

Town of Sturbridge Accessibility Plan

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I. INTRODUCTION

Background

The Sturbridge Accessibility Plan is a planning document intended to comply with state and federal accessibility regulations. One goal of the plan is to provide an evaluation of the town's operations to determine whether or not they are on the whole accessible to people with disabilities. A second goal is to identify physical barriers to public buildings, sites and services owned or operated by the town. The plan will identify recommendations on making programs or services accessible and will provide general estimates of cost for the removal of architectural barriers. Sample policies and procedures as required under the Americans with Disabilities Act (ADA) are also provided.

Through the completion of the Sturbridge Accessibility Plan, the town will be in compliance with certain provisions of the Americans with Disabilities Act and will give people with disabilities an equal opportunity to participate in the mainstream of public life offered to all citizens. In addition, through the completion of this plan, the town will be eligible to apply for state and federal funding to eliminate identified barriers.

Definition of Commonly Used Terms

Disability - a physical or mental impairment that substantially limits a major life activity, such as walking, seeing, hearing, learning, breathing, caring for oneself, or working. Individuals who have successfully completed or are currently enrolled in a drug or alcohol rehabilitation program are also considered to be disabled. The ADA protects three classes of people with disabilities:

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

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

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

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

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

Public Participation

This plan was formally initiated in January 2008 and completed in June 2008 with the presentation and submission of final report in the Summer 2008. During this short period of time, a number of activities, meetings, and actions occurred to insure full and meaningful participation of the general public. A survey form was sent to all town departments, boards, and commissions to evaluate those services and programs being offered as well as operating procedures and policies. Individual meetings and discussions were held with various department heads and officials and properties open to the public or offering direct services to the public as described in this plan were visited and assessed. Regular communication was conducted with the Town Administrator through working meetings and regular telephone and e-mail correspondence.

Organization

This plan consists of six sections. Section I provides an overview of the document and its primary goals and objectives. Section II is an overview of the various state and federal accessibility laws and regulations. Section III contains a self-evaluation of programs and services offered by the town. Section IV consists of a transition plan including an inventory of town-owned property and general estimates of cost for barriers removal and accessibility compliance. Section V identifies a number of policies and procedures to be adopted by the town in compliance with the ADA. Section VI includes a summary of recommendations identified in the plan. Supplemental information is provided as Appendices.

II. PRIMARY ACCESSIBILITY REGULATIONS

Federal Regulations

Architectural Barriers Act (ABA) - 1968

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

Rehabilitation Act - 1973

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

Voting Accessibility for the Elderly and Handicapped Act - 1984

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

Air Carrier Access Act - 1986

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

Fair Housing Act - 1988

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

Americans with Disabilities Act (ADA) - 1990

On July 26, 1990 President George H. Bush signed the Americans with Disabilities Act, a federal civil rights law that prohibits the exclusion of people with disabilities from the right of equal

opportunity. Much of the ADA legislation was built upon legislation that had already been in place for a number of years. This included portions of the Rehabilitation Act of 1973 which regulates employment practices in the federal government and by federal contractors, establishes architectural and transportation accessibility standards and guarantees equal access to entities that receive federal funds.

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

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

- Title I: Employment
- Title II: State and Local Government and Public Transportation
- Title III: Public Accommodations and Services Operated by Private Entities
- Title IV: Telecommunications
- Title V: Miscellaneous Provisions

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

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

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

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

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

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

Title I

Equal Employment Opportunity

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

Reasonable Accommodations

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

Title II

Program Accessibility

The ADA guarantees people with disabilities equal opportunity to participate in all programs, services, and activities of state and local government. Accessibility standards must be followed for new construction as well as accommodations. These standards are based on the ADA Accessibility Guidelines (ADAAG) as developed by the U.S. Access Board provide guidance to the ADA Standards for Accessible Design as enforced by the U.S. Department of Justice (DOJ), U.S. Department of Transportation (DOT), and the federal courts and apply nationwide. The ADAAG derives in part from earlier standards developed under the UFAS. Once the guidelines are adopted as part of the ADA Standards they become an integral part of the ADA. Currently the ADAAG of 7/1/94 are in effect. Guidelines covering courthouses, prisons, and other government facilities (1998); children's environments (1998); play areas (2000); and recreation facilities (2002) have since been developed by the U.S. Access Board. The DOJ has yet to adopt these as part of the ADA Standards. Although these guidelines are not enforceable standards for compliance, they should be seriously considered in all new construction and renovation projects.

