

Town of West Boylston, Massachusetts

Americans with Disabilities Act (ADA)

Self-Evaluation and Transition Plan (SETP)

Final, Approved by West Boylston Select Board September 6, 2023

1	Introduction.....	5
1.1	The Americans with Disabilities Act of 1990 (ADA)	5
1.2	Guide to Using this Document	5
2	ADA Title II Requirements Overview.....	6
2.1	Overview	6
2.2	Program Accessibility	6
2.3	Equally Effective Communication.....	7
2.4	Standards for Compliance	8
2.4.1	Facility Accessibility Standards	8
2.4.2	Other Accessibility Standards.....	9
2.4.2.2	Website Content Accessibility Guidelines (WCAG)	10
2.4.2.3	Public Rights-of-Way Accessibility Guidelines (PROWAG)	10
2.5	Limitations to West Boylston’s Obligations.....	10
2.5.1	Programs Viewed in Their Entirety.....	111
2.5.2	Equivalent Facilitation	11
2.5.3	Safe Harbor.....	12
2.5.4	Undue Financial Burden/Disproportionality & Technical Infeasibility	12
2.5.5	Fundamental Alteration of a Service or Program.....	12
2.5.6	Exceptions	133
3	Administrative Requirements of the ADA	13
3.1	Public Notice.....	13
3.1.1	Findings	13
3.1.2	Recommendations	14
3.2	Designation of Responsible Employee/ADA Coordinator	14
3.2.1	Findings	15
3.2.2	Recommendations	15
3.3	Adoption of a Grievance Procedure	15
3.3.1	Findings	166
3.3.2	Recommendations	16
3.4	Self-Evaluation of Programs and Services & Transition Plan.....	16
3.4.1	Self-Evaluation Process	17
3.4.2	Transition Plan Process.....	18
4	Self-Evaluation - Program, Policy & Procedure Review Summary	18
4.1	Overview & General Townwide Findings	18
4.1.1	Customer Service.....	18
4.1.1.1	Recommendations	19
4.1.2	Maintenance of Accessible Facilities	19
4.1.2.1	Recommendations	19
4.1.3	Emergency Preparedness, Evacuation Plans, and Emergency Shelters	20
4.1.3.1	Findings	20
4.1.3.2	Recommendations	20
4.1.4	Service Animals	21
4.2	Town Department Programs and Services	21
4.2.1	Town Hall Departments.....	21
4.2.1.2	Town Administrator	21
4.2.1.3	Accounting.....	21
4.2.1.4	Building Department	22
4.2.1.5	Town Clerk.....	22
4.2.1.6	Health Department	22

4.2.1.7	Recreation Department.....	22
4.2.1.8	Treasurer/Tax Collector.....	23
4.2.1.9	Veterans’ Services	23
4.2.2	Library.....	23
4.2.3	Municipal Light Plant.....	24
4.2.4	Department of Public Works	24
4.2.5	Council on Aging/Senior Center	25
4.2.6	Fire Department	25
4.2.7	Police Department.....	266
4.2.8	School Department	26
4.2.8.1	Major Edwards Elementary School	26
4.2.8.2	West Boylston Middle/High School.....	26
4.2.9	Outdoor Facilities	27
4.2.9.2	Goodale Park	27
4.2.9.3	Town Common	27
5	Providing Equally Effective Communications	27
5.1	Communications with Hearing and Speech Impaired Individuals.....	27
5.1.1	Findings	28
5.1.2	Recommendations	28
5.2	Website Accessibility.....	29
5.2.1	Findings	30
5.2.2	Recommendations	30
5.3	Public Meeting Access	31
5.3.1	Findings	31
5.3.2	Recommendations	31
5.3.2.1	Town Meeting	32
6	Public Engagement & Input.....	32
6.1	Overview	32
6.2	Public Input Survey.....	33
6.2.1	Methodology	33
6.2.2	Results	33
6.2.2.1	Facilities access.....	34
6.2.2.2	Program and Service access	34
6.2.2.3	Pedestrian Ease of Use	355
6.2.2.4	Effective Communication	355
6.3	Disability Commission	355
6.4	Transition Plan Public Comment	366
7	Transition Plan.....	377
7.1	Overview of Transition Plan	377
7.1.1	Administrative Action Items.....	377
7.1.2	Town-wide Action Items.....	377
7.1.3	Departmental Programs & Services Action Items	388
7.1.4	Communications, Website/Social Media & Public Meetings	39
7.1.5	Facility Improvements and Capital Projects	400
8	Appendices	444
8.1	Recommended Policy and Procedure Documents	444
8.1.1	Public Notice (Proposed).....	444
8.1.2	Service Animal Policy (Proposed)	455
8.2	Resources	466

8.2.1	General Resources & Guides	466
8.2.2	Grant Funding for Accessibility Projects.....	466
8.2.3	Services to Aid Communication with Hearing/Speech Impaired Individuals	477
8.2.4	Training and Technical Assistance	488
8.3	Department Program & Service Questionnaire Summary	500
8.3.1	Accounting Department	500
8.3.2	Building Department	500
8.3.3	Town Clerk.....	501
8.3.4	Cemetery Department	501
8.3.5	Council on Aging (COA)/Senior Center	502
8.3.6	Department of Public Works (DPW)	502
8.3.7	Fire Department	503
8.3.8	Health Department.....	503
8.3.9	Library.....	504
8.3.10	Municipal Light Plant.....	505
8.3.11	Police Department.....	505
8.3.12	Recreation Department	505
8.3.13	Town Administrator	506
8.3.14	Treasurer/Collector.....	507
8.3.15	Veterans' Agent	507
8.4	Website Audit	58
8.5	Facility Audits	67
8.5.1	Town Hall.....	67
8.5.2	Municipal Light Plant.....	76
8.5.3	Police Department.....	81
8.5.4	Council on Aging (COA)/Senior Center	84
8.5.5	Fire Department	91
8.5.6	Department of Public Works	95
8.5.7	Library.....	96
8.5.8	West Boylston Middle/High School.....	106
8.5.9	Major Edwards Elementary School	128
8.5.10	Town Commons.....	140
8.5.11	Goodale Park	142
8.6	Public Input Survey Results	146

1 Introduction

1.1 The Americans with Disabilities Act of 1990 (ADA)

As a public entity, the Town of West Boylston is subject to the ADA's Title II Requirements for State and Local Government Programs and Services and is responsible for the provision of accessible programs and facilities that are available without discrimination toward people with disabilities. A fundamental tenet of Title II of the ADA is *"the principle that individuals with disabilities must be provided an equally effective opportunity to participate in or benefit from a public entity's aids, benefits, and services."* This principle is referred to as program accessibility.

A public entity may not deny the benefits of its programs, activities, and services to individuals with disabilities because its facilities are inaccessible. A public entity's services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. This standard, known as "program accessibility," applies to all existing facilities of a public entity. Public entities, however, are not necessarily required to make each of their existing facilities accessible. The Town is required to ensure program accessibility for the programs it provides to the public, and most of these programs are based in a facility of some type.

The phrase *"when viewed in their entirety"* is important to recognize for municipalities when developing a plan to remove barriers to access. Since programs are offered across different platforms and at or in different facilities (or across multiple facilities), this allows for a degree of flexibility that recognizes both the opportunities to deliver services in alternative formats or in alternative locations, but also the fiscal constraints facing a town as well as the feasibility of altering existing facilities. If barrier removal is too costly, physically infeasible, or would adversely impact an existing program, the municipality can be creative in how they offer the delivery of a particular service in order to achieve access for all. This is the perspective from which this evaluation and resulting plan is approached.

1.2 Guide to Using this Document

This section provides an overview of the sections of this document and where to find various information.

Section 2 – ADA Title II Requirements Overview: This section outlines the key components the ADA mandates for Towns under Title II. It also includes a list of the various standards and, importantly, a breakdown of the limitations to the Town's obligations.

Section 3 – Administrative Requirements – Administrative requirements describe the basic elements that the Town must have in place in order to comply with the law. More specifically, these requirements provide the basic organization the Town must have in place to effectively implement accessibility policy. This section presents findings and recommendations on three basic requirements (Public Notice, Responsible Employee, and Grievance Procedure) and introduces the final requirement (Self Evaluation and Transition Plan), which follow in separate sections.

Section 4 – Self Evaluation – The Self Evaluation is the review, findings and recommendations of the programs provided by the Town. A program is inclusive of the services, resources, facilities and other attributes of anything and everything the Town does.

Section 5 – Providing Equally Effective Communication – A subset of the Self-Evaluation, this section includes aspects of communications, including website, publications, and public meetings.

Section 6 – Public Engagement & Input – The public input includes a survey conducted at the outset of the project, the review and guidance from the Disabilities Commission to develop the SETP, and a final opportunity to receive public input on the final plan.

Section 7 – Transition Plan – This is the action plan to remove barriers, and includes short, medium, and long-term objectives. It presents policy and programmatic changes, readily achievable physical barrier removal, and longer-term capital projects. The Transition Plan is the Town’s checklist for implementation.

Section 8 – Appendices – The appendices include the reports on the data gathered (facility and website audits, survey results, departmental questionnaires, etc.), sample policies, and a list of resources that will be useful during implementation.

2 ADA Title II Requirements Overview

2.1 Overview

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination based on disability. Specifically, Title II requires that:

No qualified individual with a disability shall, based on 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 public entity (28 CFR Part 35.130 (a)).

To ensure compliance with the ADA, the Town of West Boylston contracted with The Edward J. Collins, Jr. Center for Public Management to undertake a comprehensive assessment, including self-evaluation, of its facilities, programs, and services to determine compliance with the requirements of ADA Title II. The review provided in this assessment also recommends strategies that would result in a more practical, usable, and inclusive environment for members of the West Boylston community.

The assessment evaluated non-discrimination in policies, practices, and procedures for Town facilities, programs, and services, including those related to effective communication and employment. This report summarizes The Collins Center findings of ADA Title II compliance. The information pertinent to this assessment was obtained via a questionnaire developed by The Collins Center, meetings with Town leaders, department heads, and Boards, and comprehensive research. Findings illustrate the Town is responsive to ADA requests and requirements; however additional steps are needed to ensure that people with disabilities have the same opportunities to access facilities and participate in its programs and services as West Boylston residents without disabilities. Corrective action is needed to create or update written policies and procedures that would ensure the Town’s compliance with applicable laws.

2.2 Program Accessibility

Title II of the ADA requires state and local governments to modify its policies, programs, and services when necessary to avoid discrimination:

A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination based on disability, unless the public entity can

demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. (28 CFR Part 32.130 (b)(7))

The Town has several options to provide program access. 28 CFR 35.150, as well as the numerous advisories issued by the Department of Justice, outline the different ways in which a public entity can provide program access, including:

- Physical alteration of buildings and facilities;
- Offering services at alternate locations (including online), provided the alternative results in essentially the same level of service; and
- Where feasible, providing auxiliary aids or staff assistance in order to ensure essentially the same level of service.

When determining the type of modification, preference should always be given to the needs or method expressed by the individual requesting such modification unless this results in an undue financial burden or fundamentally alters the program or service. Practically speaking, the obligation under Title II does not mean that every building and facility has to be accessible, but ***every program and service does.***

The ADA encourages creative solutions and affords flexibility to the Town in considering the needs of those with disabilities alongside the availability of resources to address those needs. What is critical is that the Town demonstrates a continuing (and proactive) commitment to improving access and responding to complaints and concerns in a fair and timely manner.

The Department of Justice has broadly interpreted a “program” to include virtually every service that a local government provides. This includes not only the obvious direct services, such as Police protection, garbage pickup and recreation programming, but also sidewalks, walking trails, passive parks, events on public property, and emergency management and preparedness. Additionally, it applies to all facilities in which a program is offered.

2.3 Equally Effective Communication

Title II entities are required to ensure “effective communication” with people with disabilities. This obligation applies to all members of the public with disabilities including job applicants, program participants, and people who are seeking information about the Town’s programs, services, or activities. Specifically, Title II requires that:

A public entity shall take appropriate steps to ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others. (28 CFR Part 35.160(a)).

The obligation to communicate effectively with people who have disabilities applies to the presentation and exchange of information in all forms including sound, print, graphics, and voice. Much of the specific language in the ADA focused on the use of auxiliary aides such as hearing aids, TTY/TDD, large print, Braille and other devices or methods. Today, however, arguably the most important application of the equally effective communication requirement can be found in the way a Town’s website, eGovernment services, social media, and remote public meeting procedures provide access to individuals of all abilities. While this has created a significant challenge and expense, in particular for smaller municipalities with limited information technology staff and resources, the significant and rapid advances in digital services also

provides one of the best opportunities to effectively modify services and programs and, in many cases, avoid some of the costs associated with physical barrier removal in order to achieve access for all.

2.4 Standards for Compliance

Objective standards are not necessarily provided in all instances, making it somewhat challenging for local governments to find clear guidance on what they “must” do to comply with the law. Where there is no official guidance included in CFR or otherwise promulgated by a state, federal or local authority, the municipality should follow best practices or the best available standard. As an example, there currently is no federal standard for accessibility in the public rights-of-way, but the United States Access Board issued in 2011 the Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG) and although it has yet to be incorporated into the CFR, it is widely considered to be the best available guidance. Since sidewalks are a program offered by a municipality, these standards provide guidance to ensure accessibility.

Similarly, online and web services have no official standard other than the requirement for a government to provide equally effective communication, so the widely accepted Web Content Accessibility Guidelines (WCAG) is often used as the best practice for a municipality to follow. Other programs and services are much less clear, especially considering the broad nature of the many services provided by a local government. In many local government service areas, the associations serving the professionals in these fields publish guides and primers on best practices, such as the National Recreation and Park Association (www.nrpa.org) and the Government Finance Officers Association (www.gfoa.org), and there are many additional advisories available from <https://www.access-board.gov/> and <https://www.ada.gov/>.

A list of resources that can assist the Town in improving accessibility can be found in Appendix 8.2.

While there are myriad ways services can be made more accessible, the role of the physical facility in which a program is delivered is arguably the most important and one for which clear and objective standards are available and must be adhered to. These are noted in the next section.

2.4.1 Facility Accessibility Standards

Depending on when construction was completed, different standards may apply, and there are both federal accessibility standards, state building codes, and a specialized state accessibility code. These standards are voluminous, comprehensive, and very complex, and include numerous exemptions for historic buildings and specialized spaces. The relevant standards for Town facilities include:

- **2010 ADA Standards for Accessible Design** – For projects started on or before March 15, 2012, these standards apply. The 2010 Standards combine the requirements, including scope, of 28 CFR 35.151 with the 2004 ADA Accessibility Guidelines (ADAAG), which in addition to further scoping guidance, include the technical specifications that must be followed. While these standards apply to all new construction after March 15, 2012, there are also detailed explanations of how and when alterations to an existing building may require bringing other elements of a facility into compliance with the revised standards regardless of the date of original construction. These can be viewed at: <https://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards.htm>

It should be noted that, following the latest updates to the International Building Code and Residential Building Codes published by the International Codes Council, the standards are 99% identical to the 2010 Standards, with only minor variations, with respect to accessibility.

One important aspect of the 2010 Standards was the inclusion of guidelines for many recreation facilities. As these were not addressed under the 1991 Standards, the 2010 Standards are the enforceable standards for such facilities and no safe harbor is permitted.

- **1991 ADA Standards for Accessible Design** – Published in July 26, 1991, these standards should be used for evaluating buildings where construction started on or before March 14, 2012. They may be viewed at: https://www.ada.gov/1991ADASTandards_index.htm
- **Code of Massachusetts Regulations Title 521 (521 CMR)** – 521 CMR is the specialized building code for accessibility in Massachusetts and applies to all construction in the Commonwealth. While not as comprehensive as the 2010 Standards, the specific requirements under 521 CMR are more stringent and are considered additional requirements on top of the federal guidelines. They may be viewed at: <https://www.mass.gov/law-library/521-cmr>

For the purpose of conducting assessments of Town facilities and to simplify the identification and removal of barrier to access, West Boylston's Transition Plan recognizes the following facts and assumptions:

1. There is an affirmative obligation to remove barriers to access under the ADA, but not under 521 CMR. For this reason, facility audits are conducted using the relevant ADA standard. New construction and remedial projects to remove barriers should not only follow the 2010 Standards but also 521 CMR under Massachusetts law.
2. Unless a facility was, beyond any doubt, constructed and remained unaltered prior to March 14, 2012, audits were conducted using the 2010 Standards. Without having a thorough review (and documentation) of all past projects, plans and costs, it is difficult to establish whether or not a facility is provided safe harbor from the 2010 Standards. It is also important to note that most of the fundamental components of the 1991 Standards were left in place for the 2010 Standards, so there is a likelihood that significant non-compliance with 2010 Standards means non-compliance with 1991 Standards. Further, efforts to mitigate a barrier to access if performed concurrent to other alterations under the 1991 Standards may trigger a requirement to comply with the 2010 Standards. Since the intent of the Town is to err on the side of increased access, it is reasonable to audit using the 2010 Standards.

2.4.2 Other Accessibility Standards

2.4.2.1 Outdoor Developed Areas

In 2013, the U.S. Access Board issued guidelines for certain outdoor recreation and developed areas. These provisions, which cover trails, picnic and camping facilities, viewing areas, and beach access routes, have no legal effect on local governments subject to the DOJ's ADA regulations, but are considered advisory and best practice to provide accessibility to all public lands. The full guidelines can be found here: <https://www.access-board.gov/aba/guides/chapter-10-outdoor/>.

The Town should use these guidelines for developing outdoor spaces not specifically addressed in the 2010 Standards. However, caution should be used when attempting to follow these guidelines for access routes instead of accessible routes as defined in the 2010 Standards and should check with the DOJ or the Massachusetts Architectural Access Board if questions arise in altering existing facilities or undertaking new construction projects. Of course, any requirements of 521 CMR must be followed with new construction.

2.4.2.2 Website Content Accessibility Guidelines (WCAG)

There are no official standards for web content guidelines; instead, the general guidance to provide equally effective communication has been interpreted to mean that entities subject to Title II should follow the best practices available. For web content, the standard, and arguably universally accepted, guidelines are found in the Web Content Accessibility Guidelines. As these standards have evolved, and continue to evolve, it is important that a Town's Information Technology staff and other staff who post materials to websites, social media and other media, stay up to date with the latest standards and advisories.

The current standards are found in WCAG 2.0 here: <https://www.w3.org/WAI/standards-guidelines/wcag/>.

There is a draft WCAG 2.1 and 2.2 standard as well, and it is the responsibility of the Town to stay abreast of changing content guidelines as technology rapidly changes.

2.4.2.3 Public Rights-of-Way Accessibility Guidelines (PROWAG)

As with web content, there is no official standard covering all aspects of accessibility within the public rights-of-way. The U.S. Access Board proposed the Public Rights-of-Way Accessibility Guidelines (PROWAG) in 2011. As of this writing, these guidelines have not been adopted by the DOJ, nor the Commonwealth of Massachusetts, although many of the construction details have been adopted in part or fully in state and local standards for design. PROWAG may be viewed here: <https://www.access-board.gov/prowag/>.

Although not officially adopted, these guidelines are nonetheless a best practice and should be followed on public street, sidewalk and transit projects. MassDOT has developed certain standards, and a useful guide titled Municipal Resource Guide for Walkability. This guide may be viewed here: https://www.mass.gov/files/documents/2018/09/17/MunicipalResourcesGuideForWalkability_2018-08-24.pdf.

2.5 Limitations to West Boylston's Obligations

While the Town is committed to ensuring access for all residents and visitors, it is important to understand the Town has limited resources with which to address accessibility issues and competing priorities. Town management and elected officials are obligated to work towards improving accessibility, but the public must also recognize that it takes time, money, and Town Meeting buy-in to implement change.

The Town has a number of tools at its disposal to help weigh both the obligation to address a barrier and the manner in which it may be addressed. It is important to recognize that "perfect" is often the enemy of "good", and creative solutions can be developed that meet the needs of an individual or group even if they fall short of absolute compliance with a specific code or regulation.

2.5.1 Programs Viewed in Their Entirety

The phrase “when viewed in its entirety” noted in Section 1.1 refers to the Town’s ability to take into consideration other factors when evaluating program accessibility. For example, if the Town had multiple playgrounds in different locations, they could prioritize making one fully inclusive rather than meeting the minimum standards for both; in this example, the “playground program”, *when viewed in its entirety*, is accessible and results in a more inclusive playground experience for children.

28 CFR 35.150 states:

(a) General. 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 paragraph does not -

(1) Necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities;

(2) Require a public entity to take any action that would threaten or destroy the historic significance of an historic property; or

(3) Require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens.

To read the full text of this section, please visit: <https://www.ecfr.gov/current/title-28/chapter-I/part-35/subpart-D/section-35.150>. In particular, 28 CFR 35.150 (b) (1) Methods provides examples of ways a program access can be achieved. This should not be used as a reason not to complete readily achievable projects, but the reality is that West Boylston, like most towns, has limited resources and must balance competing needs when developing capital investment priorities. As long as the Town acts in good faith to provide program access and is diligent about documenting the reasons for not addressing existing deficiencies and the efforts made to achieve equivalent facilitation, it is working within the intent of the ADA.

2.5.2 Equivalent Facilitation

Section 103 of the 2010 Standards states:

Nothing in these requirements prevents the use of designs, products, or technologies as alternatives to those prescribed, provided they result in substantially equivalent or greater accessibility and usability.

Advisory 103 further states:

The responsibility for demonstrating equivalent facilitation in the event of a challenge rests with the covered entity. With the exception of transit facilities, which are covered by regulations issued by the Department of Transportation, there is no process for certifying that an alternative design provides equivalent facilitation.

Equivalent Facilitation is a tool that the Town may utilize to overcome barriers to accessibility where they have a substantial and compelling reason for non-compliance. The Town should recognize the exposure

to liability and consult with Town Counsel as well as state and federal authorities if any such questions arise. As with all exceptions, the decisions and supporting documentation should be maintained by the Town and the Transition Plan provides an ideal location for such information.

2.5.3 Safe Harbor

28 CFR 35.150 (b) (2) (i) allows for an element-by-element “safe harbor” exception for elements within facilities that have not been altered on or after March 15, 2012 provided they were in compliance with the 1991 Standards when constructed. Generally speaking, this applies only to those elements for which the 1991 Standards provided guidance, such as operable control mounting height of 54” versus the 2010 standard of 48”. It does not apply to elements for which no standard was included in 1991, such as play areas, meaning those areas are required to be brought up to current standards (programmatically or physically). Further, once the Town alters an element for any reason other than achieving ADA compliance, such as constructing new walkways or remodeling a bathroom, it loses safe harbor protection for that space. In other words, if it was compliant with the 1991 Standards and those standards changed, it does not have to be corrected unless and until an alteration occurs.

In general, safe harbor arguments are difficult to make for minor, and easy to fix, barriers to access. The Town has an ongoing obligation to address barriers and improve facility access and should take every opportunity to correct existing deficiencies to 2010 Standards *to the maximum extent possible*.

2.5.4 Undue Financial Burden/Disproportionality & Technical Infeasibility

28 CFR s36.401 subpart D details exceptions for situations where providing access would be structurally impractical, technically infeasible or create an undue financial burden where the cost of full compliance is disproportionate to the total cost of the project. The section is very specific in making such determinations and the actual text should be consulted by the Town if considering making such an argument. There are two important considerations that must be taken into account.

First, it is the responsibility of the Town to determine, through design and analysis, and document any such decision to remain fully or partially non-compliant. The Transition Plan is an important mechanism to document such determinations. Second, the Town is obligated to ensure that alterations are performed to provide the maximum amount of accessibility possible up to the limits of disproportionality or technical infeasibility.

2.5.5 Fundamental Alteration of a Service or Program

28 C.F.R. § 35.130(b)(7) states:

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

The Town should use caution when making a determination not to modify a program, service or policy due to this guidance, and should do so only after consultation with Town Counsel or other authority. Such determinations should be documented in the Transition Plan. The full text of this section can be found here:

[https://www.ecfr.gov/current/title-28/chapter-I/part-35/subpart-B/section-35.130#p-35.130\(b\)\(7\)](https://www.ecfr.gov/current/title-28/chapter-I/part-35/subpart-B/section-35.130#p-35.130(b)(7))

2.5.6 Exceptions

Section 203 of the 2010 Standards provides a number of specific exceptions to compliance with the design requirements. An important subsection is 203.9, which provides exception (and advisories) for employee work areas.

The full text can be found here:

<https://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards.htm#pgfld-1010074>

While employee works are covered by these exemptions, there is still an obligation to provide accessible routes to these spaces, as well as to common use spaces such as bathrooms, break rooms and conference rooms. These common use spaces must be made accessible as well.

3 Administrative Requirements of the ADA

Title II requires the Town of West Boylston to complete the following administrative actions:

- Provide a Public Notice which will include information regarding the Town's obligations under the ADA and non-discrimination protections available to persons covered under the Act;
- Designate an employee responsible for ADA Compliance (ADA Coordinator);
- Adopt a procedure for grievances;
- Conduct a Self-Evaluation of services, policies and practices, including providing an opportunity for public input and engagement; and
- Develop a Transition Plan which will provide an actionable and realistic plan to remove barriers to access. This plan will include reasonable and realistic timelines for achieving barrier removals.

3.1 Public Notice

Title II of the ADA requires that public entities notify participants of its non-discrimination policies:

A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part. (28 CFR Part 35.106)

3.1.1 Findings

It is not clear from questionnaire responses, interviews, and document review that the Town has a current policy and staff trained to consistently publish the ADA Non-Discrimination Notice in materials distributed by the Town to notify residents, program/service participants, and employees of its obligation to provide equal access under ADA Title II. Specific findings include:

- A document titled ADA Policy and Grievance Procedure is posted to the Town's website at <https://www.westboylston-ma.gov/sites/g/files/vyhlf1421/f/uploads/policyk7.pdf> . This document is specific to the Town's adopted Grievance Procedure and does not contain a non-discrimination policy statement;

- The name of the ADA Coordinator is not included, nor a phone number or email address;
- The mailing address of 127 Hartwell Street noted is no longer valid; and
- Where bulletin boards or areas for posting notices were noted during the site visits, the public notice was not adequately posted in several facilities (behind other postings, or missing entirely).

3.1.2 Recommendations

The Town should update the public notice and modify internal policies to require staff to ensure it remains posted and up to date. Specifically, the Town should:

- Publish the ADA Notice in all the materials distributed by the Town; post the ADA Notice on the Town’s website home page and post copies in public locations in the Town’s buildings at locations where the notice has yet to be posted. It is acceptable to create a short version or post a link depending on the media platform.
- Include the ADA Notice on Town social media pages.
- Consider creating a dedicated email account for public notices, grievance procedure complaints, and other questions around accessibility issues. This can be automatically forwarded to the ADA Coordinator, Town Administrator (or other designee), and any other staff to ensure email contacts are received and addressed in a timely manner, as well as avoid having to update the public notices should the person in the ADA Coordinator role leave the position.

See Appendix 8.1.1 for a Proposed Public Notice.

3.2 Designation of Responsible Employee/ADA Coordinator

Title II requires a public entity to designate an employee to be responsible for ensuring compliance. Title II provides little specific guidance for implementing this requirement, but the primary role of the designated employee, also called the ADA Coordinator, is to make sure the Town is compliant with the requirements.

A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph. (28 CFR Part 35.107 (a)).

It is common to designate a building code official as the ADA Coordinator due to the need to understand and enforce accessibility building codes. However, understanding building codes represent only a part of the duties of an ADA Coordinator and a lot has changed since the ADA was first signed into law. The programmatic aspect of the ADA is equally important, and with the rapid growth of e-Government services, the role now requires an understanding of the full spectrum of local government service delivery in order to help develop practical solutions to accessibility barriers and leverage the available technology and resources.

It is often the case that the physical solution to an architectural barrier is often the most expensive and takes the longest to achieve. An effective ADA Coordinator will understand how to achieve a satisfactory resolution to ensure program access by researching best practices, attending training and communicating with impacted individuals. Building inspections professionals already are subjected to significant

professional education and recertification requirements, so it is important that Town officials not only provide the necessary resources to fulfill dual roles, but also issue clear expectations for the position.

3.2.1 Findings

The Town of West Boylston has met its minimum obligation to designate a responsible employee by appointing the Building Commissioner as the Town's ADA Coordinator. However, it should be noted that the ADA Coordinator has not been assigned an active role with the Town's Disabilities Commission and the position's role has been limited to accessibility building code oversight with minimal responsibilities for overall Title II compliance.

