual or hearing impairments.

Leicester Senior Center 40 Winslow Avenue

Council on Aging

The Leicester Council on Aging (COA) maintains a staff of Director, Outreach Coordinator, and Site Manager and is funded with local appropriations, fees, and regional and state grants. The COA offices are located at the Leicester Senior Center, which also includes kitchen facilities, an eating area, and a general assembly area. Programs offered at the Center include a variety of recreational, educational, social, and health programs. The COA's services also include transportation for seniors and people with disabilities, a daily congregate lunch program, Meals on Wheels, and individualized assistance. According to the COA's 2010 Town Report, the Senior Center served approximately 8,000 seniors through its programs and individualized services and provided 4,000 rides, 6,000 meals offered at the center, and 7,000 meals delivered through its Meals on Wheels program. The COA promotes its services and programs through a monthly newsletter, the town's website, and outreach efforts.

The COA's self-assessment survey indicates that its facility is accessible and it offers the Senior Center to other local non-profit groups and various municipal departments. The COA offers a specialized exercise program (Zumba Gold) specifically designed for individuals who cannot participate in the regular class. The COA also utilizes text telephones (TTY) or Telecommunication Devices for the Deaf (TDD) to communicate with participants with hearing

impairments, but does not list this service on its letterhead or promotional materials. The COA does not currently offer accessible services to individuals with visual impairments. The COA states that it could provide additional auxiliary aids such as audio tapes or sign language interpreters; present written and spoken materials in other formats, e.g., an interpreter, in printed form, in braille, on audio tape, in large print, or through illustrations; and conduct awareness training sessions for employees and others affiliated with the Senior Center. However, the COA does not currently have funds available for these purposes.

**Leicester Public Library
1136 Main Street**

Library

Leicester's Public Library serves approximately 2,000 patrons a month, with 45,000 materials circulated annually. The library also hosts educational programs for approximately 1,500 to 2,000 adults and children each year. The library budget is funded through municipal appropriation and state and local grants. While the library has received federal grants in the past, it has not received any federal funds recently.

The library offers a variety of services including circulating books, audio and visual materials, museum passes, educational and cultural programs, reference services, genealogy, and internet access. According to the Library's self-assessment, it offers limited accessible programming and services for users with disabilities, including large print books, audio books, and captioned material as well as accessibility accommodations for reference services but does not promote these services through its website or letterhead. The self-assessment questionnaire also notes that the Library advertises its programs, services, and activities in print and online to allow individuals with speech and hearing impairments to learn of these programs independently. For individuals with mobility impairments, the library offers programs in the Children's Room in the basement level of the library, but these programs are not accessible for those with hearing or visual impairments. However, the library has not received any requests to date seeking additional accommodations. The Library acknowledges that it could offer additional accessible programs and services but does not have funding in place to pay for these services.

The Library has long recognized the need for accessibility modifications at its facility. As identified in the Facility Survey in Appendix A, the library building has limited access for patrons with disabilities through a ramp to an entrance at the basement level. The Library is in the process of a Capital Campaign and recently commissioned a study to evaluate the feasibility of renovating and expanding the library facility, which would include accessibility improvements. The Library expects to receive notification on a potential state grant to fund a portion of this work by July of 2012.

**Leicester Police Station
90 South Main Street**

Leicester Police Department

The Leicester Police Department is the primary provider of law enforcement services for the community. Funded through local revenues, the Department interacts with the community through a variety of means, including by telephone, drop-in, and emergency call assistance. According to the Department's self-assessment, the department's service window is utilized by approximately 15 individuals per day, or 5,475 people per year. The Department also hosts approximately 25 training seminars and community meetings in its training room each year. With an average attendance of 20 participants per class, these activities account for an additional 500 individuals accessing the facility each year. According to the LPD self-assessment survey, a number of individuals with physical disabilities attend the department's training seminars. The facility survey completed for this study indicates that the Police Station is accessible to individuals with mobility impairments through ramps, automatic doors, and handicapped parking.

The Department's self-assessment survey indicates that department officials and employees are somewhat familiar with Section 504 and ADA. While the department does not emphasize its services as accessible to people with disabilities through advertisements, press releases, newsletters and other publications, it does advertise its services and activities in multiple media venues, including newspapers, the town's email alert system, and the local public access cable station, to allow people with visual, speech, or hearing impairments to learn of the department's services independently. The department utilizes Text Telephones (TTY) or Telecommunication Devices for the Deaf (TDD) in its 911 emergency call system to allow access by hearing-impaired individuals and alerts the public to this service through promotional material. However, the TDD/TTY number is not published on the department's letterhead or website.

The Police Department reports that it does not provide accessible communications by presenting written and spoken materials in other ways, such as by interpreter, in printed form, in braille, on audio tape, in large print, or through illustrations. It also reports that while it has held awareness training sessions in the past to sensitize employees, elected or appointed officials affiliated with the department to the needs of people with disabilities, it would need additional funding to host these sessions today.

**Leicester Fire Department
Headquarters, 15 Water Street
Cherry Valley Station, 226 Main Street
Rochdale Station, 1055 Stafford Street**

Fire Department

The Leicester Fire Department provides fire protection and inspection services for the town through the service of 50 on-call firefighters at three fire stations. The town's 2010 Annual Report notes that the department responded to a total of 215 incidents in 2010, an increase from the

previous year. These incidents included structure and brush fires, motor vehicle accidents, and carbon monoxide emergencies. The department also conducts information sessions for local schools and daycares through its SAFE (Students Awareness Fire Education) program.

Leicester's Fire Department is funded through local appropriations with fees charged for inspections. According to the department's self-assessment questionnaire, employees are not familiar with Section 504 and ADA and their possible impacts on programs, services, and activities provided through the fire department. Emergency calls are routed through the town's 911 dispatch service which provides TTY and TDD for hearing-impaired individuals.

Emergency Medical Services

Leicester's Ambulance department is staffed by 30 on-call Basic and Paramedic EMT employees. The department is funded through fees charged for ambulance calls. As with the town's Fire Department, all EMS calls are routed through the town's 911 telephone emergency service, which has TTY and TDD capabilities. (See Police Department summary above.) In 2010, the department responded to 894 calls for medical assistance, treatment, and or transportation to area hospitals. In addition to emergency assistance, the department also sponsors an annual EMT basic course for area residents who are interested in becoming an emergency medical technician.

Highway Department 59 Peter Salem Road

Highway Department

The Highway Department is responsible for infrastructure maintenance and improvements as well as building maintenance for the Police Station, Library, and Senior Center, and landscape maintenance at all Veteran's Squares and the town's cemeteries, parks, and fields. The department operates with both local and Chapter 90 funds. According to the department's self-assessment questionnaire, department staff are aware of Chapter 504 and ADA requirements as they relate to sidewalk standards, snow removal, and handicap parking at the town's ball fields. The department has limited interaction with the public and does not offer any public programs or activities.

Hillcrest Country Club 325 Pleasant Street

The Hillcrest Country Club, which was acquired by the town with a combination of local funds and a federal land and water conservation grant, is operated by a private management company that oversees the nine-hole golf course, pro-shop, restaurant, and function facility. While attendance at the club varies, an average of 100 people use the facility each week. The Country Club is self-funding, with greens fees for golf and rental fees charged for the use of the function room. According to the self-assessment completed by the Country Club, the facility provides accommodations only for individuals with mobility impairments. However, the facility review

completed for the Country Club's buildings and parking area identifies several modifications necessary to bring the facility into compliance. (See Appendix A)

Leicester Parks, Playgrounds & Fields

Parks & Recreation Committee

The Leicester Parks & Recreation Committee is a volunteer board charged with the management of several town fields, parks, and playgrounds as well as the coordination of various recreational programs and cultural activities. According to the Committee's self-assessment survey, between 300 and 500 people participate in its programs each year. While the Committee does advertise its programs in multiple media so that individuals with visual, speech, or hearing impairments can learn of its services independently, it does not currently offer programs in an integrated setting appropriate to the needs of people with disabilities and it does not sponsor any programs specifically designed for people with disabilities. The Committee notes that auxiliary aids such as TDD or TTY, audio tapes, or sign language interpreters could be provided depending on the program offered but are not currently available.

The Committee recently oversaw the repair and upgrade of the baseball field at Rochdale Park and the installation of a volleyball court and playground equipment at Towtaid Park. In 2002 and 2004, the town completed Master Plans for Rochdale Park and Towtaid Park, respectively. These studies included recommendations related to ADA compliance for access to recreational fields and equipment as well as to historic and natural features. In 2007, the town completed an ADA Facility Inventory for each of its recreational facilities.

Leicester Public Schools
High School, 170 Paxton Street
Middle School, 170 Paxton Street
Memorial School, 11 Memorial Drive
Primary School, 170 Paxton Street

Leicester School Department

The School Department serves approximately 1,850 students in grades Pre-K through grade 12 in four separate school buildings: two elementary schools (Pre-K to grade 2 and grades 3-5), one middle school, and one high school.

The Leicester School Department is funded through local revenue, school choice, and federal and state grants. Since the School Department receives federal funds, it is subject to both ADA and Section 504 requirements. Due to long-standing special education requirements, public schools throughout the Commonwealth tend to have many systems and procedures in place to accommodate people with disabilities. According to the self-assessment questionnaire submitted by the Leicester School Superintendent, the town's schools provide special education and 504 services to accommodate people with disabilities. For example, the schools have installed carpeting in specific classrooms to reduce ambient noise for students with Cochlear implants.

School staff are aware of Section 504 and ADA and their possible impacts on department programs, services, and activities and the Leicester Schools have materials for communicating with people with learning or developmental disabilities. The School Department works with social service and advocacy organizations, including the Department of Mental Health, to accommodate participation by people with developmental disabilities. According to the Superintendent, the School Department also provides information on non-discrimination and disability accommodations in its publications, recruitment materials, program applications, and other literature about the school's programs and services. However, according to the facility survey that was completed as part of this Transition Plan, the Leicester School system does not have fully compliant facilities for individuals with mobility or visual impairments. (See Appendix A.)

**Recycling Center
200 Mannville Street**

Recycling Committee

Leicester has operated a Recycling Center for more than nineteen years with a highly successful rate of recycling in the community. Today, between 3,500 and 5,550 residents use the facility each month to recycle white goods, electronics, yard waste, and paper, metal, Styrofoam, and glass. For residents who are physically unable to drive to the recycling site, the center will send a volunteer to their home to retrieve recyclables. For residents who are able to access the site but cannot remove their recyclables from their vehicle, attendants at the facility will assist them. These services are promoted in written format on the center's website and informational brochure. The Center's Coordinator is actively involved with social service and advocacy organizations for people with disabilities. The Center has several volunteers with physical, visual, and hearing impairments and the facility is designed to accommodate a range of disabilities.

**Town Common and Bandstand
Washburn Square**

Bandstand Committee

The volunteer Bandstand Committee is responsible for overseeing the use and schedule of activities on the Town Common and Bandstand. The historic common and more recently constructed bandstand are used for six to eight weddings and eight to nine concerts every year and is also the site of the town's annual Harvest Fair, Memorial Day events, and tree lighting ceremony in December. Town residents may use the facility for free, but a \$10 fee is charged if electrical service is needed. The Committee, which is not responsible for sponsoring or organizing events, responded to most questions on the self-assessment survey as "Not Applicable."

MUNICIPAL POLICIES AND PROCEDURES

As part of this planning project, the consultant reviewed the town's employment policies and a sample of job descriptions to determine compliance with Section 504 and ADA Title II equal employment opportunity requirements.¹ The Town's Employee Handbook and general employment applications include non-discriminatory language, an Equal Opportunity Policy, and an ADA Policy. In addition, the Town has adopted a series of harassment policies prohibiting discriminatory harassment, sexual harassment, and protected class harassment, as well as policies relating to internet and cell phone usage. Furthermore, job descriptions recently revised by the town include clear descriptions of the tasks, skills, and physical requirements associated with each position. The job descriptions reviewed for this plan satisfactorily address ADA non-discrimination requirements. However, so many of the town's public facilities have architectural barriers that it would be very difficult for a qualified person with a disability to work for the Town of Leicester.

The Town of Leicester has also adopted a local ADA Grievance Policy and appointed an ADA Coordinator and Commission on Disabilities. Still, the Town has no formal policies or procedures in place to comply with Section 504 and ADA Title II requirements covering effective communication and program and facility accessibility.

KEY FINDINGS AND CONCERNS

Awareness and Understanding of ADA Obligations

- ◆ While all town departments and requested committees returned their self-assessment questionnaires, many responded "Not Applicable" to questions relating to program access. In some instances, the responding department has limited interaction with the general public and may believe that ADA does not apply to their services. For others, the use of N/A may reflect a lack of familiarity with ADA, a lack of understanding about what it means to accommodate people with sensory or mental impairments, and a lack of knowledge about accessible design. For all departments, regardless of how frequently they interact with the public, the town needs to provide technical assistance and training so that local officials and employees understand their legal obligations under ADA.
- ◆ Other respondents to the self-assessment questionnaire acknowledge a lack of understanding by elected or appointed officials and employees on Leicester's ADA obligations and what is required to provide effective program access. Educating and training town committees and employees about Leicester's legal responsibilities under ADA and formalizing procedures for program accommodations will require a commitment from the Board of Selectmen.

¹ The job descriptions reviewed include the Assistant Tax Collector, Assistant Town Accountant, COA Bus Driver, Department Assistant 2, EMS Coordinator, Heavy Equipment Operator, Health and Conservation Assistant, and Truck Driver.

- ◆ Leicester's recently re-established its Commission on Disabilities, which will be integral in the town's efforts to educate local staff and officials on ADA obligations. The Commission will also be instrumental in the town's efforts to develop program access criteria, identify structural and programmatic barriers, and institute plans to address them.

Architectural Barriers

- ◆ As evidenced in the Facilities Study in Appendix A, the list of existing conditions in Leicester that are not compliant with the ADA standards is extensive and will require a significant financial commitment to address. Therefore, it will be important for the town to review these identified barriers to determine whether they represent a barrier to a Town program or service and then develop a strategy to prioritize their mitigation. To be successful, this effort should include participation by the Board of Selectmen, Commission on Disabilities, facility managers, town staff, and individuals with disabilities. Identifying and addressing barriers that can be modified with minimal financial and staff resources, such as replacement of existing hardware with accessible features, will enable the town to begin barrier removal quickly. Appropriating a small annual budget for these projects will also be important.
- ◆ Not all of Leicester's existing architectural barriers may require modifications. The town may determine that a public program or service can be relocated to a more accessible location within the facility or to another facility altogether that can offer the same service. This may be particularly important for those architectural barriers that the town determines to be substantially cost prohibitive to remove. It is important, however, that the town provides public notification that alternative accommodations are available for individuals who request them.
- ◆ While Town Hall respondents perceive the building they work in to be accessible to people with mobility impairments, the facility has numerous ADA deficiencies as identified in the Facility Survey in Appendix A. Despite the ability to enter the Ground Floor level of the building where some meeting rooms and offices are located, interior maneuverability remains inadequate and restroom facilities are not compliant. In addition, existing ramps, service counters, and doors within Town Hall do not meet ADA requirements. While other town facilities are more accessible, particularly those constructed within the past ten years, virtually all of Leicester's community facilities have some ADA deficiencies.² As long as local officials and/or staff believe existing public buildings comply or substantially comply, Leicester will have trouble establishing consensus about barrier removal priorities.
- ◆ Leicester has several historically significant municipal facilities: the Public Library (1896); the Greenville Library (aka Copeland Memorial Library, 1884); Town Hall (1939); and the Town Common (1719). The Town Hall and Common are listed on the National Register of Historic Places within the Washburn Square – Leicester Common Historic District.

² Facilities constructed after the American with Disabilities Act was adopted in 1990 are subject to a higher accessibility standard.

The Greenville Library is protected through a preservation restriction, limiting alterations to the historic building. Before undertaking any barrier removal projects on these historic resources, Leicester should consider ways to protect each facility's historic features.

Communication Barriers

- ◆ In addition to the presence of mobility barriers, most department heads and town committee respondents also acknowledge barriers to individuals with hearing, visual, and learning disabilities. This includes a lack of the following services:
 - Regular information about physical or programmatic access to its programs and services;
 - Text Telephones (TTY) or Telecommunication Devices for the Deaf (TDD);
 - Assistive listening devices;
 - Narrated or captioned audio-visual materials;
 - Printed material in large print, on audio cassette tape or in Braille; and
 - Materials available for communicating with people with learning or developmental disabilities.
- ◆ The installation of a TTY telephone system at Town Hall will significantly improve the town's ability to communicate with individuals who have hearing impairments. Once staff are trained to use this system, it will be important to publicize the service to the public.
- ◆ During the self-assessment and training process for this plan, several town staff acknowledged their efforts to accommodate individuals with disabilities whenever possible, such as copying printed material in a larger scale format and relocating to low tables when individuals cannot access service counters. However, the town has not adopted formal policies regarding these accommodations and it does not publicize their availability.

TRANSITION PLAN RECOMMENDATIONS

- ◆ Provide resources to the newly established Commission on Disabilities for training and staff support and charge the Commission with responsibility to conduct an analysis of program and service needs of Leicester residents with disabilities.
- ◆ Establish technical assistance relationships with the Massachusetts Office on Disability (MOD) and regional organizations serving people with disabilities in order to build the

town's capacity to serve Leicester residents with disabilities, provide training to the Commission on Disabilities, town officials and employees, and provide public education. *See Other Resources section for contact information.*

- ◆ Complete installation of TDD/TTY telephone service at the Town Clerk's office in Town Hall and provide training to staff to operate the equipment.
- ◆ Change the letterhead used by town departments and the schools to include TDD/TTY telephone numbers.
- ◆ Improve the town's website by providing a link on the home page to a page with disability information. Provide basic print and audio information about Leicester's non-discrimination policies, the TDD/TTY telephone numbers for all facilities or departments with TDD/TTY capability and the name and contact information for Leicester's ADA Coordinator and the Disability Commission. In addition to information about accessibility, the accessibility of the website itself should be improved.
- ◆ Develop and print a brochure that can be distributed at public service counters in Town Hall, the Library, the Senior Center, and other public buildings, with the town's nondiscrimination policy, TDD/TTY numbers, and contact information for the ADA Coordinator and Commission on Disabilities. The brochure should also be available in alternative formats - e.g. large print, Braille, computer disk, etc., and be accessible through the town's website.
- ◆ Review all municipal job descriptions for clarity and insipient barriers. *See Other Resources section for resources relating to equal employment opportunity requirements.*
- ◆ Adopt and administer municipal policies and procedures in compliance with Section 504 and ADA Title II covering general administrative requirements, non-discriminatory program operations, effective communication, equal employment opportunity, and program and facility accessibility. *See model policies and procedures in Appendix D.*
- ◆ Begin a public process to review architectural barriers identified in Appendix A to determine each barrier's impact on program accessibility. Participants in this discussion should include the Commission on Disabilities, the Leicester ADA Coordinator, the Board of Selectmen, facility managers, town staff, and individuals with disabilities. For those barriers that are prohibiting equal access to municipal programs that cannot be addressed through modifications in local policies or procedures, such as relocation of service or programs to an accessible location, the town should prioritize the removal of these barriers through the use of locally developed program access criteria. A sample list of nine program access criteria is provided in the Facilities Study in Appendix A. This list includes the following:
 - Provide a public entrance that is accessible without assistance;
 - Provide an accessible public parking space(s) at each facility;

- Provide an unobstructed exterior route between public street and accessible public entrance;
 - Provide an unobstructed exterior route between public accessible parking and public accessible entrance;
 - Provide visual alarms in building with fire alarm systems;
 - Provide signage to identify all accessible elements when not all elements are accessible;
 - Provide an accessible route to each municipal department;
 - Provide an accessible counter, folding shelf or table at transaction counters;
 - Provide a fully compliant toilet room; and
 - Provide an unobstructed interior route connecting accessible entrance with all accessible elements in facility.
- ◆ Once the town has prioritized its architectural barrier removal needs, considering factors of safety; independent access; degree of public contact or public use of each facility; and efficient use of public funds, the town should develop an implementation plan (*see Appendix E for Draft Implementation Schedule*) assigning department or official responsibility and identifying appropriate funding sources.
 - ◆ Establish a small annual appropriation to address barrier removal projects, both communicative and architectural, that can be remedied with nominal expense.
 - ◆ Incorporate smaller scale barrier removal projects into facility maintenance plans.
 - ◆ Develop a capital planning process to address barrier removal projects requiring more significant expenditure of funds. This process should also include identification and pursuit of available grant programs to fund these projects.
 - ◆ Continue efforts to pursue grant funding for barrier removal at Leicester's Town Hall and Public Library.
 - ◆ Complete an annual review and update of this Transition Plan through a public hearing process to identify additional accessibility concerns and address any needed reordering of priorities.