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

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

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

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

Effective Communication

Local governments must ensure effective communication with individuals with disabilities. Where necessary to ensure that communications with individuals with hearing, vision, or speech impairments are as effective as communications with others, municipal governments must provide appropriate auxiliary aids.

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

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

Title III

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

Title IV

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

Title V

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

Telecommunications Act - 1996

The Telecommunications Act of 1996 requires telecommunications products and services to be accessible according to guidelines developed by the Access Board. It covers a broad range of

products, including telephones, cellular phones, pagers, and fax machines. The Federal Communications Commission (FCC) enforces requirements of the law.

Help America Vote Act – 2002

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

State Regulations

521 Code of Massachusetts Regulations: Architectural Access Board

Section 521 of the Code of Massachusetts Regulations, "521 CMR: Architectural Access Board" is a specialized section of the State Building Code which provides the actual construction standards and specifications which must be adhered to for work performed on "public" buildings (see definition of public building in 521 CMR) in the Commonwealth of Massachusetts. These buildings are also governed by the Federal ADA Accessibility Guidelines (ADAAG) and or the Uniform Federal Accessibility Standards (UFAS). If there are conflicting requirements, the higher or stricter standard typically governs. For the most part, 521 CMR contains the higher standard, but there are some exceptions. The purpose of 521 CMR is to make public buildings and facilities accessible to, functional for, and safe for use by persons with disabilities. It is the intent of 521 CMR to provide persons with disabilities full, free and safe use of all buildings and facilities so that all such persons may have the educational, living and recreational opportunities necessary to be as self-sufficient as possible and to assume full responsibilities as citizens.

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

Jurisdiction of 521 CMR

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

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

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

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

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

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

A series of amendments to the MAAB regulations were proposed on February 17, 2005. These amendments became effective July 27, 2006 and must be adhered to in all new construction and renovation projects.

III. EVALUATION OF PROGRAMS AND SERVICES (SELF-EVALUATION)

Introduction

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

A self-evaluation was conducted of those municipal departments which offer programs or provides services to the general public. A memo and accompanying survey form (See Appendix B) was sent to departments, boards, commissions and individuals who were identified as either providing a service or program to area residents. Although not every department fully responded, survey forms were sent to the town clerk, treasurer, board of selectmen, tax collector, assessors, board of health, library, planning board, police, department of public works, town accountant, parks and recreation, building inspector, conservation commission, council on aging, school department and veterans agent.

Information from each survey response, along with supplemental departmental information was used to develop the self-evaluation. Together with the structural assessment (Section IV) and policy recommendations (Section V), an accessibility compliance plan for the Town of Sturbridge is achieved. However, there are general required administrative actions which Sturbridge must adhere to in order to successfully comply with the Federal ADA. This includes:

- creation of a formal Commission on Disabilities
- appointment and active participation of a Town ADA Coordinator
- ADA education, notification and outreach
- adoption and formal notice of an ADA grievance procedure
- developing program strategies to achieve community services compliance
- maintenance and upkeep of accessible features.

Commission on Disabilities

The Town of Sturbridge has not created a formal Commission on Disability. Commissions on Disability are established by vote of Town Meeting to promote the inclusion and integration of persons with disabilities in the activities, services and employment opportunities or the community. MGL chapter 40 section 8J gives municipalities the authority to establish commissions.