The Job Description for the Building Inspector includes "Serves as the Town's ADA Coordinator", but does not include specific duties and responsibilities, nor does the essential training section include knowledge or training in ADA Title II requirements.

An additional finding notes that the Municipal Light Plant has designated its own ADA Coordinator and directs complaints, inquiries, and requests for accommodation to that individual.

3.2.2 Recommendations

The Town should review the role of the ADA Coordinator and determine if the role is appropriately located with the organizational structure. It is important that this role be recognized as a facilitator for improving access across all Town operations covered by Title II, and not solely within the sphere of building code compliance.

Wherever the ADA Coordinator role resides, the Job Description should be modified as follows:

- The final sentence in Essential Duties and Responsibilities should be modified to add the underlined language: *Serves as the Town's ADA Coordinator and as Staff Liaison to the Disabilities Commission.*
- Additional language should be added to the last paragraph of Essential Training and Experience Required to Perform Essential Functions to reflect the need for a general knowledge of Title II requirements.

The Town should determine whether the MLP should maintain a separate ADA Coordinator; this may be a decision that requires Town Counsel to determine the legal status of the MLP and whether it requires its own organizational structure and SETP.

The Massachusetts Office on Disabilities offers training for ADA Coordinators, and additional details can be found at <https://www.mass.gov/service-details/mod-training-events>.

3.3 Adoption of a Grievance Procedure

Title II of the ADA requires a public entity to adopt an adequate grievance process.

A public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by this part. (28 CFR Part 35.107 (b))

3.3.1 Findings

The Town of West Boylston currently has an *ADA Policy and Grievance Procedure*, which was written in 2012, and is posted on the Policies page of the Town website, Section K, under Personnel issues. The document required multiple clicks to reach and was not easy to find. This document can be viewed here:

<https://www.westboylston-ma.gov/sites/g/files/vyhlf1421/f/uploads/policyk7.pdf>

There is also a separate Town of West Boylston Equal Access to Parks and Recreation Facilities and Activities Grievance Policy. This document is not located online and was provided during the audit. While similar, the documents have some conflicting information regarding the procedures a complainant must follow. Neither document contains the name, phone or email contact information for the ADA Coordinator, and the address noted on the 2012 version is incorrect.

There is no “Accessibility” section, icon or link on the landing page for the Town’s main page to help people easily navigate to information on accessibility; this is a best practice.

3.3.2 Recommendations

The Town should reconcile the two policy documents into a single Grievance Procedure applicable to all departments. The New England ADA Center offers a sample template that can be viewed here:

<https://www.adaactionguide.org/themes/custom/ada/docs/samples/GrievanceProceduresSamples.pdf>

Either the template above, or the existing documents provide a starting point, and the final document should be a procedure that works with the Town’s organizational structure. The key elements that need to be included are:

- Name and contact information (phone, address and email) of the ADA Coordinator and/or designated employee to whom a complaint should be addressed;
- How a grievance can be submitted, to include multiple options (written, by phone, in-person, email, etc...) as well as an offer to provide assistance in any format accessible to the complainant;
- Process by which a grievance will be reviewed and addressed, including progressive steps should the issue not be resolved to the satisfaction of the complainant;
- Maximum time for each step in the process; and
- Requirements for documenting the complaint, including correspondence and any actions taken, including retention requirements of at least three years, or as required under Massachusetts records retention laws.

The Grievance Procedure should be distributed to the department heads and posted online. Where applicable in online postings, the Public Notice should link to the Grievance Procedure.

The Town should also add an Accessibility icon or link on the main landing page, as well as in the footer of all subpages that link to a single page containing the Public Notice, Grievance Procedure, and link to the Disability Commission web page.

3.4 Self-Evaluation of Programs and Services & Transition Plan

The final administrative requirements under Title II require the Town to 1) conduct a *self-evaluation* of its programs, policies, and facilities, and 2) develop a *transition plan* to improve access over a reasonable period of time and within the resources available. If a Section 504 evaluation and plan was previously

done, self-evaluations are permitted to only examine those programs and services which were not previously assessed.

Since the Town did not previously have a Self-Evaluation and Transition Plan (SETP), and was unable to locate a 504 plan, this administrative requirement was not met. The section below outlines the process the Town has followed to meet this requirement for the SETP.

3.4.1 Self-Evaluation Process

As an initial step, a questionnaire was distributed to all department heads that was designed to collect an inventory of programs/services provided by that department. The inventory gathered data on major “bundles” of services that share commonality in the resources they rely on, the individuals or groups they serve, and the general manner in which the service is delivered.

The survey included three questions regarding effective communication, including alternative format documents and materials format requests such as large print, braille, and TTY. Six questions were asked regarding core programs and services including location, type of program or service provided, whether the program or service is online, and whether reasonable accommodation is made for patrons with disabilities.

The data from the questionnaires is important for two primary purposes:

- To identify organization-wide barriers to access that can be addressed globally, such as whether or not staff are trained on how to respond to a request for materials in an alternative format. Town-wide training or policies can be cost-effective and relatively easy to implement.
- To identify barriers specific to providing a service or program, such as burn permits or other forms that are only available in paper and/or at in-person locations. In such instances, more tailored solutions can be identified, such as offering alternative online fillable forms, allowing phone-in of information, or offering curbside assistance.

The questionnaire was also used to aid in the evaluation of facilities within the context of the services offered. This is particularly important for facilities that found to be significantly non-compliant, but with limited public access where programmatic modifications are the most effective way to ensure accessibility, such as with the Town’s DPW facility.

In addition to the questionnaire, the study team also:

- evaluated existing policy and procedure documents;
- held meetings and interviews with key staff;
- conducted thorough site visits and facilities audits;
- audited the Town’s website and communications, including video of public meetings; and
- collected public input through an online survey, also available in hard copy and alternative format upon request.

Using the information collected during this evaluation, the study team developed a list of findings and worked with the Town to develop a plan to address any deficiencies and remove barriers to access. This process is discussed in the next step.

3.4.2 Transition Plan Process

The findings of the Self-Evaluation and developing a plan on how best to address them is a multi-step process:

- The findings and results of the report are presented in draft form to the Disabilities Commission and Town officials for an initial review and any errors or omissions are addressed.
- The final draft is presented to the Disabilities Commission, including summary tables of the administrative, program/policy/procedure, communications, and facilities deficiencies and barriers.
- The Disabilities Commission works with the study team and Town staff to develop a short, medium, and long-range plan based on relative ease of barrier removal, available resources, priorities and severity of the non-compliance. A recommended workflow for this step includes:
 - Address Administrative Requirement recommendations in consultation with Town Administrator and Select Board (Short-term – within 30 days)
 - Include a process for regular monitoring and updating of status of Transition Plan implementation to Disabilities Commission and Select Board.
- Develop funding and prioritization strategies. There are a number of ways to approach the prioritization strategy, including using:
 - Public Input Survey results
 - Grievance Procedure
 - Existing master plans
 - Additional public input
 - Executive authority
- Develop prioritized plan for programmatic modifications, including identifying and completing training for staff (Medium-term – within 12 months).
- Develop prioritized plan for readily achievable physical barrier removals that can be completed in-house or at minimal cost (Medium-term – within 12 months).
- Develop prioritized capital investment strategy for major projects as part of overall capital planning process and incorporate into the Town’s Capital Improvement Plan (CIP).
- The resulting Draft Transition Plan is presented for public comment.
- A final draft was adopted by the Select Board.

4 Self-Evaluation - Program, Policy & Procedure Review Summary

4.1 Overview & General Townwide Findings

The findings and recommendations in this section apply across all Town departments.

4.1.1 Customer Service

Questionnaire responses indicated that staff across all departments take active measures to provide ADA-compliant customer service. Staff initiatives included working with customers or employees to accommodate their needs to the best of their ability; meeting customers outside or at their car to provide

a service; providing a customer-service bell at the bottom of a non-accessible interior entry way; providing assistive listening devices at the public library and some library materials in large print, audio, and braille upon request; and providing a service online or at residents' home as needed.

4.1.1.1 Recommendations

The current staff practices of accommodating individual requests should be memorialized in standard operating procedures and policies as applicable and appropriate. In general, providing the required Public Notice as recommended in Section 3.1.2 and developing an easily accessible and comprehensive accessibility web page recommended in Section 5.2.2 will meet this recommendation.

As a best practice, the Town should integrate training on the ADA and its requirements into standard staff professional development programming. The U.S. Access Board offers a variety of self-guided training programs that can be found here: <https://www.access-board.gov/webinars/>

4.1.2 Maintenance of Accessible Facilities

In addition to providing programmatic access, the Town is obligated to maintain all accessible facilities in working order. Exceptions are provided for temporary disruptions. The ADA Technical Assistance Manual II-3.10000 contains the following language regarding the maintenance of accessible features:

Maintenance of Accessible Features. Public entities must maintain in working order equipment and features of facilities that are required to provide ready access to individuals with disabilities. Isolated or temporary interruptions in access due to maintenance and repair of accessible features are not prohibited.

Where a public entity must provide an accessible route, the route must remain accessible and not blocked by obstacles such as furniture, filing cabinets, or potted plants. An isolated instance of placement of an object on an accessible route, however, would not be a violation, if the object is promptly removed. Similarly, accessible doors must be unlocked when the public entity is open for business.

Mechanical failures in equipment such as elevators or automatic doors will occur from time to time. The obligation to ensure that facilities are readily accessible to and usable by individuals with disabilities would be violated if repairs are not made promptly or if improper or inadequate maintenance causes repeated and persistent failures.

While the departmental surveys did not indicate any issues with maintenance, the Public Input Survey (discussed in Section 6) indicated maintenance of sidewalks is a significant concern, which was also observed by the site visit teams at many facilities. Further, the placement of trashcans and furniture often created barriers by overlapping clear floor space, accessible routes and maneuvering space. Training for staff should include an overview of common barriers and routine inspections by the ADA Coordinator should be performed. Snow removal operations in particular should be evaluated to ensure priority removal of accumulated snow at accessible features remains a focus.

4.1.2.1 Recommendations

The following actions should be taken to ensure ongoing facility maintenance and operation ensures access for individuals with disabilities:

- Staff training on placement of furniture, trash cans and other items so as not to obstruct accessible routes, clear floor space and maneuvering clearances.

- Regular inspections and testing of assistive listening devices.
- If outsourced, contracts for maintenance on facilities and rights-of-way should be modified to specifically require accessible routes, clear floor spaces and maneuvering spaces be kept clear. For example, janitorial contractors should be instructed not to place trash cans within latch-side clearance of bathroom doors or in knee space under accessible counter. For right-of-way mowing and vegetation control, contractors should ensure limbs are kept trimmed above 80” and weeds between sidewalk slabs and at ramps be removed.
- Require ADA Coordinator to conduct periodic inspections at all facilities for compliance.
- The Town’s snow removal plan/policies should be updated to ensure priority is given to ensuring accessible routes are cleared. During winter months, inspections should include a focus on snow removal from accessible routes at facilities and high-traffic pedestrian routes.

4.1.3 Emergency Preparedness, Evacuation Plans, and Emergency Shelters

As evidenced by recent U.S. Department of Justice’s (DOJ) Project Civic Access Settlement agreements, emergency preparedness shelters, and evacuation plans are critical components of a Town’s responsibilities related to accessibility.

West Boylston does have a Comprehensive Emergency Management Plan (CEMP), which was updated on June 5, 2021. Upon CEMP review for ADA compliance, it was noted that the Town has addressed the “standard boilerplate” requirements for the basic plan.

There are, however, areas that should be addressed in order to plan for emergency management services to be available to disabled individuals.

4.1.3.1 Findings

CEMP currently identifies demographics of the population and shelter locations; however, there is no appendix attached to ensure the following issues have been addressed. Additionally, CEMP needs to state whether the shelters are ADA compliant and determine their current capacity.

4.1.3.2 Recommendations

West Boylston should utilize the following resources to inspect the facilities: the two *Tool B’s Shelter Capacity and ADA Accessibility* as well the *Resource Guide for Emergency Planning for People with Disabilities and others with access and Functional Needs*.

The following issues with the shelters for short/long term should also be addressed:

- Identify Public Transportation to the shelters; especially for those who have physical/medical disabilities (7% of the population)
- Determine that the (Community Emergency Response Team) CERT is robust enough to manage the shelter(s); identify/develop a roster and POC for the CERT/ Identify CERT members with “additional” skill sets
- Develop listing of sheltering Veterinarian services for those who have both “pets” and service animals
- Develop listing of sheltering medical capabilities beyond the American Red Cross (ARC), and or the Fire Department.
- Develop listing or process to engage the Visiting Nurse Association (VNA) to assist at the shelter(s)

- 16% of the population is non-English speaking; need a point of contact for translation services and availability as well as American Sign Language (ASL) interpreters.
- Emergency Operations Center (EOC) and back-up EOC - These facilities need to be ADA compliant as well, as some personnel who maybe staffing certain functions/positions may have a disability. These positions need to be identified, including any accommodation necessary for workspace, electronics etc.
- The Town should consider utilizing a voluntary opt-in identification program for individuals with disabilities to provide information in advance that may assist emergency planners and responders with accommodating their needs during an emergency event. More information on this can be found at <https://www.mass.gov/disability-emergency-preparedness>.

4.1.4 Service Animals

It is important for the Town to have a clear policy on service animals, as their use has grown substantially in the last decade. A Town-wide policy was not provided during the evaluation, so it is recommended that one be adopted and disseminated. A sample policy can be found in Appendix 8.1.2.

4.2 Town Department Programs and Services

Department recommendations are grouped by the facility in which they are primarily located. A summary of each facility is presented to give a general overview of the facility barriers that may impact the accessibility of the specific services provided by the department and inform any recommendations for modifications. Note that the general Town-wide findings discussed in Section 4.1 also apply to each department.

4.2.1 Town Hall Departments

4.2.1.1 Town Hall Facility Summary

The full audit of Town Hall is included in Appendix 8.5.1. Overall, access to the building is the most significant barrier to Town Hall access. There is no accessible route from either Franklin Street or Worcester Street, interior site walkways in several areas and parking spaces/signage. The interior of the building has minor to moderate barriers, many of which are readily addressed, such as relocating existing elements in the restrooms, brochure holders, and payment drop boxes. Facility maintenance issues include placement of trash cans, planters and furniture within accessible routes, clear floor space/knee clearances, and maneuvering spaces. Programmatically, most issues identified were related to 1) website; 2) documents/form accessibility; and 3) access to public meetings.

4.2.1.2 Town Administrator

The questionnaire provided by the Town Administrator can be viewed in Appendix 8.3.13. The following barriers to accessibility were noted:

- Forms included in the form library should be posted as fillable forms. All forms sampled were able to be read with a screen reader extension, although all abbreviations and acronyms be replaced with full text. <https://www.westboylston-ma.gov/town-administrator/pages/forms>

4.2.1.3 Accounting

The questionnaire provided by the Town Accountant can be viewed in Appendix 8.3.1. The following barriers to accessibility were noted:

- Staff is not trained to handle requests for documents in alternative format.
- Staff is not trained to use TTY/TDD.

- Forms included in the form library should be posted as fillable forms. All forms sampled were able to be read with a screen reader extension, although all abbreviations and acronyms be replaced with full text. <https://www.westboylston-ma.gov/accountant/pages/forms>

4.2.1.4 Building Department

The questionnaire provided by the Building Department can be viewed in Appendix 8.3.2. The following barriers to accessibility were noted:

- Parking lot drop box for after hours use is not within reach range, nor on an accessible route, for users not in a vehicle. Consider adding a second drop box where proposed ballot box will be installed.
- Forms included in the form library should be posted as fillable forms. All forms sampled were able to be read with a screen reader extension, although all abbreviations and acronyms be replaced with full text. <https://www.westboylston-ma.gov/building-department/pages/forms-and-applications>
- Recent new construction projects at Senior Center (Appendix 8.5.4) and Police Station (8.5.3) have minor to moderate ADA compliance issues. Recent renovations at MLP and Town Hall also missed opportunities to complete barrier removal. Inspections on public facilities should be comprehensive and fully inspect all elements, and the Building Inspector should be fully engaged in plan review for new construction, as well as renovations to ensure barrier removal is prioritized when defining project scopes.

4.2.1.5 Town Clerk

The questionnaire provided by the Town Clerk can be viewed in Appendix 8.3.3. The following barriers to accessibility were noted:

- Forms included in the form library should be posted as fillable forms. All forms sampled were able to be read with a screen reader extension, although all abbreviations and acronyms be replaced with full text. <https://www.westboylston-ma.gov/town-clerk/pages/forms>
- Town Meeting minutes are posted as image-based PDF's and are not accessible by screen readers. <https://www.westboylston-ma.gov/node/1100/minutes/2021>

4.2.1.6 Health Department

The questionnaire provided by the Health Department can be viewed in Appendix 8.3.8. The following barriers to accessibility were noted:

- Some documents posted contain images that do not have alt text. These were primarily documents created by other agencies. Care should be taken to ensure accessible docs are posted, even when they are provided by third parties. <https://www.westboylston-ma.gov/sites/g/files/vyhlf1421/f/uploads/wachdogwaste.pdf>
- Pictures on webpages without alt text. <https://www.westboylston-ma.gov/board-health/pages/beekeeping-honey>

4.2.1.7 Recreation Department

The questionnaire provided by the Recreation Department can be viewed in Appendix 8.3.12. The following barriers to accessibility were noted:

- Forms included in the form library should be posted as fillable forms. All forms sampled were able to be read with a screen reader extension, although all abbreviations and

acronyms be replaced with full text. <https://www.westboylston-ma.gov/recreation-department>

- Some event announcements noted on social media feed were image based and not accessible. Some images did not contain alt text. <https://www.facebook.com/WestBoylstonRecreation/timeline/>

Note that the Recreation Department programming primarily occurs at other Town Facilities. See Section 4.2.9. It should be noted that all outdoor fields, courts and site elements (parking, routes, concessions, spectator areas, and restrooms) are significantly out of compliance.

4.2.1.8 Treasurer/Tax Collector

The questionnaire provided by the Treasurer/Collector can be viewed in Appendix 8.3.14. The following barriers to accessibility were noted:

- Payment drop box outside of exterior door above reach range. Lower or provide a second box where new ballot box is proposed.
- Questionnaire response states staff is not trained to provide documents in alternative format, nor use TTY/TDD devices.

4.2.1.9 Veterans' Services

The questionnaire provided by the Veterans' Services can be viewed in Appendix 8.3.15. The following barriers to accessibility were noted:

- Forms included in the form library should be posted as fillable forms. All forms sampled were able to be read with a screen reader extension, although all abbreviations and acronyms be replaced with full text. <https://www.westboylston-ma.gov/sites/g/files/vyh1if1421/f/uploads/22veteransexemptionform.pdf>
- Picture on main web page lacks alt text. <https://www.westboylston-ma.gov/veterans-services>

4.2.2 Library

The full audit of the Library is included in Appendix 8.5.7. Due to the dates of renovations and the new addition, the Town may be able to claim Safe Harbor (under the 1991 Standards) for some deficiencies in the children's wing. However, due to the nature of programming and mission of the Library and the number of comments received during the public input survey it was evaluated using 2010 Standards. The Library was also identified in the top three least accessible facilities by respondents to the public input survey.

The primary accessibility issues with the Library are exterior, and center around Parking and accessible routes to the building and between site elements. There is no access to the lawn and bench area, where outdoor programming occurs. Further, the ramp providing wheelchair access is non-compliant in multiple aspects (including slope of almost 10%) and handrails. There is no ramp from Central Street. The access to the lower-level meeting room is also non-compliant.

Inside, most accessibility issues are minor to moderate and many could likely be addressed by DPW Facilities staff, as they involve removal and reinstallation of existing elements. The most significant issues are the main floor women's restroom, which could be resolved by converting to single use (which is largely how it is currently used) and the Children's wing restrooms, which are not constructed to the smaller sizes specified for younger users in addition to other deficiencies.

The Library Director stated the HVAC units need replacement in the future and she was advised the current location (adjacent to existing ramp) is too small. Given the scope of the site improvements necessary to meet the parking, accessible route, and building entrance access barriers, the Town should consider a comprehensive scope to address all issues in a single project.

The questionnaire provided by the Library can be viewed in Appendix 8.3.9. No programmatic accessibility issues were noted for the Library that were not related to the facility.

4.2.3 Municipal Light Plant

The full audit of the Municipal Light Plant is included in Appendix 8.5.2. The Light Plant offices are not accessible to individuals using wheelchairs or with other mobility impairments. There is no ramp, and the lobby is multi-level. The configuration would make a wheelchair lift and ramp impractical. The MLP Manager stated there is a plan to install an accessible space in the loading dock area at the rear of the building, along with a chair lift, in order to provide access to the lobby and board meeting room, where public meetings are held. Based on an initial plan review, this modification will require a variance application from the Massachusetts Architectural Access Board.

The questionnaire provided by the Municipal Light Plant can be viewed in Appendix 8.3.10. The following barriers to accessibility were noted:

- New service applications must be done in person or may call to have paperwork completed by office staff (website states this adds one week to processing time). Website states new services deposits must be paid by cash or check, but there is a link for online bill pay that also allows security deposits to be paid. The “*all deposits must be paid by cash or check” statement should be changed to reflect the online option. WBMLP should add a fillable form (as they have for New Construction and Service Upgrades) that can be completed and submitted online. <https://wbmlp.org/apply-for-electric-service.html>
- The questionnaire responses state that staff are not trained in how to provide alternative format documents, nor use TTY/TDD.
- Other than new service application issue noted above, WBMLP is the only Town webpage that has built-in accessibility adjustments.
- Public Meetings of the WBMLP Board are held in onsite, which, as noted above, is not accessible. They do, however, have a clear notice regarding accessibility on the website and meetings are also broadcast online. Meeting agendas state individuals requiring accommodations may contact WBMLP ADA Coordinator, who is separate from the Town’s ADA Coordinator. The current extension of COVID-19 Open Meeting Law exemptions ends in March 2025 and allows for full remote participation, but it is not clear how the expiration of these exemptions will affect the MLP’s public meetings.

It may warrant further investigation whether WBMLP is required to separately meet the Administrative Requirements of Title II since it is a distinct entity.

4.2.4 Department of Public Works

The full audit of the DPW Facility is included in Appendix 8.5.6. The building is wholly inaccessible but is largely closed to the public. Curbside service is provided upon request.

The questionnaire provided by the Department of Public Works can be viewed in Appendix 8.3.6. The following barriers to accessibility were noted:

- Forms included in the form library should be posted as fillable forms. All forms sampled were able to be read with a screen reader extension, although all abbreviations and acronyms be replaced with full text.
- Website should be updated to provide notice that curbside service is available if necessary at the DPW facility, but otherwise the facility is not open to the public. All services can be provided online or over the phone (with updated forms as noted above.)

4.2.5 Council on Aging/Senior Center

The full audit of the Senior Center is included in Appendix 8.5.4. The primary facilities issues at the Senior Center are related to accessible routes within the site connecting different elements. There is no accessible route to the ballfield which, while not used for programming, is technically on the site and required to be connected. There is no accessible route to Horseshoe Drive as required. The sidewalk running from the main entrance across the parking lot and the northwest corner of the building has several instances of excessive running and cross slope, and the curb ramp at the southwest corner of the building exceeds 9.7% with a landing over 4% cross slope. The interior of the facility has mostly minor issues that can easily be corrected by in-house staff.

The questionnaire provided by the Council on Aging can be viewed in Appendix 8.3.5. The following barriers to accessibility were noted:

- Staff has not been trained to accommodate requests for alternative format documents, nor in the use of TTY/TDD.
- While Senior Connection newsletter is readable with screen readers, it contains a large number of graphics that are not captioned with titles or alt text. Some advertisements posted in the newsletter are images and unable to be read with screen reader. <https://www.westboylston-ma.gov/senior-center/pages/senior-connection-newsletters>
- The Senior Tax Work-off Program application is a scan and not accessible to screen readers. https://www.westboylston-ma.gov/sites/g/files/vyhlif1421/f/uploads/application_2021.pdf

4.2.6 Fire Department

The full audit of the Fire Station is included in Appendix 8.5.5. Facility lacks accessible parking and an accessible route to the right-of-way and other buildings (DPW) on the site. Customer service counter and public bathroom are non-compliant.

The questionnaire provided by the Fire Station can be viewed in Appendix 8.3.7. While the facility is non-compliant, all services that face the public are offered either online, such as burn permits, with fillable forms/submittal/payment options, or via phone. Tours are also offered for school children and members of the public.

The only recommendation is to offer smoke detector application/payment online as well, although it can be done over the phone and by mail. Regarding the public tours, Fire personnel should inquire whether any accommodations are required and attempt to the maximum extent possible to offer them on a case-by-case basis.

4.2.7 Police Department

The full audit of the Police Station is included in Appendix 8.5.3. The only issues noted were a lack of accessible route to the right-of-way, insufficient maneuvering clearance in public restroom, drop-box exceeding max height, and the water-fountain which lacks accommodation for standing persons.

The questionnaire provided by the Police Department can be viewed in Appendix 8.3.11. No barriers to programs or services were identified.

4.2.8 School Department

The full audit of Major Edwards Elementary School can be found in Appendix 8.5.9. The full audit of West Boylston Middle/High School can be found in Appendix 8.5.8.

The scope of this project did not include any programmatic assessment.

4.2.8.1 Major Edwards Elementary School

Major Edwards has significant exterior access issues, largely attributable to sidewalk and walkway network and parking lot. Due to the scope and scale of these issues and interconnectedness of grades and slopes, it is recommended that a full site survey and design be undertaken prior to addressing exterior issues. Such a design may result in a phased approach that can address the most immediate needs.

On the interior of the building, there are minor to moderate issues in all restrooms that can be addressed either partially or fully, as well as other minor to moderate issues with stair railings, protruding objects, and furniture/equipment placement. Most of these issues can be addressed by either facilities maintenance personnel or smaller contracts with outside contractors.

Major Edwards does have two significant, and potentially larger projects with the Nurse's Station and the access ramps to the cafeteria. These will require an architectural design in order to address non-compliance issues.

The full audit of Major Edwards Elementary School can be found in Appendix 8.5.9.

Not surveyed as part of this scope were the playgrounds managed by the Town but used by the School Department. A separate facility audit was conducted by KMA, LLC and provided to the Town addressing deficiencies at these playgrounds and a project is currently underway for Phase 1.

4.2.8.2 West Boylston Middle/High School

The Middle/High School has significant barriers to access throughout the exterior site. Most exterior sidewalks, walkways, site arrival points, parking areas, and routes connecting site elements were significantly out of compliance with both 2010 and 1991 Standards. Given the scope and scale of these issues, as well as the interconnectedness of grades, elevations and paths of travel, the exterior improvements should be approached comprehensively in their design. A qualified architect and civil engineering firm may be able to recommend a phased approach, but this will require a complete site survey and, at the least, preliminary conceptual design.

The interior of the building presents significant challenges as well, as the existing ramps connecting the multiple levels are all sloped in excess of maximum slopes in both 2010 and 1991 Standards. The existing structure limits the available space to modify these ramps, so an architect should be engaged to determine if this can be corrected to achieve full compliance. This is discussed in greater detail in Section 2.5.4.

There are also numerous interior access issues that should be addressable either as standalone projects or over time as resources allow. See Appendix 8.5.8 for the full details of the site audit.

4.2.9 Outdoor Facilities

4.2.9.1 Pride Park

As noted above, a full and complete audit of Pride Park was undertaken by KMA, LLC and submitted to the Town. Design work has been completed and Phase 1 is underway for improvements to Pride Park.

4.2.9.2 Goodale Park

Goodale Park lacks accessible routes connecting the various fields, courts, concession stands, restrooms, parking and spectator viewing areas. The site has no accessible parking. Goodale shares athletic facilities with the Town's recreation programs and those of the schools. Given this adjacency, and significant sloping of the site, it is recommended that a master plan and comprehensive design be developed in order to develop a phasing plan to address the accessibility requirements.

4.2.9.3 Town Common

West Boylston's Town Common offers a large outdoor gathering space for community events. The site does not have dedicated parking, nor a complete sidewalk network serving it. Within the site, there is a bandstand and several benches. The bandstand, remodeled in 2013, lacks a compliant ramp and stairs, and is not served by an accessible route. The benches, as well as other site elements (trash cans, monument, portable toilet) are not served by an accessible route.