ADDITIONAL RESOURCES

Technical Assistance:

Massachusetts Office on Disability (MOD)

<http://www.mass.gov/mod>

Telephone: 617-727-7440

Toll-free: Voice/TTY: 1-800-322-2020

New England ADA Center

<http://www.humancentereddesign.org/neada/site/home>

Telephone: Voice/TTY: 1-800-949-4232

Free Web course on employment requirements under ADA Title I

Department of Justice

<http://www.ada.gov>

ADA Information Line - Telephone: 1-800-514-0301; TTY: 1-800-514-0383

Toolkit for Local Governments - <http://www.ada.gov/pcatoolkit/chap1toolkit.htm>

ADA Guide for Small Towns - <http://www.ada.gov/smtown.htm>

ADA Technical Assistance CD-ROM available

Technical Assistance for Equal Opportunity Employment Policies:

U.S. Equal Employment Opportunity Commission

"The ADA: Your Responsibility as an Employer", <http://www.eeoc.gov/eeoc/publications/ada17>

"ADA Recruiting & Hiring Checklist", <http://www.onlinehumanresources.net/ada-performance-management-best-practices.html>

Funding Sources:

Community Development Block Grant Program (CDBG)

U.S. Department of Housing and Urban Development

The Massachusetts Cultural Facilities Fund (CFF)

Commonwealth of Massachusetts

http://www.massculturalcouncil.org/facilities/facilities_about.htm

This fund provides capital grants for acquisition, design, repair, rehabilitation, renovation (including accessibility improvements), expansion, or construction of nonprofit cultural facilities in Massachusetts. Grant funds are also available to municipalities that own cultural facilities, provided that the facility is at least 50,000 square feet in size and at least 50% of space is devoted to cultural purposes. All grants from the Fund must be matched with cash contributions from the private or public sector.

GLOSSARY

Unless another citation appears, the following definitions and regulatory summaries are condensed versions of the text in ADA Title II, 28 CFR 35. This is not a complete list of ADA requirements.

Disability: a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.

Physical or mental impairment: any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine; or any mental or psychological disorder such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

The term includes but is not limited to contagious and non-contagious diseases and conditions such as orthopedic, visual, speech and hearing impairments, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, specific learning disabilities, HIV disease (whether symptomatic or asymptomatic), tuberculosis, drug addiction, and alcoholism.

The term does not include homosexuality or bisexuality; transvestism, transsexualism, pedophilia, exhibitionism, voyeurism, gender identity disorders not resulting from physical impairments, or other sexual behavior disorders; compulsive gambling, kleptomania, or pyromania; or psychoactive substance use disorders resulting from current illegal use of drugs.

Major life activities: functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

Record of such an impairment: the individual has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

Regarded as having an impairment: the individual has a physical or mental impairment that does not substantially limit major life activities but that is treated by a public entity as constituting such a limitation; or a physical or mental impairment that substantially limits major life activities only as a result of the attitudes of others toward such impairment; or has none of the impairments defined above but is treated by a public entity as having such an impairment.

Historic property: any property listed or eligible for listing in the National Register of Historic Places, or properties designated as historic under state or local law. (ADA Title II provides

special exceptions for architectural barrier removal when modifications would threaten the historically significant elements of a building.)

Individual with a disability: a person who has a disability. The term does not apply to an individual who is currently engaging in the illegal use of drugs when the public entity acts on the basis of such use (i.e., law enforcement actions).

Qualified individual with a disability: an individual with a disability who, with or without reasonable modifications to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a public entity.

Program accessibility: the operation of a public service, program, or activity so that when viewed in its entirety, it is readily accessible to and usable by individuals with disabilities.

Existing buildings: In lieu of making structural modifications to existing buildings, public entities may provide program accessibility through such means as redesign of equipment, reassignment of services to accessible buildings, assignment of aides to beneficiaries, home visits, delivery of services at alternate accessible sites, alteration of existing facilities and construction of new facilities, use of accessible rolling stock or other conveyances, or any other methods that result in making its services, programs, or activities readily accessible to and usable by individuals with disabilities. A public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance. In choosing among available methods for providing program access, a public entity shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

New construction or major alterations: For construction commencing after January 26, 1992 [effective date of 28 CFR 35.00], each facility or part of a facility constructed or altered by, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities... Design, construction, or alteration of facilities in conformance with the Uniform Federal Accessibility Standards (UFAS) or with the Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (ADAAG) shall be deemed to comply...except that the elevator exemption [for commercial buildings] shall not apply to a public entity.

Historic properties: Alterations to historic properties shall comply, to the maximum extent feasible, with the applicable provisions of UFAS or ADAAG. When it is not feasible to provide physical access to an historic property in a manner that will not threaten or destroy the historic significance of the building or facility, alternative methods of [program] access shall be provided...

Curb ramps: Newly constructed or altered streets, roads, and highways must contain curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street level

pedestrian walkway. In addition, newly constructed or altered street-level pedestrian walkways must contain curb ramps or other sloped areas at intersections to streets, roads, or highways.

Communications: A public entity shall take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others.

Auxiliary aids: Appropriate auxiliary aids and services shall be furnished where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity conducted by a public entity. In determining what type of auxiliary aid and service is necessary, a public entity shall give primary consideration to the requests of the individual with disabilities. [Example: for an individual with a hearing impairment, local governments may not limit the form of accommodation to a sign language interpreter – especially since not all people with hearing impairments have been trained to use ASL or SEE. Local governments also may not assume that people with hearing impairments have been trained in speechreading. The needs of a community’s hearing-impaired population should be assessed as part of any accommodation plan.]

Telecommunications: When a public agency typically communicates by telephone with applicants, program participants or employees, TDD’s or equally effective telecommunication systems shall be used to communicate with individuals with impaired hearing or speech. [Telephone relay systems are a permissible alternative, especially in small towns. TDD/TTY is much preferred, but the technology is effective only when town staff have been properly trained to use the equipment.]

Signage: A public agency shall ensure that interested persons, including persons with impaired vision or hearing, can obtain information about the existence and location of accessible services, activities, and facilities. Signage shall be provided at all inaccessible entrances to each of its facilities, directing users to an accessible entrance or to a location at which they can obtain information about accessible facilities. The international symbol for accessibility shall be used at each accessible entrance of a facility.

APPENDIX

A: Kessler McGuinness & Associates Municipal Facilities Report

B: Compliance Overview Questionnaire

C: Self-Assessment Questionnaire

D: Model Policies and Procedures

E. Draft Implementation Schedule



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Town of Leicester

ADA Audit Report



August 15, 20011

Town of Leicester, MA

As part of the development of the Town of Leicester's (the Town) *ADA Self Evaluation and Transition Plan*, KMA performed an accessibility survey of the public areas of the Town's facilities. The purpose of this report is to:

1. Discuss the Town's pro-active barrier removal obligations under Title II of the Americans with Disabilities Act (ADA)
2. Provide our findings regarding the principal existing architectural elements that may present barriers to individuals with disabilities in accessing the programs and services of the Town.

Program Accessibility

The Town has a regulatory obligation to insure that it does not discriminate against individuals with disabilities in the provision of municipal programs and services. The ADA does not necessarily require that all of its facilities be made fully accessible. Rather it requires that all of the Town's programs and services, "when viewed in their entirety" are accessible. The law provides public entities with some flexibility in how this standard can be met. Both structural and nonstructural methods of providing "program access" can be used.

The Town is required to perform a Self Evaluation to determine the barriers that exist to its programs and services. Then it must develop and implement a plan to remove the barriers. The only limit to the Town's obligation is if an action will result in a fundamental alteration to the program or service or create undue administrative or financial burdens.

Existing Conditions

The facility surveys identified numerous non-compliant existing conditions. Some facilities had significant accessibility issues including steps at the building entrance, no accessible route between floors and parking spaces or paths-of-travel with excessive slopes. Facility reports include a barrier statement, a generic mitigation and an estimated cost for barrier removal. Costs are intended for capital planning purposes only. Where a generic mitigation will not provide an adequate solution, the statement "additional study required" is used and an estimated cost is assigned as a place holder. Below are the estimated barrier removal costs for providing *architectural access* to each facility:

Facility	\$
Leicester Memorial School	364,350
Leicester Middle School	63,200
Leicester Primary School	49,900
Leicester High School	65,900
Fire Station Headquarters	63,750
Cherry Valley Fire Station	62,000
Rochdale Fire Station	62,000
Police Station	9,975
Library	434,340
Town Hall	373,500
Council on Aging/Senior Center	62,200
Highway Department	1,950
Office of Veteran Services	20,200
Russell Memorial Park	49,000

Facility	\$
School Department Central Office	57,000
Greenville Library (historic museum)	4,500
Recycling Center	2,000
Hillcrest Golf Course and Clubhouse	59,450
Elliot Cemetery	3,500
Rochdale Park	3,500
Towtaid Park	2,750
Lion's Park	1,700
Waite Street Recreational Fields	64,050
Burncoat Park and Fields	4,750
Burncoat Beach	NA
Town Common and Gazebo	14,500
Sidewalks and Curb Ramps	20,000

The total estimated cost of barrier removal for all facilities surveyed is: \$1,919,965.00. The actual cost of barrier removal will depend upon the strategies adopted by the Town to provide *program access*.

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Highway Department

Office of Veterans Service

Russell Memorial Park

School Department Central office

Greenville Library (historic museum)

Recycling Center

Hillcrest Gold Course and Clubhouse

Elliot Cemetery

Rochdale Park

Towtaid Park

Lion's Park

Waite Street Recreational Fields

Burncoat Parks and Fields

Burncoat Beach

Town Common and Gazebo

Sidewalks and Curb Ramps

Town of Leicester, MA

KMA performed accessibility surveys of the public areas of the following Leicester, MA municipal facilities:

Leicester Memorial School	School Department Central Office
Leicester Middle School	Greenville Library (historic museum)
Leicester Primary School	Recycling Center
Leicester High School	Hillcrest Golf Course and Clubhouse
Fire Station Headquarters	Elliot Cemetery
Cherry Valley Fire Station	Rochdale Park
Rochdale Fire Station	Towtaid Park
Police Station	Lion's Park
Library	Waite Street Recreational Fields
Town Hall	Burncoat Park and Fields
Council on Aging/Senior Center	Burncoat Beach
Highway Department	Town Common and Gazebo
Office of Veteran Services	Sidewalks and Curb Ramps
Russell Memorial Park	

The purpose of this report is to provide a discussion of the Town's pro-active barrier removal obligations under Title II of the Americans with Disabilities Act (ADA) and to:

- Summarize the principal non-compliant elements identified in the survey
- Provide generic barrier mitigation options and costs¹
- Photos of unique and typical barriers

Pro-Active Barrier Removal Obligations

Summary

The Town has a regulatory obligation to ensure that it does not discriminate against individuals with disabilities in the provision of municipal programs and services. The ADA does not necessarily require that all of its facilities are fully accessible. Rather it requires that all of the Town's programs and services, "when viewed in their entirety" are accessible. The law provides public entities with some flexibility in how this standard can be met. Both structural and nonstructural methods of providing "program access" can be used.

The Town is required to perform a Self Evaluation to determine the barriers that exist to its programs and services. Then it must develop and implement a plan to remove the barriers. The only limit to the Town's obligation is if an action will result in a fundamental alteration to

¹ Costs provided by KMA are intended only for order of magnitude budgeting purposes. KMA has developed the cost estimates based on industry reference materials and on work with other public entities.

the program or service or create undue administrative or financial burdens. The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee and must be accompanied by a written statement of the reasons for reaching that conclusion. If it is determined that barrier removal will result in such an alteration or burdens, the Town must still "take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity."

Discussion

The *Americans with Disabilities Act* (ADA) (1990) created a new "protected class" - people with disabilities. It is broad civil rights legislation that protects roughly 54 million individuals in the United States. The ADA defines individuals with disabilities as those who fall into one of the following three categories:

1. Individuals who have a physical or mental impairment that substantially limits one or more major life activities,
2. Individuals with a record of such an impairment,
3. Individuals regarded as having such an impairment.

The ADA requires most public entities to take five administrative action steps:

1. Designate an employee responsible for carrying out compliance activities (This obligation is limited to entities that employ 50 or more people.)
2. Provide notice to the public of its rights and protections under the ADA and how the entity complies with those obligations.
3. The Town must establish a grievance procedure. (This obligation is limited to entities that employ 50 or more people.)
4. Conduct a Self-Evaluation, a comprehensive review of policies and procedures.
5. Develop An *ADA Transition Plan*. (This obligation is limited to entities that employ 50 or more people.)

The Regulatory Context

There are three federal and state laws/codes requiring architectural barrier removal from existing buildings and in alterations to existing buildings. These are:

1. **PL101-336: 1990 *Americans with Disabilities Act (ADA)*.** This is the federal civil rights statute whose first purpose " *...To provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.*" (42 USC 12101. Sec.2(b))
 - a. **28 CFR Part 35: Department of Justice: *Nondiscrimination on the Basis of Disability in State and Local Government Services; Final Rule (1991)*.** These are the U.S. Department of Justice's regulations implementing the ADA, as required in 42 USC 12101, Sec.204(a)).
 - b. **28 CFR Part 35: *Nondiscrimination on the Basis of Disability in State and Local Government Services (as amended by the final rule published on September 15, 2010)*.** These are the Department of Justice's regulations implementing the ADA updated to incorporate *The 2010 ADA Standards for Accessible Design*. All barrier removal being undertaken after March 2012 must comply with these standards. Barrier removal being undertaken between September 2010 and March 2012 may comply with either the 1991 Standards or the 2010 Standards.
2. **29 USC 794: Section 504 of the 1973 *Rehabilitation Act (504)*.**
3. **521 CMR: *The Rules and Regulations of the Massachusetts Architectural Access Board*.** (1977, 1987, 1990, 1992, 1996, 1998) These regulations are *designed to make public buildings and facilities accessible to, functional for, and safe for use by persons with disabilities.* (521 CMR 2.1) They are incorporated by reference as a special code in the Massachusetts State Building Code.

ADA and 504 Barrier Removal Requirements

There are two requirements under Title II of the ADA that require a public entity such as the Town to remove existing barriers to bring an end to and to prevent discrimination against a person or people with disabilities:

- Program Access
- Alterations to existing facilities

These ADA requirements are substantially similar to those of Section 504 of the Rehabilitation Act of 1973. Section 504 was the first federal statute to extend civil rights protections to people with disabilities, drawing on language from the Civil Rights Act of 1964. It requires that programs and services operated by recipients of federal funds must be "accessible to and usable by individuals with handicaps." The word "handicap" was changed to "disability" in subsequent legislation to reflect the preferred nomenclature. Although

enacted in 1973, Section 504 was not effective until 1977 when regulations implementing it were promulgated.

Section 504 was not rigorously enforced, however. As a result, relatively little changed between the promulgation of the Section 504 regulations and the enactment of the ADA. Section 204 of Title II of the ADA specifically states that the ADA's implementing regulations relative to program access and facilities should be consistent with regulations implementing 504. Therefore, when contemplating a compliance plan, it is critical to recognize that the Town's obligations began not in 1990, but in 1977.

Program Access

The ADA's Section 202. Discrimination states:

... no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.

The ADA's Section 204 required that the U.S. Department of Justice (DoJ) promulgate implementing regulations by 26 July 1991, one year after enactment of the legislation. These regulations are 28 CFR 28, published on July 26, 1991. 28 CFR 35.149 states:

... no otherwise qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

28 CFR 35.150 states 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.*

This statutory and regulatory language above describes what is known as "program access" - all programs must be readily accessible to, and usable by, qualified persons with disabilities. In addition, qualified students with disabilities must be provided with equal services in as integrated a setting as possible. The determination of what is an equal and integrated setting will be made on a case-by-case basis. What is appropriate for one person with a specific impairment may not be useful or appropriate for another person with the same impairment. Failure to provide "program access" is an illegal act of discrimination under Title II of the ADA. The Town must identify and correct policies and practices that have the effect of discriminating against individuals with disabilities.

Methods of Providing Program Access

28 CFR 35.150 details the methods that a public entity such as the Town may use to provide program access. These include:

- Reassignment of services to accessible buildings
- Delivery of services at alternate accessible sites
- Alteration of existing facilities and construction of new facilities, or
- Any other methods that result in making its services, programs, or activities readily accessible to and usable by individuals with disabilities.

From an architectural standpoint, this requirement does not mean that every building has to be accessible. However, every program must be accessible.

Limitations on Obligation to Provide Program Access

The ADA's regulations specify certain clear limitations on a public entity's obligation to provide program access. An entity is not required to perform an action that poses an undue financial or administrative burden or constitutes a fundamental alteration. The threshold for an action constituting an undue burden is a high one for state and local government entities. The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee and must be accompanied by a written statement of the reasons for reaching that conclusion. If it is determined that barrier removal will result in such an alteration or burdens, the Town must still "take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity."

Transition Plan

Where the Town's Self Evaluation determines that structural changes are required to provide program access, the ADA requires² that a Transition Plan be developed that establishes the planned barrier removal. The plan is required to:

- *Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities*
- *Describe in detail the methods that will be used to make the facilities accessible*
- *Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and indicate the official responsible for implementation of the plan.*

A copy of the transition plan is required to be made available for public inspection.

² If the Town has 50 or more employees.

If the Town receives federal funds, it was required in 1980 to develop a similar transition plan to achieve program accessibility under Section 504 of the Rehabilitation Act. Under 504, structural or architectural barriers to program access identified in the 504 Transition Plan were to be removed by 1983.

The ADA's Transition Plan was intended as an update of the 504 plan to cover any new programs and services not covered and made accessible under the 504 barrier removal program. The ADA requires public entities either to supplement their 504 Transition Plans or replace them with ADA Transition Plans. The Town should have developed an ADA Transition Plan by July 1992.

Schedule for Program Access Compliance

28 CFR 35.150 sets a time period for ADA compliance stating:

Where structural changes in facilities are undertaken to comply with the obligations established under this section, such changes shall be made within three years of January 26, 1992, but in any event as expeditiously as possible.

Both 504 and Title II of the ADA presume that people with disabilities will be using the programs and services of public entities. In anticipation, they both mandate proactive steps to prevent discrimination by removing existing barriers. They do not permit public entities to wait until a person with a disability arrives before beginning to make accommodations. 504 and Title II mandate proactive barrier removal so that when a student with a disability arrives at school, the programs and services are substantially accessible. Minor accommodations may be needed, but the significant assessment and barrier removal should be complete.

Physical Barrier Removal

The Town must comply with both state and federal regulations when undertaking barrier removal. 521 CMR: *The Rules and Regulations of the Architectural Access Board* is not a civil rights law, like the ADA, and therefore does not have any jurisdiction over the existing programs and services of The Town. However, because 521 CMR is part of the Massachusetts State Building Code, all work being done to mitigate barriers must be in compliance with this code.

Currently the ADA is going through a transition period. In September 2010, The Department of Justice published regulations implementing new ADA standards, called *The 2010 ADA Standards for Accessible Design*. The new standards provide updated scoping and technical requirements for implementing the ADA to new and existing facilities. Compliance with the new standard is optional from September 15, 2010 until March 15, 2012. After that compliance with the 2010 ADA Standard is mandatory.

KMA looked at Leicester's municipal facilities for compliance with the 1991 ADA Standards. While the majority of issues remain intact, certain key issues may be more or less restrictive in the 2010 ADA Standards in terms of conducting barrier removal. For example the 1991 Standards require the centerline of the toilet to be 18" fixed to the nearside wall, while the 2010 Standards allow the toilet to be 16"-18" to the near side wall.

SURVEY FINDINGS AND RECOMMENDATIONS

KMA performed the facility surveys on Wednesday July, 6, Wednesday, July 13, and Wednesday, July 20, 2011. Neither the ADA nor the US DoJ regulations implementing Title II provide specific criteria for *program accessibility*. It is up to the Town to establish its own criteria. The ADA provides no means of verifying the adequacy of an entity's *program access* criteria other than through judicial review. KMA's survey of the Town's municipal facilities focused on identifying typical and significant unique barriers. The Town does not necessarily have an obligation to mitigate all barriers identified and may also seek other ways to mitigate barriers that do not require altering existing buildings. It is the Town's responsibility to establish criteria for barrier removal. For example:

- 1) **Public Parking:** Where parking for the public is provided, or where accessible on-street parking exists, provide accessible space(s).
- 2) **Exterior Route:** Provide an unobstructed exterior route between public streets the public entrance **and** exterior route between public accessible parking and the public entrance.
- 3) **Public Entrance:** The public entrance will be accessible without assistance. Locked entrances will **not** be considered accessible public entrances.
- 4) **Visual Alarms:** In buildings with a fire alarm system, visual alarms will be provided in toilet rooms and other rooms where someone might be alone. If an existing building has no fire alarm, no visual alarms will be added.
- 5) **Signage:** Signage will be added to identify all accessible elements when not all elements are accessible, including parking, entrances and toilet rooms. Permanent rooms and spaces will have tactile/Braille signs.
- 6) **Transaction counters:** Provide an accessible route to each municipal department (unless it would require an elevator solely for the purpose of access to that office). At transaction counters provide an accessible counter, folding shelf, or table.
- 7) **Toilet room:** Provide a fully compliant single user toilet room or accessible elements in one male and one female multi-user toilet room.
- 8) **Drinking Fountain:** If public drinking fountains are provided in the facility, provide at least one combination hi-lo drinking fountain, or one accessible fountain and a cup dispenser.
- 9) **Interior path of travel:** Provide an unobstructed interior route (doors, thresholds, hardware, maneuvering spaces, and floor surfaces etc.) connecting the accessible entrance with all of the accessible elements listed here.

KMA recommends that the Town establish its own *program access* criteria to evaluate and determine the barrier removal that is necessary to provide *program access*. For example, Cherry Valley Fire Station is one of three town fire stations and contains very little public use,

primarily limited to tours for Boy Scouts and people dropping off permits. In addition to this, the cost to mitigate barriers at this facility is very high in comparison to the size of the building. Leicester may want to seek other ways of achieving program access to this facility. Below is a list of possible ways in which Leicester may provide *program access* to its three fire stations.

- 1) Removal all physical barriers at all three fire stations.
- 2) Limit programs and services to one fire station.
- 3) Develop policies and procedures to ensure people with visual and mobility impairments have a safe way of arriving and getting through the building. This may mean temporarily removing a fire engine and allowing a van to deploy its ramp in a vacated engine bay. It may also mean directing wheelchair users through the bay doors where there is a step to the actual building entrance

Barrier removal costs provided by KMA are intended for budgeting purposes only. Construction costs must be determined for each project based on detailed plans. The actual costs for achieving *program access* will be determined by the Town's barrier removal plan.

MEMORIAL SCHOOL



The Memorial School, located at 11 Memorial Drive is a two story building constructed in 1954. There is one public entrance at the front of the building and a secondary entrance adjacent to the parking lot.

1. **Issue:** Main entrance is not accessible. There is no directional signage to accessible entrance.

Recommendation: Provide directional signage to accessible entrance.

Est. Cost: \$100



2. **Issue:** Accessible entrance is locked during business hours. Clear maneuvering space at the door is not level (@5% slope.) Surface of pavement is broken and uneven. Entrance threshold has a change in level $>1/2"$ (@1")

Recommendation: Resurface landing outside of door and patch lip at threshold. Install an automatic door opener. Addressing the locked accessible entrance requires additional study.

Est. Cost: \$8,000



3. **Issue:** There is no striped access aisle at accessible parking. Surface of parking space is not level. Parking signage does not contain the words "van accessible."

Recommendation: Resurface pavement. Restripe an 8' wide access aisle. Install "van accessible" signage at one parking space.

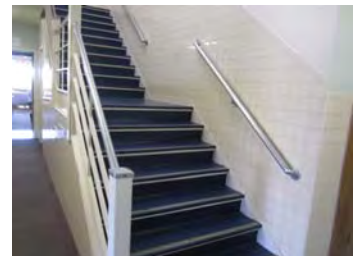
Est. Cost: \$750



4. **Issue:** There is no accessible route between floors

Recommendation: Install an elevator.

Est. Cost: \$250,000



5. **Issue:** Stair handrails are not continuous. Handrails do not extend 12" at top and bottom of stairs. Tread nosings are abrupt.

Recommendation: Replace handrails and repair nosings. (if elevator is installed, stairs do not need to comply.)

Est. Cost: 3 x \$3,500 = \$10,500

6. **Issue:** Door hardware (typical) requires tight grasping and twisting of the wrist.

Recommendation: Provide lever style door hardware.

Est. Cost: 20 (est.) x \$100 = \$2,000

7. **Issue:** Doors do not provide a minimum 32" clear width.

Recommendation: Widen door openings and install new doors.

Est. Cost: 20 (est.) x \$2,000 = \$40,000

8. **Issue:** There is no accessible route to stage.

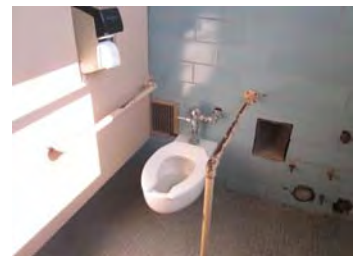
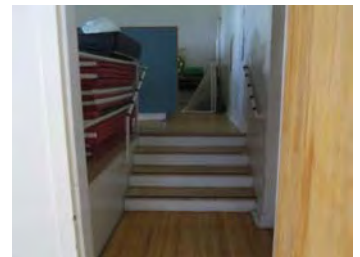
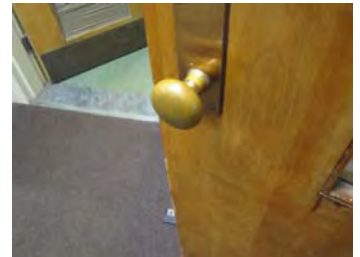
Recommendation: Install a ramp.

Est. Cost: \$20,000

9. **Issue:** There are no accessible toilet stalls. There are no grab bars on both rear and side wall. Flush valves are not on the open side of the toilet. Minimum clearance around the toilet is <56" deep x60" wide. Entrances to toilet rooms have a 1" high threshold.

Recommendation: Install an accessible unisex toilet room on the accessible level (first floor) and provide directional signage to accessible toilet room.

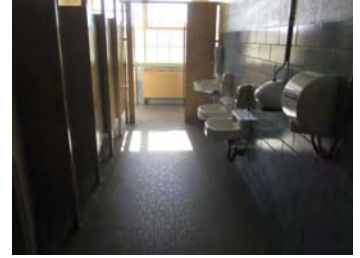
Est. Cost: \$12,000



10. **Issue:** Multi-user toilet rooms have six stalls and therefore an ambulatory stall is required.

Recommendation: See Issue #9

Est. Cost: \$0



11. **Issue:** Bathroom in nurse' office has no accessible elements.

Recommendation: Install an accessible toilet room.

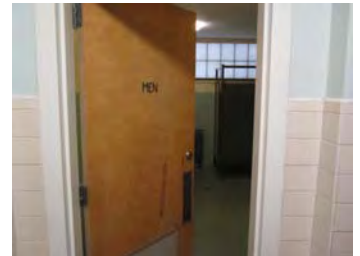
Est. Cost: \$12,000



12. **Issue:** Signage designating permanent rooms and spaces do not have tactile lettering and Braille and are not mounted on the latch side of the door.

Recommendation: Provide tactile/Braille signage at all rooms and spaces.

Est. Cost: 30 (est.) x \$40 = \$1,200



13. **Issue:** Drinking fountain hardware requires pinching, tight grasping and twisting to use. No drinking fountain accommodates persons with difficulty bending.

Recommendation: Replace drinking fountains.

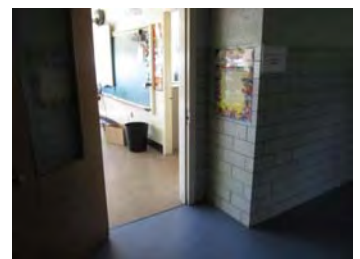
Est. Cost: 2 x \$1,500 = \$3,000



14. **Issue:** Classrooms do not have 18" clear maneuvering space on the latch pull side of the door.

Recommendation: Reverse latch and hinge side of door.

Est. Cost: 3 x \$500 = \$1,500



15. **Issue:** Library sink is mounted greater than 34" AFF. Paper towel and soap dispenser are not mounted within an accessible reach range.

Recommendation: Reposition sink and dispensers.

Est. Cost: \$2,500



16. **Issue:** There is no accessible route to the play areas.

Recommendation: Provide a paved path to the play area.

Est. Cost: \$500



17. **Issue:** There is no accessible route to the flag pole.

Recommendation: Provide a paved path to the flag pole.

Est. Cost: \$300



TOTAL ESTIMATED COST: \$364,350

MIDDLE SCHOOL



The Middle School, located at 170 Paxton Street is a single story building constructed in 1961. There is one public entrance at the front of the building. There is a significant grade change between the Middle School, the High School and their associated playing fields.

1. **Issue:** Access aisle at accessible parking at front entrance is <8' wide. Surface of parking space is cracked and uneven. Signage does not contain the words "van accessible."

Recommendation: Restripe and resurface parking spaces. Add new post mounted signage.

Est. Cost: \$750



2. **Issue:** Accessible parking spaces at side entrance do not have a striped access aisle between them. There are no signs at the head of each space. Surface of parking spaces is cracked and uneven.

Recommendation: Restripe and resurface parking spaces. Add new post mounted signage.

Est. Cost: \$750



3. **Issue:** There is no accessible route from parking to entrance.

Recommendation: Install a curb ramp along sidewalk.

Est. Cost: \$2,000



4. **Issue:** Path to entrance is cracked and uneven.

Recommendation: Resurface asphalt path.

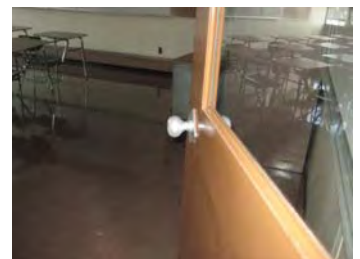
Est. Cost: \$400



5. **Issue:** Door hardware requires pinching, tight grasping or twisting of the wrist.

Recommendation: Replace knobs with lever hardware.

Est. Cost: 2 x \$100 = \$200



6. **Issue:** No drinking fountain accommodates persons with difficulty bending.

Recommendation: Provide a high fountain.

Est. Cost: \$2,000



7. **Issue:** Classrooms do not have tactile and Braille signage.

Recommendation: Install signage with tactile and Braille information.

Est. Cost: 40 x \$40 = \$1,600



8. **Issue:** Diameter of ramp handrails is >1.5". Handrails do not extend 12" at the top and bottom of the ramp.

Recommendation: Replace wall-mounted handrails.

Est. Cost: 80 LF x \$150 = \$12,000



9. **Issue:** Locker hardware requires pinching, tight grasping and twisting to operate.

Recommendation: Install an accessible locker.

Est. Cost: \$200



10. **Issue:** There are no accessible lab sinks.

Recommendation: Install an accessible sink.

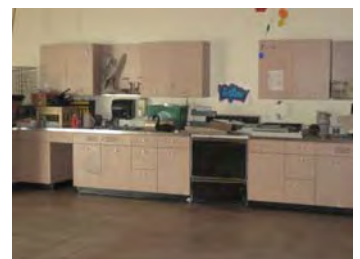
Est. Cost: \$10,000



11. **Issue:** There are no accessible sinks in home economics classroom.

Recommendation: Install an accessible sink

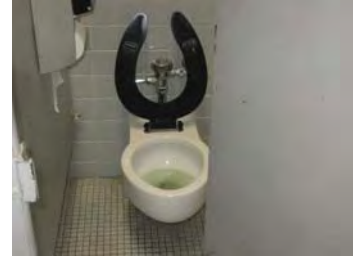
Est. Cost: \$10,000



12. **Issue:** Toilet rooms outside of gymnasium are not accessible.

Recommendation: Provide directional signage to nearest accessible toilet room.

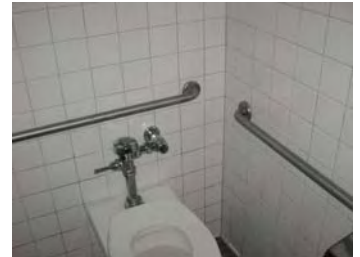
Est. Cost: \$150



13. **Issue:** Grab bars in accessible toilet rooms are mounted <33" AFF (30" -32") Side grab bar extends <54" out from back wall. (@48")

Recommendation: Reposition grab bars.

Est. Cost: 8 x \$200 = \$1,600



14. **Issue:** Lavatory pipes at accessible toilet rooms are not recessed or insulated

Recommendation: Insulate pipes.

Est. Cost: 4 x \$200 = \$800



15. **Issue:** There are no accessible showers in locker rooms.

Recommendation: Install an accessible shower.

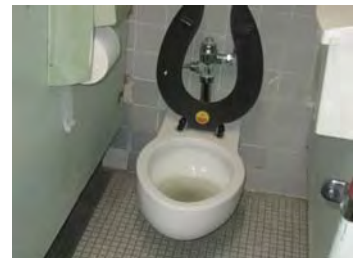
Est. Cost: \$6,000



16. **Issue:** There are no accessible toilet rooms in locker rooms.

Recommendation: Install an accessible toilet room

Est. Cost: \$12,000



17. **Issue:** There are no accessible benches in locker rooms.

Recommendation: Install a bench with a back.

Est. Cost: \$500



18. **Issue:** Library circulation desk does not have a 36" wide portion of the counter at 36" AFF. (@40")

Recommendation: Install an auxiliary counter or shelf.

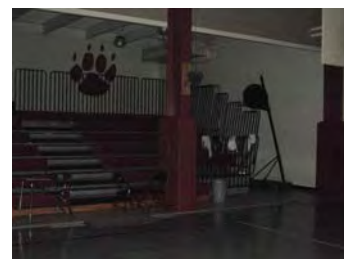
Est. Cost: \$1,500



19. **Issue:** There are no integrated wheelchair spaces at bleachers.

Recommendation: Additional study required.

Est. Cost: \$0



20. **Issue:** There is no accessible route to the tennis courts

Recommendation: Install an asphalt path.

Est. Cost: \$750



21. **Issue:** There is no accessible route to the baseball fields.

Recommendation: Additional study required.

Est. Cost: \$0



22. **Issue:** There is no accessible route to the High School.

Recommendation: Additional study required.

Est. Cost: \$0



TOTAL ESTIMATED COST: \$63,200

PRIMARY SCHOOL



The Primary School, located at 170 Paxton Street is a two story building constructed in 1974. There is one public entrance at the front of the building and a student pick-up area along the side of the building.

1. **Issue:** Curb cut at covered entrance has a slope >8.3%. Bottom landing is abrupt and uneven.

Recommendation: Install a new curb ramp.

Est. Cost: \$2,000



2. **Issue:** There is no van accessible parking. Parking signage is able to be obscured by parked vehicles and does not contain the words "van accessible."

Recommendation: Restripe parking and provide new "van accessible" signage.

Est. Cost: \$500



3. **Issue:** Door hardware (Typical) requires tight grasping and twisting of the wrist.

Recommendation: Provide lever style door hardware.

Est. Cost: 20 (est.) x \$100 = \$2,000



4. **Issue:** Doors to cafeteria lunch line do not provide 32" minimum clear width. There is no 18" wide clear maneuvering space on the latch side of the door.

Recommendation: Replace doors, widen door openings and reconfigure tray slides and freezers.

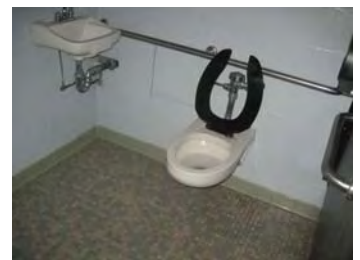
Est. Cost: 2 x \$3,000 = \$6,000



5. **Issue:** All toilet rooms. Centerline of toilet is >18" to the near side wall. Side grab bar is <42" long. Lavatory interferes with clearance within toilet stall.

Recommendation: Reconfigure fixtures and stall.

Est. Cost: \$5,000 x 4 = \$20,000



6. **Issue:** There are no accessible urinals in boy's rooms. Urinal rims are >17" AFF.

Recommendation: Lower one urinal.

Est. Cost: 2 x \$1,500 = \$3,000



7. **Issue:** Lavatories pipes are not recessed or insulated.

Recommendation: Insulate pipes at one lavatory.

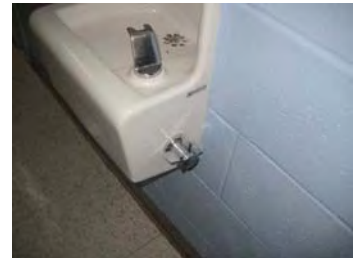
Est. Cost: 4 x \$100 = \$400



8. **Issue:** Drinking fountain hardware requires pinching, tight grasping and twisting to use. Fountain projects >4" into the circulation route and therefore is a protruding object. No drinking fountain accommodates persons with difficulty bending.

Recommendation: Replace drinking fountains and add wing walls.

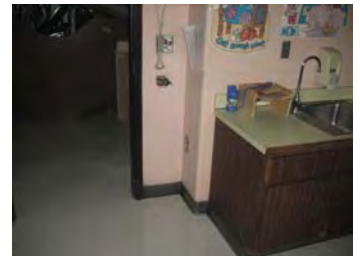
Est. Cost: 2 x \$1,500 = \$3,000



9. **Issue:** Classrooms do not have 18" wide clear maneuvering space on the latch pull side of the door.

Recommendation: Modify door placement.

Est. Cost: \$5,000



10. **Issue:** There is no accessible route to the play areas.

Recommendation: Provide a paved path to the play area.

Est. Cost: \$500



11. **Issue:** Exterior door to kindergarten pickup areas do not have 18" wide clear maneuvering space on the latch side of the door.

Recommendation: Install automatic door openers.

Est. Cost: \$7,500

TOTAL ESTIMATED COST: \$49,900



HIGH SCHOOL



The High School, located at 170 Paxton Street is a three story building constructed in 1995. There is one public entrance at the front of the building. There is a significant grade change between the High School, the Middle School and their associated playing fields.

1. **Issue:** Parking at main entrance has no van accessible parking, access aisle are <8' wide. There is no signage at the head of each parking space, unable to be obscured by parked vehicles. Signage does not contain the words "van accessible".

Recommendation: Restripe pavement markings and provide new signage at the head of each space.

Est. Cost: \$750



2. **Issue:** Curb ramps and concrete path from parking to main entrance is cracked, uneven and has changes in level >1/2".