Given the relative flatness of the site, providing access and achieving compliance at Town Common should be relatively straightforward, and includes rebuilding ramp with compliant slope, adding handrails to the ramp and stairs, and connecting the bandstand to the other site elements. At least 5% of the benches and trash cans should be on an accessible route, and the route should connect to each street as well as the monument.

The full audit of the Town Common can be found in Appendix 8.5.10.

5 Providing Equally Effective Communications

The ADA requires that Title II entities (State and local governments) communicate effectively with people who have communication disabilities. The goal is to ensure that communication with people with these disabilities is as effective as communication with people without disabilities.

5.1 Communications with Hearing and Speech Impaired Individuals

The Town is required to provide and/or facilitate the use of auxiliary aids to individuals with hearing and speech impairments. The decision about what auxiliary aid is appropriate should evolve from a consultation between the ADA Coordinator (or designee) and individuals requesting an accommodation. In many cases, more than one type of auxiliary aid or service may make effective communication possible. While consultation is always strongly encouraged to achieve effective communication, all public entities are required to give primary consideration to the requests of individuals with disabilities. The Effective Communication obligation does not require the Town to take any action that would result in a fundamental alteration in its services, programs, or activities or that would impose an undue financial and administrative burden.

5.1.1 Findings

From the questionnaire responses and reviewing the provided materials, the Town does not have a standard policy regarding Effective Communication or how to accommodate a request for accommodation. Staff does a good job of addressing issues as they arise but would benefit from a standard policy and procedures. Questionnaire responses indicated a need for training and tools to equip staff to effectively communicate with hearing impaired individuals.

- The Town website, program literature, or announcements do not mention the availability of auxiliary aids, TTY, or other effective communication materials or assistance.
- Auxiliary listening devices are available at public meeting spaces upon request and signs are not posted to that effect.
- Most departments indicated staff was not aware how to request the service of a qualified interpreter.
- Most departments were not aware how to have documents converted to Braille, but also have not received this request (outside of the Library). With the widespread use and availability of screen readers and the ability to post documents electronically, the need for Braille documents has decreased significantly, but still exists.
- Departments have received requests to print in large format and have accommodated such requests from time to time.

5.1.2 Recommendations

The ADA Coordinator should develop clear procedures for staff to address requests for auxiliary aids, translation, ASL and other communications accommodations. This should be a written policy on Effective Communication and employee training so staff across all departments understand their responsibility and clarity about what services are available.

Sample of Effective Communication Statement and Request for Accommodation:

“The Town of West Boylston is committed to the full participation of people with disabilities. Any person with a disability who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in the Town’s programs, services, activities, and committee meetings, should contact the office of the ADA Coordinator (Name, Address, Phone number and Email) as soon as possible but no later than 48 hours before the scheduled event.” (*if the Town needs 2 or 3 weeks or longer to ensure an interpreter, then it must be clearly stated).*

Other recommendations include:

- Post signage in meeting rooms that auxiliary listening devices are available and how they can be requested.
- Distribute the Effective Communication Notice/Policy to all department heads and publish on the Town’s website home page.
- Developing a roster of ASL translators and vendors that can be engaged to provide translation. The Police Department already has access to such vendors.
- Conduct regular inspections and testing of auxiliary listening devices available at Town facilities.
- Provide training to staff on how to use TTY/TDD, and in general how to interact and communicate with individuals with hearing or speech impairments.

Section 8.2.3 contains links to services to aid in communication with hearing and speech impaired individuals.

5.2 Website Accessibility

Almost every department noted that they regularly post information or notices to one or more Town or departmental web page(s). Four of the questionnaire responses indicated an awareness of minimum standards of website accessibility requirements and referenced an effort to meet them via their website posts. Overall, responses indicated a need for uniformity and staff training regarding website posting and accessibility standards.

Websites are considered a public program/service and must meet Title II requirements as well as Web Content Standards of Accessibility. Poorly designed websites can create unnecessary barriers for people with disabilities. Many people with disabilities use assistive technology that enables them to use computers. Some assistive technology involves separate computer programs or devices such as screen readers, text enlargement software, and computer programs that enable people to control the computer with their voice. Other assistive technology is built into computer operating systems. For example, basic accessibility features in computer operating systems enable some people with low vision to see computer displays by simply adjusting color schemes, contrast settings, and font sizes. Operating systems enable people with limited manual dexterity to move the mouse pointer using keystrokes instead of a standard mouse.

Websites should comply with Web Content Accessibility Guidelines WCAG 2.0 Level AA standards. These standards, while not included in the ADA or under current CFR guidelines, are universally accepted as the best available and most appropriate standard for web content guidelines.

- Level A is the minimum level of conformance with the fewest requirements. A couple of examples of Level A requirements are that all non-text components such as images include an alternative text component and that captions are provided for all prerecorded audio content
- Level AA compliance must satisfy all the Level A requirements and offer additional criteria such as providing captions for all live broadcasted audio content
- Level AAA satisfies all Level A and Level AA criteria as well as offer additional requirements such as providing sign language interpretation for all prerecorded audio content

Website accessibility also extends to social media platforms that are used by a public entity to deliver information and notices to the public. Content and information created and shared via social media by a public entity is required to comply with WCAG 2.0 Level AA requirements. Level AA requirements include all minimum standards of Level A as well. It is the responsibility of the public entity to design accessible content that will be shared via a social media platform.

To assess the Town's progress in meeting these website standards, a manual accessibility audit of the Town of West Boylston website was performed to evaluate content against current WCAG requirements. This audit was not 100% comprehensive but sampled sufficient pages and features to identify areas for improvement. Manual accessibility audits have the major advantage of being the most thorough type of auditing. After completion of the audit, a report was created containing an assessment of a municipality's assets along with issues that need to be addressed. For every unique issue listed, instructions or examples

were provided to show precisely how to make the website accessible. It is important to note that accessibility is an ongoing process.

5.2.1 Findings

The Town of West Boylston's website audit illustrated that the Town has both strengths and areas of concern. A strong asset is the intuitive layout of the site. Specific areas of strength are:

- Toolbar navigation that is uniform, uncomplicated, and easy to understand
- Links accessible by keyboard, mouse, or tap of the finger
- Ease of use for first-time visitors to find documents and forms with ease
- Succinct language and appropriate comprehension level
- Mobile friendly and formats correctly on smart phone

There are also areas where the site accessibility features can be improved, specifically to comply with ADA regulations. Specifically, these areas include:

- Accompanying all images with alternative text
- Ensuring ADA-compliant contrast between background logos, images, and fonts
- Embedding text directly into the page rather than uploading as an image
- Certain documents posted to the website are images and do not contain searchable text, and inaccessible to screen readers or other accessibility tools. Examples can be found in [Town Meeting Minutes](#) and the [Specimen Ballot](#) posted by the Town Clerk's office.
- Converting printable forms into online fillable forms whenever possible; examples are [Dog License Form](#) and [all forms](#) posted by the Building Department for permit applications.
- Although 10 department heads responded that they use a Town or departmental web page, none stated that they currently provide notices to patrons on how to access a service if they are unable to do so due to a disability.

5.2.2 Recommendations

Overall, the underlining structure of the municipal website is efficient and effective; however, it can be enhanced by adding additional ADA-recommended features. The Town should consider:

- Create a separate landing page for accessibility with the Public Notice and contact information for the ADA Coordinator, link to Grievance Procedure and links to the Disability Commission.
- Making a commitment by policy or resolution of the Select Board to prioritize phasing in a completely accessible website, which would make it available to site visitors who use assistive technology such as screen readers as well as website visitors with a mix of other functional limitations.
- Offering employee training to department heads and staff who regularly post to the Town website to enable them to post in an accessible manner, including social media and accessible documents.
- Regularly posting practical information and resources regarding the Town's commitment to accessibility on the Town web site and social media sites for the public to become familiar with how to use resources.
- Convert all forms that are required to be printed and mailed to fillable forms.
- Address the formatting and contrast deficiencies identified in the audit in Appendix 8.4.

The full website accessibility audit is available in Appendix 8.4.

5.3 Public Meeting Access

Equal access to public meetings is critical to ensuring participation and representation in Town government. Like most municipalities in Massachusetts, West Boylston has a large number of boards, commissions, advisory committees, and task forces, all of which must abide by public meeting laws including regarding access, posting of agendas and minutes, and making available materials used and presented in these meetings. All of these different components of a public meeting must be fully accessible to individuals with disabilities.

5.3.1 Findings

Public meeting access was mentioned several times during the public input process. Several deficiencies were noted during the evaluation, including:

- Agendas posted as low-quality scans:
<https://www.westboylston-ma.gov/sites/g/files/vyhlif1421/f/agendas/boa.pdf> ,
- Minutes posted as images: [Board of Assessors](#), [Council on Aging](#)
- Videos posted to Town’s public access channel did not display closed captioning:
<https://west-boylston.vod.castus.tv/vod/?video=faa29001-e309-4af5-b808-95be93421efb>
- Agendas posted did not contain information on how to request an accommodation:
https://www.westboylston-ma.gov/sites/g/files/vyhlif1421/f/agendas/july_26_2022_agenda_for_posting6722.pdf
- Certain documents posted for meetings were low-resolution scans:
https://www.westboylston-ma.gov/sites/g/files/vyhlif1421/f/news/wb_tm_warrant.pdf
- With the changes during the pandemic, virtual access to meetings increased dramatically, providing alternative ways to attend other than in-person. While many meetings remain either virtual or hybrid, many have returned to fully in-person.
https://www.westboylston-ma.gov/sites/g/files/vyhlif1421/f/agendas/wbha_monthly_meeting_notice_-_2.pdf
- Town Meeting is held in the auditorium of the Middle/High School (and outside during COVID). Both events rely on parking and accessible route on a site that has numerous instances of non-compliance, making it difficult to participate for wheelchair users and others with mobility impairments. Multiple residents stated issues participating due to accessibility issues at Town Meeting, whether at the auditorium or outside.

5.3.2 Recommendations

While the facilities issues noted in the audits for the various meeting spaces should be remedied, the Town should also look at making reasonable modifications to public meetings to allow all individuals to attend. The Town’s experiences during the COVID-19 pandemic also provide opportunities to continue fully remote and hybrid meeting formats that will not only increase participation but offer cost effective ways to improve accessibility. Other specific recommendations include:

- Develop a policy requiring all agendas, minutes, and materials to be posted in an accessible format.
- Require all programs offered on Town’s Public Cable Access Channel provide closed captioning.

- Offer hybrid meetings for all public meetings, or at the least, those that occur in facilities that have any identified and significant barriers to access. This may require adoption of a remote policy by the Select Board.
- All agendas should include a notice regarding the availability of reasonable accommodations, including contact information and procedures to request such assistance.
- Where the only venue for a large meeting is an inaccessible site, such as the High School, utilize temporary materials, such as mats, portable ramps, additional accessible parking signs/markings, and other purpose-built solutions to improve accessibility to the maximum extent feasible. Provide notice offering guidance on how best to access the site and request assistance.

5.3.2.1 Town Meeting

Town Meeting, as the legislative body of the Town, presents unique challenges for ensuring accessibility. Like many towns in Massachusetts, Town Meeting is held in the High School Auditorium which, as noted in the audit in Appendix 8.5.8, has significant barriers to accessibility.

Given the public input (detailed in Section 6.2.2 and Appendix 8.6) and the results of the Middle/High School facility audit in Appendix 8.5.8, the Town should evaluate alternatives to make Town Meeting accessible to all residents. This may include (but not be limited to), the following:

- Providing temporary modifications to the existing high school site, such as additional parking, drop off locations, and other physical modifications to provide access;
- Moving Town Meeting to the Senior Center if it is determined sufficient space and parking is available;
- Offering a second location (such as the Senior Center) with full remote participation to complement the in-person quorum at the High School; or
- Offering full participation remote individual participation (such as via Zoom), although this presents significant technical and potential legal challenges.

6 Public Engagement & Input

6.1 Overview

ADA requires public participation to be a part of the transition plan process and implementation.

Per 28 C.F.R. § 35.150(d)(1), the Town “. . . shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments.”

Accordingly, the public was provided opportunities to provide input toward the content and development of the West Boylston ADA Transition Plan as well as review and comment on the ADA Transition Plan itself. Specific efforts were made to inform residents and local or regional disability organizations regarding the

opportunity to provide feedback including a Public Input Survey, engagement with the Town’s Disabilities Commission, and an opportunity for Transition Plan public comment.

6.2 Public Input Survey

A Public Input Survey is a key component of the Town’s process to develop a Self-Evaluation and Transition Plan. The Survey is a valuable tool to inform the Town’s planning team as they work to gather data and identify any barriers to access for individuals with disabilities at Town facilities or within the programs and services it currently offers. Specifically, gathering public feedback is valuable to develop a practical, effective, achievable, and ADA-compliant Self Evaluation and Transition Plan for the Town by helping to identify areas of primary concern for individuals with disabilities, their caregivers and families.

6.2.1 Methodology

The Town distributed surveys from October 1 – 31, 2021, to various stakeholders online via Survey Monkey. Paper copies were also available at Town facilities and upon request. The Survey, which was targeted towards community members, organizations representing individuals with disabilities, and Town staff was made available to enhance public input efforts to identify physical and programmatic barriers that may impact accessibility of Town facilities, programs, and services.

The Survey included a comprehensive range of questions regarding respondents’ usage of and access to Town facilities, programs, and services. It was specifically designed to elicit public opinion regarding information important to assess how respondents state the Town is currently providing accessibility and identify areas where current barriers may exist.

Survey questions 1 – 14 were quantitative multiple choice questions allowing respondents to select one or more options from a list of answers; or to choose “other” and qualitatively describe that choice in their own words. Question 15 was a qualitative open-ended question, which asked respondents to provide feedback regarding accessibility in their own words. Three questions were demographic in nature, asking respondents to identify West Boylston resident status, age range, and perspective of their responses. The remaining 13 questions were specific to identifying the Town’s accessibility strengths and areas of concern as identified by respondents. Approximately 3% of the Town’s 7,877 residents responded to the survey. In total, there were 214 online survey respondents, and no one responded via paper copy. Of the 214 responses, 209 were residents and five were non-residents. For a complete list of Survey questions, and responses, please see Appendices 5.4.

6.2.2 Results

Survey responses were received by respondents ranging in age from 18 to 65; and response rates increased with age. This response trend illustrates that older residents are potentially more impacted by and aware of accessibility issues. Most respondents fell into the following age ranges: 26% identified themselves as ages 56 to 65 and 28% as over 65.

Many respondents, 66%, stated they do not have a disability themselves; 16% stated they have a disability; and 18% stated they are a caregiver for a someone with a disability. 53% of respondents reported that they, or people who they serve as caregivers, have not used a mobility aid, auxiliary aid for hearing or visual impairment, or service animal. Of those who stated they have used a mobility aid, auxiliary aid for hearing or visual impairment, or service animal, the three highest reported uses were crutch or cane at 32%, mobility scooter or walker at 18%, and wheelchair at 15%. Use of service animals were only 2%.

Respondents had an opportunity to answer both quantitative and qualitative questions intended to elicit public opinion regarding accessibility in the areas of 1) facilities, 2) program and service access, 3) pedestrian ease of use, 4) effective communication and experience with Town staff responsiveness to accessibility questions and concerns.

Encouragingly, most respondents stated that they did not have an issue accessing a Town facility, program, or service. Of those who reported an issue(s), common themes emerged regarding which facilities, programs, and services posed a barrier to accessibility. In the open-ended questions, the highest respondents' areas of concerns were stated as need to 1) improve accessibility of sidewalks, roads and/or parking; 2) update parks, playgrounds, and recreation areas to be accessible; 3) improve access to Town Meetings, Select Board and Other Commission and Committee Meetings both in-person and virtually; and 4) improve accessibility of communication tools including the website, printed materials and mobility aids for the hearing and vision impaired.

6.2.2.1 Facilities access

The majority, 86%, of respondents stated that they, or people they serve as caregivers, have not have an issue accessing a town facility due to a disability or physical limitation. Of the 14% who reported this issue, the following facilities were cited as the top three facilities posing a physical limitation: Recreational Facilities including the Town Commons, Goodale, Pride, and/or Woodland Park; Municipal Light Plant; and Town Hall. Many respondents noted the need to improve accessibility at Town parks; and that keeping them available to the public while improvements are made is important to them.

Open-ended facilities comments/concerns from respondents included,

- Lack of push buttons to open Town Hall doors
- No access at the Municipal Light Plant
- Lack of appropriate parking at the public schools
- Non-accessible playground and fields
- Inaccessible public library steps and handicap ramp at wrong angle

6.2.2.2 Program and Service access

8.46% of respondents stated they, or people they serve as caregivers, have had an issue accessing a town program or service due to disability or physical limitations. When asked the source of the difficulty, the following reasons were cited:

- Physical barrier 67%
- Difficulty accessing online materials due to format or readability 13%
- Lack of accommodations for the hearing impaired 13%

The following facilities were cited as the top three facilities posing a programmatic or service barrier due to disability or physical limitation:

- Town Administrator/Select Board Office
- Municipal Light Plant
- Beaman Public Library.

86% of respondents reported no difficulty accessing or participating in the local government activities including Town Meeting, Select Board Meeting, Other Board, Commission, Committee or Task Force Meeting, Local, State or National Elections or Other. Of the 9% who reported difficulty, the top three reported types of inaccessibility were cited as 1) Town Meeting; 2) Other Board, Commission, Committee or Task Force Meeting; and 3) Select Board Meeting.

Open-ended programs and services comments/concerns from respondents included,

- Holding Town Meeting outside, without accessible paths, and sidewalks, during Covid
- Difficulty hearing televised or remote meetings and programs
- All public meetings need to be run in a hybrid fashion so people can access them online
- Unable to attend an outdoor sporting event at the High School field, lack of handicapped parking and concerns for family members to be able to safely navigate uneven field surfaces

6.2.2.3 Pedestrian Ease of Use

There was a wide variety of answers from respondents regarding accessibility of pedestrian facilities. Pedestrian facilities were specified as sidewalks, crosswalks, push buttons at crosswalks (where present), curb ramps, and pedestrian crossings at driveways. On average, 32% of respondents stated they do not know the condition of the pedestrian facilities in Town; 29% listed pedestrian facilities as easily accessible; and 11% as usable but with some with minor difficulty.

Respondents reported several open-ended comments regarding pedestrian ease of use and the need for improvement. Comments included,

- Facilities are easily accessible, however getting to and from via sidewalks and roads are not
- Sidewalks are not maintained. Overgrowth on sidewalks is horrible, must walk in road at times
- Making sure that all residents and especially youth and seniors regardless of abilities can safely navigate walking in town including sidewalks and playgrounds
- Plow all sidewalks in town during the winter, not just ones near the schools
- More sidewalks are needed

6.2.2.4 Effective Communication

While most (92%) of respondents stated they have not made an accommodation request of the Town and stated general satisfaction with the Town's effective communication tools, areas of concerns were also identified including,

- 71% of respondents did not know who to contact to make a request for accommodation, state a grievance, or offer input related to accessibility to programs, services, or facilities.
- 40% of respondents who did make an accessibility inquiry, stated that the staff they spoke with was not responsive and the issue remained unresolved.

Respondents reported several open-ended comments regarding accessible communication including,

- Consider not just physical disability, but audio and visual disabilities as well
- Adopt universal accommodations for the hearing impaired
- Provide interpreter at every meeting because there are deaf people in Town
- Make the print bolder on surveys
- Please remember that all with disabilities are not wheelchair bound
- Consider small things that can affect "hidden" disabilities such as dyslexia and ADHD
- A paper mailing would be beneficial for upcoming town news

6.3 Disability Commission

The Disability Commission was established in October of 2021 to provide advisory services to the Town and residents, advocate for accessibility and assist in the development and implementation of the Town's

Self-Evaluation and Transition Plan. The Commission will play an integral role in reviewing the audit results, and in developing the plan of action to remove barriers to access across the Town's facilities, rights-of-way and programs and services. For more information on the Commission's role in the SETP process, see Section 3.4.2

6.4 Transition Plan Public Comment

At the Select Board meeting of July 19, 2023, the Select Board was presented with the final draft of the SETP. The Select Board voted to accept public comment on the plan from July 20, 2023 through August 19, 2023. Comments were accepted by West Boylston residents who included their name and address. On July 20, 2023, the SETP was posted on the Town's webpage on the 'Town News' section of the main page and the 'Accessibility' page. The notification of public comment stated the document was also available in alternative format upon request to the Town Administrator/ADA Coordinator. In addition to posting on the Town webpage, a post was also made on the Town's Facebook account. No public feedback was submitted for consideration.

7 Transition Plan

7.1 Overview of Transition Plan

Recommendations made in the previous sections are summarized in this section as the Transition Plan. The initial timeline is presented as a recommendation based on observed inaccessibility of programs, ease of barrier removal, existing plans, available resources, and processes to implement changes. Since most of the physical modifications will require the authorization of appropriations or grants, and the Town does not have a dedicated Facilities Division, most of these recommended action items are realistically many years out. Administrative and policy/procedure actions that do not require significant approval or development processes have shorter timelines. Since the Town does not have a dedicated IT function, many technology solutions are envisioned with longer timelines.

7.1.1 Administrative Action Items

The items in this section are the responsibility of the ADA Coordinator, Town Administrator and Select Board.

Action Item	Ref.	Timeline	Status
Update and post public notice	3.1.2	90 days	Completed 6/9/2023
Clarify and Update role of ADA Coordinator	3.2.2	60 days	Completed January 18, 2023.
Revision to ADA Coordinator Job Description	3.2.2	6 months	TA appointed as ADAC.
Revise, adopt and post new grievance procedure	3.3.2	90 days	Completed 1/18/2023
Complete Self-Evaluation	3.4.1	N/A	Draft completed 2/2023 for review.
Adopt Transition Plan (including public comment)	3.4.2	Summer 2023	
Establish an Accessibility Task Force	N/A	6 months	

7.1.2 Town-wide Action Items

The items in this section are the responsibility of the ADA Coordinator, Town Administrator and Select Board.

Action Item	Ref.	Timeline	Status
Develop employee training program and standards on ADA and accessibility awareness.	4.1.1.1	Fall 2023	
Integration of public notice into all Town and Departmental web pages, print materials, social media feeds.	4.1.1.1	December 2023	
Create standard internal policies and procedures for addressing requests for accommodation.	4.1.1.1	Fall 2023	
Create an accessibility web page with links on all subpages/sites.	4.1.1.1 & 5.2.2	6-9 months	Completed 6/9/2023
Develop program for routine inspections of facilities and testing of any specialized assistance devices.	4.1.2.1	July 2024	
Conduct an initial training event or requirement on maintenance of accessible features and set schedule for periodic training; integrate into onboarding materials for new employees.	4.1.2.1	December 2023	

Ensure maintenance of accessible features is specifically addressed in all contracts for services and construction projects as appropriate.	4.1.2.1	3 years	Allows for expiration of any multi-year contracts.
Update Comprehensive Emergency Management Plan to address accessibility	4.1.3.2	December 2024	

7.1.3 Departmental Programs & Services Action Items

The items included in this section are the responsibility of the individual departments.

Action Item	Ref.	Timeline	Status
Town Administrator – update of all forms to fillable forms and make recommended edits to content.	4.2.1.2	December 2023	
Town Administrator- hire a Facilities Director	N/A		Completed 6/5/2023
Accounting – Staff training in TTY/TDD & alternative format requests.	4.2.1.3	December 2023	
Accounting - update of all forms to fillable forms and make recommended edits to content.	4.2.1.3	December 2023	
Building Department – Address inaccessible drop box	4.2.1.4	February 2024	
Building Department - update of all forms to fillable forms and make recommended edits to content.	4.2.1.4	December 2023	
Building Department – mandate stringent inspections of all public projects including thorough and comprehensive inspection of accessible features.	4.2.1.4	Immediate	
Town Clerk - update of all forms to fillable forms and make recommended edits to content.	4.2.1.5	December 2023	
Town Clerk – Policy statement to require all minutes and agendas be posted as accessible PDF’s or another accessible format.	4.2.1.5	Immediate	Policy to be considered by Select Board 6/21/2023
Health Department – Ensure website postings are accessible and provide alt text as needed.	4.2.1.6	March 2024	
Recreation Department – Update social media feeds to replace image-based program information	4.2.1.7	3-6 months	Implemented for all social media 7/1/2023 forward
Recreation Department - update of all forms to fillable forms and make recommended edits to content.	4.2.1.7	December 2023	
Treasurer/Collector - update of all forms to fillable forms and make recommended edits to content.	4.2.1.8	December 2023	
Veterans’ Services - update of all forms to fillable forms and make recommended edits to content.	4.2.1.9	December 2023	
Veterans’ Services - ensure web content pictures have alt text	4.2.1.9	December 2023	
Municipal Light Plant – Clarify or update policy and procedure regarding new services applications and deposit payments as noted in the evaluation.	4.2.3	1 year	

Municipal Light Plant – Clarify ADA Coordinator role between MLP and Town	4.2.3 & 3.2.2	6 months	
Municipal Light Plant – Address long-term access to public meetings of MLP Board of Directors.	4.2.3	18 months	
DPW - update of all forms to fillable forms and make recommended edits to content.	4.2.4	December 2023	
DPW – develop written policy and notice on curbside service and service requests by phone, online forms, or email. Policies and notices should also provide guidelines for any in-person meetings requiring accommodations to be conducted at an alternate accessible location (Town Hall or Senior Center)	4.2.4	6-9 months.	
COA – Revise Senior Newsletter to eliminate image-based information and create policy for advertisers to submit any ads in an accessible format.	4.2.5	6-9 months.	
COA – Provide staff training and policy/procedure on handling alternative format requests.	4.2.5	6-9 months	
COA – Revise Senior Tax Workoff form to make fully accessible.	4.2.5	3-6 months	Completed by 7/1/2023
Fire – Update form and payment method for smoke detector inspection to allow online processing.	4.2.6	6-9 months	

7.1.4 Communications, Website/Social Media & Public Meetings

All items under this section are the responsibility of the ADA Coordinator, working with the impacted departments, IT vendors, Town Administrator and Select Board.

Action Item	Ref.	Timeline	Status
The ADA Coordinator should develop an Effective Communications Notice/Policy and distribute to Departments and website for posting.	5.1.2	6 months	Select Board considering Policy 6/21/2023
Develop a roster of ASL translators, alternative format vendors (braille) and ensure it is kept up to date if needed.	5.1.2	6 months	
Develop a standard policy/procedure and training on use of TTY/TDD and communication with hearing and speech impaired individuals.	5.1.2	6 months	
Develop a schedule and procedure for testing any assistive or auxiliary listening devices.	5.1.2	6 months	
Create separate landing page for accessibility, to include public notice, grievance procedure, contact information/links for ADA Coordinator, and Disability Commission (contact and agendas).	5.2.2	6 months	Completed 6/20/2023
Schedule and provide routine training for staff responsible for website and social media posting.	5.2.2	6-9 months	

Review and address specific formatting and contrast recommendations and findings from the website accessibility audit.	8.4	1 year	
Develop a procedure and schedule for routine audits of forms and postings provided by departments.	8.4	6 months	
Select Board policy statement on posting of minutes, agendas, and materials in an accessible format.	5.3.2	3 months	Select Board considering Policy on 6/21/2023
Require all programming on public access channel post closed captioning.	5.3.2	1 year	
Evaluate the feasibility of continuing all meetings in a hybrid format to allow full participation	5.3.2	6 months	
Require all agendas for all public meetings contain statement on requesting accommodations.	5.3.2	Immediate	Implemented effective 7/1/2023
Evaluate alternatives for Town Meeting.	5.3.2.1	1-2 years	

7.1.5 Facility Improvements and Capital Projects

The following projects are based on the consultant’s recommended grouping of modifications based on logical sequencing of tasks and scope of work required.

Projects are noted as “in-house” are those that would likely be candidates for in-house personnel, or direct contracting with qualified contractors with minimal design work.

Where feasibility studies or further evaluation is noted, this is intended to allow the Town to determine if a project can be completed through either a preliminary or conceptual design, or through a determination of whether it will pursue or claim an exception under the various provisions of the ADA or under a variance request to Massachusetts Architectural Access Board. This will also allow the Town to research further into scope of work and timing of past projects on a particular facility to determine if they will seek safe harbor as discussed in Section 2.5.3.