Recommendation: Repair concrete sidewalk and repair curb ramps.

Est. Cost: 4 x \$500 = \$2,000



3. **Issue:** Parking spaces at main lot do not have signs at the head of each space. Curb ramp overlaps access aisle.

Recommendation: Install sign at the head of each space. Rebuild curb ramp

Est. Cost: \$3,000



4. **Issue:** Fine Arts Center does not have sufficient number of integrated wheelchair locations.

Recommendation: Remove fixed seating in a number of locations throughout auditorium.

Est. Cost: \$500



5. **Issue:** Top handrails along ramp to stage do not have a round or oval gripping surface.

Recommendation: Replace top handrail.

Est. Cost: 100 LF x \$50 = \$5,000



6. **Issue:** Doors to nurse's office do not have 48" between the swing of both doors. (@40")

Recommendation: Reverse the swing of one door.

Est. Cost: \$200



7. **Issue:** Lockers require pinching, tight grasping and twisting.

Recommendation: Provide accessible lockers.

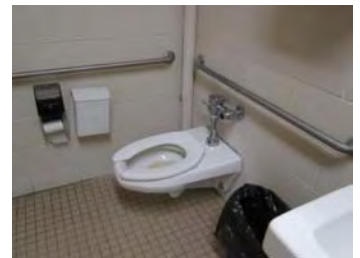
Est. Cost: 5 (est) x \$400 = \$2,000



8. **Issue:** Grab bars in accessible stalls and toilet rooms are not mounted 33"-36" AFF (@30"-32".) Side grab bars extend <54" out from rear wall (@48")

Recommendation: Reposition Grab Bars.

Est. Cost: 7 x \$200 = \$1,400



9. **Issue:** Flush valves are not mounted on the open side of the toilet

Recommendation: Reposition flush valves

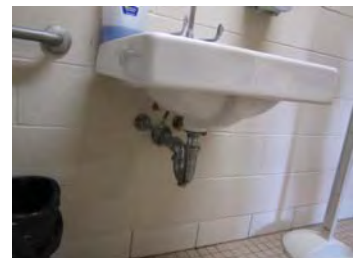
Est. Cost: 4 x \$750 = \$3,000

See above

10. **Issue:** Lavatory pipes are not recessed or insulated.

Recommendation: Insulate pipes.

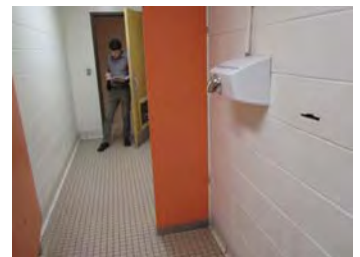
Est. Cost: 7 x \$100 = \$700



11. **Issue:** Dispensers and shelves in multi-user toilet rooms project >4" into the circulation route and are therefore protruding objects. Dispensers interfere with clear maneuvering space for door.

Recommendation: Reposition Dispensers and shelves.

Est. Cost: 6 x \$200 = \$1,200



12. **Issue:** Lavatory mirrors are mounted >40" AFF. (@48"-52")

No photo

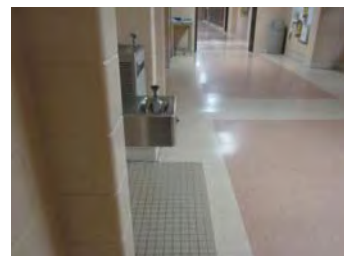
Recommendation: Reposition Mirrors.

Est. Cost: 6 x \$150 = \$900

13. **Issue:** Drinking fountain extends >4" out from wing wall and is therefore a protruding object.

Recommendation: Build out wing walls.

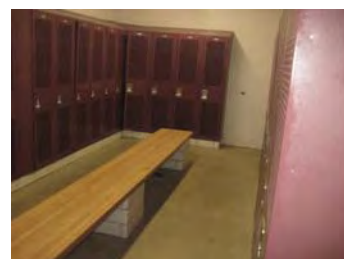
Est. Cost: 3 x \$300 = \$900



14. **Issue:** Locker room benches do not have backs

Recommendation: Provide a bench with a back.

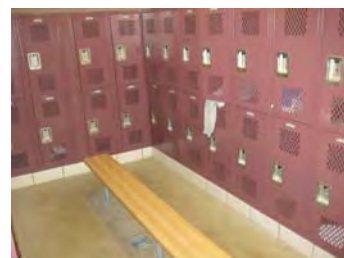
Est. Cost: 2 x \$500 = \$1,000



15. **Issue:** Lockers in locker room require pinching, tight grasping and twisting.

Recommendation: Provide an accessible locker.

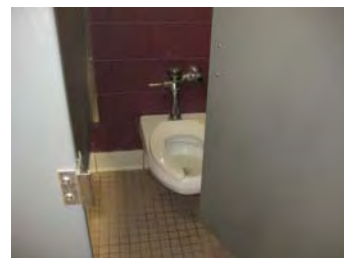
Est. Cost: 2 x \$400 = \$800



16. **Issue:** There is no accessible toilet room in boy's locker room.

Recommendation: Install an accessible stall

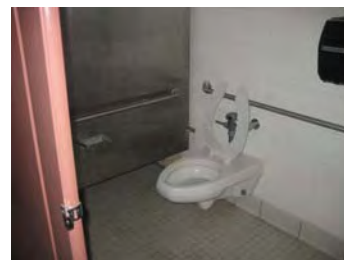
Est. Cost: \$10,000



17. **Issue:** Accessible toilet room in boy's coaches office. Flush valve is not on the open side of the toilet. Side grab bar extends <54" out from back wall (@48"). Paper towel dispenser is mounted over the rear grab bar.

Recommendation: Reposition grab bar. Reposition paper towel dispenser and reposition flush valve.

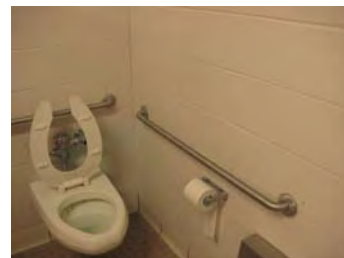
Est. Cost: \$1,500



18. **Issue:** Side grab bar in girl's locker room extends <54" out from back wall. (@48")

Recommendation: Reposition grab bar.

Est. Cost: \$200



19. **Issue:** Lavatory pipes in girl's locker room is not recessed or insulated.

Recommendation: Insulate lavatory pipes.

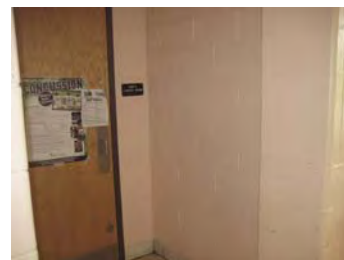
Est. Cost: \$200



20. **Issue:** Entrance to girl's locker room does not have 60" deep maneuvering clearance on the latch side of the door.

Recommendation: Install an automatic door opener.

Est. Cost: \$7,500



21. **Issue:** Library circulation desk does not have a 36" wide portion of the counter at 36" AFF. (@42")

Recommendation: Provide an auxiliary counter or shelf.

Est. Cost: \$1,500



22. **Issue:** Band Practice Room does not have sufficient number of integrated wheelchair locations.

Recommendation: Additional study required.

Est. Cost: \$10,000



23. **Issue:** Home Economics classroom does not have a wheelchair accessible kitchen. Knee clearance is not provided beneath sink. Surface of counter is mounted >34" AFF.

Recommendation: Remove base cabinets below sink and lower counter.

Est. Cost: \$5,000



24. **Issue:** There are no accessible sinks in science labs.

Recommendation: Remove base cabinets below sink and lower counter.

Est. Cost: \$5,000



25. **Issue:** There is no accessible route from school to sports fields.

Recommendation: Additional study required.

Est. Cost: \$0



26. **Issue:** There is no accessible seating at sports field bleachers.

Recommendation: Install level asphalt landings at bleachers.

Est. Cost: \$400



27. **Issue:** There is no accessible route to transaction area of concession stand. Height of transaction counter at concession stand is >36" AFF.

Recommendation: Provide an asphalt path to concession stand. Install an auxiliary counter or folding shelf.

Est. Cost: \$750



28. **Issue:** There is no accessible route to inside of concession stand. Change in level at entrance to concession stand is >1/2".

Recommendation: Install an asphalt path to meet floor of concession stand.

Est. Cost: \$500



TOTAL ESTIMATED COST: \$65,900

FIRE STATION HEADQUARTERS



The Fire Station Headquarters, located at 15 Water Street is a one story building which houses two engine bays as well as staff spaces. There is one public entrance at the front of the building adjoining a sloped drive way.

1. **Issue:** Entrance is not accessible. Change in level at entrance threshold is $>1/2"$ high (3"). There is no level 18" clear maneuvering space on the latch side of the door.

Recommendation: Remove threshold and enlarge concrete landing.

Est. Cost: \$1,500



2. **Issue:** Mailbox is mounted $>4"$ deep and is therefore a protruding object.

Recommendation: Reposition object or install a cane-detectable barrier.

Est. Cost: \$250



3. **Issue:** Bathroom is not accessible.

Recommendation: Install an accessible bathroom.

Est. Cost: \$12,000



4. **Issue:** There is no accessible parking.

Recommendation: Additional study required.

Est. Cost: \$50,000



TOTAL ESTIMATED COST: \$63,750

CHERRY VALLEY FIRE STATION



The Cherry Valley Fire Department, located at 226 Main Street, is a one story building which houses two engine bays as well as staff spaces. There is one public entrance at the front of the building adjoining a sloped drive way.

1. **Issue:** Entrance is not accessible. Change in level at entrance threshold is $>1/2"$ high (2.5"). Clear maneuvering space at door is not level. Approach to entrance has a slope $>5\%$.

Recommendation: Additional study required.

Est. Cost: \$50,000



2. **Issue:** Bathroom is not accessible.

Recommendation: Install an accessible bathroom.

Est. Cost: \$12,000



3. **Issue:** There is no accessible parking.

Recommendation: Additional study required.

Est. Cost: *see issue #1*



TOTAL ESTIMATED COST: \$62,000

ROCHDALE FIRE STATION

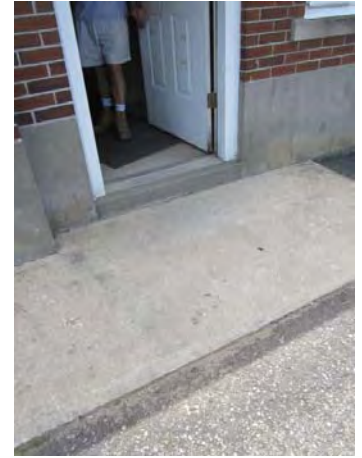


The Rochdale Fire Station, located at 1055 Stafford Street is a one story building which houses two engine bays as well as staff spaces. There is one public entrance at the front of the building adjoining a sloped drive way.

1. **Issue:** Entrance is not accessible. Change in level at entrance threshold is $>1/2"$ high (2.5"). Clear maneuvering space at door is not level. Approach to entrance has a slope $>5\%$.

Recommendation: Additional study required

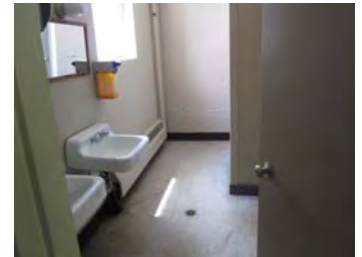
Est. Cost: \$50,000



2. **Issue:** Bathroom is not accessible.

Recommendation: Install an accessible bathroom.

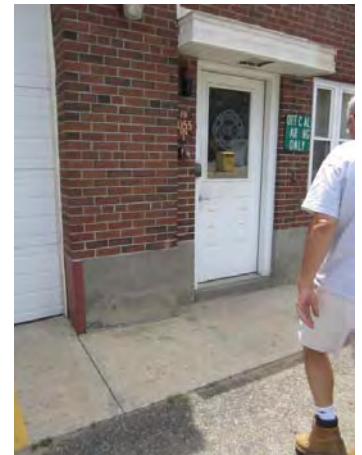
Est. Cost: \$12,000



3. **Issue:** There is no accessible parking.

Recommendation: Additional study required

Est. Cost: *see above.*



TOTAL ESTIMATED COST: \$62,000

POLICE STATION



The Leicester Police Station, located at 90 South Main Street, is a three story building constructed in 2005. There is one public entrance facing the street and a public training room entrance behind the building.

1. **Issue:** Accessible parking signage does not contain the words "van accessible."

Recommendation: Add new post mounted signage.

Est. Cost: \$200



2. **Issue:** Curb ramp at front entrance has an abrupt transition.

Recommendation: Resurface transition.

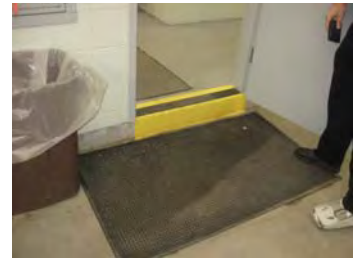
Est. Cost: \$400



3. **Issue:** There is no accessible route from sally port to holding cells.

Recommendation: Install a ramp.

Est. Cost: \$7,500



4. **Issue:** Signage is not mounted on the latch side of the door.

Recommendation: Reposition signage.

Est. Cost: 5 (est.) x \$75 = \$375



5. **Issue:** Kitchenette in training room does not provide knee clearance.

Recommendation: Remove recessed panel and insulate pipes.

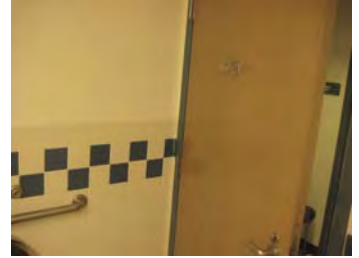
Est. Cost: \$400



6. **Issue:** Coat hooks in toilet rooms are mounted >54" AFF.

Recommendation: Lower coat hooks

Est. Cost: 2 x \$50 = \$100



7. **Issue:** Threshold toilet room adjacent to training room is >1/2".

Recommendation: Replace marble threshold.

Est. Cost: \$1,000



TOTAL ESTIMATED COST: \$9,975

LIBRARY



The Leicester Public Library, located at 1136 Main Street is a three story building constructed in 1896. There are public entrances at the front and back of the building. The building's historic significance should be determined before undertaking barrier removal.

1. **Issue:** There is no van accessible parking. Access aisle is less than 8' wide. Surface of parking space and aisle have a slope >2%. Surface is cracked and uneven. (@4%)

Recommendation: Resurface and restripe pavement markings.

Est. Cost: \$500



2. **Issue:** Parking signage is able to be obscured by parked vehicles. Signage does not contain the words "van accessible."

Recommendation: Install a new sign.

Est. Cost: \$100



3. **Issue:** Main entrance is inaccessible. There is no directional signage to the accessible entrance.

Recommendation: Provide signage at main entrance indicating the location of the accessible entrance.

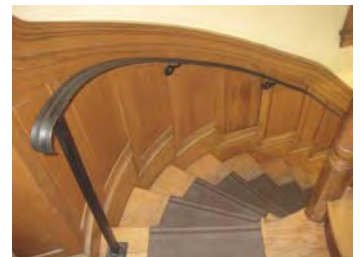
Est. Cost: \$100



4. **Issue:** There is no accessible route from accessible basement level to main library area.

Recommendation: Install an Elevator

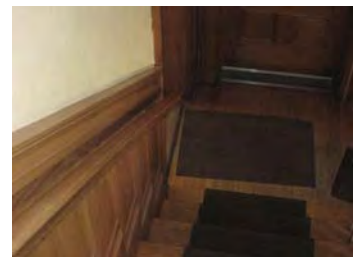
Est. Cost: \$400,000



5. **Issue:** Stair handrails do not have a round or oval gripping profile.

Recommendation: Replace handrails

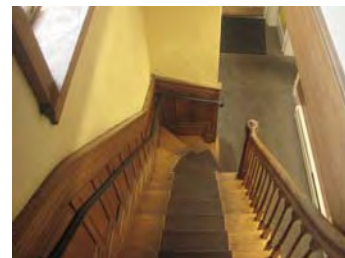
Est. Cost: \$5,000



6. **Issue:** Stair treads are not a uniform width.

Recommendation: Additional study required.

Est. Cost: \$25,000



7. **Issue:** Door hardware (Typical) requires tight grasping and twisting of the wrist.

Recommendation: Provide lever style door hardware.

Est. Cost: est. 5 x \$200 = \$1,000



8. **Issue:** There is no 36" clear width between stacks. (@30")

Recommendation: Relocate stacks

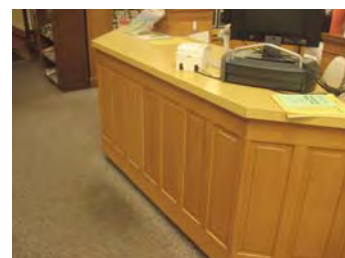
Est. Cost: \$500



9. **Issue:** Circulation desk does not have a 36" wide portion of the counter at 36" AFF. (@40")

Recommendation: Provide an auxiliary counter or shelf.

Est. Cost: \$1,500



10. **Issue:** Accessible toilet room signage is mounted on the face of the door.

Recommendation: Relocate signage.

Est. Cost: \$40



11. **Issue:** Lavatory interferes with the clear maneuvering space at the door. Lavatory pipes are not recessed or insulated

Recommendation: Reverse the swing of the door. Insulate Pipes

Est. Cost: \$600



TOTAL ESTIMATED COST: 434,340

TOWN HALL



The Leicester Town Hall, located at 1136 Main Street is a three story building constructed in 1939. There are three public entrances to the building. At the time of the audit, the third floor contained only one active program space (fitness room). An accessible path of travel (e.g. an elevator) will be required to this floor if it is used to provide program space. Any elevator installed in this building must serve all levels.

1. **Issue:** Designated accessible parking spaces at entrance to Town Meeting Room have uneven surface with sections that are not level ($> 2\%$). No signage is provided.

Recommendation: Resurface and restripe pavement markings. Provide two post-mounted signs.

Est. Cost: \$750



2. **Issue:** Threshold at Ground Floor entrance has lip $> \frac{1}{4}$ " and is not beveled.

Recommendation: Grind/patch to provide bevel at 1:2.

Est. Cost: \$100



3. **Issue:** Ramp to Town Meeting room lacks edge protection.

Recommendation: Provide curb or guard rail.

Est. Cost: 60 LF x \$50 = \$3,000



4. **Issue:** Path of travel from designated accessible parking to Evening Meeting Rooms has an excessive slope before exterior ramp.

Recommendation: Additional study required

Est. Cost: \$10,000



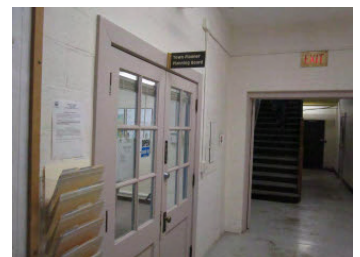
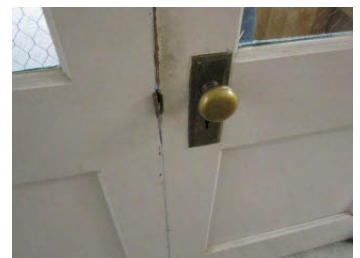
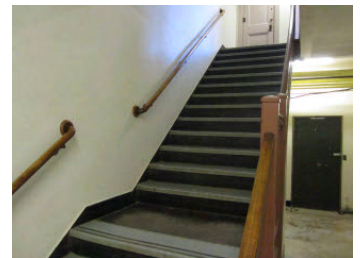
5. **Issue:** Upper run of ramp to Evening Meeting Rooms has sections with slope $> 8.3\%$ (@9.4%)

Recommendation: Additional study required.

Est. Cost: \$10,000



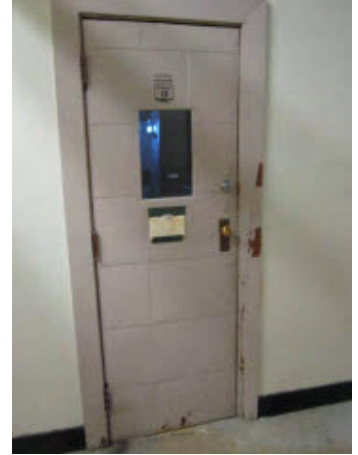
6. **Issue:** Rooms lack tactile and Braille signs
Recommendation: Provide tactile and Braille signs
Est. Cost: 25 (est.) x \$50 = \$1,250
7. **Issue:** Wall-mounted shelves and protruding stand-pipes project >4" into the circulation route.
Recommendation: Provide wing walls or relocate.
Est. Cost: \$200 /ea
8. **Issue:** Outside handrails lack extensions at top, bottom and landings. Inside handrails are not continuous.
Recommendation: Provide new compliant handrails.
Est. Cost: \$30,000
9. **Issue:** Stair treads have abrupt nosings.
Recommendation: Install beveled transitions.
Est. Cost: \$1,500
10. **Issue:** Door hardware requires tight grasping, pinching or twisting of the wrist.
Recommendation: Replace with lever hardware.
Est. Cost: 30 (est.) x \$100 = \$3,000
11. **Issue:** Neither leaf of double doors provides minimum 32" clear width. (e.g. Board of Health, Planning Board)
Recommendation: Replace with single leaf door.
Est. Cost: 5 (est.) x \$1,500 = \$7,500



12. **Issue:** Door does not provide minimum 32" clear width

Recommendation: Widen and replace door

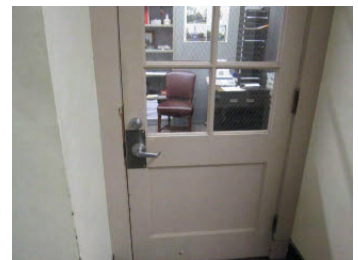
Est. Cost: \$2,000



13. **Issue:** Door lacks minimum 18" on latch pull side. (e.g. Selectman, Tax Collector, Town Clerk, Assessor's offices)

Recommendation: Relocate door or provide automatic door opener.

Est. Cost: 5 (est.) x \$7,500 = \$37,500



14. **Issue:** Service counter lacks minimum 36" wide section at 36" AFF max. (Board of Health, Town Clerk)

Recommendation: Provide an auxiliary counter or folding shelf.

Est. Cost: 2 x \$200 = \$400



15. **Issue:** Assessor's Office lacks min. 60" diameter turning space

Recommendation: Relocate counter

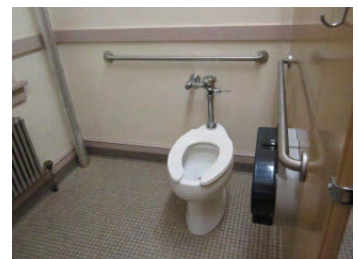
Est. Cost: \$500



16. **Issue:** Men's room. Stall provides < 59" clear depth (@ 56"). Flush valve is on the narrow side of fixture. Side grab bar extends less than 54" from rear wall.

Recommendation: Relocate flush valve to wide side. Replace floor-mounted toilet with wall-mounted fixture.

Est. Cost: \$4,000



17. **Issue:** Women's room. Flush valve is on the narrow side of fixture. Side grab bar extends less than 54" from rear wall.

Recommendation: Relocate flush valve to wide side and relocate side grab bar.

Est. Cost: \$1,000



18. **Issue:** If gym is used for sporting events, the bleachers lack integrated wheelchair spaces.

Recommendation: Additional study required.

Est. Cost: \$7,500



19. **Issue:** No accessible path of travel to the stage.

Recommendation: Install wheelchair lift.

Est. Cost: \$125,000



20. **Issue:** Fitness room. No accessible path of travel.

Recommendation: Additional study required

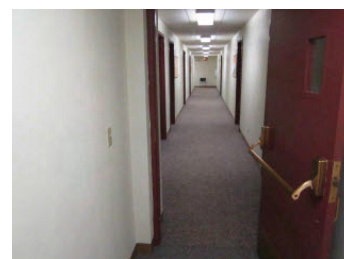
Est. Cost: \$100,000



21. **Issue:** Meeting room corridor door lacks minimum 18" on latch pull side of the door.

Recommendation: Provide an automatic door opener.

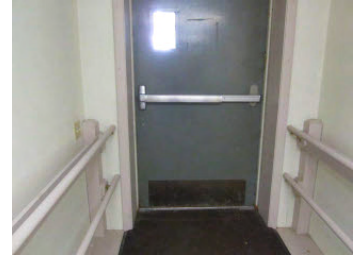
Est. Cost: \$7,500



22. **Issue:** Meeting room corridor egress door (with latch and closer) lacks minimum 12" clear maneuvering space on latch push side.

Recommendation: Provide automatic door opener.

Est. Cost: \$7,500



23. **Issue:** No water fountain is accessible to individuals who have difficulty bending. Drinking fountain projects >4" into the circulation route and therefore is a protruding object.

Recommendation: Provide a "hi" drinking fountain and wing walls.

Est. Cost: \$2,500



24. **Issue:** Lavatory in Men's Room obstructs clear maneuvering space at entry and stall door. No rear grab bar. Toilet paper dispenser obstructs side grab bar.

Recommendation: Additional study required.

Est. Cost: \$10,000



25. **Issue:** Women's Room. No rear grab bar. Toilet paper dispenser obstructs side grab bar.

Recommendation: Add rear grab bar. Relocate dispenser.

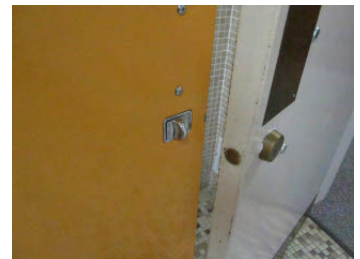
Est. Cost: \$400



26. **Issue:** Stall lock hardware required tight grasping or pinching. No interior handle.

Recommendation: Replace stall handle and lockset

Est. Cost: \$200



27. **Issue:** Women's Room. Hot water and drain pipe is not recessed or insulated.

Recommendation: Insulate pipes.

Est. Cost: \$200

TOTAL ESTIMATED COST: \$373,500



SENIOR CENTER COUNCIL ON AGING



The Leicester Senior Center and Council on Aging, located at 40 Winslow Avenue, is a one story building constructed in 1998. There is one public entrance and public parking.

1. **Issue:** Accessible parking signage does not contain the words "van accessible."

Recommendation: Restripe and resurface parking spaces. Add new post mounted signage.

Est. Cost: \$200



2. **Issue:** Accessible route from parking spaces does not coincide with the route for the general public. Access aisles are separated by a curb.

Recommendation: Install curb ramps at all access aisles.

Est. Cost: 3 x \$2,000 = \$6,000



3. **Issue:** Accessible passenger loading zone does not contain the International Symbol of Accessibility.

Recommendation: Install post-mounted sign or provide pavement markings.

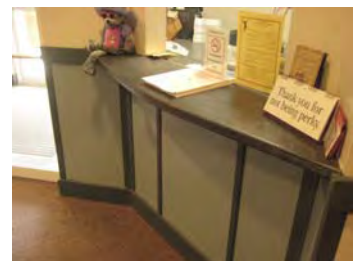
Est. Cost: \$250



4. **Issue:** Transaction area does not have a portion of the counter 36" wide and 36" AFF.

Recommendation: Lower counter to an accessible height or provide an auxiliary counter.

Est. Cost: \$1,500



5. **Issue:** No drinking fountain accommodates people with difficulty bending.

Recommendation: Install a high fountain.

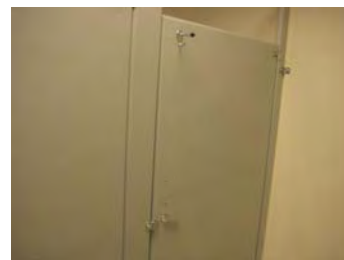
Est. Cost: \$2,500



6. **Issue:** Coat hooks in accessible toilet stalls are mounted >54" AFF.

Recommendation: Lower coat hooks

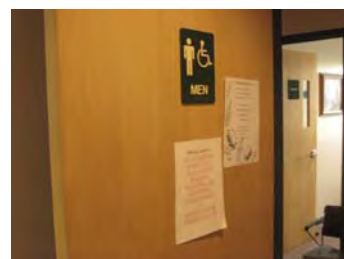
Est. Cost: 2 x \$50 = \$100



7. **Issue:** Room identification signage is mounted on the face of the door and >60" AFF.

Recommendation: Reposition room signage.

Est. Cost: 10 (est.) x \$75 = \$750



8. **Issue:** Coat rods are mounted >54" AFF.

Recommendation: Provide a coat hook adjacent to coat rods

Est. Cost: 4 x \$50 = \$200



9. **Issue:** Kitchen has no accessible elements.

Recommendation: Additional study required.

Est. Cost: \$50,000



10. **Issue:** Kitchenette pipes in recreational room are not recessed or insulated.

Recommendation: Insulate pipes.

Est. Cost: \$200



11. **Issue:** There is no accessible route to outdoor seating area.

Recommendation: Provide a paved path.

Est. Cost: \$500



TOTAL ESTIMATED COST: \$62,200

HIGHWAY DEPARTMENT



The Leicester Highway Department, located at 59 Peter Salem Street, is a garage, waste disposal and office space. There is one public entrance.

1. **Issue:** There is no accessible parking.

Recommendation: Restripe and resurface parking spaces.
Add new post mounted signage.

Est. Cost: \$750



2. **Issue:** Entrance door has a threshold $>1/2"$. Entrance does not have 18" wide clear maneuvering space on the latch side of the door.

Recommendation: Resurface and widen asphalt path.

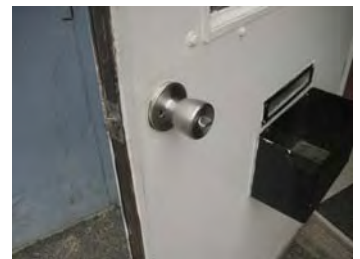
Est. Cost: \$500



3. **Issue:** Door hardware requires pinching, tight grasping or twisting of the wrist.

Recommendation: Replace knobs with lever hardware.

Est. Cost: $2 \times \$100 = \200



4. **Issue:** Path to entrance is cracked and uneven.

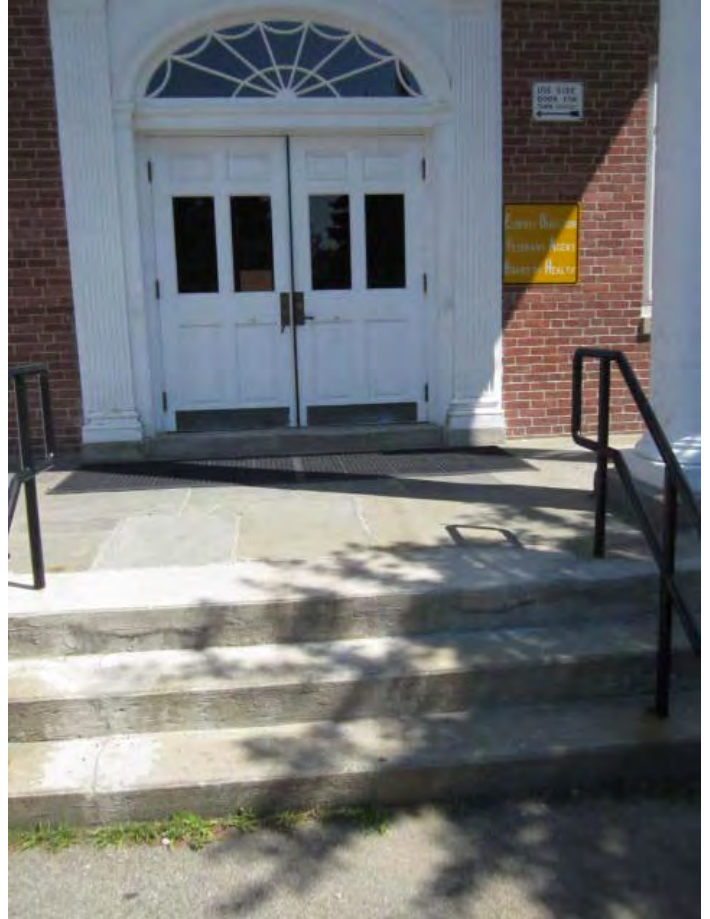
Recommendation: Resurface asphalt path.

Est. Cost: \$500



TOTAL ESTIMATED COST: \$1,950

OFFICE OF VETERANS SERVICES



The Leicester Office of Veterans Affairs is located off the lobby at the front of the Town Hall building, constructed in 1939. There are both interior and exterior steps leading to the lobby. The building's historic significance should be determined before undertaking barrier removal.

1. **Issue:** No accessible path of travel (exterior or interior) to office.

Recommendation: Additional study required

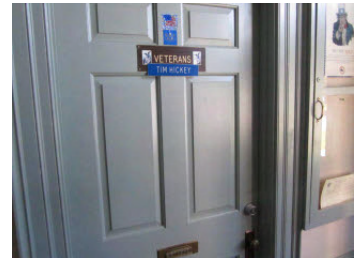
Est. Cost: \$20,000



2. **Issue:** Door hardware requires tight grasping, pinching or twisting of the wrist.

Recommendation: Replace with lever hardware

Est. Cost: \$200



TOTAL ESTIMATED COST: \$20,200

RUSSELL MEMORIAL PARK



The Russell Memorial Park, located at 90 South Main Street, is recreational facility behind The Leicester Police Station. There are three baseball fields as well as concession stands and other ancillary facilities.

1. **Issue:** There are no striped parking locations. There is no striped access aisle at accessible parking. Parking signage is able to be obscured by a parked vehicle.

Recommendation: Stripe accessible pavement markings. Add new post mounted signage.

Est. Cost: \$750



2. **Issue:** There is no accessible route to playing fields. Paths are not firm stable or slip-resistant.

Recommendation: Install an asphalt path to both sides of the baseball fields

Est. Cost: \$2,500



3. **Issue:** There is no accessible route to bleachers. There is no integrated wheelchair seating at bleachers.

Recommendation: Install asphalt path to bleachers and level asphalt pas adjacent to bleachers.

Est. Cost: 3 x \$250 = \$750



4. **Issue:** There is no accessible route to dugouts. Change in level between path and seating area is >1/2"

Recommendation: Install ramps at entrance to dugouts.

Est. Cost: 3 x \$1,000 = \$3,000



5. **Issue:** There is no accessible route to the concession stand. Transaction counter is >36" AFF.

Recommendation: Install an asphalt path to the concession stand and lower a portion of the transaction counter.

Est. Cost: \$2,000



6. **Issue:** There is no accessible route to press box.

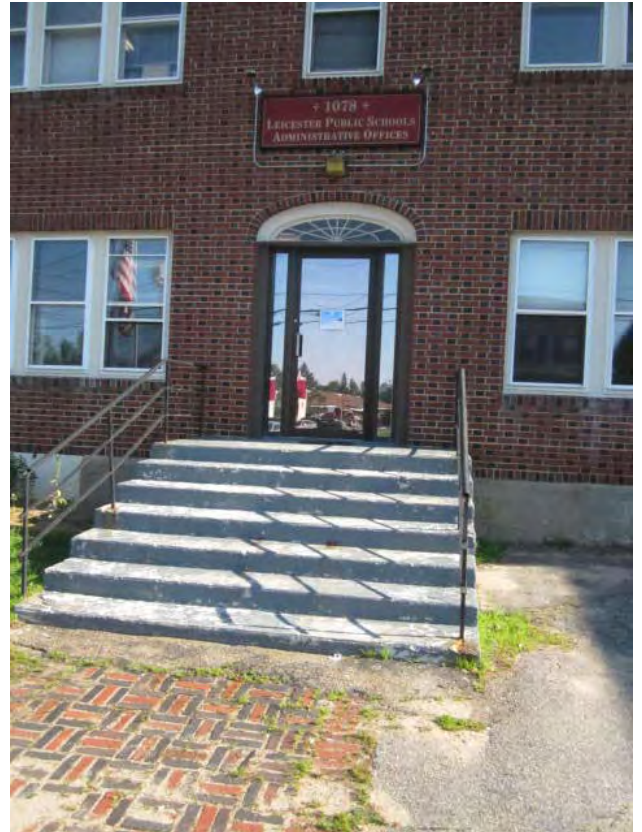
Recommendation: Provide a platform lift to the press box.

Est. Cost: \$40,000

TOTAL ESTIMATED COST: \$49,000



SCHOOL DEPARTMENT CENTRAL OFFICE

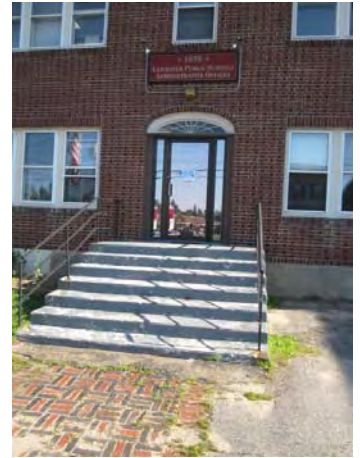


The School Department Central Office, located at 1078 Main Street is a two story building which contains administrative offices and reception. There is one public entrance at the front of the building.

1. **Issue:** There is no accessible entrance (7 steps.) Entrance threshold is $>1/2"$ high (1".)

Recommendation: Provide a ramp to entrance.

Est. Cost: \$36,000



2. **Issue:** There is no 36" wide portion of the counter at 36" AFF. (@42")

Recommendation: Provide an auxiliary counter or folding shelf.

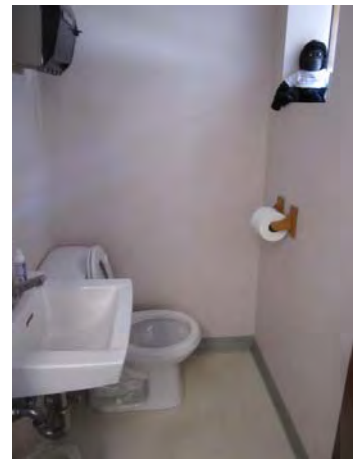
Est. Cost: \$1,500



3. **Issue:** Bathroom is not accessible.

Recommendation: Install an accessible bathroom.

Est. Cost: \$12,000



4. **Issue:** There is no accessible parking.

Recommendation: Regrade and restripe a portion of the parking lot and provide signage.

Est. Cost: \$7,500



TOTAL ESTIMATED COST: \$57,000

GREENVILLE LIBRARY



The Greenville Library, located on River Street, is a historic museum. The library was not in use at time of audit. The building's historic significance should be considered when undertaking barrier removal.

1. **Issue:** There is no public parking or public sidewalks within close proximity to the library.

Recommendation: Additional study required.

Est. Cost: \$2,500



2. **Issue:** Route to library is not firm, stable or slip-resistant.

Recommendation: Provide a paved path along route to library.

Est. Cost: \$1,500



3. **Issue:** Change in level between grass path and entrance stoop is $>1/2"$.

Recommendation: Regrade path to meet stoop.

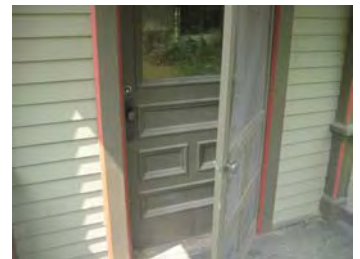
Est. Cost: \$300



4. **Issue:** Door hardware requires pinching, tight grasping or twisting.

Recommendation: Replace door hardware.

Est. Cost: 2 x \$100 = \$200



TOTAL ESTIMATED COST: \$4,500

RECYCLING CENTER



Leicester Recycling Center, located at 200 Mannville Street, is a recycling and redemption center open on select days of the month. There is one public vehicular entrance along Mannville Street.