In any event, the Town will be responsible for either correcting an identified issue or making (and defending) a decision not to do so.

Action Item	Ref.	Timeline	Status
Fund Annual Access Improvements at a Minimum of \$10,000 per Year		1 year	
Town Hall Exterior Site Improvements – Design	8.5.1	3-5 years (budget dependent)	
Town Hall Exterior Site Improvements - Construction	8.5.1	3-5 years and will be based upon projected costs from design	
Town Hall Interior Modifications & Barrier Removal (in-house)	8.5.1	1-2 years	
Library Exterior Site Improvements – Design	8.5.7	3 years (budget dependent)	
Library Exterior Site Improvements - Construction	8.5.7	Will require debt exclusion or grant	
Library Interior – Main Floor Restroom Improvements	8.5.7	3-5 years	

Library Interior – Modifications & Barrier Removal (in-house)	8.5.7	1-2 years	
Municipal Light Plant – Accessibility Improvements (in design now)	8.5.2	1-3 years	

DPW – Feasibility review for parking/curbside improvements	8.5.6	3- 6 months	
Fire Department – Parking, lobby, public restroom and entrance (public areas only) – design	8.5.5	3 years (budget dependent)	
Fire Department – Public areas Construction	8.5.5	Requires debt exclusion, grant, Capital Investment Fund, or Free Cash	
Senior Center – Main walkway improvements & access to ballfields	8.5.4	Requires grant, Capital Investment Fund, or Free Cash	
Senior Center – Rear walkway improvements	8.5.4	Requires grant, Capital Investment Fund, or Free Cash	
Senior Center – Interior Modifications & Barrier Removal (in-house)	8.5.4	1-2 years	
Police Station – Sidewalk from right-of-way	8.5.3	Requires grant, Capital Investment Fund, or Free Cash	
Police Station – Interior and exterior modifications and barrier removal (in-house)	8.5.3	1-2 years	
Major Edwards Elementary – Nurse’s Station Improvements	8.5.9	1-2 years	
Major Edwards Elementary – Basement ramp feasibility study	8.5.9	3 years (budget dependent)	
Major Edwards Elementary – Interior Modifications & Barrier Removal (potential in-house)	8.5.9	3 years	
Major Edwards Elementary – Exterior Site Improvements - Design	8.5.9	3 years (budget dependent)	
Major Edwards Elementary – Exterior Site Improvements – Construction	8.5.9	Requires debt exclusion, grant, Capital Investment Fund, or Free Cash	
Middle/High School – Exterior Design/Master Plan	8.5.8	Requires debt exclusion, grant, Capital Investment Fund, or Free Cash	
Middle/High School – Exterior Construction (phases TBD)	8.5.8	Requires debt exclusion, grant, Capital Investment Fund, or Free Cash	
Middle/High School – Interior Ramp feasibility analysis	8.5.8	3 years (budget dependent)	
Middle/High School – Auditorium/Stage Improvements	8.5.8	Requires grant, Capital Investment Fund, or Free Cash	
Middle/High School – Interior Modifications & Barrier Removal (in-house)	8.5.8	3 years	
Pride Park – Phase 1	4.2.9.1	Est. Completion 11/1/2023	In process
Pride Park – Phase 2	4.2.9.1	Requires grant, Capital Investment Fund, or Free Cash	
Goodale Park – Master plan and design	8.5.11	Requires grant, Capital Investment Fund, or Free Cash	

Goodale Park – Site Improvements Construction	8.5.11	Requires debt exclusion, grant, Capital Investment Fund, or Free Cash	
Town Common – Bandstand Improvements	8.5.10	2-3 years	
Town Common – Accessible routes/connectivity	8.5.10	2-3 years	

8 Appendices

8.1 Recommended Policy and Procedure Documents

8.1.1 Public Notice (Proposed)

The Town of West Boylston does not discriminate based on disability in its services, programs, or activities.

Employment: The Town of West Boylston does not discriminate based on disability in its hiring or employment practices and complies with the ADA title I employment regulations.

Effective Communication: The Town of West Boylston will, upon request, provide auxiliary aids and services leading to effective communication for people with disabilities, including qualified sign language interpreters, assistive listening devices, documents in Braille, and other ways of making communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The Town of West Boylston will make reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to enjoy programs, services, and activities. For example, people with service animals are welcomed in Town offices, even where pets and other animals are prohibited.

Requests: To request an auxiliary aid or service for effective communication, or a modification of policies or procedures contact the ADA Coordinator (listed below) as soon as possible, preferably 14 days before the activity or event.

Complaints: A grievance procedure is available to resolve complaints. <LINK TO GRIEVANCE PROCEDURE>
For complaints, comments or concerns, please contact:

NAME, ADA Coordinator
140 Worcester Street
West Boylston, MA 01583
(774) 261-4030
gtignor@westboylsont-ma.gov

Upon request, this notice is available in alternative formats such as large print or Braille.

NOTE: This notice can be inclusive of the Grievance Procedure, but this is not required.

8.1.2 Service Animal Policy (Proposed)

The Town of West Boylston complies with the Americans with Disabilities Act and the Rehabilitation Act of 1973, Section 504, which states, "No otherwise qualified person with a disability in the United States...shall, solely on the basis of a disability, be denied access to, or the benefits of, or be subjected to discrimination under any program or activity provided by any institution receiving federal assistance." The Town of West Boylston intends to provide the broadest possible access to service animals in all public areas.

The U.S. Department of Justice has issued regulations effective March 15, 2011 (28 CFR 36.302), limiting the types of animals that qualify as "service animals" for purposes of the Americans with Disabilities Act (ADA). According to these regulations, "Service animal means any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. Other species of animals, whether wild or domestic, trained, or untrained, are not service animals for the purposes of this definition. The work or tasks performed by a service animal must be directly related to the individual's disability. Examples of work or tasks include, but are not limited to, assisting individuals who are blind or have low vision with navigation and other tasks, alerting individuals who are deaf or hard of hearing to the presence of people or sounds, providing non-violent protection or rescue work, pulling a wheelchair, assisting an individual during a seizure, alerting individuals to the presence of allergens, retrieving items such as medicine or the telephone, providing physical support and assistance with balance and stability to individuals with mobility disabilities, and helping persons with psychiatric and neurological disabilities by preventing or interrupting impulsive or destructive behaviors. The crime deterrent effects of an animal's presence and the provision of emotional support, well-being, comfort, or companionship do not constitute work or tasks for the purposes of this definition." Section 36.302(c)(9) also identifies miniature horses as service animals. Other species of animals, wild or domestic, do not qualify as "service animals". Therapy or emotional support animals are not considered to be service animals.

The Town of West Boylston is not responsible for the care or supervision of the service animal.

Below are the policy guidelines for the Town:

- A service animal is permitted to accompany the individual with a disability to most areas within Town facilities where members of the public are normally allowed to go.
- Some areas are not safe for service animals; therefore, these areas may exclude service animals. Water treatment facilities and/or areas that require protective clothing may exclude service animals. This denial or granting of admission to an area will be made based on the nature of the machinery and/or on the nature of the work performed.
- An individual with a service animal may not be segregated from other members of the public.
- A service animal may be removed from a facility if that animal poses a direct threat to the health or safety of others.
- A service animal may be removed from a facility if that animal's behavior is out of control and the handler does not take effective control or if the service animal is not housebroken.
- If a service animal is removed from a facility, the individual with a disability will be given the option of continued participation, with assistance, within the facility.
- The service animal must be clean, in good health, with current rabies vaccination.
- All service animals must be always on a leash or under control of the handler.

8.2 Resources

8.2.1 General Resources & Guides

There are several resources available to assist the Town with the implementation of their Transition Plan and to ensure it meets its obligations to its residents.

ADA Action Guide for State and Local Governments: <https://www.adaactionguide.org>

ADA Checklist for Existing Facilities: <https://www.adachecklist.org>

Outdoor Developed Areas: A Summary of Accessibility Standards for Federal Outdoor Developed Areas: <https://www.access-board.gov/attachments/article/1637/outdoor-guide.pdf>

US Access Board: <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/guide-to-the-ada-standards/animations>

ADA Checklist for Polling Places: <https://www.ada.gov/votingchecklist.htm>

Solution for Five Common ADA Access Problems at Polling Places: https://www.ada.gov/ada_voting/voting_solutions_ta/polling_place_solutions.htm

Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities - <http://www.ada.gov/emergencyprepguide.htm>

FEMA Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters http://www.fema.gov/pdf/about/odc/fnss_guidance.pdf

Job Accommodation Network: <http://www.askjan.org>

Website: [Understanding WCAG 2.0: A guide to understanding and implementing Web Content Accessibility Guidelines 2.0](#)

8.2.2 Grant Funding for Accessibility Projects

Massachusetts Municipal ADA Improvement Grant Program

The Massachusetts Office on Disability (MOD) administers the Municipal ADA Improvement Grant program. This funding is aimed at supporting capital improvements to improve programmatic access and/or removing barriers encountered by people with disabilities. Project grants of up to \$250,000 are available. There are also planning grants to assist communities in creating or updating a Self-Evaluation and/or Transition Plan. More information about the program can be found here:

<https://www.mass.gov/municipal-americans-with-disabilities-act-grant>

Massachusetts Cultural Facilities Fund

The Massachusetts Cultural Council and Mass Development provides cultural organizations, including Municipalities that own cultural facilities that are at least 50,000 square feet, with grant funding to support three project types: Feasibility and Technical Assistance grants; Systems Replacement Plan

Grants; and Capital grants. Feasibility and Technical Assistance grants of up to \$50,000 are available for costs and expenses related to overall planning and feasibility for a project. Systems replacement plan grants of up to \$7,000 are available to support the development of a capital needs assessment of a building and its mechanical system. Capital grants ranging from \$250,000-\$675,000 are available for acquisition, design, construction, repair, renovation, rehabilitation, or other capital improvements. For a municipality to be eligible to apply for this funding, it must demonstrate that 50% or more of the facility is used for arts, humanities, or interpretative science programming. All grant programs require a 1-1 match. More information about the program can be found here:

<http://www.massculturalcouncil.org/facilities/facilities.htm>

Complete Streets Funding Program

A Complete Street is one that provides safe and accessible options for all travel modes - walking, biking, transit, and vehicles – for people of all ages and abilities. MassDOT provides funding to municipalities for technical assistance to analyze their community needs and develop a Complete Streets Prioritization Plan, and funding for construction of Complete Streets infrastructure projects. Also inherent in the development of a Complete Street is meeting the most current accessibility guidelines outlined by the Americans with Disabilities Act (ADA) and the Massachusetts Architectural Access Board (AAB), which are upheld by Code of Massachusetts Regulations 521 (521 CMR). MassDOT has allocated \$12.5 million for the first two years, 2016 and 2017. Future funding will be based on the availability of funds and the interest and success of the program. More information about the program can be found here:

<http://www.massdot.state.ma.us/highway/DoingBusinessWithUs/LocalAidPrograms/CompleteStreets.aspx>

Community Transit Grant Program

MassDOT administers the Community Transit Grant Program which is the annual competitive grant program to distribute Federal Transit Administration Section 5310: Enhanced Mobility of Seniors & Individuals with Disabilities funds, and State Mobility Assistance Program funds. This grant program provides funding to assist with mobility management activities, the purchase of capital equipment, and operational costs to meet the mobility needs of seniors, defined as those 65 and older and individuals with disabilities of any age. State Mobility Assistance Program (MAP) funds are to assist in the provision of transportation services to seniors and persons with disabilities. MAP funding is exclusively used for the purchase of eligible vehicles, and most often as a State financial match to federally funded capital vehicle purchases. More information about the program can be found here:

<http://www.massdot.state.ma.us/transit/CommunityTransitGrantProgram/ProgramInformation.aspx>

8.2.3 Services to Aid Communication with Hearing/Speech Impaired Individuals

MassRelay Service

The Massachusetts Department of Mental Health operates the MassRelay service. This service is provided 24 hours, seven days a week, 365 days a year and enables people who are deaf, hard of hearing, late deafening, or speech disabled to communicate with hearing people over regular phone lines. A Relay Operator will complete your call, dialing the party you wish to contact and then stay on the line to relay messages electronically via a TTY or verbally to people who can hear. Dial 711 in Massachusetts or 1-800-439-0183 from anywhere else.

Massachusetts Commission for the Deaf & Hard of Hearing (MCDHH) Statewide Interpreter/CART Referral Service

The MCDHH provides statewide interpreter and Communication Access Realtime Translation (CART) referral services. It provides referral services for sign language, spoken English, oral, tactile and close vision interpreting for Deaf and Deaf-Blind individuals, as well as making referral to freelance CART providers for services. They also provide an After-hours Emergency Interpreter Service, an Interpreter Screening service, Interpreter and CART provider trainings, case management, and technical assistance. More information can be found here:

<http://www.mass.gov/eohhs/gov/departments/mcdhh/programs/cart/>

8.2.4 Training and Technical Assistance

Massachusetts Commission for the Deaf & Hard of Hearing (MCDHH)

MCDHH, through the Communication Access, Training, and Technology Services Department (CATTS) provides information and training to the public on issues of deafness and hearing loss. Free In-service or educational services/presentations can be provided for any organization or business seeking to improve their effectiveness in interacting with people who are deaf and hard of hearing. They also provide technical assistance on assistive technology to public and private agencies, professional organizations, businesses, and individuals related to all aspects of technology for the deaf and hard of hearing individuals. In addition, they also create several publications with a wide range of topics related to deafness and hard of hearing. For more information visit their website at:

<http://www.mass.gov/eohhs/gov/departments/mcdhh/programs/communicate-train/>

Massachusetts Commission Against Discrimination (MCAD)

MCAD provides discrimination prevention training to the public and for workplaces. Training sessions range from two hours to four days in length, depending on the topics covered. They also offer Equal Employment Opportunity Certifications for individuals who currently provide, or seek to provide, employment discrimination prevention training, conduct internal discrimination complaint investigations and/or respond to accommodation requests. For more information visit their website at:

<https://www.mass.gov/training-and-outreach>

Massachusetts Office on Disability (MOD)

MOD's mission is to "bring about full and equal participation of people with disabilities in all aspects of life...in a manner that fosters dignity and self-determination. They have four areas of focus: 1) Providing Training; 2) Advocacy; 3) Monitoring; and 4) Resources. MOD provides training to various entities in a variety of formats on all topics related to the state and federal civil rights laws that govern disability discrimination. Topics may include but are not limited to: ADA, Fair Housing Act, Section 504 of the Rehabilitation Act, M.G.L. Chs. 151b and 272, Service Animals, Vocational Rehabilitation and Independent Living Services and Programs, and Architectural Access Regulations. MOD also provides architectural review/site visits, either through plan review or on-site visits to ensure compliance with the various building requirements specific to persons with disabilities. Training and Architectural Review/Site Visits can be requested at:

<http://www.mass.gov/anf/employment-equal-access-disability/disability-info-and-resources/education-and-training/customized-trainings.html>

ADA Coordinator Certification Program

The ADA Coordinator Training Certification Program is offered by the University of Missouri and the Great

Plain ADA Center Classes are offered online and through trainings offered at various conferences the University hosts. Following the successful completion of the program, the participant will have the knowledge base essential to performing the role of an ADA Coordinator. Course and certification requirements can be found on their website:

<http://www.adacoordinator.org/?page=About>

National ADA Symposium

This premier, national four-day event includes more than eighty breakout sessions on every aspect of ADA. It is a project of the ADA National Network and is organized and run by the Great Plains ADA Center. For more information about the Symposium visit:

<http://www.adasymposium.org/>

New England ADA Center

New England ADA Center is one of 10 regional ADA Centers comprising the ADA National Network. They provide information, guidance and training on ADA tailored to meet the needs of business, government and individuals at local, regional and national levels. Their website has a clearing house of ADA training topics that are no cost web-based courses in addition to publications and best practices resources. Their website can be found at:

<https://www.newenglandada.org/>

8.3 Department Program & Service Questionnaire Summary

The Town’s departmental core programs and services, as determined by questionnaire responses, communication with staff, and website research, are outlined in the tables below.

8.3.1 Accounting Department

Primary Address	140 Worcester St
Core Program Inventory	Town Budget Preparation & Oversight Financial Management Payroll Employee & Retirement Benefits Employment Paperwork
Services Provided	New Employee Benefits Enrollment Existing Employee Benefit Changes Retired Employee Benefit Services
Communications Summary	Posts to two town website pages: Accountant and Employee Benefits
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	NO
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	NO

Department	Assessors
Primary Address	140 Worcester St
Core Program Inventory	Tax Abatements & Exemptions Chapter Land Property/Parcel Information Abutters Lists Registry of Deed Information Property Map Data Updates
Services Provided	Comprehensive customer and technical services to support the Core Program Inventory listed above
Communications Summary	TBD
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	TBD
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	TBD

8.3.2 Building Department

Primary Address	140 Worcester St
Core Program Inventory	Administration & Enforcement of State Building, Electrical, Plumbing & Gas Codes Enforcement of Town Zoning Bylaws
Services Provided	Building & Demolition Permits Certificates of Occupancy Electrical, Plumbing & Gas Inspections

	Complaint Responses Zoning Enforcement
Communications Summary	TBD
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	TBD
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	TBD

8.3.3 Town Clerk

Primary Address	140 Worcester St
Core Program Inventory	Elections & Open Meeting Law Town Meeting Certifications, Licenses & Forms Annual Town Report Vital Recordkeeping
Services Provided	Elections & Town Meetings Voter Information, Dates, Deadlines and Results Citizens' Petitions Open Meeting Law Certificates & Licenses including DBA, Residency, and Dogs Vital Records Requests
Communications Summary	Posts to town website pages regularly across Town Clerk functionality
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	DID NOT ANSWER
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	DID NOT ANSWER

8.3.4 Cemetery Department

Primary Address	140 Worcester St
Core Program Inventory	Cemetery & Grounds Management
Services Provided	Burial Services Selling of Graves Maintenance of Cemetery Roads and Grounds
Communications Summary	Posts regularly on Town website cemetery pages
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	NO
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	NO

8.3.5 Council on Aging (COA)/Senior Center

Primary Address	120 Prescott Street
Core Program Inventory	Nutritional Programs Transportation Assistance/Outreach Programs Instructional/Recreational Classes Community Education
Services Provided	Hot Meals & Meals on Wheels Senior Van SHINE Ask Attorney AARP Tax Aide Fuel Assistance SNAP Durable Medical Equipment Elder Services Health Screenings Health Classes Community Education Seminars & Events for Seniors
Communications Summary	Yes. Using Civic Plus program, information is posted under each tab heading all relating to "senior" services or activities. The monthly newsletter is also posted. Accessibility is via computer users
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	NO
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	NO

8.3.6 Department of Public Works (DPW)

Primary Address	35 Worcester St.
Core Program Inventory	Road Maintenance Sewer Management Solid Waste & Recycling Stormwater Management Tree Warden Parks Department
Services Provided	Drain Layer Applications Road Opening Permits Trash and Recycling Services Yard Waste Snow and Ice Removal Street Sweeping & Maintenance Sewer Connection Permits & Billing Other Public Works Services
Communications Summary	YES Permit applications/forms/regulations (drainlayer license, road opening, new driveway, sewer connection, trench permit

	etc.), trash & recycling calendar and updates, yard waste facility schedule, snow & ice reminders/winter parking ban, street sweeping schedule and updates, Report A Public Works Problem
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	We can change font size No training on braille. Braille not available
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	I have had a couple TTY/TDD calls over the years that went well.

8.3.7 Fire Department

Primary Address	39 Worcester St.
Core Program Inventory	Public Safety Fire Prevention & Rescue Emergency Medical Education & Planning
Services Provided	Comprehensive Fire Prevention & Safety Services Educational Programs Burn Permits Smoke detector inspections.
Communications Summary	Posts items of interest on the Fire Department Facebook page. These posts are events, incidents, or information about Fire department issues, such as burning permits and how to obtain them
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	NO The Officer would be able to offer large print, but it is not an item we are trained on
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	NO

8.3.8 Health Department

Primary Address	140 Worcester St
Core Program Inventory	Restaurant, Retail & Workplace Inspections Food & Milk Retail Inspections Enforce State Sanitary Code Respond to Nuisance Complaints Title 5 Regulation Enforcement
Services Provided	Comprehensive customer & technical services to support Core Program Inventory listed above
Communications Summary	Did not answer

Staff trained to handle requests for alternative format document/materials requests including Braille or large print	Did not answer
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	Did not answer

8.3.9 Library

Primary Address	8 Newton St.
Core Program Inventory	Adult, Teen, and Children's Programs Circulation & Lending Public Access Computers Craft Programs Outdoor Programming Research Social Media & Digital
Services Provided	Print and Digital Media Lending In-Person and Contactless Pickup Public Computer Access Craft Programs Lawn games Summer Reading & Story Walks Book Groups, Pet Shows Programs/Presentations
Communications Summary	Website: beamanlibrary.org , Town website links to the library website Newsletter pdf is posted to Library website, if opened in Microsoft Edge the browser can read the text aloud Monthly e-newsletter
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	Staff are trained to search for library materials in alternative formats such as large print, braille, and audio
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	We have a TTY and offer training and refreshers to staff

8.3.10 Municipal Light Plant

Primary Address	4 Crescent St.
Core Program Inventory	Electric Light Service to Residents
Services Provided	Customer Service at Counter, Online & via Phone Bill Payment General and Technical Assistance with Electric Light Initiatives and Issue Resolution
Communications Summary	Our content passes Accessibility Testing, except for items served externally such as some elements in Google Maps and the locked PDF documents provided by your auditor
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	NO
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	NO

8.3.11 Police Department

Primary Address	141 Sterling St
Core Program Inventory	Community Public Safety Pistol Permitting Fingerprinting Public Records Requests Interviews Education Community & School Engagement Parking and Traffic Enforcement
Services Provided	Comprehensive Public Safety Services in- person, online and via phone
Communications Summary	Posts to a departmental web page and Facebook page. Both pages could be accessed by a standard browser that would enable the user to make the print larger. If a picture is posted, a description of the picture is included, so the user can understand what is being shown in the picture.
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	Large print YES, Braille NO
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	Yes. The dispatchers are trained in the use of TTY and have access to interpreters if needed

8.3.12 Recreation Department

Primary Address	140 Worcester St
Core Program Inventory	Comprehensive Recreation Programs, Classes, Events and Fund Raisers

	Day of Play Program Fall Celebration Event Sporting Events Zumba in the Park Social Media Safety Training
Services Provided	Comprehensive Recreational Services in-person, online and via phone
Communications Summary	Not regularly. Planning to start this September
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	UNSURE
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	UNSURE

8.3.13 Town Administrator

Primary Address	140 Worcester St
Core Program Inventory	Manage Town Polices, Programs & Procedures for the Select Board Budget Preparation Human Resources Labor Contracts Chief Procurement Officer Staff Appointments & Oversight
Services Provided	Comprehensive customer & technical services to support Core Program Inventory listed above
Communications Summary	TBD
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	TBD
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	TBD

8.3.14 Treasurer/Tax Collector

Primary Address	140 Worcester St
Core Program Inventory	Abatements & Exemptions Real Estate & Personal Property Taxes Sewer Betterment Employee & Retiree Health Insurance & Benefits Parking Tickets Tax Title
Services Provided	Comprehensive Tax & Benefits Services in-person, online and via phone
Communications Summary	YES The Town Clerk updates our Web page, including a word document containing outstanding checks every 6 months
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	NO
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	NO

8.3.15 Veterans' Agent

Primary Address	140 Worcester St.
Core Program Inventory	Assist Veterans, Family Members, and Veterans' Survivors with establishing State Benefits through the State Benefit, Chapter 115
Services Provided	Comprehensive Veterans' Benefits Services In-Person, Online and via Phone
Communications Summary	Not regularly
Staff trained to handle requests for alternative format document/materials requests including Braille or large print	NO
Staff knowledgeable on use of TTY/TDD or relay services for hearing impaired and/or interpreter services	NO

8.4 Website Audit

Conducted March, 2022

Website Auditing Process and Methodology

A website accessibility audit is performed by an accessibility professional who meticulously evaluates digital assets against the current Web Content Accessibility Guidelines (WCAG). The Web Content Accessibility Guidelines are part of a series of web accessibility guidelines published by the Web Accessibility Initiative of the World Wide Web Consortium, the main international standards organization for the Internet. The WCAG standard has been tried and tested and is under routine development by accessibility experts, making it a reliable standard. Accessibility is defined as ensuring a digital product, such as a website, is as usable as possible by everyone, including people with a range of disabilities. These recommendations also include standards for documents, video, social media, integrated apps, and navigating content on highly limited devices such as mobile phones. As of May 2021, version WCAG was released as a working draft and is scheduled to be finalized within 2022.

Manual accessibility audits have the major advantage of being the most thorough type of auditing. After completion of the audit, a report will be created containing an assessment of a municipality's assets along with issues that need to be addressed. For every unique issue listed, instructions or examples will be provided. This is so a city or town will know precisely how to make their website accessible from the audit and clients can take immediate action. Always keep in mind that accessibility is an ongoing process and not a one-off project.

The Town of West Boylston's municipal website has both many strengths and areas for improvement. A big asset is the intuitive layout of the site. The toolbar navigations are uniform, uncomplicated, and easy to understand. All links are accessible by both keyboard, mouse, or a tap of the finger. First time visitors are able to find important documents and forms with ease. The language used is succinct and written at an appropriate comprehension level. The website is mobile friendly and formats correctly on a smartphone.

The site could improve upon many of its accessibility features, specifically in compliance with American Disability Act regulations. To enhance the experience for users reliant on-screen readers or assistive technologies, all images should be accompanied by alternative text. Additionally, some photos have existing captions, but they are not robust enough to be meaningful to someone with low or impaired vision. Alternative text should be present not only on the website, but all documents and social media channels, where applicable.

The town logo against the current homepage's background does not provide enough contrast to be considered ADA compliant. Consider changing the background image to a color that strikes a stronger distinction with a white font. Many announcements, specifically in the Town News section, are uploaded images of text. This text would not be recognized by a screen reader and should instead be embedded directly into the page. Alternatively, if the graphic needs to remain in place due to it being a creative advertisement, a copy of the contents outside of the image should be provided.

As often as possible, convert print forms into online fillable forms. When users can submit information through a website, rather than printing off and mailing in a form, it not only saves paper and postages costs, but increase involvement by eliminating the "hassle factor." Online payment will simplify the





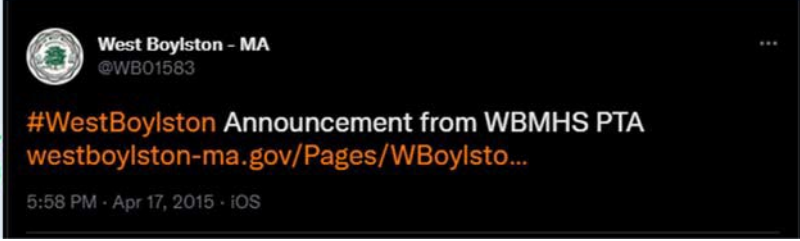
process for fee payment, which will lead to increased revenues and time saved chasing down late payments.



Overall, the underlining structure of the municipal website is efficient and effective, however can be enhanced by adding additional ADA recommended features.