1. **Issue:** Designated accessible parking is not level. There is no striped access aisle, 8' wide. Signage does not contain the words "van accessible."

Recommendation: Regrade or relocated parking stall. Restripe pavement markings. Add "van accessible signage."

Est. Cost: \$1,000

2. **Issue:** Path of travel between elements is cracked and uneven.

Recommendation: Repair surface of pavement.

Est. Cost: \$1,000

TOTAL ESTIMATED COST: \$2,000



HILLCREST GOLF COURSE AND CLUBHOUSE



Hillcrest Golf Course and Clubhouse, located at 325 Pleasant Street, is golfing facility including a golf course, pro shop and clubhouse. The golf course has holes on either side of Pleasant Street.

1. **Issue:** Accessible parking spaces do not have signage at the head of each space.

Recommendation: Provide post-mounted signage.

Est. Cost: \$250



2. **Issue:** Path from parking to the Pro Shop is cracked and uneven. Cross-slope is >2%,

Recommendation: Resurface area of parking lot.

Est. Cost: \$5,000



3. **Issue:** Gravel path to the Pro Shop is not firm, stable or slip-resistant.

Recommendation: Provide a paved path from parking to pro-shop.

Est. Cost: \$1,000



4. **Issue:** There is no accessible route to entrance of pro shop. There is a 4" step to entrance landing. Entrance threshold is 5".

Recommendation: Install a ramp to entrance.

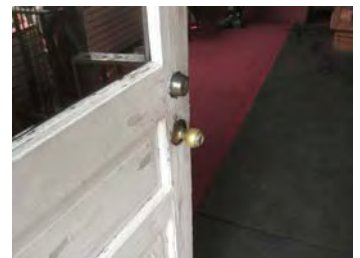
Est. Cost: \$12,000



5. **Issue:** Door hardware at entrance to pro shop requires pinching, tight grasping and twisting.

Recommendation: replace with lever hardware.

Est. Cost: \$100



6. **Issue:** Transaction counter in the Pro Shop does not have a portion of the counter 36" high & 36" wide.

Recommendation: Provide an auxiliary counter or folding shelf.

Est. Cost: \$1,500



7. **Issue:** Path from the Pro Shop to the golf cart area is not firm, stable or slip-resistant.

Recommendation: Provide a paved path from parking to pro-shop.

Est. Cost: \$1,000



8. **Issue:** Curb transition at club house is >8.3%. Transition at top and bottom is abrupt and uneven.

Recommendation: Install a new curb ramp.

Est. Cost: \$2,000



9. **Issue:** There is no accessible route to performance area in clubhouse

Recommendation: Install a ramp.

Est. Cost: \$8,000



10. **Issue:** There is accessible route to patio area.

Recommendation: Install a ramp

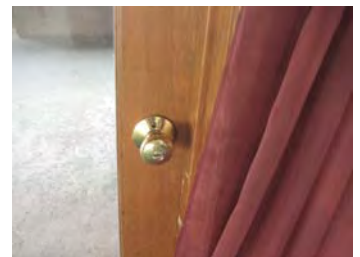
Est. Cost: \$4,000



11. **Issue:** Door hardware requires twisting, tight grasping and twisting to operate.

Recommendation: Replace knobs with lever hardware.

Est. Cost: 5 x \$100 = \$500



12. **Issue:** There is no portion of the bar 34" high and 60" wide.

Recommendation: Lower portion of bar.

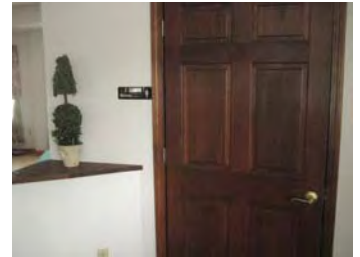
Est. Cost: \$3,000



13. **Issue:** Toilet room signage does not have tactile and Braille lettering. Signage is not mounted on the latch side of the door.

Recommendation: Install tactile and Braille signage

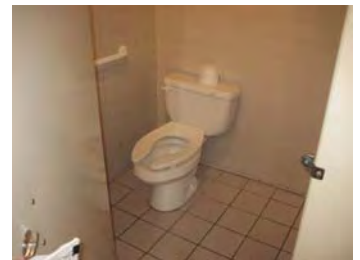
Est. Cost: 2 x \$50 = \$100



14. **Issue:** Stall in women's toilet room is not accessible. Toilet clearance is <59" deep (@53"). There is no rear grab bar, side grab bar is <42". Flush valve is on the wrong side of the toilet. Stall door requires pinching, tight grasping and twisting. Coat hook is mounted >54" high.

Recommendation: Provide an accessible stall.

Est. Cost: \$10,000



15. **Issue:** Women's room lavatory does not provide 27" high knee clearance. Faucets require pinching tight grasping and twisting. Lavatory pipes are not insulated or recessed. Mirror is mounted >40" high.

Recommendation: Remove lavatory apron. Insulate lavatory pipes. Replace twist faucets with lever faucets. Relocate mirror.

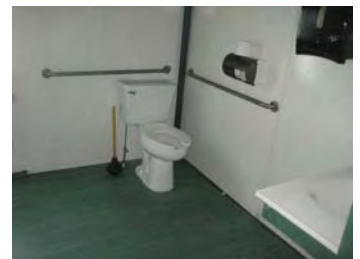
Est. Cost: \$7,500



16. **Issue:** Side grab bar in men's toilet room extends <54" out from back wall. Toilet paper dispenser interferes with the use of the side grab bar.

Recommendation: Reposition grab bar and dispenser.

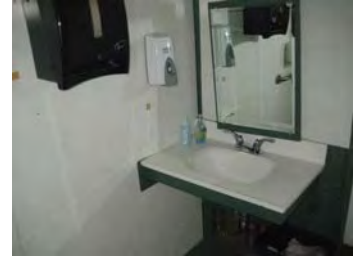
Est. Cost: \$500



17. **Issue:** Lavatory pipes in men's toilet room are not recessed or insulated. Paper towel dispenser is mounted >54" high.

Recommendation: Insulate pipes and relocate dispenser.

Est. Cost: \$500



18. **Issue:** There is no lowered urinal, 17" high.

Recommendation: Lower urinal.

Est. Cost: \$1,500



19. **Issue:** There are no detectable warnings where golf course route crosses pleasant street.

Recommendation: Provide detectable warnings.

Est. Cost: 2 x \$500 = \$1,000



TOTAL ESTIMATED COST: \$59,450

ELLIOT BURIAL GROUND



Elliot Burial Ground, located at 372 Marshall Street, is a Revolutionary War era cemetery built in 1760. The cemetery is only accessible via an overgrown path between two houses in a residential neighborhood. The cemetery's historic significance should be considered when undertaking barrier removal.

1. **Issue:** There is no public parking or public sidewalks within close proximity to the burial ground.

Recommendation: Additional study required.

Est. Cost: \$2,000



2. **Issue:** There is no accessible path to the burial ground.

Recommendation: Provide a paved path from street to burial ground.

Est. Cost: \$1,500



TOTAL ESTIMATED COST: \$3,500

ROCHDALE PARK



The Rochdale Park, located at 1050 Stafford Street, is a recreational park including baseball fields as well as a skate park, basketball and tennis courts. There is one public entrance and parking lot along Stafford Street.

1. **Issue:** Parking access aisle is not marked so as to discourage parking. Parking signage is able to be obscured by parked vehicles and does not contain the words "van accessible."

Recommendation: Restripe access aisle. Add new post mounted signage.

Est. Cost: \$500



2. **Issue:** Accessible parking is not dispersed across parking locations. There is no accessible parking at entrance to skate park and tennis courts.

Recommendation: Restripe pavement markings. Add new post mounted signage.

Est. Cost: \$500



3. **Issue:** There is no accessible path of travel to baseball field.

Recommendation: Provide a paved path to baseball field.

Est. Cost: \$2,500



TOTAL ESTIMATED COST: \$3,500

TOWTAID PARK



The Towtaid Park, located on Olney Street, is a recreational park, basketball courts and a playground. There is one public entrance along Olney Street.

1. **Issue:** There is no van accessible parking. There are no striped access aisles. Parking signage does not contain the words "van accessible." Surface of parking space is cracked and uneven.

Recommendation: Restripe and resurface parking spaces. Add new post mounted signage.

Est. Cost: \$750



2. **Issue:** There is no accessible route to playing area.

Recommendation: Install an asphalt path.

Est. Cost: \$2,000



TOTAL ESTIMATED COST: \$2,750

LION'S PARK



The Lion's Park, located at Bottomly Ave, is a recreational park. There is one public entrance along Bottomly Ave and informal parking.

1. **Issue:** There is no accessible parking.

Recommendation: Restripe and resurface parking spaces.
Add new post mounted signage.

Est. Cost: \$750



2. **Issue:** Path from sidewalk to park is abrupt and has a change in level >1/2"

Recommendation: Repair asphalt path.

Est. Cost: \$200



3. **Issue:** Bricks are loose. Surface of path is uneven and unstable. Water collects along surface of path.

Recommendation: Replace bricks.

Est. Cost: \$750



TOTAL ESTIMATED COST: \$1,700

WAITE STREET RECREATIONAL FIELDS



The Waite Street Recreational Fields, located at 20 Waite Street, is a recreational park including football and soccer fields. There is one public entrance along Waite Street.

1. **Issue:** There is no van accessible parking. Access aisle is <8' wide (@5'). Signage is able to be obscured by parked vehicles and does not contain the words "van accessible". Parking spaces are not level.

Recommendation: Restripe and resurface parking spaces. Add new post mounted signage.

Est. Cost: \$750



2. **Issue:** There is no accessible path to the concession stand.

Recommendation: Provide a paved path from parking to concession stand.

Est. Cost: \$500



3. **Issue:** Transaction area does not have a portion of the counter 36" wide and 36" AFF.

Recommendation: Provide an auxiliary counter or folding shelf.

Est. Cost: \$300

4. **Issue:** There is no accessible path of travel to playing fields and spectator areas.

Recommendation: Install a paved path to spectator area and playing fields.

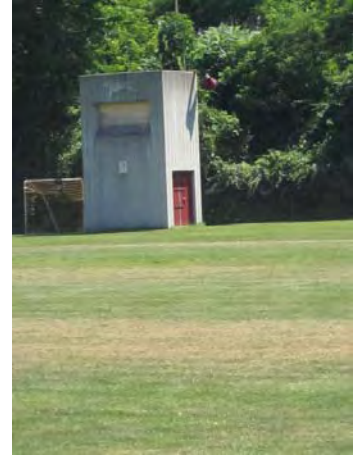
Est. Cost: \$2,500



5. **Issue:** There is no accessible path of travel to press box.

Recommendation: Install a platform lift.

Est. Cost: \$60,000



TOTAL ESTIMATED COST: \$64,050

BURNCOAT FIELDS AND BEACH



The Burncoat Parks and Fields and Burncoat Beach, located along Town Beach Road, is a recreational park including a baseball field, basketball court and town beach. The park is currently not open to the public.

1. **Issue:** There are no designated accessible parking locations.

Recommendation: Provide level parking space with post mounted signage.

Est. Cost: \$750



2. **Issue:** There is no accessible route to the basketball court.

Recommendation: Provide a paved path to the basketball court.

Est. Cost: \$2,500



3. **Issue:** There is no accessible route to the baseball fields.

Recommendation: Provide a paved path to the baseball field.

Est. Cost: \$1,500



4. **Issue:** There is no accessible route of travel to beach.

Recommendation: No action necessary as beach is no longer open to the public.

Est. Cost: N/A



TOTAL ESTIMATED COST: \$4,750

TOWN COMMON & GAZEBO



The Town Common and Gazebo, located at Washburn Square is a recreational and community gathering space adjacent to the Town Hall. There is access to the park along North Main Street, Paxton Street and Washburn Square.

1. **Issue:** Path to North Main Street has a slope >5%.

Recommendation: Additional study required.

Est. Cost: \$10,000



2. **Issue:** Surface of paths is cracked and uneven. There are changes in level >1/2". Water is able to collect on surface of path.

Recommendation: Resurface asphalt paths

Est. Cost: \$1,000



3. **Issue:** There is no accessible route to the gazebo.

Recommendation: Provide an asphalt path and ramp.

Est. Cost: \$3,500



TOTAL ESTIMATED COST: \$14,500

SIDEWALKS AND CURB RAMPS



KMA audited Leicester's primary public sidewalks and curb ramps located adjacent to the Town Common and at the intersection of Route 9 and 56.

1. **Issue:** Curb ramp at Town Common has a change in level $>1/2"$. Surface of bottom landing is cracked and uneven. Water is able to collect at bottom of curb ramp.

Recommendation: Install a new curb ramp.

Est. Cost: \$2000



2. **Issue:** Where pedestrian route crosses curb outside Town Hall, There is no curb ramp.

Recommendation: Install a new curb ramp.

Est. Cost: \$2000



3. **Issue:** Sidewalk at the intersection of Market Street and Main Street has a cross slope $>2\%$. Water is able to collect on surface of sidewalk.

Recommendation: Repair sidewalk.

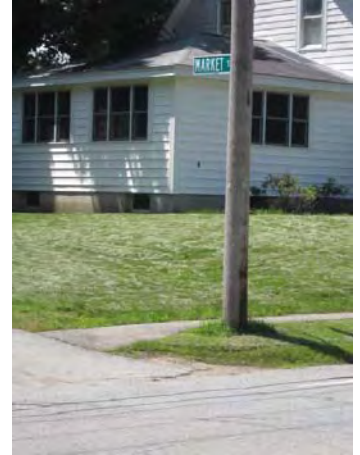
Est. Cost: \$1000



4. **Issue:** Where sidewalk intersects vehicular way at the intersection of Market Street and Main Street, there is a cross slope >2%.

Recommendation: Regrade sidewalk.

Est. Cost: \$1500



5. **Issue:** Crosswalk on Paxton street near town hall does not have a curb cut where pedestrian route intersects curb.

Recommendation: Install a new curb ramp.

Est. Cost: \$2000



6. **Issue:** Curb ramp on Paxton street near town hall has a cracked and uneven surface. Transition at top and bottom of ramp is abrupt. There is no level landing at the top of the ramp.

Recommendation: Install a new curb ramp.

Est. Cost: \$2000



7. **Issue:** Curb ramp on Paxton street near town hall does not align with crosswalk. Transition at bottom of ramp is abrupt. Water is able to collect at bottom of curb ramp.

Recommendation: Install a new curb ramp.

Est. Cost: \$2000



8. **Issue:** Sidewalk at the intersection of route 9 and 56 has a change in level >1/2."

Recommendation: Repair sidewalk.

Est. Cost: \$500



9. **Issue:** Crosswalk at intersection of route 9 and 56 does not have detectable warnings where pedestrian route crosses hazardous vehicular area.

Recommendation: Install detectable warnings.

Est. Cost: 3 x \$500 = \$1500



10. **Issue:** Where Hillcrest golf course crosses pleasant street, there are no detectable warnings at hazardous vehicular area.

Recommendation: Provide detectable warnings.

Est. Cost: 2 x \$500 = \$1000



11. **Issue:** Sidewalk at Lion's Park is cracked and uneven. There are changes in level >1/2."

Recommendation: Repair sidewalk.

Est. Cost: \$500



12. **Issue:** Curb ramp opposite Lions Park does not align perpendicular with crosswalk.

Recommendation: Install a new curb ramp.

Est. Cost: \$2000



13. **Issue:** Curb ramp adjoining parking lot at Lions Park has an abrupt transition, >1/2".

Recommendation: Install a new curb ramp.

Est. Cost: \$2000



TOTAL ESTIMATED COST: \$20,000

**Americans with Disabilities Act - Section 504 of the Rehabilitation Act of 1973
Self-Evaluation**

**TOWN OF LEICESTER
Part I. Compliance Overview**

A. Organization

1) 504/ADA Coordinator: _____¹

- a) Is this individual a ☐ full-time or ☐ part-time employee, or a ☐ volunteer?
- b) How long has this individual served as the Town's 504/ADA Coordinator?
- c) When did this individual most recently attend a 504/ADA conference, training workshop or educational/professional development seminar related to disability law or disability accommodation?

Year: _____

2) Disabilities Commission Members:

a) Does the Commission include people with disabilities?

☐ Yes ☐ No ☐ Not Applicable

3) Does the Town have a written grievance policy to address complaints from people with disabilities? *(If yes, obtain a copy.)*

☐ Yes ☐ No ☐ Not Applicable

a) If yes, is the policy available in multiple formats, e.g., large-print or cassette? *(Ask to see or inspect an example.)*

4) In the past five years, has the Town received a complaint from an individual asserting that she was denied or unable to obtain access to a local government program, service or

¹ Communities usually have two people serving in the capacity of 504/ADA Coordinator: one for municipal programs, another for school programs. Identify all individuals with 504/ADA Coordinator responsibilities here.

activity due to a disability? If the Town has not received a direct complaint, has it been notified of any complaint received by another public agency, such as the Massachusetts Office on Disability, Department of Education, or Department of Elder Affairs; or the U.S. Department of Justice? (*Examples of possible complaints: a person who could not enter or move within a public building or use a public park because of architectural barriers, a person who could not participate in town meeting because the meeting hall lacks assistive listening devices, a person who could not make proper payment of a tax bill or other municipal charge because she could not read small print, or a person for whom intersections and crosswalks are unsafe because there are no accessible pedestrian systems?*)

☐ Yes

☐ No

☐ Not Applicable

a) If yes, what was the complaint and how did the Town resolve it?

b) If the complaint is not resolved, what is its status?

B. Non-Discrimination in Employment

- 1) How many full- and part-time employees does the Town have? (*Approximate count is fine.*)

_____ Full-time

_____ Part-time

- 2) Does the Town currently have any employees with disabilities?

☐ Yes

☐ No

☐ Not Applicable

- 3) Has the Town had any employees with disabilities at any point in the past five years?

☐ Yes

☐ No

☐ Not Applicable

- a) If "yes," has the Town made reasonable accommodations, i.e., modifications to public buildings or the job structure to accommodate the employee(s)?

☐ Yes

☐ No

☐ Not Applicable

- b) If yes, summarize modifications:

- c) If no, were modifications necessary?

☐ Yes

☐ No

☐ Not Applicable

- d) If the Town did not make modifications because of undue hardship, explain the hardship. What accommodations were necessary, and what was their approximate cost?

- 4) Does the Town make its employment advertisements or notices, recruitment methods, and job application process accessible to people with various disabilities, including people with hearing, visual or speech impairments? For example, do you use Braille or large-print text, audio cassette, captioned CATV announcements and job application forms? *(If yes, inspect a sample.)*

☐ Yes ☐ No ☐ Not Applicable

- 5) Do job recruitment materials contain a nondiscrimination policy? *(For example: Does the Town's standard employment application form, if there is one, job notices placed in publications such as MMA's The Beacon or professional journal or personnel plan or personnel bylaw contain nondiscrimination policy notices?)*

☐ Yes ☐ No ☐ Not Applicable

- 6) Does the Town require pre-employment medical examinations?

☐ Yes ☐ No ☐ Not Applicable

- 7) Has the Town ever received a complaint from a job applicant asserting that she was denied employment on the basis of a disability? Or a complaint from an employee asserting that she was denied promotion or transfer on the basis of a disability, or reasonable accommodation? *(If yes, summarize what happened in the space below.)*

☐ Yes ☐ No ☐ Not Applicable

Part II: Departmental or Board/Committee Interview

Department:

Building/Facility Address:

Person Interviewed:

Date:

A. Departmental Programs, Services & Activities

- 1) Please identify the programs and services operated by your department:
 - a) Approximately how many people use your department's services or participate in your programs each year?
 - b) What source of funds pays for your programs? Do you charge any user fees?
 - c) Do you receive any federal grants?
- 2) Are the elected and/or appointed officials and employees affiliated with your department aware of Section 504 and ADA and their possible impacts on local government programs, services and activities?
 - ☐ Yes
 - ☐ No
 - ☐ Not Applicable

- 3) Through methods such as public notices in print, audio, and visual media, does your department inform the general public and people with disabilities that your programs, services or activities do not discriminate on the basis of disability in admission, access/participation, or employment? *(If yes, ask for one or more specific examples and summarize in the space below, or ask for a copy if the example is print.)*

☐ Yes ☐ No ☐ Not Applicable

- 4) Have you ever conducted outreach or made public information presentations to any of the following? *(If yes, when?)*

The public	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Employees	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Employment agencies	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Organizations representing people with disabilities	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Town's collective bargaining units	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Professional or business associations active in Leicester or in the surrounding area	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Other (cite):	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

- 5) Does your outreach include notice about non-discrimination and disability accommodations in any departmental publications, recruitment materials, program applications or other literature that contains general information about your department's programs and services? *(If yes, ask to see an example.)*

☐ Yes ☐ No ☐ Not Applicable

- 6) In your advertisements, press releases, newsletters, and other publications, do you emphasize that your programs, services and activities are accessible to people with disabilities? *(If yes, ask to see an example.)*

☐ Yes ☐ No ☐ Not Applicable

- 7) Do you advertise programs, services or activities in multiple media so that visually, speech, or hearing impaired people can learn of your program independently? *(If yes, ask to see an example.)*

☐ Yes ☐ No ☐ Not Applicable

- 8) Have you ever worked, or do you work actively today, with social service or advocacy organizations in order to accommodate participation by people with developmental disabilities such as mental retardation, autism, cerebral palsy, seizure disorders, or head injuries?

☐ Yes ☐ No ☐ Not Applicable

a) If yes:

- (i) What types of outreach or public information did you offer in order to work with such organizations and their clientele?

- (ii) What kinds of accommodations did you make to include people with developmental disabilities?

B. Program Accessibility

- 1) Are your programs and activities when viewed in their entirety accessible to people with disabilities? "When viewed in their entirety" means that an individual with disabilities can take part in any of your programs, services or activities, whether as an employee, citizen volunteer, participant, observer, visitor, client or student. To assess the degree to which your department's services are program accessible, consider the following criteria. (For "yes" items, ask for specific examples.)

Does your department regularly advertise physical access to its events and services?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Does your department regularly advertise programmatic access to its events and services?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is there a fee or charge to attend or participate in the program?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is there a fee or charge to use the facilities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Are there discounts available?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Does your department have Text Telephones (TTY) or Telecommunication Devices for the Deaf (TDD)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is the TDD/TTY number listed on the letterhead?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is the TDD/TTY number listed in promotion material?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Are your employees or volunteers trained to use the TDD/TTY?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
How many employees or volunteers are trained? _____			
Does your department have assistive listening devices?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Are your audio-visual materials audio narrated?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Are your audio-visual materials captioned?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is your printed material available in large print?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is your printed material available on audio cassette tape?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Is your printed material available in braille?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Does your department have materials for communicating with people with learning or developmental disabilities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A

- 2) Are your department's programs and services presented in the most integrated setting appropriate to the needs of people with disabilities? That is, do people with disabilities have the same opportunity to participate as non-disabled people, and are your programs designed to include both disabled and non-disabled people?

☐ Yes ☐ No ☐ Not Applicable

- 3) List programs or services in which people with disabilities participate in an integrated setting.

- 4) Do you currently sponsor or provide any programs, services or activities specifically for people with disabilities?

☐ Yes ☐ No ☐ Not Applicable

- 5) Identify the types of programs/services you offer, the disabilities they address, and the reason(s) for having a special program.

- 6) Are these special programs offered only when there is no other way for the activity to be made available to people with disabilities?

☐ Yes ☐ No ☐ Not Applicable

- 7) Are people with disabilities free to choose whether they participate in the special program or in the regular program? *(If yes, review Q. D-1 items with a "no" response, in order to determine how people with a disability have a meaningful choice between special and regular programs.)*

☐ Yes ☐ No ☐ Not Applicable

- 8) Can a qualified person with a disability participate in your programs as an employee, citizen volunteer, participant, observer, visitor, client or student? (Mark "Y" for "yes" items; "N" for "no" items; "NA" for items not applicable.)

Disability Type	Is the program accessible?	Are all <u>activities</u> of the program accessible?	Are <u>products</u> of the program usable by people with a disability? ¹	Is the <u>facility</u> accessible?
Hearing impaired				
Visually impaired				
Other sensory impaired				
Mentally impaired ²				
Mobility impaired				

C. Program Modifications (Non-Structural)

- 1) Do you have people with disabilities serving as advisors to your department or any of its programs, services or activities?

☐ Yes ☐ No ☐ Not Applicable

- 2) Have you ever relocated or rescheduled any programs to an existing accessible facility to make them available to people with disabilities?

☐ Yes ☐ No ☐ Not Applicable

¹ "Product" is a broad term and it should be interpreted in light of the programs and services of a particular department. For example, when local government publishes minutes of a public meeting, the minutes are a product. Similarly, the town meeting warrant, informational handouts on display at voter check-in tables, and town meeting minutes are products. Other products of programs and services could include a community's official web site (a communication product); CATV programs sponsored by the town or school department; taping and broadcasts of plays performed in public buildings; a pamphlet published by the local historical commission on historic buildings or landmarks, such as a "guided tour" pamphlet, or a pamphlet on topics ranging from water conservation to trails on public land.

² "Mentally impaired" broadly includes people with mental, emotional, developmental or learning impairments.

- 3) Can you locate your programs or services in a facility that is accessible? *(If yes, what facility?)*

☐ Yes ☐ No ☐ Not Applicable

- 4) Can you provide auxiliary aids such as TTs (TDD or TTY), audio tapes, or sign language interpreters to make your programs available to people with communication impairments? What resources would you need to provide these kinds of aids?

☐ Yes ☐ No ☐ Not Applicable

- 5) Can you provide adequate communications by presenting all written and spoken materials in other ways, such as by interpreter, in printed form, in braille, on audio tape, in large print, or through illustrations? What resources would you need to provide communications in multiple formats?

☐ Yes ☐ No ☐ Not Applicable

- 6) Can you provide awareness training sessions or otherwise sensitize the employees, elected or appointed officials affiliated with your department to the needs of people with disabilities? What resources would you need in order to provide training?

☐ Yes ☐ No ☐ Not Applicable

ADA Model Policies and Procedures

General Administrative Actions

PUBLIC NOTICE

The Town will adopt and distribute a *Public Notice of ADA Compliance* based on the following model:

AMERICANS WITH DISABILITIES ACT

The Town does not discriminate on the basis of disability and is committed to the full participation of persons with disabilities in all programs, services, and activities and on our work force.

The person named below is responsible for coordinating the Town's compliance with the Americans with Disabilities Act. Inquiries, complaints, requests for communication aids, and other accommodations and assistance should be directed to:

Coordinator (name and title)
Town of Leicester
Town Hall
Leicester, MA
Phone:

Copies of this notice are available in large print, audiotape, Braille, and on computer disk. The Town's ADA grievance procedure, Self--Evaluation, and policies and procedures are also available on request.

Signed: _____

DISTRIBUTION OF PUBLIC NOTICE

The *Public Notice of ADA Compliance* will be posted in visible locations in public buildings, and will appear in a short form on the Town's website and other public information materials. It will be made available upon request in alternative formats.

DECISIONS REGARDING UNDUE BURDEN, UNDUE HARDSHIP AND FUNDAMENTAL ALTERATION

In any circumstance when, in the opinion of the ADA Coordinator, an accommodation, modification or other action, requested under Title II of the ADA may involve an undue financial or administrative burden or hardship, or a fundamental alteration to a program, service or activity; the Coordinator will refer the request to the Board of Selectmen for a final decision and will assist in properly documenting the reason for acceptance or denial of any such request.

Non-Discriminatory Operation of Programs and Services

EQUAL OPPORTUNITY POLICY

No qualified person with a disability shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any of Town's programs, services, or activities.

In providing its' services, programs, and activities, the Town will not:

1. Deny a qualified individual with a disability the opportunity to participate in, or benefit from, a benefit, service, or activity.
2. Deny a qualified individual with a disability the opportunity to participate in, or benefit from, any aid, benefit, or service that is not equal to that afforded to others.
3. Otherwise limit a qualified individual with a disability the enjoyment of any right, privilege, advantage, or opportunity enjoyed by other qualified individuals receiving the aid, benefit, or service.

REASONABLE MODIFICATION POLICY

The Town will make reasonable modifications to policies and procedures necessary to accommodate the needs of a person with a disability whenever an otherwise qualified person with a disability requests such modification, unless it can be demonstrated that the requested modification would impose an undue burden or fundamental alteration to the program.

Requests for reasonable modifications should be made to program staff or the ADA Coordinator and can be presented verbally or in writing. It is the responsibility of the ADA Coordinator to ensure that requests are responded to appropriately and in a timely fashion—generally not more than two working days.

Final decisions regarding requests for reasonable modifications, that in the opinion the ADA Coordinator may represent an undue burden or fundamental alteration, will be made by the Board of Selectmen in a timely fashion and no longer than ten (10) working days. Individuals seeking to contest a denial of a

request for reasonable modification will be given the Town's Grievance Procedure in a format appropriate to their needs.

ELIGIBILITY AND SAFETY REQUIREMENTS ASSURANCE

It is the policy of the Town that programs will not impose eligibility or safety standards or requirements that prohibit or limit the participation of qualified individuals with disabilities unless such standards are necessary and essential to the operation of programs, activities, or services. Eligibility requirements will be reviewed by the ADA Coordinator and program managers and updated to comply with the requirements of the American with Disabilities Act. Whenever programs formulate new eligibility policies or new programs are development, the ADA Coordinator will review these policies to ensure compliance.

Safety requirements have also been reviewed to ensure that they are necessary to the safe operation of programs, and that any decision to limit the participation of a person with a disability related to safety concerns will be reviewed on a case by case basis to ensure that the decision is based on facts, not myths or stereotype, and that all appropriate mitigating measures are taken to provide for maximum participation. Staff will be informed of, and trained in any changes in eligibility and /or safety requirements that may arise.

SURCHARGES PROHIBITION POLICY

It is the policy of the Town that no surcharges (charges in addition to those imposed on all program participants) will be charged to persons with disabilities, their family members, or organizations representing them for the provision of reasonable accommodations or modifications, auxiliary aids and services, removal of architectural barriers, or any other costs related to the participation of persons with disabilities in programs, services, and activities.

INTEGRATED SERVICES POLICY

It is the policy of the Town that all services, programs, and activities, including all public meetings, are provided in the most integrated setting appropriate to the needs of participants with disabilities. Persons with disabilities are not required to participate in separate programs even if the Town offers separate programs specifically designed to meet their needs.

SIGNIFICANT ASSISTANCE POLICY

It is the policy of the Town that programs that receive significant assistance, either financial or in-kind from the Town, may not discriminate against persons with disabilities. It is the responsibility of the ADA Coordinator to inform organizations receiving assistance from the Town of this policy and to respond to any questions regarding its meaning and application. It is also the Coordinator's responsibility to investigate any situation in which discrimination towards persons with disabilities may have occurred, and to take appropriate action either to correct the discriminatory situation or to recommend that the Board of Selectmen terminate assistance.

CONTRACTED SERVICES POLICY

It is the policy of the Town that when services are provided under contracts, the Town will set forth in the terms of the contract the obligations of the provider agency or agencies to operate in a manner consistent with the requirements of Title II of the ADA and, furthermore, that the Town will monitor the performance of the contractor in fulfilling this obligation.

Effective Communications

EFFECTIVE COMMUNICATIONS POLICY

It is the policy of the Town that auxiliary aids and services will be provided when necessary to ensure effective communication with persons whose disabilities affect communication. Persons with communications disabilities will be given the opportunity to request the aid or service that they prefer and the requested aid or service will be given primary consideration. The preferred means of communication will be provided unless doing so would impose an undue burden or fundamental alteration or an effective alternative means of communication is available.

Requests for auxiliary aids or services should be made verbally or in writing to program directors or to the ADA Coordinator. Unless otherwise specified, the Town asks that requests be made at least ten (10) days in advance of the occasion on which the communications support will be needed. Reasonable effort will be made to respond on shorter notice.

The person requesting the service will be notified as soon as possible if the Town is unable to meet his/her request. In some circumstances, an appropriate alternative will be offered such as rescheduling. The ADA Coordinator will be responsible for training town staff and overseeing the implementation of effective communication procedures. The Board of Selectmen will be responsible for making final decisions related to undue burden or fundamental alteration.

ALTERNATIVE FORMAT POLICY AND PROCEDURES

It is the policy of the Town that all documents, publications, and materials used in municipal programs will be made available to persons with disabilities who need them in alternate formats. The Town has established procedures to respond to requests for alternative formats including large print, audiotape, Braille, and computer diskettes in a timely fashion. Three (3) weeks notice is generally necessary for the preparation of Braille materials. Reasonable efforts will be made to respond on shorter notice.

Large print, short audiotapes, and computer diskettes will be prepared by staff persons who have been identified by the ADA Coordinator and trained in the necessary skills and procedures. Preparation of long audiotapes will be purchased from a professional provider.

1. The person making the request should identify the materials desired and specify his/her preferred alternate format to the program director or the ADA Coordinator either verbally or in writing ten (10) working days in advance of the event or activity for which the material is needed.

Reasonable effort will be made to meet requests made less than ten (10) days before an event or activity.

2. The materials will be provided in the requested format at no charge.
3. Primary consideration will be given to the format preferred by the person making the request, and the Town will decide whether to provide the preferred format or an effective alternative format.
4. If a request cannot be met, the person making the request will be informed as soon as possible but at least two (2) days in advance of the event or activity.
5. The Board of Selectmen, in consultation with the ADA Coordinator, will make the final decision regarding any request that may represent an undue financial or administrative burden.

WEBSITE ACCESSIBILITY POLICY

The Town will ensure that information posted on the Town's website including site navigation, notices, documents, and images are accessible to persons using screen reader technology.

INTERPRETER SERVICES POLICY

It is the policy of the Town that sign language interpreters will be provided upon request to any person needing interpreter services to participate in any meeting, program, or activity of the Town. Requests should be made at least twenty (20) working days in advance of the event or meeting, but reasonable effort will be made to meet requests made on shorter notice. Requests can be made verbally, by TTY, or in writing to a program director or the ADA coordinator.

Within four (4) hours of receipt of the request, the ADA Coordinator or other responsible employee will contact the Massachusetts Commission for the Deaf and Hard of Hearing (MCDHH) (www.mass.gov/eohhs/gov/departments/mcdhh/request-an-interpreter.html) to schedule the interpreter service.

In addition to using the MCDHH, the Town maintains a list of names and phone numbers of at least three qualified freelance sign language interpreters working in the region. If informed that MCDHH has not been successful in scheduling interpreters as requested, staff of Town will immediately attempt to contact and schedule a freelance interpreter.

If an interpreter cannot be obtained, the ADA Coordinator or other member of the staff will offer the option of an alternative effective form of communication or the opportunity to postpone the meeting until such a time as an interpreter can be scheduled.

ASSISTIVE LISTENING DEVICE POLICY

It is the policy of the Town that sound amplification and assistive listening devices will be provided upon request to persons needing the device to participate in programs, services, and activities.

The person needing the device (or his/her representative) can make a request verbally or in writing to the ADA Coordinator or Program Director ten (10) days or as soon as possible before the scheduled event or activity will take place. Advance notice will not be necessary for meetings at which amplification and assistive listening devices will routinely be provided.

The ADA Coordinator or other designated member of the staff will arrange for amplification and assistive listening device's use and will provide any necessary training or orientation to program staff. Reasonable effort will be made to meet requests made with less than ten (10) days notice.

TELEVISION CAPTIONING POLICY

It is the policy of the Town to ensure that televisions used in town programs have the capacity to display closed---captioning, that captioned versions of pre---recorded videos or DVDs purchased or rented for use in Town programs will be used if available, that public services announcements broadcast on behalf of the Town will be captioned.

Equal Employment Opportunity

EQUAL EMPLOYMENT OPPORTUNITY POLICY

It is the policy of the Town of Leicester that no otherwise qualified individual with a disability shall, by reason of his/her disability, be excluded from employment or employment---related benefits.

Employment, hiring, and advancement will be based solely on the employee or applicant's ability to perform function what the Town determines to be essential to the position.

REASONABLE ACCOMMODATIONS POLICY

It is the policy of the Town of Leicester that reasonable accommodation will be made for an otherwise qualified applicant or employee with a disability, unless the Town of Leicester can demonstrate that the accommodation imposes an undue financial or administrative hardship on the operation of its programs.

Notice of the availability of reasonable accommodations that may be needed by applicants during the pre-employment process will be included in job postings and advertisements and will be made available upon request to applicants with disabilities during interviews and other pre--employment functions as necessary to ensure equal opportunity for the applicant to secure employment with the Town.

During the pre-employment process, the Town will make no written or verbal inquiry regarding the existence, cause, extent or impact of any disabling condition.

Applicants will be informed at the initial pre-employment interview that the Town does not discriminate on the basis of disability and that requests for reasonable accommodations needed for the performance of essential job functions or for the enjoyment of other benefits of employment should be made following receipt of a conditional offer of employment, preferably at a post-offer meeting.

Persons with disabilities employed by the Town of Leicester are encouraged to request reasonable accommodation at any time when such accommodation becomes necessary to the employee's performance of essential functions of their position or to the enjoyment of any other benefits of employment.

Requests for reasonable accommodations should be present verbally or in writing to the employee's immediate supervisor or to the ADA Coordinator. The request should include a description of the nature and purpose of the accommodation. Assistance will be made available to any employee requiring assistance in identifying an appropriate accommodation or in documenting the reasons why such accommodation is needed.

A decision will be made within ten business days of the submission of a reasonable accommodation request accompanied by any supporting documentation needed by the Town to fairly evaluate the request. The effectiveness of the accommodation and the need for changes or additions to the accommodation will be assessed during first month of the employee's use of the accommodation.

All reasonable accommodation requests and documentation, discussions, decisions and other matters including the results of medical examinations and/drug tests relative to an employee's status as a person with a disability will be kept confidential and documentation will be maintained in secure files.

If assistance is needed in designing a reasonable accommodation, the Town with the approval of the candidate or employee requesting the accommodation will consult the Regional ADA Technical Assistance Center, the Job Accommodations Network administered by the President's Committee on Employment of Persons with Disabilities and other individuals and organizations with expertise in the employment of persons with disabilities.

The Board of Selectmen in consultation with the ADA Coordinator will make the final decision concerning requested accommodations that may represent undue financial or administrative hardships.

Applicants and employees have the right to appeal the denial of any accommodation request using the ADA Grievance Procedure.