<p>Alternative Text PDF508</p>	<p>PDF documents do not contain images that require alternative text</p>	<p>Type text that describes the image in the Alternative Text field (click Options > Properties)</p>
--	--	---


Accessibility Area: Social Media

<p>Alternative Text</p>		<p>Provide media with alternative text that describes the image</p>
-------------------------	---	---


	<p>Tweet is missing alternative text</p> <p>Alt text: A recycling symbol surrounding a Christmas tree</p>	
Media Captions	<p></p> <p>All videos on town YouTube page allow for embedded YouTube caption capabilities.</p>	<ul style="list-style-type: none"> • Ensure video content includes synchronized captions. • Ensure audio descriptions for people with visual disabilities are included in the default soundtrack, or as a separate selectable sound track. • Add captions to photos to ensure individuals understand what is going on in the picture.
Plain Language	<p></p>  <p>Hashtags that contain more than one word should use camel case, for example, #WestBoylston</p>	<ul style="list-style-type: none"> • Write in plain language, use camel case when appropriate (i.e., capitalize the first letters of compound words. This is helpful as it makes multi-word hashtags easier to read, including for those using a screen reader. • Limit use of hashtags, abbreviations and acronyms.
Acronyms	<p></p>  <p>Refrain from multiple uses of acronyms</p>	<p>Always spell out the first instance of the acronym and add the acronym, in parentheses after. This is especially helpful for those using screen readers, because after the name is heard and the acronym is spelled out, the user will be better able to associate the sound of the acronym with the full name.</p>
Outside content	<p>The municipality does not link any outside content, except on the Board of Health page.</p>	<p>For content the municipality has not created and thus may not be</p>

		accessible, make audience aware of these limitations. Provide a note briefly explaining the limitation, such as that: the photo is untagged; the video will auto start; the video does not include captioning; or the audio file is not accompanied by a written transcript.
Accessibility Area: Newsletter		
	Website allows users to customize what type of alerts, news, or announcements they want to receive via email	
Accessibility Area: E-permitting		
	N/A: Site contains downloadable permitting application. Various license applications also direct users to downloadable PDF form	
Accessibility Area: Downloadable Forms		
Form Accessibility	Some PDF forms allow users to directly type content into the blank spaces, such as the Absentee Ballot . Others require the user to print the form or upload to a third-party PDF reader, such as the Dog License Application . The latter is much more difficult for low- or-vision- impaired citizens	
Accessibility Area: Public Notice and Grievance Procedure		
Title II	Website grievance procedure is not intuitive to find. Also, it lacks contact information for the ADA Coordinator	The ADA Coordinator is responsible for coordinating the efforts of the government entity to comply with Title II and investigating any complaints that the entity has violated Title II. The name, office address, and telephone number of the ADA Coordinator must be provided to interested persons.
Accessibility Area: Secure Electronic Transfers (E-payments)		
Clear confidentiality language	Municipal e-pay system is “digicert Trusted secure” and also provides a link to the privacy policy where information about security and encryption is provided	To facilitate and encourage electronic commerce using payment card products, it will be necessary to assure cardholders that their payment information is safe and can only be accessed by the intended recipient.
Functioning Services	 Option to pay “ Supplemental ” Taxes is non-functioning	
Contact Information	 Online Payment Center, UniPay, provides a contact phone number, email address, and hours of operations in the event residents need assistance	

Accessibility Area: Outside / Integrated Apps

Alternate Text	 Map Layers and Descriptions are provided for GIS users	Text alternatives for any non-text content provides context for users who use braille, screen readers, assistive technologies, or need simpler language.
----------------	--	--


Accessibility Area: Mobile Version

Layout	 Site layout is compatible with mobile device	
--------	--	--



8.5 Facility Audits


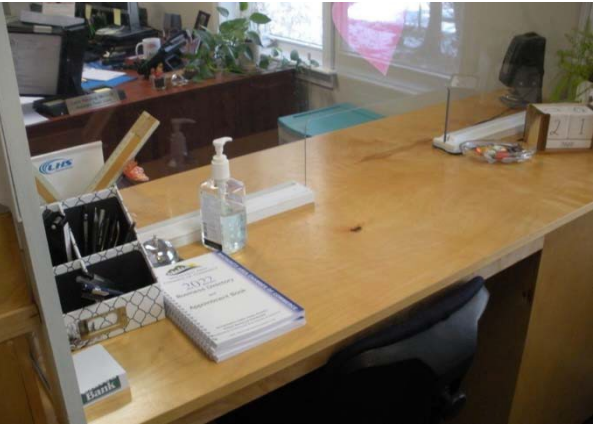
8.5.1 Town Hall

Address	140 Worcester Street
Building Area (sq.ft.)	9,088 sqft.
Site (acres)	1.08 acres
Date of Original Construction	2004
Dates/Description of Renovations/Alterations	Major renovation completed in 2014, and flooring systems replaced in 2018. Renovations to repair sprinkler/flood damage was completed in 2022.
Date of Audit	12/14/2021
Jurisdiction/Applicable Standards	2010 Standards/2004 ADAAG
Description of Use	Offices for Town administration; multiple public meeting rooms; customer service counters for several departments.
Maximum Occupancy	140
Parking Spaces	41 plus 3 non-compliant accessible spaces (2 required)
Number of Floors	2
Elevator/Lift?	Yes


#	Barrier to Access	Reference	Photo	Corrective Action
1	<p>Site arrival point from Franklin St (west end) and Worcester Street (east end) both lack an accessible route to the building. Excessive cross-slopes on sidewalks (up to 5%), curb ramps and crosswalks. Running slope from Worcester Street exceeds 5% (8% was max) in some places and rise greater than 6 inches. Asphalt is deteriorated in several places.</p> <p>No landing is provided at top of ramp on Worcester St.</p> <p>At time of inspection, ice and debris buildup (several days after snow removal) made areas inaccessible. Grading at transition to asphalt not constructed to avoid accumulation of water.</p>	<p>206.2.1 (site arrival)</p> <p>405.10 (accumulation of water)</p> <p>406.4 (landing)</p>		<p>Regrade drives/sidewalks to provide compliant site arrival points from both rights of way, or evaluate feasibility of alternate site arrival point from Worcester street using ramp (with handrails) and potentially switchbacks if needed.</p>
2	<p>No van accessible spaces are provided.</p>	<p>208.2.4</p>		<p>Existing spaces and access aisle meets width guidelines for van access. Replace signage to designate at least 1 of 3 spaces as van accessible.</p>



3	<p>Accessible parking signs are mounted at 45-48" from ground level.</p>	502.6		<p>Reinstall existing signage.</p>
4	<p>Excessive cross slope on east walkway to ramp at 3.2%</p>	403.3		<p>Replace middle sections of concrete walkway to achieve 2% max cross slope.</p>

5	Height of handrails at 40.5" (top) exceeds maximum of 38"	505.4		Reinstall handrail system in its entirety to achieve 35"-38" at top of gripping surface.
6	Payment drop box (operable part) at 63" exceeds 48" reach range for forward reach.	308.2.1		Relocate drop box or add second box in accessible location where operable opening is within 48" range max.

7	Wall-mounted self-serve permits and business cards at 59-67" exceed the 48" reach range maximum	30.2.1		Relocate or provide these at counter level as well.
8	Clerk's office: A separate counter meeting the height requirement is provided; however, a chair is kept in this space making it inaccessible for forward approach.	904.4		Remove chair or keep it against the far wall unless needed for a customer. This is a routine maintenance issue.

9	<p>Drinking fountains provided are not provided for standing persons with a spout height of 33". The fountain also presents a protruding object hazard.</p>	307.2 & 602.7		<p>Depending on space available and plumbing, replace with combination unit or add second fountain complying with 602.7. Alternatively, replace with bottle filling unit.</p>
10	<p>1st floor single user unisex bathroom (on east side) lacks grab bars.</p> <p>At 15.5", 1st floor single user bathroom toilet seat height is below the minimum of 17".</p> <p>At 3", toilet paper dispenser is not within the 7-9" distance required from the front of the toilet.</p> <p>Sink lacks insulation on supply and drainpipes.</p> <p>Sink lacks knee clearance complying with Sec. 306</p> <p>18" maneuvering space requirement on latch side of door is not present due to sink depth.</p>	<p>604.5</p> <p>604.4</p> <p>604.7</p> <p>606.5</p> <p>606.2</p> <p>404.2.4</p>		<p>Install side and rear grab bars complying with 604.5</p> <p>Replace toilet.</p> <p>Relocate dispenser.</p> <p>Replace sink and insulate pipes.</p>

11	<p>Men's/Women's Restrooms 1st Floor (all similar issues).</p> <p>At 48" extending from back wall, all 42" long side wall grab do not meet the required 54" distance.</p> <p>Coat hooks are provided for standing persons only.</p> <p>Maneuvering clearance requirement of 18" at latch side of door is not present in any stall due to deep sinks. Clearance is 14.5"</p> <p>Reflective edge of mirrors at 41" do not meet 40" maximum from floor</p> <p>Top of sink, at 35", exceeds the maximum of 34".</p> <p>At 34", top of grab bar exceeds 33" maximum measured at top of gripping surface.</p>	<p>604.5.1</p> <p>603.4</p> <p>404.2.4</p> <p>603.3</p> <p>606.3</p> <p>609.4</p>		<p>Reposition the grab bars by moving 6" forward. Bar should be 12" max from back wall and extend 54" from back wall.</p> <p>Add additional coat hook between 40-48" from floor.</p> <p>Replace sink with shallower sink to achieve 18" clearance.</p> <p>Reinstall mirror.</p> <p>See above.</p> <p>See above. Lower grab bar when repositioning.</p>
----	--	---	---	--


12	<p>Stairs (209) on east side of building: Handrail on left side does not extend 12" from top of riser nosing at top of stairs.</p>	505.10.2		Install return.
13	<p>Selectboard Restroom (unisex, single user)</p> <p>Reflective edge of mirrors at 43" do not meet 40" maximum from floor</p> <p>Toilet paper dispenser is not within 7-9" from front of toilet.</p>	<p>606.3</p> <p>604.7</p>		<p>Reinstall mirror.</p> <p>Reinstall dispenser.</p>

14	2 nd floor drinking fountain does not meet standard for standing person.	307.2 & 602.7		Width does not allow for combination unit. Consider replacing with a bottle filler instead.
----	---	---------------	--	---




8.5.2 Municipal Light Plant




Address	2 Crescent Street
Building Area (sq.ft.)	4,977 sq.ft.
Site (acres)	0.79 acres
Date of Original Construction	1935
Dates/Description of Renovations/Alterations	See card
Date of Audit	12/14/2021
Description of Use	Offices for MLP, public board meeting room, customer service counter; rear of site includes garages for equipment/vehicles that are not open to public.
Maximum Occupancy	N/A
Parking Spaces	Space for under 25 vehicles. No accessible parking provided.
Number of Floors	1.5
Elevator/Lift?	No

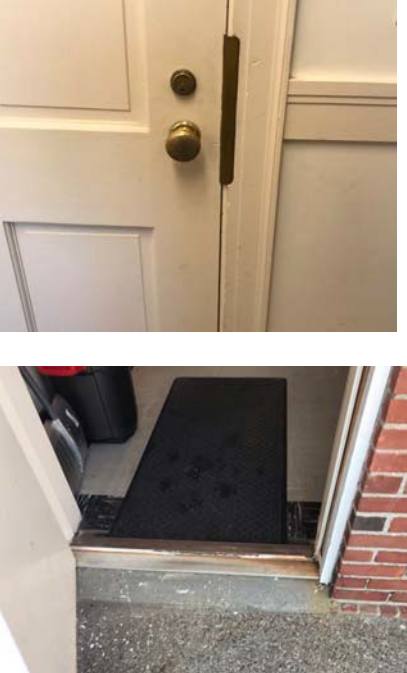
<Audit complete; Report in Process>

#	Barrier to Access	Reference	Photo	Corrective Action
1	Building lacks accessible entrance.	206.1		The MLP has design plans for a lift and other improvements at the rear of the building necessary to provide an accessible route to the customer service counter and public meeting room. Plans provided for review were not to scale, so it is recommended that a full plan review be performed to ensure compliance and submittal of any necessary variances with the MAAB. Signage should be installed in parking area and at front entrance to advise visitors of accessible entrance.

2	Existing handrails on main entrance stairs do not comply with 505.	504.6; 505		Replace handrails.
3	Curb ramp should be striped or otherwise marked to prohibit parking in order to provide an unobstructed path of travel.	406.5		Stripe no parking area in front of curb ramp.

4	Payment drop box is not accessible due to slope. 228.1 provides an exception for drive-up only depositories, but programmatically, an accessible drop box should be provided. The location of this box is not easily accessible for drive-up use, given the direction of travel in the parking lot.	228.1		Install a second drop box at an accessible location. If payments can be made at Town Hall, provide an advisory stating such on the Town's website and on site as a means of improving access.
5	No accessible parking is provided.	208		As noted above, MLP has a plan to install accessible route and parking at rear of building. Based on available space, it does not appear there is sufficient space (14.5') to provide a fully compliant van accessible space, so a variance will likely be required. If stairs are included in the redesign, handrails should be installed that comply with 505. Cross slope of this area exceeds 2% as well, so it will likely be necessary to fully reconstruct the area.
6	Interior handrails do not extend at top and bottom and exceed (at 48") maximum height of 38".	505.4 (height) 505.10 (extension)		Replace handrails.

7	At 40", counters exceed maximum height of 36".	904.4		Modify one counter to provide an accessible surface complying with 904.
8	Front curb ramp has a change in level of 1+"	303		Install asphalt ramp at curb ledge.
9	<p>Accessible restroom in rear (employee restroom):</p> <p>Lavatory lacks insulation on pipes</p> <p>Bottom of mirror at 52" exceeds minimum height from floor of 40"</p> <p>Towel dispenser exceeds maximum height of 48" reach range.</p> <p>Flush valve on wrong side of toilet.</p>	<p>606.5</p> <p>603.3</p> <p>308</p> <p>604.6</p> <p>604.3</p>		<p>Note that this restroom is in the rear and for employees. Given the layout of the current public bathroom, should consider making these alterations and designating this restroom the accessible public restroom.</p> <p>Each element noted should be removed and reinstalled as noted to achieve compliance. Toilet tank would need replacement.</p> <p>Care should be taken by cleaning crews to keep trash cans out of clear floor spaces.</p>

	<p>Trash can blocks clear floor space adjacent to toilet.</p> <p>Toilet paper dispenser is not within 7-9" from front of toilet.</p>	604.7		
10	<p>Advisory only – if the work to construct an accessible entrance in the rear is completed, doorknob should be replaced with a lever on the door leading from stairs to hallway.</p> <p>The threshold on the exterior door should be replaced as well.</p> <p>Given the space confines, likely need for variances, and existing conditions, project should consider replacing both doors and adding automatic openers.</p>			

8.5.3 Police Department

Address	141 Sterling Street
Building Area (sq.ft.)	8,680 sqft.
Site (acres)	2.97 acres
Date of Original Construction	2017
Dates/Description of Renovations/Alterations	N/A
Date of Audit	July 20, 2022
Description of Use	Police personnel offices; dispatch room, holding cells, interview rooms and other uses typical of a law enforcement building. Customer service counter off lobby, as well as a large conference/training room that is available for public, staff and area agency use.
Maximum Occupancy	184
Parking Spaces	
Number of Floors	2
Elevator/Lift?	No

<Audit complete; Report in Process>

#	Barrier to Access	Reference	Photo	Corrective Action
1	Sharps depository handle exceeds 48" reach range max	308		None recommended. Lobby is staffed when open and assistance is readily available.



2	<p>Public restroom in lobby:</p> <p>Soap dispenser at 50" exceeds maximum reach range of 48"</p> <p>At 12", latch side clearance of door to sink is under the minimum of 18".</p>	<p>606.1</p> <p>404.2.4</p>		<p>Lower dispenser.</p> <p>None possible without replacing sink. This is a low priority.</p>
3	<p>Mailbox/Paperwork Drop-off exceeds 48" maximum reach range at 51" high.</p>	<p>308/309</p>		<p>Cut down standpipe and reweld at least 3" lower.</p>
4	<p>No accessible route is provided from the right-of-way.</p>	<p>206.2.1</p>		<p>There is not a consistent and apparent route within driveway that has acceptable cross slopes. A walkway from the existing sidewalk should be constructed.</p>



5	Drinking fountain – 211.2 requires two fountains that can serve seated and standing persons. The fountain also creates a protruding object hazard.	211.2, 602.4 & 602.7		Install a combination unit that also provides high unit meeting 602.7 with accessory skirt/apron to provide the necessary cane-detectable element below the unit.
---	--	----------------------	--	---



8.5.4 Council on Aging (COA)/Senior Center


Address	120 Prescott Street
Building Area (sq.ft.)	10,202
Site (acres)	13.7 acres
Date of Original Construction	2019
Dates/Description of Renovations/Alterations	N/A
Date of Audit	12/14/2021
Jurisdiction/Applicable Standards	2010 Standards/2004 ADAAG
Description of Use	Majority of building is open to public and offers senior and community programming. A small area houses administrative offices, and there is an onsite nurses station. Reading room, 1 large and several smaller multipurpose rooms, kitchen and meal space and large lobby/waiting area. Several outdoor spaces, including a baseball field used for youth sports.
Maximum Occupancy	291
Parking Spaces	75 (including 3 employee spaces); 4 van accessible spaces (3 required)
Number of Floors	1
Elevator/Lift?	No



#	Barrier to Access	Reference	Photo	Corrective Action
1	Site arrival point from Prescott Street: Concrete at curb ramp is over 1" above level of asphalt.	303.1		Install patch at asphalt that results in ramp of 8.3% or less; this may include some amount of beveling of existing concrete to achieve compliance.

2	Ballfield is not on an accessible route.	206.2.2		Areas of sport activity (from field boundary) must be connected to other accessible facilities. Consider also designating one diagonal parking space adjacent to field that meets slope requirements as accessible and include an access aisle.
3	Walkway connecting rear of site to right-of-way at Horseshoe Drive is deteriorated and excessively sloped (running slopes up to 14% and cross-slope over 5%). Since the right-of-way connects to the site, it must have an accessible route to the building.	206.2.1		Construct an accessible route. This will likely include ramps and/or switchbacks in order to achieve compliance.

4	<p>Although this may be a temporary situation, the placement of the table in front of the automatic door openers at the main entrance obstructs the parallel side reach to the controls. Buttons are over 28" from table edge.</p>	308.3.2		<p>Do not place anything that obstructs the automatic door buttons.</p>
5	<p>Interior double-leaf doors are set to 7lbs of opening force, which exceeds the 5lb maximum.</p>	404.2.9		<p>Adjust closures to 5lbs or less on all interior door closures. These are also on automatic door openers, but still should be able to be adjusted.</p>

6	<p>Public area kitchenette sink lacks the clear floor space for knee and toe clearance. While an exception allows for parallel approach, given the use of this facility and the position of the sink against an angle, the Town should consider providing forward approach.</p>	606.2		<p>Replace cabinet under sink with a new cabinet meeting the requirements of section 306. <i>This is not a requirement but a recommended alteration.</i></p>
7	<p>Men's restroom off lobby:</p> <p>Door closers set to 9lbs of opening force.</p> <p>Inside of door lacks the 18" required clear floor space on latch side of door. Additionally, trash cans are placed in the corner creating a further obstruction.</p> <p>Toilet paper dispenser is not located within the required 7-9" from front of toilet.</p>	<p>404.2.9</p> <p>404.2.4.1</p> <p>604.7</p>		<p>Adjust closers to 5lbs or less.</p> <p>Cannot be fixed without major alteration. Consider installing automatic door opener as a mitigation.</p> <p>Relocate dispenser.</p>

<p>8</p>	<p>Unisex restroom off rear hallway</p> <p>Toilet paper dispenser is not located within the required 7-9" from front of toilet.</p> <p>Coat hook is located at 60" outside of reach range.</p>	<p>604.7</p> <p>603.4</p>		<p>Relocate dispenser.</p> <p>Add second coat hook within 48" reach range.</p>
----------	--	---------------------------	---	--



9	Curb ramp at walkway intersection at southeast corner of building has a slope 9.8% and cross slope at landing of 4%.	405.2, 405.3		Reconstruct ramp.
10	Northwest ramp at walkway has 9% running slope exceeding 6" rise;	405.2		Reconstruct as ramp, or grade back to achieve 5% max slope.



11	Walkway/curb ramp before parking lot has excessive slope and exceeds 6% running slope for a rise greater than 6".	405.2		Reconstruct curb ramp and at least one adjacent slab to create a 5% or less running slope. This will allow it to not be considered a ramp, but a walkway.
----	---	-------	--	---


8.5.5 Fire Department

Address	39 Worcester Street
Building Area (sq.ft.)	4,290 sq.ft.
Site (acres)	3 acres
Date of Original Construction	1958
Dates/Description of Renovations/Alterations	Last interior remodel work for which a permit was pulled was in 2007.
Date of Audit	12/14/2021
Jurisdiction/Applicable Standards	1991 Standards
Description of Use	Administrative offices, living quarters for on-duty staff, vehicle/apparatus bays. Small customer service lobby/counter with public restroom.
Maximum Occupancy	N/A
Parking Spaces	3 (1 marked as accessible that is non-compliant)
Number of Floors	2
Elevator/Lift?	No

#	Barrier to Access	Reference	Photo	Corrective Action
1	Lack of accessible route from right-of-way, parking, and any other elements on the site. Walkway connecting to DPW facility slopes in excess of 15%.	4.3.2		Regrade and construct accessible route from road.

2	<p>No accessible parking space. Slopes exceed 5% in all directions; and lacks compliant signage.</p>	<p>4.6.3 4.6.4</p>		<p>Regrade accessible spaces. Install signage and stripe space/access aisle.</p>
3	<p>Entrance door landing does not meet maximum 2% level, existing at 3%</p> <p>Placement of ash urn obstructs maneuvering clearance.</p>	<p>4.13.6</p>		<p>Replace slab at entrance to achieve level landing.</p> <p>Remove ash urn.</p>

4	Customer service counter, at 43", exceeds the maximum height at 36"	7.2		
5	Various items (sanitizer dispenser, police call button, brochures, etc..) all are mounted above the 48" maximum reach height.	4.34.3		

6	<p>Public Restroom is not accessible due to:</p> <p>Clear width of door is 28"</p> <p>Supply and drain pipes at lavatory are not insulated.</p> <p>Mirror is mounted too high at 45"</p> <p>No grab bars are provided</p> <p>Clear floor space and room width is not provided.</p> <p>Signage not provided on latch side of door.</p>	<p>4.19.4</p> <p>4.19.6</p> <p>4.17.6</p> <p>4.46.2/4.17.3</p>		<p>Relocate all movable fixtures to provide the maximum amount of barrier removal. Otherwise, this room will have to be reconstructed to gain sufficient space to make accessible under 2010 Standards.</p>
---	---	--	--	---



8.5.6 Department of Public Works

Address	35 Worcester Street
Building Area (sq.ft.)	4,290 sq.ft.
Site (acres)	3 (shared with Fire)
Date of Original Construction	1942
Dates/Description of Renovations/Alterations	No interior renovations on record.
Jurisdiction/Applicable Standards	1991 Standards.
Date of Audit	12/14/2021
Description of Use	Administrative offices on second floor, shop/garage space on first; no public access to building. Most services offered online, but a doorbell is provided if curbside customer service is needed and staff will assist in parking lot if necessary. No accessible parking or public parking...staff/Town only. Per parcel boundaries, shares site with Fire Department.
Maximum Occupancy	N/A
Parking Spaces	12 marked; no accessible parking.
Number of Floors	2
Elevator/Lift?	No



#	Barrier to Access	Reference	Photo	Corrective Action
1	There is no accessible parking, no accessible route from right-of-way, and no accessible parking spaces within the facility.	Section 4 in its entirety.		The extent of remedial work required would be a significant and likely of little overall benefit to program access for the Town as a whole. All public facing customer service should be provided online, at an alternate accessible location, or via curbside service (most currently are). Webpages/social media feeds for and signage at this facility should be modified to redirect customers either online or to the alternate location. If curbside service is to remain an option, a van accessible parking space and accessible route connecting the parking to the front entrance where doorbell is located should be constructed.



8.5.7 Library



Address	8 Newton Street
Building Area (sq.ft.)	20,082
Site (acres)	0.42 acres
Date of Original Construction	1912
Dates/Description of Renovations/Alterations	Addition in 1999 Interior remodeling completed in 2007 and 2017. Exterior site work (curb ramps, some sidewalk repairs) completed in last 10 years.
Jurisdiction/Applicable Standards	2010 Standards; Given that most of the noted issues would trigger other requirements as well as the use of the building, 2010 standards were relied upon to conduct this audit. Items are cited with 2010 code reference, but in most cases, the 1991 standard was the same.
Date of Audit	
Description of Use	Most of building is public use typical of libraries; administrative offices and circulation work space not open to public. Basement has a special program room, accessed for both inside and outside. 3 rd floor is children's library.
Maximum Occupancy	240
Parking Spaces	20 on-street spaces, with 2 marked for accessible use (non-compliant). These spaces are general public use and not assigned specifically to the Library and are located on public rights-of-way.
Number of Floors	3
Elevator/Lift?	Yes
Notes/Comments	The main entrance is not accessible. A non-compliant ramp is provided on the west side of the building. Given the other accessibility issues (parking/lawn, site arrival to Central, main entrance handrails) and need to replace the existing HVAC (required more space than exists, adjacent to existing ramp), the Town should consider a larger and more comprehensive project to address the site and building access issues rather than a piecemeal approach.



#	Barrier to Access	Reference	Photo	Corrective Action
1	<p>Accessible parking.</p> <p>Space abut railing, preventing deployment of wheelchair lift or access from passenger side of vehicle.</p> <p>Signage installed under 60" and not located at head or foot of parking space.</p> <p>Since parking is in the right-of-way, this is advisory only.</p>	<p>PROWAG R309.2</p> <p>R211.4</p> <p>2010 Standards – 502.6</p>		<p>Given the property boundaries to the northwest, the location of the library open space, and the need to address access to the lawn (as programming is conducted there), the Town should consider constructing a wide sidewalk and turnout parallel space/access aisle complying with R309.2.1. Based on R214, only a single parking space is required. Given the nature of the facility, it is highly advised that parking be addressed as part of the site even though it is in the right-of-way. Cost would be negligible for those aspects requiring work in ROW (signage, striping) and other work is required to meet obligation for site arrival point.</p>
2	<p>No direct accessible route to Central Street.</p>	<p>206.2.1</p>		<p>Construct accessible ramp/walkway. Given parking issue noted in #1 above, consider constructing an additional accessible space on Central Street and reworking lawn/site access and arrival points. This would allow accessible parking on both sides of road and accommodate vehicles/wheelchair lifts from both directions of travel.</p>
3	<p>Handrails on Central Street stairs do not extend the full depth of lower tread.</p>	<p>505.10.3</p>	<p>See picture above.</p>	<p>Replace handrails.</p>



4	Crack/gaps at stairs create trip hazard (Central Street stairs)			Patch cracks.
5	Patio area lacks access. Per staff, programming occurs regularly on the lawn area, so this space should have full access.	206.2.2		Construct walkway from level of main walkway to patio area. There is a level slab west of the area pictured that would allow compliant cross slope.



<p>6</p>	<p>Handrails at main entrance:</p> <p>Do not extend 1 tread depth beyond top and bottom tread.</p> <p>Do not meet the cross-section standards.</p>	<p>505.10</p> <p>505.7</p>		<p>Replace handrails.</p>
<p>7</p>	<p>Vertical level change at street and crosswalk exceeds ¼" at Central Street Crosswalk</p>	<p>PROWAG R302.7.2</p>		<p>Grind or patch asphalt as required.</p>


8	<p>Excessive cross slope on west curb ramp, south of accessible parking. (2.7%)</p>	404.3		Reconstruct sidewalk section.
9	<p>Ramp on west side providing wheelchair access entrance is not compliant:</p> <p>Slopes (running) up to 9.8%, exceeding 8.33% max.</p> <p>Landing at top slopes 3.5%</p> <p>Handrails do not extend onto landings.</p> <p>Handrails are under 34" high</p> <p>Handrail space between rail and wall is under 1.25" at inside corners.</p>	<p>405.2</p> <p>405.7</p> <p>505.10.1</p> <p>505.4</p> <p>505.5</p>		Reconstructing this ramp may not be possible within the space available. If a survey/design results in continued non-compliance, consider relocating ramp to main entrance as part of a larger project.

10	<p>Men's 1st floor bathroom:</p> <p>Lavatory hot water supply pipes lack insulation</p> <p>Toilet flush lever is on wrong side</p> <p>Toilet paper dispenser is mounted inside the 7" minimum front of toilet.</p>	<p>605.5</p> <p>604.6</p> <p>604.7</p>		<p>Install pipe insulation</p> <p>Replace toilet tank</p> <p>Move toilet paper dispenser to 7-9" from center.</p>
11	<p>Women's 1st floor bathroom:</p> <p>Pipe insulation is missing from one lavatory</p> <p>Coat hook is not provided within reach range</p> <p>Latch-side clearance of 18" on door is obstructed by lavatory counter.</p> <p>Stall width is 55", under the 60" required minimum.</p> <p>Handle is on wrong side of toilet</p> <p>Soap dispenser is outside the 48" max reach range.</p>	<p>605.5</p> <p>603.4</p> <p>404.2.4.1</p> <p>604.3.1</p> <p>604.6</p> <p>308.2</p>		<p>The restroom is set up as multiple user. Staff states it is typically used as a single user, and the door has a thumb lock. Consider converting this to single-user and address the other deficiencies. This will address the stall width and allow space for the lavatory to be relocated to allow proper latch-side clearance for the door.</p> <p>Staff should consider making each public bathroom unisex and single user. This has the added benefit of allowing caregivers of the opposite sex easier access to assist disabled individuals.</p>

12	<p>Exterior entrance to public meeting space in basement (accessed from Central Street) is not accessible due to size and condition of drainage grate. Gaps exceed ½". This entrance is used for public meetings, often during non-business hours.</p>	302.3		<p>Repair concrete, replace grates with new ones that have openings less than ½"</p>
13	<p>Women's Basement Restroom</p> <p>One lavatory is missing pipe insulation.</p> <p>Towel dispenser lever is 53" AFF.</p> <p>Stall door lacks functional self-closing hinges</p> <p>Diaper changing station is too high, requiring reach of 54" to open, and surface is 43" from ground.</p>	<p>605.5</p> <p>308.2</p> <p>604.8.1.2</p> <p>902.3</p>		<p>Insulate pipe.</p> <p>Lower dispenser to place top of lever at 48" max</p> <p>Install self-closing hinges</p> <p>Lower station to place top of handle below 48" and work surface between 28"-34". Since the grab bar interferes, it may require moving this outside the stall or eliminating it, or providing an accessible one in another bathroom (with signage advising where to find).</p>

14	<p>Men's Basement Restroom</p> <p>Diaper changing station is too high, requiring reach of 54" to open, and surface is 43" from ground.</p> <p>Towel dispenser lever is 53" AFF.</p> <p>Lavatory is missing pipe insulation.</p>	<p>902.3</p> <p>308.1</p> <p>308.2</p>		<p>Lower changing station.</p> <p>Relocate dispenser</p> <p>Insulate pipes.</p>
15	<p>Girls Bathroom in Children's Area (3rd Floor)</p> <p>Lavatory is missing pipe insulation.</p> <p>Toilet height does not meet standard for children's use (advisory only for audit as this standard was not in place when constructed)</p> <p>Diaper changing station, at 36", is above the 34" max for work surfaces.</p> <p>Toilet is missing side wall grab bar</p> <p>Coat hook at 60" above 48" reach range (36"-44" for children)</p> <p>Stall is 59" wide, short of the 60" minimum</p> <p>Toilet flush lever is on wrong side</p>	<p>605.5</p> <p>605.9</p> <p>902.3</p> <p>604.5</p> <p>308.1</p> <p>604.3.1</p> <p>604.6</p>		<p>Install pipe insulation</p> <p>Replace with child-sized toilet</p> <p>Lower station</p> <p>Install grab bar</p> <p>Install additional hook meeting child reach ranges (between 20-36" meets all ages)</p> <p>Widen partition (low priority)</p> <p>Replace tank</p>

<p>16</p>	<p>Boys Restroom in Children's Area (3rd Floor)</p> <p>Towel dispenser lever, at 54", is above 48" max (adult) and 40" max (ages 5-8)</p> <p>Coat hook is not provided for wheelchair users</p>	<p>308.1</p> <p>308.1</p>		<p>Relocate dispenser</p> <p>Install additional coat hook under minimum for children (depends on age...see chart 308.1)</p>
<p>17</p>	<p>Drinking Fountain is not provided for standing persons. (hi/lo unit). Also presents a protruding object barrier.</p>	<p>602.7/211.2</p>		<p>Replace unit with combination unit.</p>

18	Handrails in stairwell in addition do not provide top extension of 12"	505.10.2		
----	--	----------	--	--




8.5.8 West Boylston Middle/High School

Address	125 Crescent Street
Building Area (sq.ft.)	93,606
Site (acres)	8.4 acres
Date of Original Construction	1958
Dates/Description of Renovations/Alterations	1996 addition/renovation Media center/wing added in 1977
Date of Audit	3/14/2022
Description of Use	High School and Middle School classrooms; district administrative offices; multiuse athletic fields including for Town use.
Maximum Occupancy	2,086 (auditorium=508; stage=70; cafeteria=220; classrooms=675; gym=508; exercise room=508; library=70)
Parking Spaces	Northwest lot 46 spaces (+1 HC); Main drive 19 (+2 HC); Lower front 52; Student lot 53 (no HC)
Number of Floors	1
Elevator/Lift?	no




#	Barrier to Access	Reference	Photo	Corrective Action
1	Site arrival points from Crescent Street at southeast end lack a compliant accessible route. Excessive running slopes (up to 10%%) on southeast walkway to main entrance; crosswalk cross slope exceeds 3.5%; cross slopes on walkway exceed 3% in many places.	206.2.1 403.3		Regrade and reconstruct the ramps, crosswalk and walkway network throughout the site. As noted below, the scope of necessary exterior site improvements to comply are significant and should be designed and constructed as a comprehensive project.




				
2	<p>Northwest crosswalk and walkway have excessive cross slope (>3%) and are deteriorated. Asphalt ramping up to concrete ramp on north end exceeds 15% on running slope and 4.5% cross slope. Cross slope on south end of cross walk before ramp exceeds 7%</p>	<p>403.3 (walkways) 405.2 (ramps)</p>		<p>See comment on #1. Site and walkway network require significant redesign and rework to achieve compliance.</p>


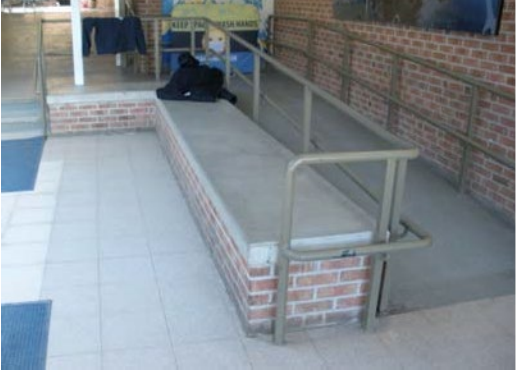
3	Walkways to rear of school on southeast corner (leading behind gym to rear entrances and upper parking lot) are deteriorated, lack turning space at changes of direction and have cross slopes exceeding 6%, running slopes exceeding 12% as it approaches student parking area.	403.3		See comment in #1. All walkways should be reconstructed. Several may require constructing as ramps due to site and building element grades.
4	Exterior doors on southeast side of building lack landings and are deteriorated and inaccessible.	404.2.4		Construct new landings connecting to accessible route as described in #1.

5	Picnic table area (also an area of refuge servicing emergency exits) lack an accessible egress route to sidewalk network.	206.2.2		
6	Picnic tables lack accessible seating, and the placement does not allow for maneuvering or accessible route between and amongst tables.	226.1		Replace or modify tables to provide at least 5% of total seating for wheelchair use. Reposition tables to allow for at least 36" between each unit to provide route and t-shaped turning space at all intersections.
7	<p>Northwest Parking Lot:</p> <p>Accessible space is noncompliant...slopes exceeding 4-5% in all directions, including access aisle.</p> <p>Signage at 52" above floor</p> <p>Width tapers to 94", below 96" minimum. Access aisle does not provide van accessibility.</p> <p>46 spaces total, requiring 2 spaces. Only one space is marked.</p>	502		Regrade and restripe to provide parking per Section 502 and meeting the scope requirements found in 208.2. Spaces should be dispersed as possible in each lot.




8	<p>Walkway from northwest lot to main entrance:</p> <p>Cross slopes exceeding 7.5%</p> <p>Abrupt changes in level exceeding 1" due to sidewalk settling and heaving.</p>	403.3		See #1. Regrade and reconstruct sidewalks.
9	Picnic tables and benches lack accessible seating and accessible route amongst and between them.	226.1		Modify, replace or add new accessible tables to achieve minimum 5% accessible seating and 36" spacing.
10	<p>Front drive parking area:</p> <p>19 spaces + 2 marked</p> <p>Asphalt is deteriorated.</p> <p>Signs at 52-54" high; no van accessible space signed.</p> <p>Slopes exceed 3-5%</p>	502		



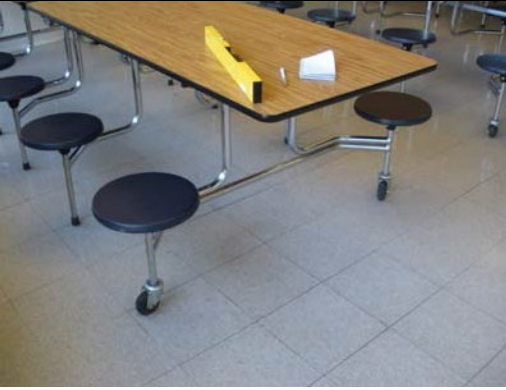
11	<p>Designated accessible drop-off/pick-up area:</p> <p>Running slope on ramp approach exceeds 11% and rises over 8" with a cross slopes on adjacent walkways of 5-7%.</p> <p>Surface has severe deterioration.</p>	405		
12	<p>Main entrance:</p> <p>Lacks curb ramp at crosswalk</p> <p>Cross and running slopes in front of and leading to main entrance exceed 5% in several areas.</p> <p>Entrance doors lack a 60" level maneuvering space.</p>	403.3 404.2.4		See comment for #1. As the primary entrance and path of travel from the accessible parking area and drive, a ramp is required.
13	<p>Main walkway from gym/fields to main entrance – excessive running slope at 8.2% for a total rise of over 40". Max permitted for walkway is 5%; 8.33% is permitted for a ramp but then would require edge protection and railing and max rise cannot exceed 30" without landing.</p>	403.3		See comment above.




14	Stairs to lower parking area from entrance drive –do not extend 12”	505.10.2		
15	<p>Student parking lot:</p> <p>53 spaces, 1 non-compliant HC space.</p> <p>No access aisle or signage.</p> <p>No accessible route connecting parking lot to any other site elements.</p>	502		<p>Regrade and restripe to provide parking per Section 502 and meeting the scope requirements found in 208.2. Spaces should be dispersed as possible in each lot.</p>
16	<p>No accessible routes connecting any of the school’s athletic fields or outdoor elements.</p> <p>Bleachers at football/multi-use field are not accessible and have no route to access them.</p> <p>There is a paved route from Crescent Street, but running slopes exceed 11%, cross slopes exceed 3% and the pathway is deteriorated.</p>	206.2		<p>See comment in #1. While there are exceptions for area of sport play, all viewing areas, tables, concession stands, and restrooms are required to be connected to parking areas, the public rights-of-way and accessible building entrances.</p>


				
17	<p>Interior ramps at main lobby:</p> <p>Slopes ranging from 8-9.6% exceeding the 8.33% maximum.</p> <p>47" turning space at change in direction.</p> <p>Security gates obstruct handrails.</p> <p>Handrails at 33" high. Min is 34"</p>	<p>405.2</p> <p>405.7.4</p> <p>505.3</p> <p>505.4</p>		<p>Ramps should be reconstructed, or it should be demonstrated that it would be technically infeasible to achieve compliance due to available space and existing interior grades.</p> <p>Handrails should be replaced if ramp is reconstructed. If not, evaluate feasibility of modifying existing.</p>


	Signage/banner placed in ramp obstructs turning space.			
18	Ramp leading from front entrance ramps to main hall/library/auditorium has slopes ranging from 8.4% to 9.3%, exceeding the 8.33% maximum.	405.2		An architect or engineer would need to determine whether reconstruction of this ramp is technically and financially feasible.

19	Upper and lower ramps in hallway to Art wing have running slopes ranging from 9-10%.	405.2		An architect or engineer would need to determine whether reconstruction of this ramp is technically and financially feasible.
20	Ramp to Northwest wing has a running slope of 10.3%. Handrails do not extend to the landing at the bottom of ramp.	405.2 505.10.1		An architect or engineer would need to determine whether reconstruction of this ramp is technically and financially feasible. Handrails should be extended 12" from start of landing at bottom.
21	Main office counter: Height at 41", above maximum height of 36"	904.4		Counter should be modified to lower to 36" maximum for a minimum length of 36" for parallel approach. It is recommended to modify for forward approach with knee/toe clearance complying with 904.4.2.

22	<p>Auditorium:</p> <p>Aisle ramps taper from 11.1% (top) to 2% (bottom).</p> <p>No accessible seating (wheelchair spaces or companion seating) is provided in the auditorium.</p>	<p>405.2</p> <p>221.2</p>		<p>It may be possible to remove one or more rows of the rear seating to provide a wheelchair accessible seating area. An architect should evaluate the feasibility of this alternative. This should be done in conjunction with stage improvements noted below.</p> <p>For additional guidance specific to auditoriums, see 28 CFR 35.151 (g)4.</p>
23	<p>Auditorium stage does not provide wheelchair access. There is not a ramp or lift to access the stage from inside the auditorium, and the side door from the hallway leads to a section of the stage that is too narrow to provide wheelchair passage.</p>	206.2.2		<p>Stage should be reconstructed to provide to allow, at a minimum, sufficient width to allow use of a wheelchair from the hall door. A feasibility study should be undertaken to evaluate the potential for full stage reconstruction to provide access to stage and auditorium from the side door, utilizing a lift if necessary and potentially reconfiguring seating at lower level. Note that wheelchair seating should be dispersed in the rear of the auditorium as well as the front.</p>
24	<p>Cafeteria:</p> <p>8 rectangular tables with 12 seats, 10 round with 8 seats = 176 seats total. Only rectangular tables have accessible seating (1 per end) but due to placement, only 8 accessible seats are available. 1 additional is required.</p>	<p>226.1</p> <p>308.3</p>		<p>Minor relocation of tables to free up one additional end unit.</p> <p>Relocate existing dispensers.</p>

	Napkin/paper towel dispensers at 50-52" exceed 48" max reach range.			
25	Counseling Office – placement of file cabinet obstructs required 18" latch side clearance.	404.2.4.1		Relocate file cabinet.
26	Health Office - placement of table obstructs required 18" latch side clearance.	404.2.4.1		Relocate table.

27	<p>Health Office Restroom:</p> <p>Lavatory pipes lack insulation</p> <p>Trashcan placement obstructs clear floor space next to toilet.</p> <p>At 16", latch-side clearance to door from lavatory does not meet 18" minimum.</p> <p>Side grab bar at 6" off wall and extending 48" from rear wall, short of required 54".</p> <p>Table placed in front of toilet obstructs required dept (at 53").</p> <p>Coat hooks provided at top of door on hanging rack outside of</p>	<p>606.5</p> <p>604.3</p> <p>404.2.4.1</p> <p>604.5.1</p> <p>604.3</p> <p>308.3</p>		<p>Insulate pipes.</p> <p>Remove trashcan.</p> <p>Replace lavatory with a shallower unit. This is a low priority given deficiency.</p> <p>Reinstall existing grab bar.</p> <p>Remove toilet. Train staff.</p> <p>Add second hook at or below 48".</p>
----	--	---	--	---

28	<p>Boys' restroom off main wing (south):</p> <p>Toilet paper dispenser mounted too far from toilet in accessible stall.</p> <p>Door requires 7lbs of pressure to open, exceeding 5lb maximum.</p> <p>Self-closing hinges are inoperable on accessible stall.</p> <p>Toilet height is 20" at top of seat.</p> <p>Grab bars do not extend 54" from rear wall.</p>	<p>604.7</p> <p>404.2.9</p> <p>604.8.1.2</p> <p>604.9.3</p> <p>604.5.1</p>		<p>Relocate dispenser to within 7-9 inches from front of toilet.</p> <p>Adjust closer to 5lbs or less</p> <p>Replace hinges</p> <p>Install new toilet at or below 17"</p>
----	---	--	--	---


29	<p>Girls' restroom off main wing (south):</p> <p>Toilet paper dispenser mounted too close to toilet in accessible stall.</p> <p>Door requires 7lbs of pressure to open, exceeding 5lb maximum.</p> <p>Self-closing hinges are inoperable on accessible stall.</p> <p>Toilet height is 20" at top of seat.</p> <p>Grab bars do not extend 54" from rear wall.</p>	<p>604.7</p> <p>404.2.9</p> <p>604.8.1.2</p> <p>604.4</p> <p>604.5.1</p>		<p>Relocate dispenser to 7-9"</p> <p>Adjust closer to 5lbs or less</p> <p>Replace hinges</p> <p>Replace toilet with unit 17-19" above floor.</p> <p>Relocate existing grab bars.</p>
----	--	--	---	--



29	<p>Faculty Men's Restroom:</p> <p>Hot water supply line is not insulated. 606.5</p> <p>Flush valve on wrong side of toilet. 604.6</p> <p>Table is installed in front of toilet. 604.3</p>			<p>Insulate pipes</p> <p>Remove and reinstall vacuum flush valve to other side.</p> <p>If table is necessary for an accommodation request for a student or staff member, this should be documented and an alternate location should be identified with signage that directs a user to a fully accessible location.</p>
----	---	--	--	--



30 Furniture obstructing clear floor space, accessible routes, and maneuvering spaces at doors. Desk placement (room 102) (noted in other spaces as well) obstructs accessible route to faculty restroom & Faculty Women's restroom (drawer unit); classrooms (multiple)






Ensure maintenance personnel and staff are mindful of placement of furniture, trash cans and other moveable obstacles.

31	Classroom sinks (multiple) are not positioned for a forward approach with the required knee and toe clearance.	212; 606.2		Replace sink/cabinetry to provide for forward approach and the required knee and toe clearance. Where multiple sinks serve a single room, only 5% must comply.
32	H/S Wing; North side girls' restroom:			

	<p>Grab bar in accessible stall does not extend 54" from rear wall.</p> <p>Stall width is only 58" wide, less than the required 60".</p>	<p>604.5.1</p> <p>604.3.1</p>		<p>Reinstall existing grab bar.</p> <p>Available space and</p>
33	<p>H/S Wing – Faculty women’s restroom:</p> <p>Missing rear grab bar.</p> <p>Hot water supply is missing insulation.</p> <p>Flush valve on wrong side of toilet.</p> <p>Toilet height is 15 1/2" from floor, under minimum height of 17"</p> <p>Bottom of mirror is at 43.5", above the 40" max height.</p>	<p>604.5.2</p> <p>606.5</p> <p>604.6</p> <p>604.4</p> <p>603.3</p>		<p>Install grab bar.</p> <p>Insulate pipes.</p> <p>Remove and reinstall vacuum breaker/flush valve.</p>
34	<p>H/S Wing – Faculty men’s restroom:</p> <p>Missing rear grab bar.</p> <p>Hot water supply is missing insulation.</p> <p>Toilet height is 15 1/2" from floor, under minimum height of 17"</p> <p>Bottom of mirror is at 43.5", above the 40" max height.</p>	<p>604.5</p> <p>606.5</p> <p>604.4</p> <p>603.3</p>		<p>Install grab bar.</p> <p>Insulate pipes</p> <p>Replace toilet.</p> <p>Reinstall mirror to 40" max.</p>

35	<p>HS Wing – Boy’s restroom:</p> <p>Missing signage</p> <p>Self-closing hinges on accessible stall inoperable</p>	<p>216.2</p> <p>604.8.1.2</p>		<p>Install new sign.</p> <p>Replace hinges</p>
36	<p>HS Side, 300 Block - Emergency egress has excessive slope on walkway; walkway has cracks and is deteriorated.</p>	403.3		<p>See comment in #1.</p>




<p>37</p>	<p>HS Side, 400 Block Gender neutral accessible restroom:</p> <p>Furniture blocks clear floor space to toilet.</p> <p>Missing insulation on drain and supply pipes.</p> <p>Latch-side clearance on door is 8", less than the 18" required.</p> <p>Grab bar extends 48" from rear wall, less than the 54" required.</p>	<p>606.5</p> <p>404.2.4.1</p> <p>604.5.1</p>		<p>Remove furniture. Train staff.</p> <p>Insulate pipes.</p> <p>Install a shallower sink to provide the maximum accessibility; unlikely to achieve full compliance.</p> <p>Remove and reinstall existing grab bar.</p>
<p>38</p>	<p>Media Center – Work counters lack knee and toe clearance; since these are the only work tables with outlets for student laptops, etc, they are required to be accessible.</p>	<p>902.2</p>		<p>Either modify these counters to provide knee and toe clearance for 5% of units, or provide permanent outlets to other seating that is accessible.</p>

39	Protruding objects – fire extinguishers (multiple in building) extend 5-5 1/2” in hallways, exceeding the maximum protrusion of 4”.	307.2		Install units that are recessed; alternatively, provide cane detectable element below any protrusion that cannot be relocated.
40	No accessible parking onsite. See comments addressing each separate lot above.	208.1		Based on number of parking spaces in each lot, northwest lot requires 2 spaces (1 van accessible); Main lot requires 3 spaces (1 van accessible) and student lot requires 3 spaces (1 van accessible). Grading and accessible routes are problematic, so consultation with a civil engineer and architect is advised.

8.5.9 Major Edwards Elementary School



Address	70 Crescent Street
Building Area (sq.ft.)	49,752
Site (acres)	8.2 acres (including Pride Park)
Date of Original Construction	1930
Dates/Description of Renovations/Alterations	Addition in 1996.
Date of Audit	3/14/2022
Description of Use	Classroom and administrative uses typical of elementary school; Site includes a 6-12Y and 2-5Y playground, which are open to public during non-school hours. 2-5Y (toddler) play area is available during school hours and separated by gate/fence.
Maximum Occupancy	1,370 (gym=450; cafeteria=200; 1 st floor classrooms=530; 2 nd floor classrooms=90; basement classrooms=30; library=70)
Parking Spaces	45 in main lot (+5 NC accessible spaces); 12 marked spaces in rear/side.
Number of Floors	3
Elevator/Lift?	Yes; elevator serving classroom wing and lift in auditorium/gym.


#	Barrier to Access	Reference	Photo	Corrective Action
1	Ramps at crosswalk have significant slopes, with one section exceeding 22%, (max allowed 8.33%), are deteriorated, and have multiple and abrupt changes in level.	406, 405.2		Reconstruct curb ramps.




2	Main walkway leading from street has multiple cracks exceeding 1", abrupt level changes and cross slopes at 2.2-2.9% that exceed the 2% maximum. This section also has an 18" drop-off with no edge protection or railings.	403.3		Reconstruct walkway; considering the scope of the deficiencies on all walkways, curb ramps and accessible routes to parking and building entrances, it is very unlikely that any of these repairs can be completed without impacting the slopes and design of the overall walkway system. It is recommended that a full site grade survey be completed and a qualified architectural/engineering consultant be engaged to design a comprehensive scope of work.
3	Walkway leading to play areas and rear of building has multiple depressions creating cross slope issues, as well as cracking and settling.	403		Reconstruct walkway. See comment in #2 above.
4	Curb ramp is severely deteriorated, lacks a level landing at the top and restricts the adjacent sidewalk cross slope and accessibility.	406.4		Reconstruct ramp as a parallel ramp allowing level passage from drive to walkway.




5	Double doors (#1) lack 10" smooth surface on push side of door.	404.2.7		Replace doors; may consider installing automatic opener.
6	Walkway to playgrounds has excessive running slope (>10% at gate area), cross slopes greater than 2% and numerous areas of heave/settling, cracks and deterioration.	403.3		Regrade and reconstruct walkway in coordination with Pride Park Playground project.



7	<p>Walkway leading to rear of classrooms has excessive cross slopes, areas of settling and deterioration. None of the classroom exit doors have the required level landing (at 4-5%), and door ramps lack maneuvering space. The last door lacks connectivity to walkway.</p>	403.3, 404.2		See comment in #2 above.
---	---	--------------	---	--------------------------



<p>8</p>	<p>Designated accessible parking spaces:</p> <p>No spaces meet the required 2% max slope in all directions.</p> <p>Signage is too low at 50-54" above ground.</p> <p>Spaces 3, 4 and 5 (from south to north) lack an accessible route to the entrance.</p> <p>Asphalt is cracking and deteriorated.</p> <p>No van accessible space provided and no spaces have striped access aisles.</p>	<p>502.4</p> <p>502.6</p> <p>502.4</p> <p>502.4</p> <p>208.2.4</p>		<p>See comment in #2 above.</p>
<p>9</p>	<p>Main entrance ramp has excessive running slope at 9.1%</p>	<p>405.2</p>		<p>See comment in #2 above.</p>



10	Fire lane signage protrudes over 5" and is less than 80" above finished floor, creating a protruding object hazard.	307.2		Raise signs
11	Sidewalk at bus drop-off area lacks a ramp and has cross slopes exceeding 4-5% (2% max). Edge is deteriorated as well. No access aisle for drop off area.	403.3		See comment in #2 above.
12	Stairs to cafeteria – handrails lack return on open side, and wall side return does not level off at floor level.	505.10.3		Reconstruct handrails.


13	Ramp to cafeteria exceeds 10% running slope (from front stairs) and 9% (to rear of building)	405.2		
14	Cafeteria tables are designed to have an accessible space at each end, but most are placed in such a way (against the support posts) to make either space usable.	226.1		Rearrange tables.
15	Drinking fountain does not meet the spout height for standing persons. Also presents a protruding object barrier (as does towel dispenser).	602.7		Install combination unit.

16	Stairwell leading to basement does not extend 12" past top tread on wall side.	505.10.2		
17	Defibrillator cabinet extends 9" from wall, creating a protruding object hazard.	307.2		
18	Gymnasium/stage: stage is served by a wheelchair lift that is blocked by storage and inaccessible. The platform was significantly out of level and did not align with landing by over 1".	410.2		<p>Have a qualified service technician evaluate lift operation and alignment and adjust as necessary. Facilities personnel should also regularly inspect the lift for operation and to ensure it is kept clear of obstructions.</p>

19	<p>Boys 1st floor restroom (south wing): At 35", rim of lavatory exceeds the 34" maximum</p> <p>Grab bar height do not meet standards for children at 34" and do not extend 54" from rear wall (at 48")</p> <p>Coat hooks at 52" exceed reach range maximum for adults or children.</p> <p>Self-closing hinges in accessible stall inoperable.</p>	<p>606.3</p> <p>604.9</p> <p>308.1</p> <p>604.8.1.2</p>		<p>Replace lavatory.</p> <p>Reinstall existing grab bars.</p> <p>Add second coat hook.</p>
20	<p>1st floor faculty restroom:</p> <p>Bottom of mirror, at 52", exceeds the maximum height of 40" from floor.</p> <p>Grab bar does not extend 54" from rear wall.</p>	<p>603.3</p> <p>604.5.1</p>		

21	<p>Girls 1st Floor restroom:</p> <p>Furniture placed in restroom obstruct clear floor space.</p> <p>Soap dispenser and paper towel dispenser, at 52", exceed 48" max for adults.</p>	308.1		<p>This may be programmatically necessary for age of children and nature of disability to provide for companion seating and use of stall. If not, remove obstructing furniture.</p> <p>Relocate dispensers to meet appropriate reach ranges for age group using table 308.1 for guidance.</p>
22	<p>Staff 1st floor restroom:</p> <p>Trash can, furnishings obstruct clear floor space around toilet.</p> <p>Water supply lines on lavatory lack insulation.</p> <p>Coat hook is outside 48" reach range maximum.</p> <p>At 55", mirror is above the 40" maximum height from floor.</p> <p>Grab bar on side wall does not extend 54" from rear wall.</p>	606.5 308.1 603.3 604.5.1		<p>Remove furniture</p> <p>Install insulation on pipes</p> <p>Add second coat hook at or below 48"</p>



23	<p>Boys second and third floor restrooms (identical):</p> <p>Accessible stall does not have self-closing hinges.</p> <p>Side grab bar does not extend 54" from rear wall (at 48")</p> <p>At 35", lavatory exceeds 34" max height. (2nd floor)</p>	<p>604.8.1.2</p> <p>604.5.1</p> <p>606.3</p>		<p>Install self-closing hinges.</p> <p>Reposition existing grab bar.</p> <p>Replace lavatory</p>
24	<p>Girls' second and third floor restrooms:</p> <p>Side grab bar does not extend 54" from rear wall (at 48").</p> <p>Door requires 15lbs of force to open. (third floor only)</p>	<p>604.5.1</p> <p>404.2.9</p>		<p>Reposition existing grab bar.</p> <p>Adjust door closer to 5lbs or less.</p>

25	<p>Nurses Station:</p> <p>Toilet room is significantly below minimum width and length.</p> <p>Doorway width for toilet room is under 28", less than the required minimum of 32"</p> <p>Sink does not have the required knee and toe clearance, nor the required maneuvering or clear floor space for forward approach.</p> <p>Space limitations prevent any configuration that allows maneuvering space for toilet room door.</p> <p>No grab bars are installed.</p>	604		
----	--	-----	--	--

8.5.10 Town Commons


Address	Intersection of Worcester/Church/Central
Building Area (sq.ft.)	
Site (acres)	
Date of Original Construction	Unknown; bandstand constructed circa 2003
Dates/Description of Renovations/Alterations	Bandstand alterations 6/20/2012
Date of Audit	7/1/2022
Description of Use	Public park/open space; events and other public passive recreation.
Maximum Occupancy	N/A
Parking Spaces	Some on-street, but no dedicated parking.
Number of Floors	N/A
Elevator/Lift?	N/A

#	Barrier to Access	Reference	Photo	Corrective Action
1	Portable restroom not located on an accessible route	213.1		Relocate adjacent to level roadway, or add surface mat to make ground level, firm and stable.