Leicester ADA Transition Plan
Preliminary Implementation Schedule (12/31/2011)

*Note: This schedule is preliminary and is to be used in conjunction with the ADA Audit Report in Appendix A, pending a comprehensive review by the town to determine specific programmatic and architectural barriers that do not comply with Section 504 and ADA Title II. Barrier removal projects will be completed as funding is available. All improvements will be contingent upon availability of funding. Timeframes are estimated based on prioritization, cost factors, and likelihood of funding availability. 'Short' timeframe is estimated as 0-3 years, 'medium' as 3-6 years, and 'long' as 6-10 years. *Cost Estimates are intended for budgeting purposes only. Construction costs must be determined for each project based on detailed plans. The actual costs for achieving program access will be determined by the Town's barrier removal plan.*

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
GENERAL TOWN-WIDE						
<u>Programmatic</u>	Operational	Provide resources to Commission on Disabilities	Town	N/A	High	Short
	Operational	Establish relationship with MA Office on Disabilities and other regional organizations to build capacity and provide staff training	Commission on Disabilities; Town	N/A	High	Short
	Communicative	Improve town website with disability information and appropriate formatting	Town	N/A	High	Short
	Communicative	Develop and print brochure with disability information and distribute throughout town	Commission on Disabilities; Town	N/A	High	Short
	Operational	Adopt and administer municipal policies and procedures in compliance with Section 504 and ADA Title II	Commission on Disabilities; Town	N/A	High	Short
	Operational	Adopt and administer town-wide maintenance plan to inventory and prioritize physical improvements for ongoing implementation when existing non-accessible items/facilities require replacement	Town	N/A	High	Short/Medium

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
TOWN HALL						
<u>Programmatic</u>	Communicative	Complete installation of TTY telephone service in Town Clerk's Office and provide staff training	Town	N/A	High	Short
	Communicative	Change Department letterhead to include TDD/TTY telephone numbers	Town	N/A	High	Short
<u>Exterior</u>	Architectural	Resurface/restripe handicapped parking spaces	Town	\$750	Middle	Medium
	Architectural	Level entrance threshold at the handicapped entrance	Town	\$100	High	Short
	Architectural	Improve wheelchair ramp with curb or guardrail	Town	\$3,000	High	Medium
	Architectural	Reduce slope between handicapped parking area and wheelchair ramp to building	Town	\$10,000	Middle	Medium
<u>Interior</u>	Architectural	Install elevator to provide access to upper level for municipal office use (currently underutilized in part as Fire Department's fitness center)	Town	\$100,000	High	Short/Medium

Architectural	Install code compliant interior doors and hardware and, where appropriate, add automated doors	Town	\$65,000	Middle	Medium
Architectural	Install compliant bleacher seating and stage access (ramp) in the gymnasium/meeting hall	Town	\$132,500	Middle	Medium/Long
Architectural	Replace or improve access ramp to evening meeting rooms	Town	\$10,000	High	Medium
Communicative	Install tactile and Braille signage throughout	Town	\$1,250	Middle	Short
Architectural	Improve stairway railings and treads	Town	\$31,500	Middle	Long
Architectural	Improve or relocate office counters and spacing (Assessor, Clerk, Board of Health) to allow access	Town	\$900	Middle	Short
Architectural	Improve restroom stalls, hardware and other items	Town	\$15,800	High	Short/Medium
Architectural	Misc. improvements (remove protruding shelves, provide accessible water fountain, etc...)	Town	\$2,700	Middle	Short/Medium

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
MEMORIAL SCHOOL						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town; School Department			
<u>Exterior</u>	Architectural	Provide directional signage to accessible entrance	School Dept	\$100		
	Architectural	Resurface landing outside of door and patch lip of threshold, install automatic door opener	School Dept	\$8,000		
	Architectural	Resurface pavement with 8' wide access aisle and install "van accessible" signage at one parking space	School Dept	\$750		
		Provide a paved path to the play area.		\$500		
		Provide a paved path to the flag pole.		\$300		
<u>Interior</u>		Install an elevator	School Dept; Town	\$250,000		
	Architectural	Replace handrails and repair nosings. (if elevator is installed, stairs do not need to comply.	School Dept	3 x \$3,500 = \$10,500		
	Architectural	Widen door openings and install new doors.	School Dept	20 (est.) x \$2,000 = \$40,000		
	Architectural	Install a ramp to stage.	School Dept	\$20,000		
	Architectural	Install an accessible unisex toilet room on the accessible level (first floor) and provide directional signage to accessible toilet room.	School Dept	\$12,000		
	Architectural	Install an accessible toilet room in Nurse's office.	School Dept	\$12,000		
	Architectural	Provide tactile/Braille signage at all rooms and spaces.	School Dept	30 (est.) x \$40 = \$1,200		
	Architectural	Reposition library sink and dispensers.		\$2,500		

		Replace drinking fountains.		2 x \$1,500 = \$3,000		
		Reverse latch and hinge side of door.		3 x \$500 = \$1,500		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
MIDDLE SCHOOL						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town; School Department	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Restripe and resurface parking spaces at front entrance. Add new post mounted signage.		\$750		
	Architectural	Restripe and resurface parking spaces at side entrance. Add new post mounted signage.		\$750		
	Architectural	Install a curb ramp along sidewalk from parking area to school entrance.		\$2,000		
	Architectural	Resurface asphalt path to entrance.		\$400		
<u>Interior</u>	Architectural	Replace knobs with lever hardware.		2 x \$100 = \$200		
	Architectural	Provide a high fountain.		\$2,000		
	Architectural	Install signage with tactile and Braille information in classrooms		40 x \$40 = \$1,600		
	Architectural	Replace wall-mounted handrails on ramp.		80 LF x \$150 = \$12,000		
	Architectural	Install an accessible locker.		\$200		
	Architectural	Install an accessible sink in science lab.		\$10,000		
	Architectural	Install an accessible sink in home economics classroom.		\$10,000		
	Architectural	Provide directional signage at gymnasium to nearest accessible toilet room .		\$150		
	Architectural	Reposition grab bars in accessible toilet rooms.		8 x \$200 = \$1,600		
	Architectural	Insulate pipes in accessible toilet rooms.		4 x \$200 = \$800		
	Architectural	Install an accessible shower in locker rooms.		\$6,000		
	Architectural	Install an accessible toilet room in locker rooms		\$12,000		
	Architectural	Install a bench with a back in locker rooms.		\$500		
	Architectural	Install an auxiliary counter or shelf in library.		\$1,500		
	Architectural	Install an asphalt path to tennis courts.		\$750		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
PRIMARY SCHOOL						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town; School Department	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Install a new curb ramp		\$2,000		
	Architectural	Restripe parking and provide new "van accessible" signage.		\$500		
	Architectural	Provide a paved path to the play area.		\$500		
	Architectural	Install automatic door openers at Kindegarden pickup area.		\$7,500		
<u>Interior</u>	Architectural	Provide lever style door hardware.		20 (est.) x \$100 = \$2,000		
	Architectural	At Cafeteria lunch line, replace doors, widen door openings and reconfigure tray slides and freezers.		2 x \$3,000 = \$6,000		
	Architectural	At toilet rooms, reconfigure fixtures and stall.		\$5,000 x 4 = \$20,000		
	Architectural	Lower one urinal in boy's toilet rooms.		2 x \$1,500 = \$3,000		
	Architectural	Insulate pipes at one lavatory.		4 x \$100 = \$400		
	Architectural	Replace drinking fountains and add wing walls.		2 x \$1,500 = \$3,000		
	Architectural	Modify door placement at classrooms.		\$5,000		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
HIGH SCHOOL						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town; School Department	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Restripe pavement markings and provide new signage at the head of each space.		\$750		
	Architectural	Repair concrete sidewalk and repair curb ramps from parking area to main entrance.		4 x \$500 = \$2,000		
	Architectural	At main parking area, install sign at the head of each space and rebuild curb ramp.		\$3,000		
	Architectural	Additional Study needed. There is no accessible route from school to sports fields.		N/A		
	Architectural	Install level asphalt landings at sports field bleachers.		\$400		

	Architectural	Provide an asphalt path to concession stand. Install an auxiliary counter or folding shelf.		\$750		
	Architectural	Install an asphalt path to meet floor of concession stand.		\$500		
Interior						
	Architectural	In Fine Arts Center, remove fixed seating in a number of locations throughout auditorium.		\$500		
	Architectural	Replace top handrail along ramp to stage.		100 LF x \$50 = \$5,000		
	Architectural	Reverse the swing of one door to Nurse's Office.		\$200		
	Architectural	Provide accessible lockers.		5 (est) x \$400 = \$2,000		
	Architectural	Reposition Grab Bars in accessible stalls and toilet rooms.		7 x \$200 = \$1,400		
	Architectural	Reposition flush valves in toilet rooms		4 x \$750 = \$3,000		
	Architectural	Insulate laboratory pipes.		7 x \$100 = \$700		
	Architectural	Reposition Dispensers and shelves in multi-user toilet rooms.		6 x \$200 = \$1,200		
	Architectural	Reposition laboratory mirrors.		6 x \$150 = \$900		
	Architectural	Build out wing walls at drinking fountains.		3 x \$300 = \$900		
	Architectural	Provide a bench with a back in locker rooms.		2 x \$500 = \$1,000		
	Architectural	Provide an accessible locker in locker rooms.		2 x \$400 = \$800		
	Architectural	Install an accessible stall in boy's locker room.		\$10,000		
	Architectural	In boy's coaches office, reposition grab bar, paper towel dispenser, and flush valve.		\$1,500		
	Architectural	In girl's locker room, reposition grab bar.		\$200		
	Architectural	Insulate lavatory pipes in girl's locker room.		\$200		
	Architectural	Install an automatic door opener at girl's locker room entrance.		\$7,500		
	Architectural	In Library, provide an auxiliary counter or shelf.		\$1,500		
	Architectural	Additional study of Band Practice Room. Room does not have sufficient number of integrated wheelchair locations.		\$10,000		
	Architectural	In Home Economics classroom, remove base cabinets below sink and lower counter.		\$5,000		

	Architectural	In Science Labs, remove base cabinets below sink and lower counter.		\$5,000		
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Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
FIRE STATION HEADQUARTERS						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Remove threshold and enlarge concrete landing at building entrance.		\$1,500		
	Architectural	Reposition mailbox or install a cane-detectable barrier.		\$250		
	Architectural	There is no accessible parking. Additional study required.		\$50,000		
<u>Interior</u>	Architectural	Install an accessible bathroom.		\$12,000		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
CHERRY VALLEY FIRE STATION						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Entrance is not accessible. Additional study required.		\$50,000		
		There is no accessible parking. Additional study required.		See issue above.		
<u>Interior</u>	Architectural	Install an accessible bathroom.		\$12,000		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
ROCHDALE FIRE STATION						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Entrance is not accessible. Additional study required.		\$50,000		
	Architectural	There is no accessible parking. Additional study required.		See issue above.		
<u>Interior</u>	Architectural	Install an accessible bathroom.		\$12,000		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
POLICE STATION						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Add new post mounted signage for designated van accessible parking space.		\$200		
	Architectural	Resurface transition at curb ramp at front entrance.		\$400		
<u>Interior</u>	Architectural	Install a ramp from sally port to holding cells.		\$7,500		
	Architectural	Reposition signage to the latch side of the door		5 (est.) x \$75 = \$375		
	Architectural	Remove recessed panel and insulate pipes in kitchenette.		\$400		
	Architectural	Lower coat hooks in toilet rooms.		2 x \$50 = \$100		
	Architectural	Replace marble threshold in toilet room.		\$1,000		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
LIBRARY						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Resurface and restripe pavement markings for van accessible parking.		\$500		
	Architectural	Install a new sign with the words "van accessible."		\$100		
	Architectural	Provide signage at main entrance indicating the location of the accessible entrance.		\$100		
<u>Interior</u>	Architectural	Install an Elevator from accessible basement level to main library area.		\$400,000		
	Architectural	Replace handrails with a round or oval gripping profile.		\$5,000		
	Architectural	Stair treads are not a uniform width. Additional study required.		\$25,000		
	Architectural	Provide lever style door hardware.		est. 5 x \$200 = \$1,000		
	Architectural	Relocate stacks to provide 36" clear width between stacks		\$500		

	Architectural	Provide an auxiliary counter or shelf at Circulation Desk.		\$1,500		
	Architectural	Relocate accessible toilet room signage.		\$40		
	Architectural	Reverse the swing of the laboratory door and insulate pipes.		\$600		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
SENIOR CENTER/COUNCIL ON AGING						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Restripe and resurface parking spaces for van accessible parking. Add new post mounted signage.		\$200		
	Architectural	Install curb ramps at all access aisles.		3 x \$2,000 = \$6,000		
	Architectural	At accessible passenger loading zone, install post-mounted sign or provide pavement markings with International Symbol of Accessibility.		\$250		
<u>Interior</u>	Architectural	At transaction area, lower counter to an accessible height or provide an auxiliary counter.		\$1,500		
	Architectural	Install a high drinking fountain.		\$2,500		
	Architectural	Lower coat hooks in accessible toilet stalls.		2 x \$50 = \$100		
	Architectural	Reposition room signage.		10 (est.) x \$75 = \$750		
	Architectural	Provide a coat hook adjacent to coat rods		4 x \$50 = \$200		
	Architectural	Kitchen has no accessible elements. Additional study required.		\$50,000		
	Architectural	Insulate Kitchenette pipes in recreational room.		\$200		
	Architectural	Provide a paved path to outdoor seating area.		\$500		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
HIGHWAY DEPARTMENT						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A

<u>Exterior</u>	Architectural	Restripe and resurface parking spaces. Add new post mounted signage.		\$750		
	Architectural	Resurface and widen asphalt path at entrance door.		\$500		
	Architectural	Resurface asphalt path to entrance.		\$500		
<u>Interior</u>	Architectural	Replace knobs with lever hardware.		2 x \$100 = \$200		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
OFFICE OF VETERANS SERVICES						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	No accessible path of travel (exterior or interior) to office. Additional study required		\$20,000		
<u>Interior</u>	Architectural	Replace existing door hardware with lever hardware		\$200		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
RUSSELL MEMORIAL PARK						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Stripe accessible pavement markings. Add new post mounted signage.		\$750		
	Architectural	Install an asphalt path to both sides of the baseball fields		\$2,500		
	Architectural	Install asphalt path to bleachers and level asphalt pas adjacent to bleachers.		3 x \$250 = \$750		
	Architectural	Install ramps at entrance to dugouts.		3 x \$1,000 = \$3,000		
	Architectural	Install an asphalt path to the concession stand and lower a portion of the transaction counter.		\$2,000		
	Architectural	Provide a platform lift to the press box.		\$40,000		
<u>Interior</u>		N/A				

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
SCHOOL DEPARTMENT OFFICES						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town; School Department	N/A	N/A	N/A

<u>Exterior</u>	Architectural	Provide a ramp to entrance.		\$36,000		
	Architectural	Regrade and restripe a portion of the parking lot and provide signage.		\$7,500		
<u>Interior</u>	Architectural	Provide an auxiliary counter or folding shelf		\$1,500		
	Architectural	Install an accessible bathroom.		\$12,000		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
GREENVILLE LIBRARY (historic museum)						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	There is no public parking or public sidewalks within close proximity to the library. Additional study required.		\$2,500		
	Architectural	Provide a paved path along route to library.		\$1,500		
	Architectural	Regrade path to meet stoop.		\$300		
<u>Interior</u>	Architectural	Replace door hardware.		2 x \$100 = \$200		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
RECYCLING CENTER						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Regrade or relocated parking stall. Restripe pavement markings. Add "van accessible signage."		\$1,000		
	architectural	Repair surface of pavement.		\$1,000		
<u>Interior</u>		N/A				

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
HILLCREST GOLF COURSE						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Provide post-mounted signage at accessible parking spaces.		\$250		
	Architectural	Resurface area of parking lot.		\$5,000		
	Architectural	Provide a paved path from parking to pro-shop.		\$1,000		
	Architectural	Install a ramp to entrance.		\$12,000		

	Architectural	Install a new curb ramp at club house.		\$2,000		
	Architectural	Install a ramp to patio area.		\$4,000		
	architectural	Provide detectable warnings where golf course route crosses Pleasant Street.		2 x \$500 = \$1,000		
<u>Interior</u>	Architectural	Replace existing door hardware with lever hardware.		\$100		
	Architectural	Provide an auxiliary counter or folding shelf at Transaction counter in the Pro Shop		\$1,500		
	Architectural	Install a ramp to performance area in clubhouse.		\$8,000		
	Architectural	Replace knobs with lever hardware.		5 x \$100 = \$500		
	Architectural	Lower portion of bar.		\$3,000		
	Architectural	Install tactile and Braille signage at toilet rooms.		2 x \$50 = \$100		
	Architectural	Provide an accessible stall in women's toilet room.		\$10,000		
	Architectural	Remove lavatory apron. Insulate lavatory pipes. Replace twist faucets with lever faucets. Relocate mirror.		\$7,500		
	Architectural	Reposition grab bar and dispenser in men's toilet room.		\$500		
	Architectural	Insulate pipes and relocate dispenser in men's toilet room.		\$500		
	Architectural	Lower urinal in men's toilet room.		\$1,500		

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
ELLIOT CEMETERY						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	There is no public parking or public sidewalks within close proximity to the burial ground. Recommendation: Additional study required.		\$2,000		
	Architectural	Provide a paved path from street to burial ground.		\$1,500		
<u>Interior</u>		N/A				

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
ROCHDALE PARK						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Restripe access aisle. Add new post mounted signage.		\$500		

	Architectural	Restripe pavement markings. Add new post mounted signage.		\$500		
	Architectural	Provide a paved path to baseball field.		\$2,500		
<u>Interior</u>		N/A				

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
TOWTAID PARK						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Restripe and resurface parking spaces. Add new post mounted signage.		\$750		
	Architectural	Install an asphalt path tp play area.		\$2,000		
<u>Interior</u>		N/A				

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
LION'S PARK						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Restripe and resurface parking spaces. Add new post mounted signage.		\$750		
	Architectural	Repair asphalt path from sidewalk to park.		\$200		
	Architectural	Replace bricks in path.		\$750		
<u>Interior</u>		N/A				

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
WAITE STREET RECREATIONAL FIELDS						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Restripe and resurface parking spaces. Add new post mounted signage.		\$750		
	Architectural	Provide a paved path from parking to concession stand.		\$500		
	Architectural	Provide an auxiliary counter or folding shelf at transaction area.		\$300		
	Architectural	Install a paved path to spectator area and playing fields.		\$2,500		
	Architectural	Install a platform lift to press box.		\$60,000		

<u>Interior</u>		N/A				

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
BURNCOAT FIELDS AND BEACH						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Provide level parking space with post mounted signage.		\$750		
	Architectural	Provide a paved path to the basketball court.		\$2,500		
	Architectural	Provide a paved path to the baseball field.		\$1,500		
<u>Interior</u>		N/A				

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
TOWN COMMON AND GAZEBO						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Path to North Main Street has a slope >5%. Additional study required.		\$10,000		
	Architectural	Resurface asphalt paths		\$1,000		
	Architectural	Provide an asphalt path and ramp.		\$3,500		
<u>Interior</u>		N/A				

Location	Barrier Type	Suggested Action(s)	Responsibility	Cost Est.*	Priority	Timeframe
SIDEWALKS AND CURB RAMPS (throughout Town)						
<u>Programmatic</u>	Operational	Prioritize actions following development of municipal policies and procedures	Commission on Disabilities; Town	N/A	N/A	N/A
<u>Exterior</u>	Architectural	Install a new curb ramp at Town Common.		\$2,000		
	Architectural	Install a new curb ramp where pedestrian route crosses curb outside Town Hall.		\$2,000		
	Architectural	Repair sidewalk at the intersection of Market Street and Main Street.		\$1,000		
	Architectural	Install a new curb ramp at crosswalk on Paxton Street.		\$2,000		
	Architectural	Install a new curb ramp on Paxton Street near Town Hall.		\$2,000		
	Architectural	Install a new curb ramp on Paxton Street near Town Hall where it does not align with crosswalk.		\$2,000		

	Architectural	Repair sidewalk at the intersection of Routes 9 and 56.		\$500		
	Architectural	Install detectable warnings at crosswalk at intersection of Routes 9 and 56.		3 x \$500 = \$1500		
	Architectural	Provide detectable warnings where Hillcrest golf course crosses Pleasant Street.		2 x \$500 = \$1000		
	Architectural	Repair sidewalk at Lion's Park.		\$500		
	Architectural	Install a new curb ramp opposite Lions Park.		\$2,000		
	Architectural	Install a new curb ramp adjoining parking lot at Lions Park.		\$2,000		
<u>Interior</u>		N/A				