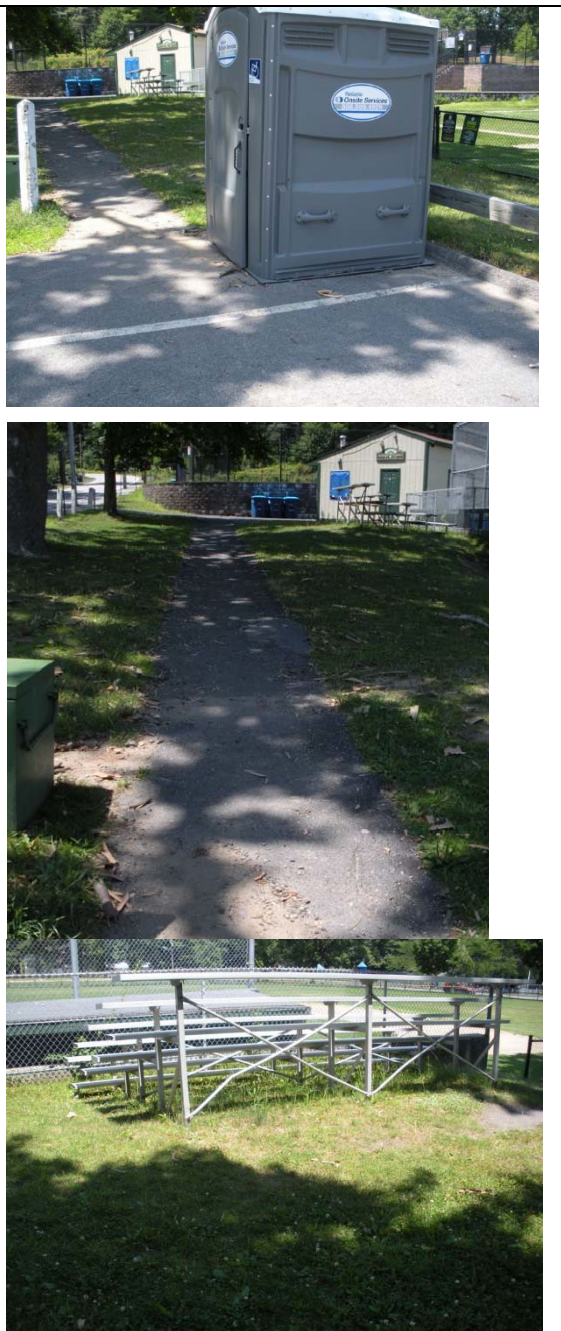
2	There is no accessible route to the benches, field space, trash cans or bandstand. Generally, there is no accessible route on the site at all.	206.2.2		Construct an accessible walkway from all public streets and sidewalks; walkway should connect bandstand and at least 5% of benches and trash cans, as well as the monument. If a portable restroom is routinely provided, the walkway should also be designed for a permanent location to place an accessible unit on the route.
3	<p>Bandstand:</p> <p>Ramp to bandstand has a running slope of 10.5%.</p> <p>Landing is 45" x 48" at top and no landing is provided at bottom.</p> <p>Handrails are non-compliant</p> <p>Stairs – treads are not uniform and have excessive height at 8". No handrails are provided with a 20" drop.</p>	<p>405.2</p> <p>405.7</p> <p>405.8</p> <p>504.2; 505</p>		<p>Reconstruct ramp in compliance with Section 405.</p> <p>Install handrails complying with Section 505.</p>

8.5.11 Goodale Park

Address	50 Goodale Street
Building Area (sq.ft.)	N/A
Site (acres)	12.0 acres
Date of Original Construction	Unknown
Dates/Description of Renovations/Alterations	No building permits listed.
Date of Audit	
Description of Use	Athletic fields, basketball courts, tennis courts, outbuilding, concession stand, bleachers.
Maximum Occupancy	N/A
Parking Spaces	41 marked, including 5 noncompliant designated accessible spaces.

#	Barrier to Access	Reference	Photo	Corrective Action
1	<p>Accessible parking non-compliant.</p> <p>2 spaces marked with paint, no signage. Slope exceeds 2%</p> <p>2 spaces signed; 1 missing access aisle.</p> <p>Lot across street, 1 space with 5% slopes, exceeding 2% max. No signage is installed.</p>	208, 502		<p>Regrade, repave and restripe lot; install compliant signage. Since grade may prevent dispersal of spaces, evaluate if there is one area that can provide all accessible parking.</p>



<p>2</p>	<p>No elements on the site have an accessible route connecting them.</p> <p>This includes the basketball courts, tennis courts, accessible portable toilet, bleachers (all), baseball field, tennis court, picnic tables, trash cans and concession stand.</p> <p>The visitor side spectator area of the baseball field does have an area suitable for wheelchairs, but does not have a compliant accessible route, and no edge protection or railing.</p>	<p>206</p>	 <p>The top photograph shows a grey portable toilet on a paved surface. The middle photograph shows a dirt path leading towards a building. The bottom photograph shows bleachers on a grassy area.</p>	<p>The complete lack of any accessible routes on this site will require a comprehensive master plan and design effort. It will be difficult to attempt to construct piecemeal improvements without the risk of having to remove them at a later date.</p>
----------	--	------------	--	---

3	The sidewalk on the right-of way is deteriorated and lacks the width to provide any site connectivity between the tennis/basketball courts and the parking/restrooms or other site elements.	206		Reconstruction of this sidewalk would allow some site interconnectivity to tennis courts and basketball courts. Since the sidewalk is on the right-of-way and not the site, the excessive slope may be permissible in order to afford some access to the courts. This would not relieve the Town of the obligation to connect all site elements via an accessible route.
---	--	-----	--	--

8.6 Public Input Survey Results

Note that the survey results are provided by a third party, and the graphs and tables are images and not accessible. The text is accessible. For details on the survey data, please see Section 6.2.2 for narrative detailing the results in an accessible form.

Town of West Boylston Accessibility Survey

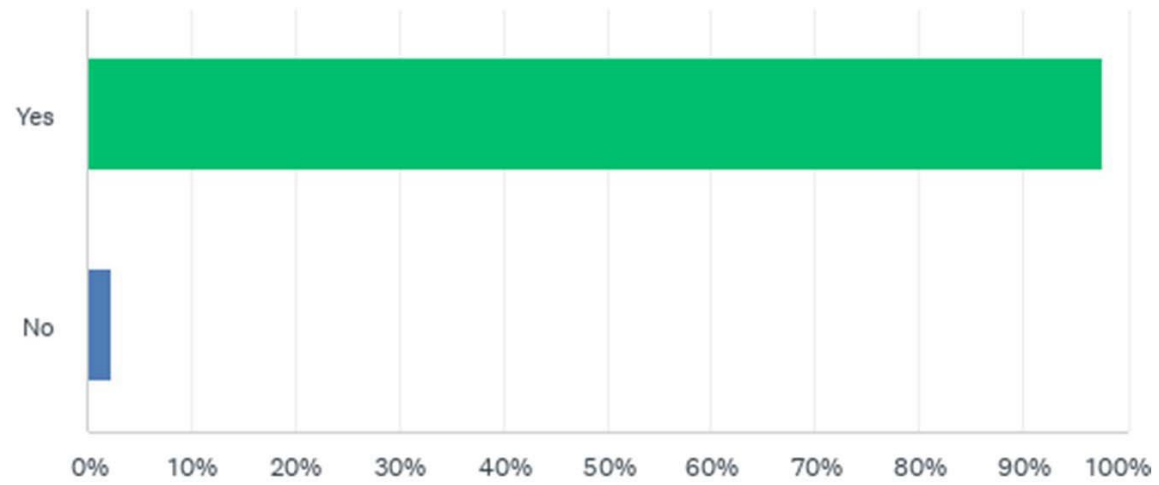
Administered October 1-31, 2021

Administered online via SurveyMonkey with paper copies available at Town facilities.

Complete Responses: 214 online, 0 paper.

Q1: Are you a resident of the Town of West Boylston?

Answered: 214 Skipped: 0



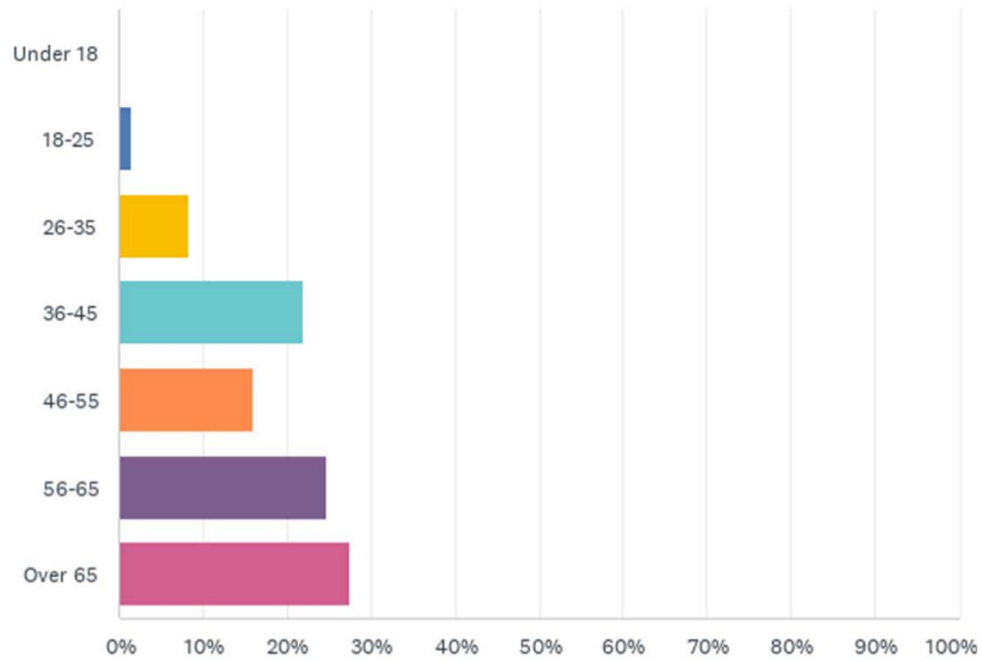
Q1: Are you a resident of the Town of West Boylston?

Answered: 214 Skipped: 0

ANSWER CHOICES	RESPONSES	
Yes	97.66%	209
No	2.34%	5
TOTAL		214

Q2: What is your current age?

Answered: 214 Skipped: 0



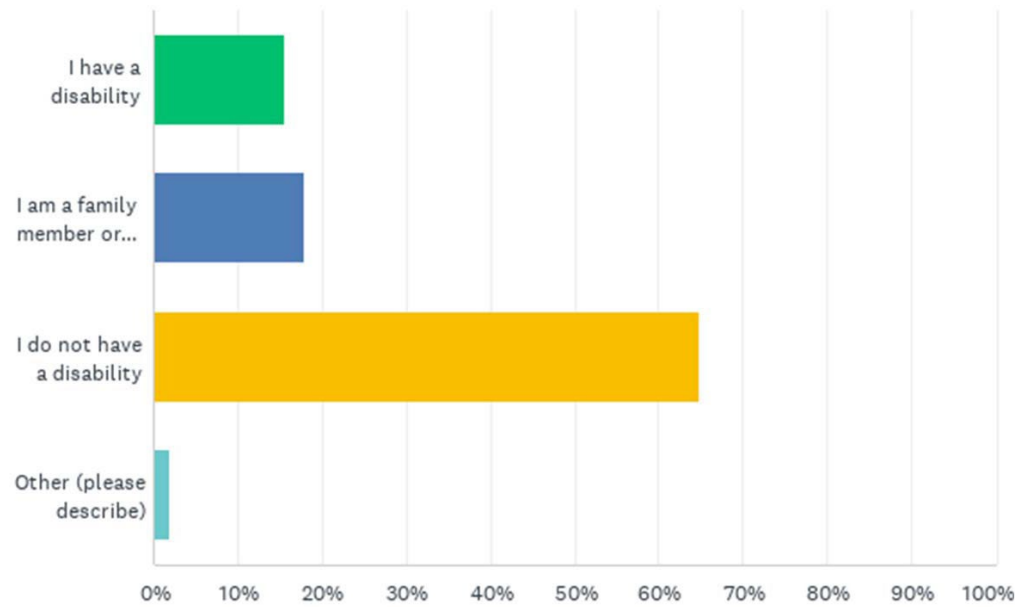
Q2: What is your current age?

Answered: 214 Skipped: 0

ANSWER CHOICES	RESPONSES	
Under 18	0.00%	0
18-25	1.40%	3
26-35	8.41%	18
36-45	21.96%	47
46-55	15.89%	34
56-65	24.77%	53
Over 65	27.57%	59
TOTAL		214

Q3: Which of the following best describes you and/or the perspective of your responses?

Answered: 213 Skipped: 1



Q3: Which of the following best describes you and/or the perspective of your responses?

Answered: 213 Skipped: 1

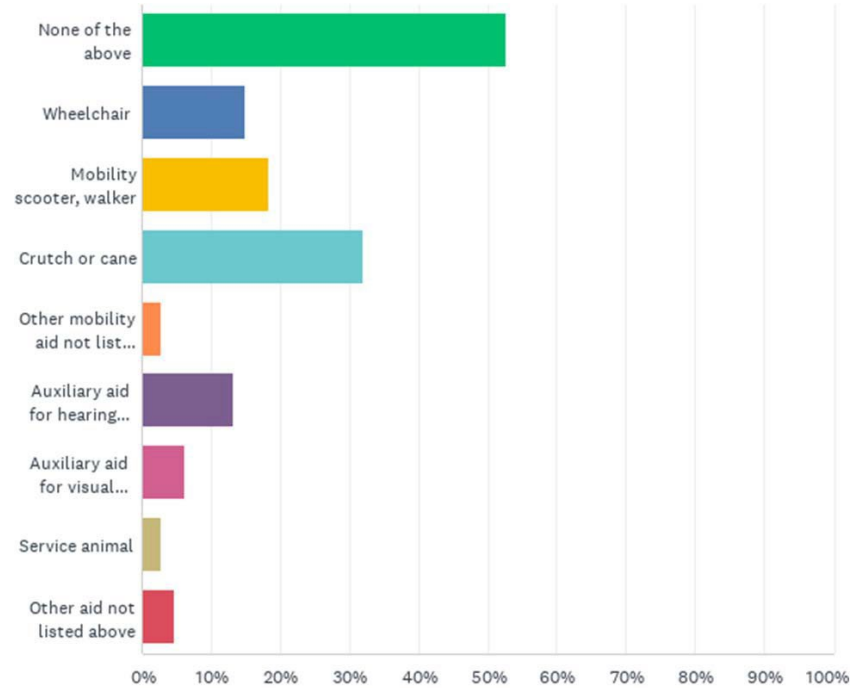
ANSWER CHOICES	RESPONSES	
I have a disability	15.49%	33
I am a family member or caregiver for a person with a disability	17.84%	38
I do not have a disability	64.79%	138
Other (please describe)	1.88%	4
TOTAL		213

Other:

- Caregiver for 89 year old mom and 90 year old father in law. 60 year old brother in law with disabilities lives with us too
- I both have a disability and am the caretaker for someone with a disability
- Retired person in 70's
- I nor any family members have disabilities

Q4: Have you or an individual for which you are the caregiver ever used any of the following (select all that apply):

Answered: 213 Skipped: 1



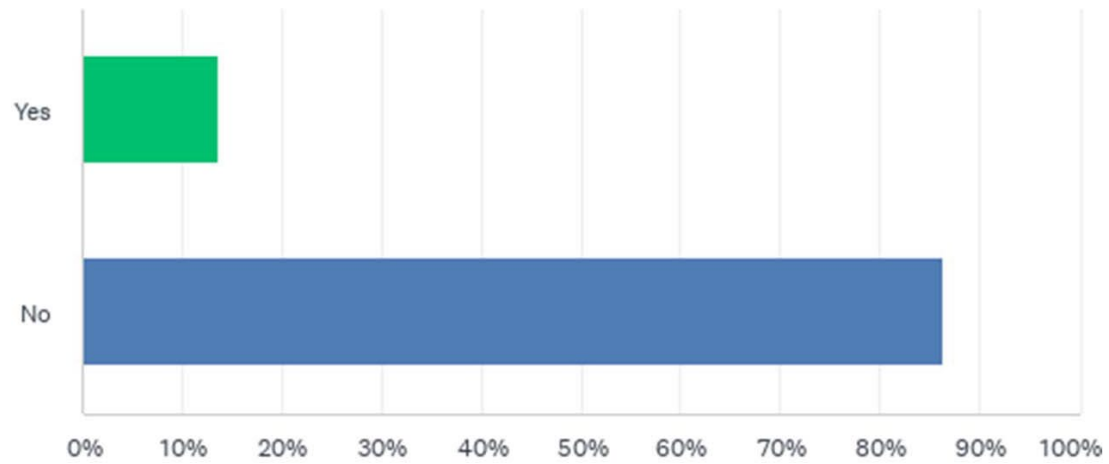
Q4: Have you or an individual for which you are the caregiver ever used any of the following (select all that apply):

Answered: 213 Skipped: 1

ANSWER CHOICES	RESPONSES	
None of the above	52.58%	112
Wheelchair	15.02%	32
Mobility scooter, walker	18.31%	39
Crutch or cane	31.92%	68
Other mobility aid not listed above	2.82%	6
Auxiliary aid for hearing impairment	13.15%	28
Auxiliary aid for visual impairment	6.10%	13
Service animal	2.82%	6
Other aid not listed above	4.69%	10
Total Respondents: 213		

Q5: Have you or an individual for which you are the caregiver ever had an issue accessing a Town facility due to a disability or physical limitation?

Answered: 212 Skipped: 2



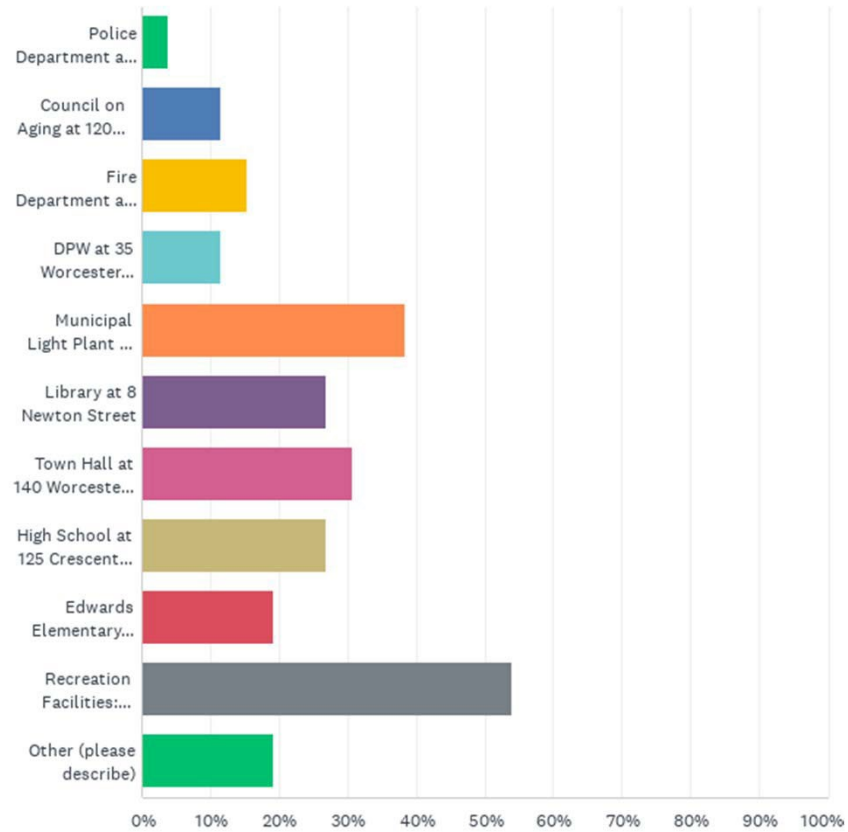
Q5: Have you or an individual for which you are the caregiver ever had an issue accessing a Town facility due to a disability or physical limitation?

Answered: 212 Skipped: 2

ANSWER CHOICES	RESPONSES	
Yes	13.68%	29
No	86.32%	183
TOTAL		212

Q6: Please select the facility or facilities where an accessibility issue has occurred (select all that apply):

Answered: 26 Skipped: 188



Q6: Please select the facility or facilities where an accessibility issue has occurred (select all that apply):

Answered: 26 Skipped: 188

ANSWER CHOICES	RESPONSES	
Police Department at 141 Sterling Street	3.85%	1
Council on Aging at 120 Prescott Street	11.54%	3
Fire Department at 39 Worcester Street	15.38%	4
DPW at 35 Worcester Street	11.54%	3
Municipal Light Plant at 4 Crescent Street	38.46%	10
Library at 8 Newton Street	26.92%	7
Town Hall at 140 Worcester Street	30.77%	8
High School at 125 Crescent Street	26.92%	7
Edwards Elementary School at 70 Crescent Street	19.23%	5
Recreation Facilities: Town Commons, Goodale Park, Pride Park and/or Woodland Park	53.85%	14
Other (please describe)	19.23%	5
Total Respondents: 26		

Q6: Please select the facility or facilities where an accessibility issue has occurred (select all that apply):

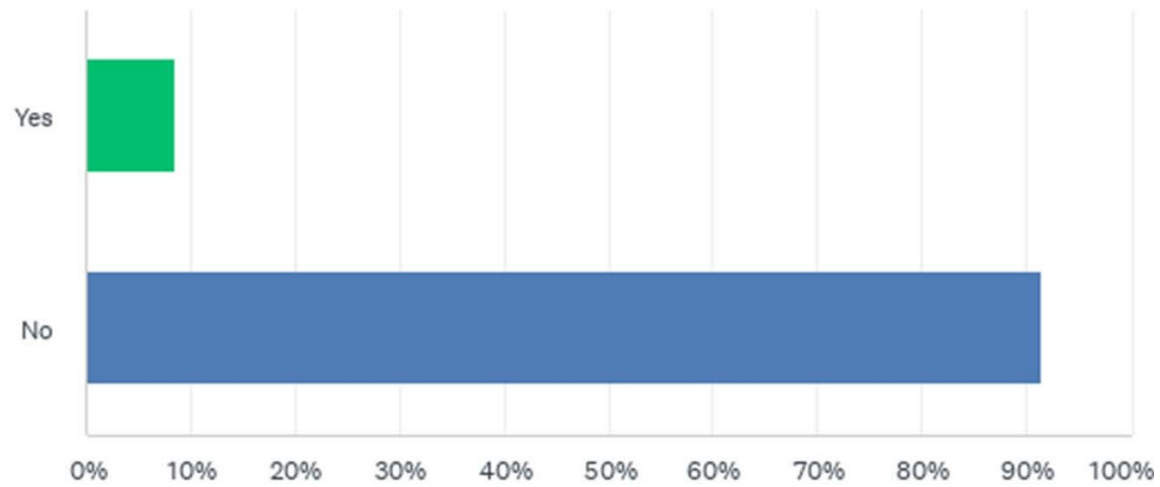
Answered: 26 Skipped: 188

Other:

- High School field for Town Meeting
 - Previous Senior Center
 - I have severe chemical sensitivities and cannot enter any building that uses air fresheners or harsh cleaners. Most places have be inaccessible to me, so I have stopped trying. The Police station was safe for me for a short visit, which was a happy surprise. With the talk of a new playground, I fear it will have rubber ground cover and this will make the playground inaccessible to me and my child.
 - Orchard Knoll Housing
 - Town meeting at field- no path, sidewalks not stable, field not accessible. meetings need to have option for people that can't attend in person even beyond covid
-

Q7: Have you or an individual for which you are the caregiver ever had an issue accessing a Town program or service due to a disability or physical limitation?

Answered: 201 Skipped: 13



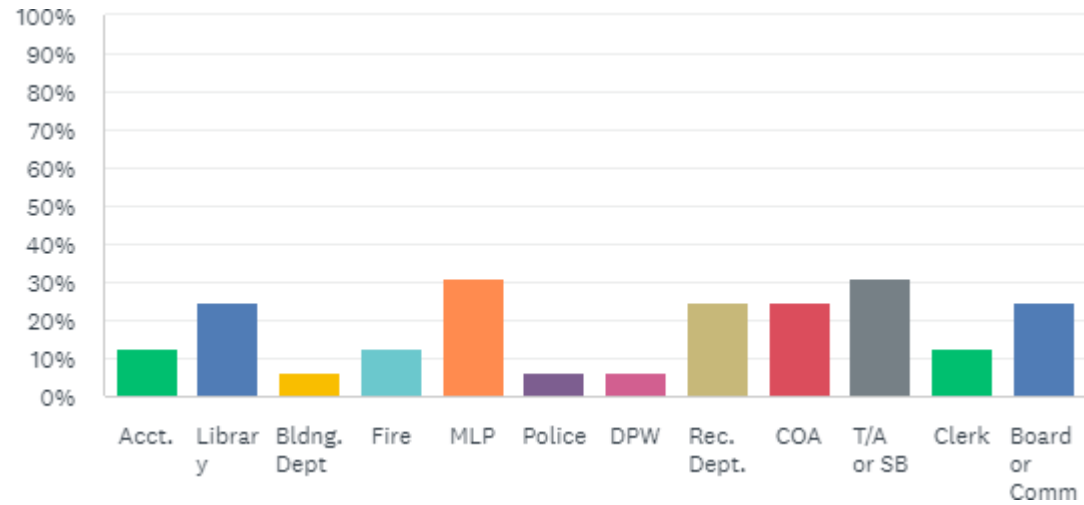
Q7: Have you or an individual for which you are the caregiver ever had an issue accessing a Town program or service due to a disability or physical limitation?

Answered: 201 Skipped: 13

ANSWER CHOICES	RESPONSES	
Yes	8.46%	17
No	91.54%	184
TOTAL		201

Q8: Please specify which department(s) offered the program or service:

Answered: 16 Skipped: 198



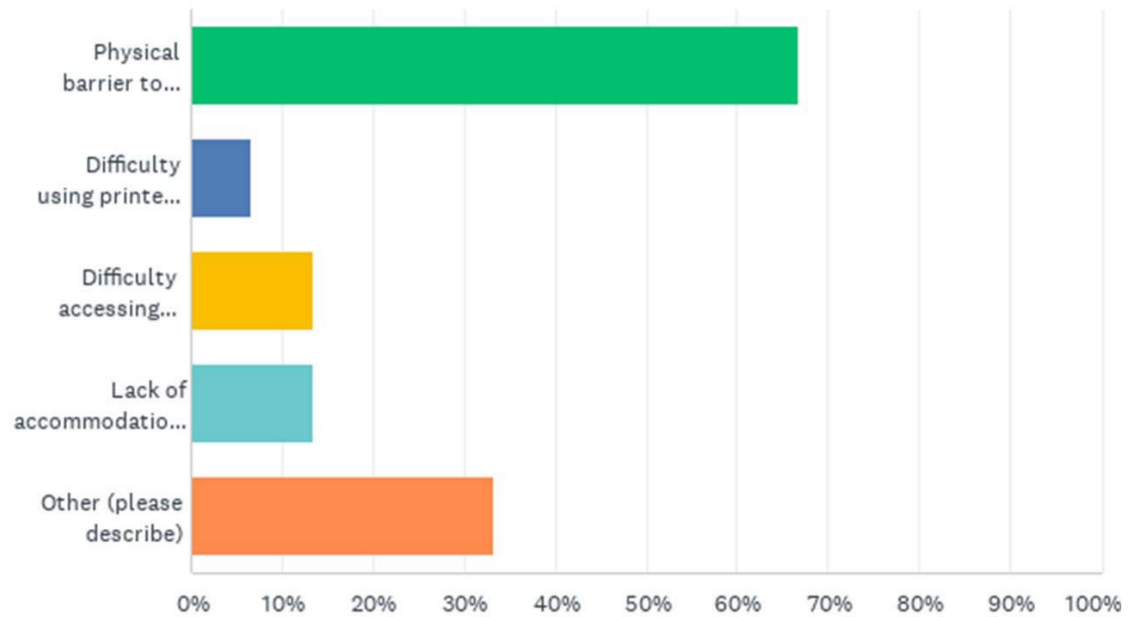
Q8: Please specify which department(s) offered the program or service:

Answered: 16 Skipped: 198

ANSWER CHOICES	RESPONSES	
Town Accountant	12.50%	2
Animal Control	0.00%	0
Assessor's Office	0.00%	0
Beaman Memorial Library	25.00%	4
Building Department	6.25%	1
Cemetery Department	0.00%	0
Fire Department	12.50%	2
Health Department	0.00%	0
Municipal Light Plant	31.25%	5
Police Department	6.25%	1
Public Works	6.25%	1
Recreation Department	25.00%	4
Senior Center	25.00%	4
Town Administrator or Board of Selectmen	31.25%	5
Town Clerk	12.50%	2
Treasurer/ Collector	0.00%	0
Veterans' Services	0.00%	0
WBPA - Public Access TV	0.00%	0
Water District	0.00%	0
Town board, commission or other unit (please specify)	25.00%	4
Total Respondents: 16		

Q9: Which best describes the reason you were unable to access the program(s) or service(s)?

Answered: 15 Skipped: 199



Q9: Which best describes the reason you were unable to access the program(s) or service(s)?

Answered: 15 Skipped: 199

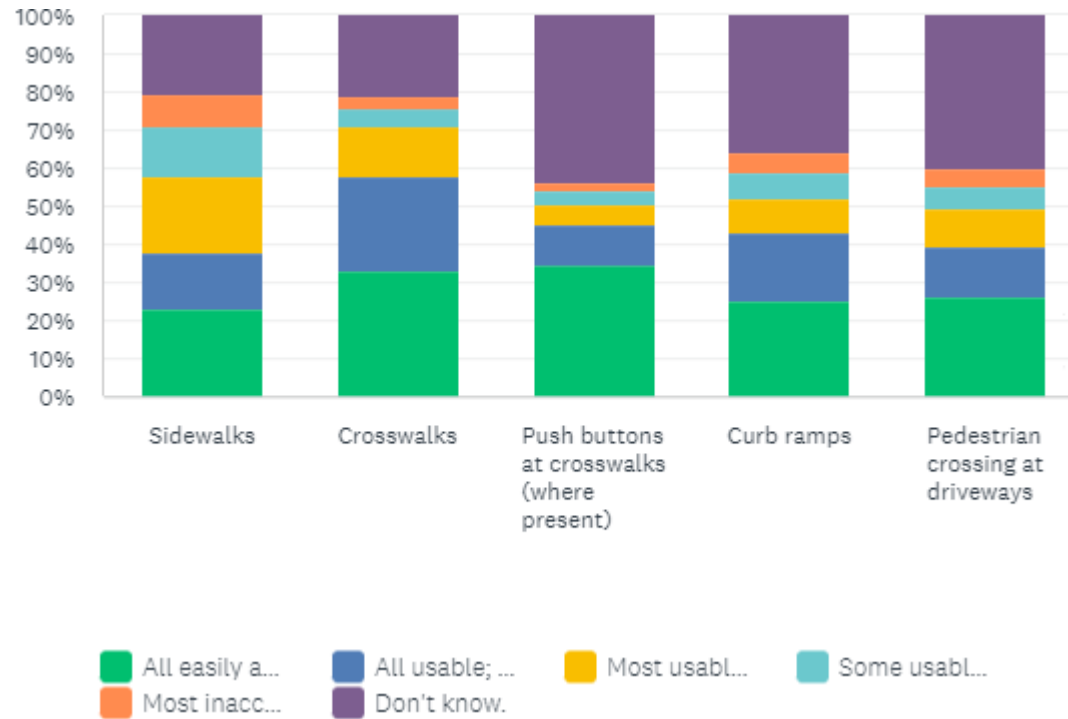
ANSWER CHOICES	RESPONSES	
Physical barrier to access, such as a lack of wheelchair access, counter height, or lack of accessible parking	66.67%	10
Difficulty using printed materials or forms	6.67%	1
Difficulty accessing online materials or services due to format, readability or other technical issue	13.33%	2
Lack of accommodations for the hearing impaired	13.33%	2
Other (please describe)	33.33%	5
Total Respondents: 15		

Other:

- Absent signs
- I am unable to go to the senior center for the town meeting as the building is so new, I fear the offgassing of building materials will make me sick. I understand there is nothing but time that will solve this problem, but it is still an accessibility barrier.
- No buttons to open doors at town hall, no access at lighting plant, no appropriate parking at high school and elementary school, playground not accessible, fields not accessible. Basketball and tennis courts don't have adequate parking and table and trash are in the space always, ramp at library isn't correct angle, programs at library on own aren't accessible due to step.
- Town administrator rolled eyes at request for accommodation
- refusal to accommodate online meeting request during COVID-19

Q10: How would you describe the ease of usage for the following pedestrian facilities in the Town:

Answered: 185 Skipped: 29



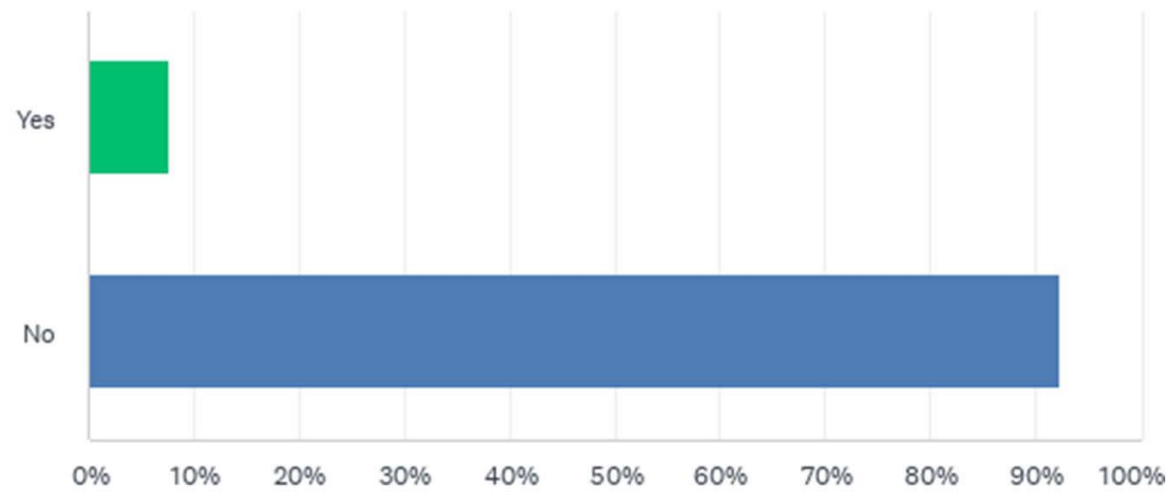
Q10: How would you describe the ease of usage for the following pedestrian facilities in the Town:

Answered: 185 Skipped: 29

	ALL ARE EASILY ACCESSIBLE.	ALL ARE USABLE BUT SOME WITH MINOR DIFFICULTY.	MOST ARE USABLE BUT SOME ARE TOO DIFFICULT.	SOME ARE USABLE BUT MANY ARE TOO DIFFICULT.	MOST ARE INACCESSIBLE/ TOO DIFFICULT TO USE.	DON'T KNOW.	TOTAL
Sidewalks	23.37% 43	14.67% 27	20.11% 37	13.04% 24	8.15% 15	20.65% 38	184
Crosswalks	32.97% 60	24.73% 45	13.19% 24	4.95% 9	3.30% 6	20.88% 38	182
Push buttons at crosswalks (where present)	34.81% 63	10.50% 19	4.97% 9	3.87% 7	2.21% 4	43.65% 79	181
Curb ramps	25.27% 46	18.13% 33	8.79% 16	6.59% 12	5.49% 10	35.71% 65	182
Pedestrian crossing at driveways	26.37% 48	13.19% 24	9.89% 18	6.04% 11	4.40% 8	40.11% 73	182

Q11: Have you or an individual for which you are the caregiver ever made a request to the Town for an accommodation related to a disability?

Answered: 184 Skipped: 30



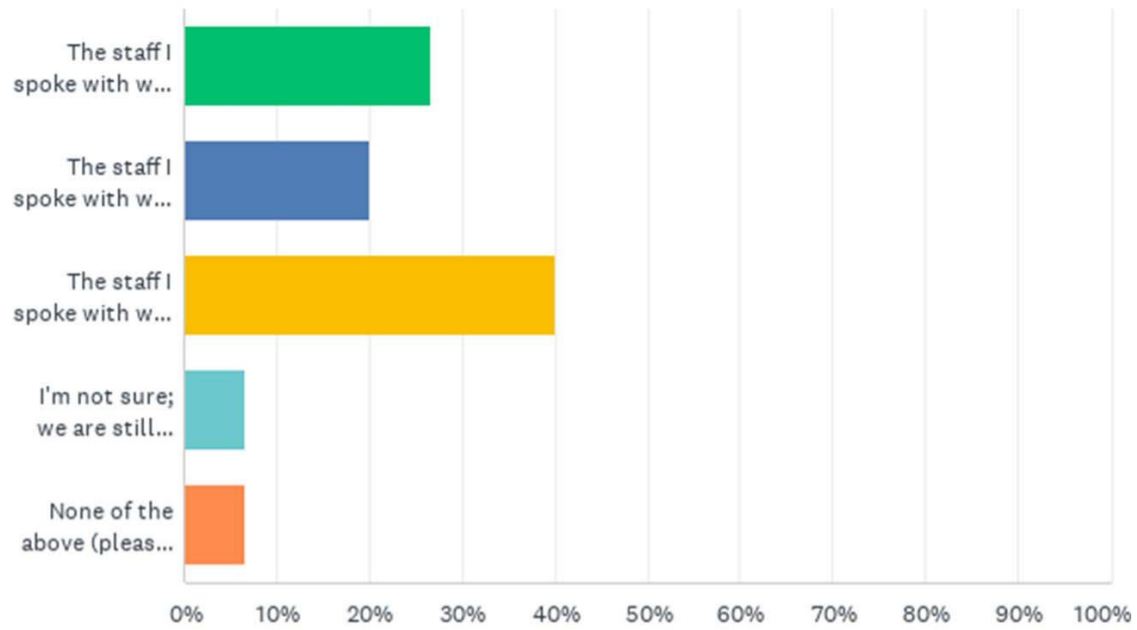
Q11: Have you or an individual for which you are the caregiver ever made a request to the Town for an accommodation related to a disability?

Answered: 184 Skipped: 30

ANSWER CHOICES	RESPONSES	
Yes	7.61%	14
No	92.39%	170
TOTAL		184

Q12: How would you describe your experience?

Answered: 15 Skipped: 199



Q12: How would you describe your experience?

Answered: 15 Skipped: 199

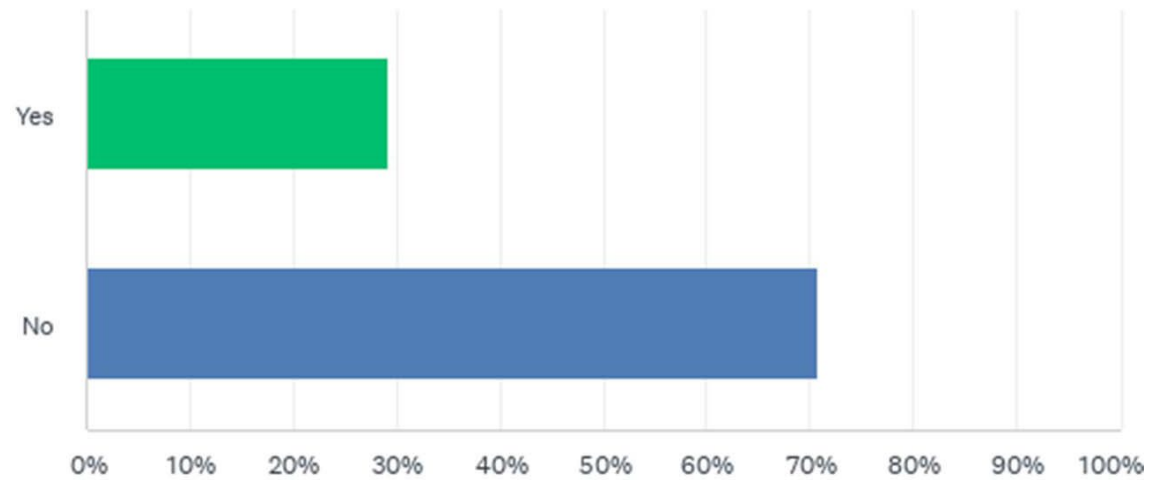
ANSWER CHOICES	RESPONSES	
The staff I spoke with was responsive and resolved my issue.	26.67%	4
The staff I spoke with was responsive, but unable to resolve my issue.	20.00%	3
The staff I spoke with was not responsive and my issue remained unresolved.	40.00%	6
I'm not sure; we are still working through it.	6.67%	1
None of the above (please describe):	6.67%	1
TOTAL		15

Other:

- Town administrator and boards are not willing to work on any solutions and are not inclusive in the least

Q13: Do you know who at the Town a member of the public can contact to make a request for an accommodation, state a grievance or more generally offer input related to accessibility to programs, services or facilities?

Answered: 171 Skipped: 43



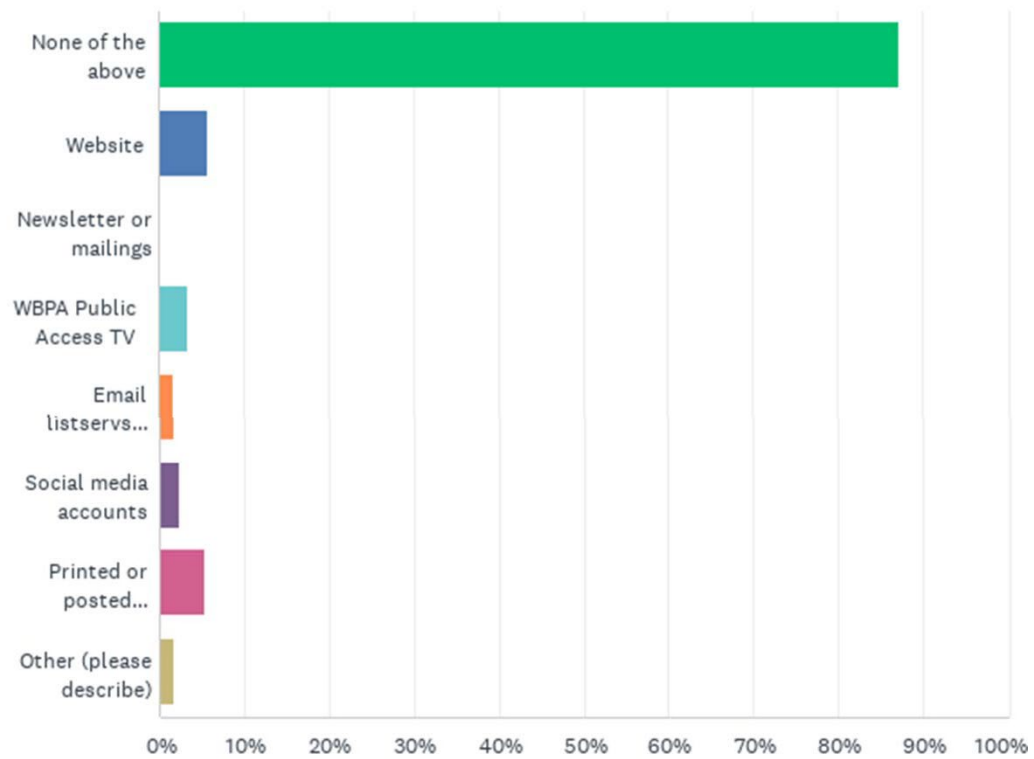
Q13: Do you know who at the Town a member of the public can contact to make a request for an accommodation, state a grievance or more generally offer input related to accessibility to programs, services or facilities?

Answered: 171 Skipped: 43

ANSWER CHOICES	RESPONSES	
Yes	29.24%	50
No	70.76%	121
TOTAL		171

Q14: Have you or an individual for which you are a caregiver had difficulty accessing any of the following Town communication and information services due to a disability?

Answered: 172 Skipped: 42



Q14: Have you or an individual for which you are a caregiver had difficulty accessing any of the following Town communication and information services due to a disability?

Answered: 172 Skipped: 42

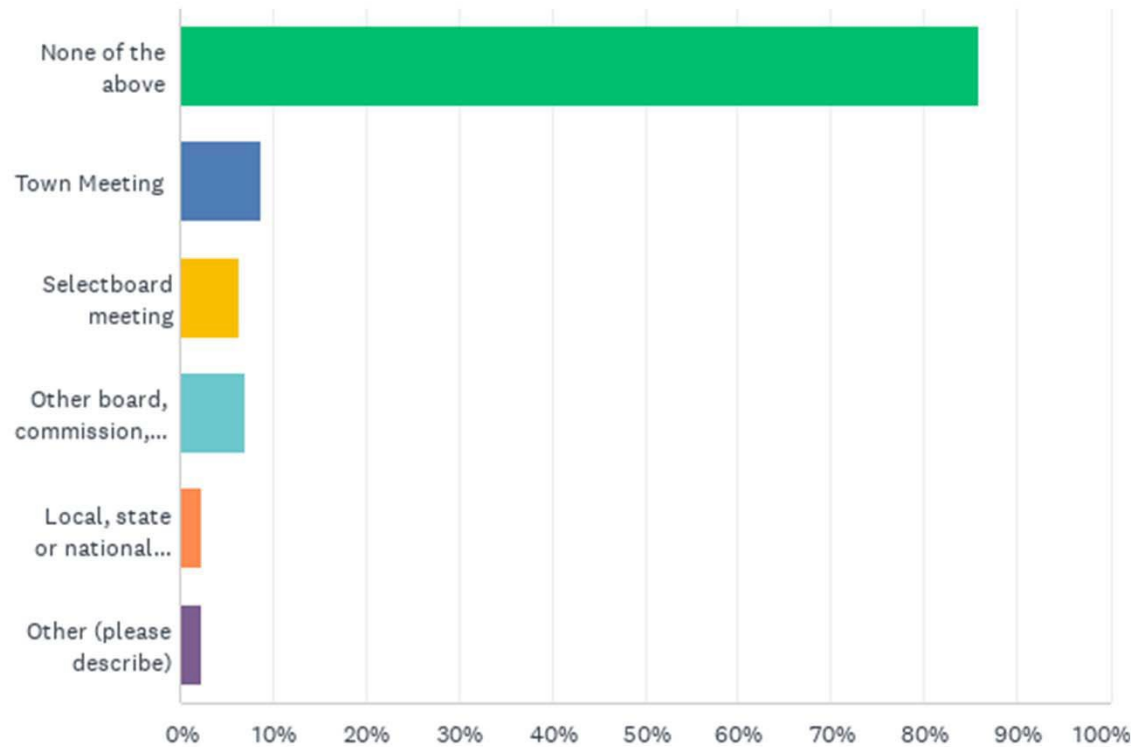
ANSWER CHOICES	RESPONSES	
None of the above	87.21%	150
Website	5.81%	10
Newsletter or mailings	0.00%	0
WBPA Public Access TV	3.49%	6
Email listservs (email blasts)	1.74%	3
Social media accounts	2.33%	4
Printed or posted materials at a Town office	5.23%	9
Other (please describe)	1.74%	3
Total Respondents: 172		

Other:

- All Town meetings
- lack of computer access for family member
- Difficult to hear televised or remote meetings/programs

Q15: Have you or an individual for which you are a caregiver had difficulty accessing or participating in any of the following local government activities, including accessing the materials for meetings due to a disability?

Answered: 171 Skipped: 43



Q15: Have you or an individual for which you are a caregiver had difficulty accessing or participating in any of the following local government activities, including accessing the materials for meetings due to a disability?

Answered: 171 Skipped: 43

ANSWER CHOICES	RESPONSES	
None of the above	85.96%	147
Town Meeting	8.77%	15
Selectboard meeting	6.43%	11
Other board, commission, committee or task force meetings	7.02%	12
Local, state or national elections	2.34%	4
Other (please describe)	2.34%	4
Total Respondents: 171		

Other:

- Unable to attend HS outdoor sports at the football field
- Handicap parking is limited at schools and good dale park
- Family member cannot safely navigate uneven surface(field)
- Zoom meetings

Q15: Is there any other information you would like the Town to consider in evaluating accessibility to Town facilities, programs or services?

Responses of "no" or "none" omitted

'Senior' activities at the library are usually during the workday, would possibly participate in evenings after 7pm. I work weekdays

The town administrator refuses to adopt universal accommodations for the hearing impaired. There should be an interpreter at every meeting because there are deaf people in town. We cannot easily participate. Nancy is rude when asked to provide this accommodation. The schools do it with no push back. Why can't the town administrator do the same?

Single-person genderless accessible bathrooms (at least 2) should be on every floor of every public building

Thank you for doing this!

It is not reasonable to try to give 100% access to 100% of the population. The town is doing a great job in response to needs of the disabled. HOWEVER, I think that closing Pride Park to everyone until accommodations are made for the needs of one child was a stupid decision based on political correctness rather than good old common sense. In the words of Mr. Spock "the needs of the many exceed the needs of the few".

Facilities are easily accessible however getting to and from via sidewalks and roads are not.

Please also consider cognitive disabilities and mental health needs

Handicapped parking is impossible some people have distance problems and can't walk far!

a playground that is not currently accessible to those with limitations but with plans for future improvements should NOT be closed to everyone in the interim.

The town does a wonderful job keeping us informed of changes. The senior center has reached out multiple times and is very involved in the community

Q15: Cont'd

We are in good shape

Make everything accessible to all.

It would be great to see Pride Park updated sooner than expected.

While I or persons I'm responsible for do not have a disability. I fully support making the town more accessible to residents and visitors.

Parking and sidewalks

Access to the playground at pride park needs to be more inclusive

Sidewalks are not maintained. Overgrowth on sidewalks in town is horrible, have to walk in road at times.

I think the town does a great job. Unfortunately, a couple of people have put a stop to the elementary students' use of Pride Park. My children couldn't use some of the equipment just because they didn't have the physical ability to use it. It doesn't mean no one can use it.

Although I do not have a disability the town should be accessible to all

Accessibility is more than these questions. 'Accessibility to Town facilities, programs or services' leads the reader to think this is about all services access-one of which has been a major ongoing issue to many in town is access to the yard waste area. It is absolutely a concern for many especially given the amount of properties in the town that do not back up to woods for disposal of leaves etc. it seems to be an ignored issue. Most home owners have to work in order to afford to live in town which means the yard waste area should be open on full Saturdays. It is impossible for anyone who works all week to clean up their yard by 11:30 am and get to the facility-on the very few Saturdays that the area is open. If it rains that rare Saturday, well then the homeowner is out of luck. Having been a taxpayer for over 20 years, this issue has such an effect on property value, aesthetics and taxpayer satisfaction. It's such a low cost issue to have the area open on Saturday's until 3, every other week but yet high impact effect on the quality of real estate. The next hire to the public works department should include the expectation that they are expected to work 8-3 on a Saturday in order to minimize staffing issues. This is a huge roadblock in this town.

This survey makes me nervous as a taxpayer.

Q15: Cont'd

Check all sidewalks for walkability.

Studies have shown that 1/3 of our population have chemical sensitivities, although I am on the worse end of the spectrum, many many of our town residents suffer, many whom I have met in person. I hope you will consider making all town building fragrance free. That means no air fresheners, but it also means having the town employees not wear perfume or use laundry detergent with fragrance. Cleaning with hypochlorous acid, which kills covid, would be another great way to keep building accessible and improve indoor air quality for everyone.

All public meetings need to be run in a hybrid fashion so people can access them online, and the town needs to explore a means of securely conducting an online/hybrid town meeting to improve participation rates.

Town facilities should be accessible to all. There are currently some facilities (including the playground at Major Edwards) that are not. That is problematic (and illegal).

Making sure that all residents and especially youth and seniors regardless of abilities are able to safely navigate walking in town including sidewalks and playgrounds

I think the town needs to consider if all public parks, meeting locations, and buildings are accessible for anyone with disability. I have answered the survey as a asked, as a person currently without a disability. I would not consider this survey a true gage of how accessible the town makes public spaces. There should be better and many more sidewalks put in, especially on double yellow roads like Woodland. Crosswalks should be repainted and highly visible, more crosswalks should be installed on double yellow roads and near parks like Woodland! Parks and public spaces should be accessible to anyone using an assistive device for ambulation (cane, crutches, walker, scooter, wheelchair)

The sidewalks in this town are either non-existent or overflowing with growth and debris. The mowing is a joke - and they leave the crap behind. The streets are unsafe to walk along.

We need more crosswalks in this town. There are no crosswalks on maple street between route 140 and the worcester line. The same for wotcester street. Even the school bus will not stop for a pedestrian.

Yes please make the survey stop if I say I have no disabilities in never work with anyone with disabilities

Q15: Cont'd

Programs or facilities or playgrounds should not be shut down until it is in compliance for disabilities. There could be another solution until it is compliant, so that the majority can still participate. Not very logical to shut it down for everyone, just because a few cannot participate. With Covid and everything being shut down for so long, too many individuals already have depression and anxiety. To stop everything, especially for children, until compliant makes absolutely no sense. Have a table set up with projects that could be done by someone with a disability until changes are made. Something that someone with a disability could do.

Sound systems, microphones and related uses.

More side walks are needed. As an example, sections of well traveled North Main St. do not have side walks forcing pedestrians to walk in the street.

This survey is flawed. If I'm not impacted as an individual or caregiver my responses should not be lumped in with those who need accessibility.

Although it may not be part of a "Town" location or service, the Orchard Knoll Housing is not very accommodating to individuals with disabilities and specifically when it comes to providing adequate and convenient parking for persons with disabilities.

Make the print bolder on these surveys.

Allow towns people to join town meetings via zoom in the event they are unable to physically go

Plow all sidewalks in town during the winter, not just ones near the schools.

Not really as while I am handicapped, I find a way on my own to get access to everything.

Please remember that all with disabilities are not wheel chair bound

Please take care of those who need it. The town should not believe the "bare minimum" is sufficient. It is heartbreaking to hear some talk about kids in this way. Our kids have ONE playground and the town should make it spectacular for our kids.

Q15: Cont'd

It is not evident that the leadership in this town truly understand why accessibility is important and understand that civil rights are human rights for all humans disabled or not. They do not show willingness to work with residents to solve issues, instead they work hard to push back and stop things from happening. Their motivations aren't to make the town better for its residents, rather it is to avoid a suit. Until the town leadership works with its residents these issues will never improve. The lack of participation and partnership is truly disheartening. What people don't understand is that the disabled population is the largest minority group of which none of us are immune. We have laws that exist and it shouldn't be a battle to get leaders in this town to follow them.

Not just physical disability, but audio and visual disabilities as well.

All children and persons of all abilities should be able to safely access public grounds and buildings. No possible reason for otherwise to occur or for there to be any question regarding ensuring this accessibility to all.

This is a benefit to ALL members of the West Boylston community and long overdue.

Town meeting at the HS baseball field is a challenge for accessibility but hopefully that will change when the meeting can be safely held in the auditorium.

Considering small things that can affect "hidden" disabilities such as dyslexia and ADHD, these affect adults as well as children

It would be nice if the town would include contact information for individual persons, administrators, offices in newsletters & how any or all can provide assistance & services to residents with a wide variety of disabilities and or access to help. Perhaps, give some general examples of who/where to call.

while I have not had an issue with accessibility, the town should work to keep all facilities in compliance with ADA and to continue to be accommodating and welcoming to all members of our community.

For some, a paper mailing would be beneficial for upcoming town news- perhaps a town newsletter similar to the one the Senior Center provides

I would like to see the town playground be accessible to all town children

Take this program seriously. I hear many with no financial limit to the changes many are looking for.
disability housing

The front lawn of the library, where the annual Book Sale is held, is currently inaccessible to a resident or guest who uses a wheelchair.