The function of a disabilities commission is to:

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

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

ADA Coordinator

The Town of Sturbridge has appointed Fire Chief Leonard Senecal to serve as its ADA Coordinator as specified under 28 CFR 35.107 (a). He is listed as the Handicapped and ADA Coordinator in 2005 and 2006 Annual Town Reports. It is also recommended that this position be posted under the Department Directory of the Town's website. The role of the ADA Coordinator is extensive and includes:

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

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

Education, Notification and Outreach

In addition to the policies recommended in Section V of this Accessibility Plan, the town must undertake a formal education, notification and outreach process which includes the general public and town departments, boards, and commissions. This should consist of education and information ranging from general information about the ADA to reasonable accommodations. Notices pertaining to the town's grievance procedure (detailed later), equal opportunity policy, communications and program/services access should be posted in all public buildings, included in town documents and reports where appropriate and listed on the town's web site. It may be necessary to develop an audiotape version of these policies and procedures for the sight impaired. Similarly, all postings and advertisements for employment, including formal job descriptions, must include references to non-discrimination on the basis of disability. The town's Affirmative Action Policy Statement should contain an equal employment opportunity statement that includes a reference to nondiscrimination on the basis of a disability. Recommended policies for town adoption are included in the Appendices.

The town, through its ADA Coordinator, must also insure that effective communication is achieved through the use of available resources and local policy implementation. It is recommended that, at a minimum, the town general government install a TTY/TDD (est. \$350) at Town Hall to allow a centralized communication point to town services. In the future, as the need dictates, the acquisition of a Braille Embosser (est. \$2,500) would allow the town to disseminate public information, as necessary, to the sight impaired as required under the ADA.)

Hiring and Employment Practices

Under the ADA, it is discriminatory to use selection criteria that screen out or tend to screen individuals with disabilities unless the criteria are shown to be job-related for the position in question and are consistent with business necessity. This is to ensure that tests do not act as barriers to the employment of persons with disabilities unless the person is unable to do the job, even with reasonable accommodation. Employers should design selection criteria for jobs to ensure a close fit between the selection criteria and an individual's ability to do the job.

Job postings and advertisements must be placed in locations that are accessible to persons with mobility impairments. Postings and notices should be done in large print format and should include both a regular telephone number and a TDD number. In addition, interviews must be conducted at an accessible location.

Job applications are considered to be pre-employment inquiries under the ADA. Its purpose is to gather information on the skills, abilities, training, credentials, and references of the applicant. It also serves to identify where an applicant can be reached. It cannot be used to elicit information about whether an applicant is an individual with a disability or as to the nature or severity of such disability. Under the ADA, a person is considered a qualified individual with a disability if he or she can perform the essential functions of the job with or without reasonable accommodation. Although the ADA does not require an employer to have job descriptions, they can be used as evidence of the essential functions of the job.

Although job testing is not prohibited under the ADA, it requires that testing be job related and consistent with work necessity. Tests which measure aptitude, physical agility, intelligence, and

specific skills are not considered to be "medical examinations" under the ADA. Medical examinations are prohibited until after a job offer has been made to an applicant. Test results cannot be used to exclude an individual with a disability unless

- the tested skill is necessary to perform an essential function of the position, and
- there is no reasonable accommodation that can be made available to enable the individual to perform that essential function, or
- providing the necessary accommodation would cause undue hardship.

Job Descriptions

The Personnel Committee has revised job descriptions for most, if not all, town employees. These descriptions reflect a thorough description which includes essential functions and minimum physical requirements to perform essential duties of a position. As an attempt to insure compliance, these descriptions clearly state that reasonable accommodations will be made to enable individuals to perform the essential functions of a position. It is critical that this effort be continued to cover all municipal job descriptions. In addition, the Town should insure that all advertisements for positions should include the following or a similar non-discrimination statement in its posting: *"The Town is an Equal Employment Opportunity/Affirmative Action Employer and does not discriminate on the basis of race, color, sex, national origin, religion or disability in employment or the provision of services"*.

ADA Grievance Procedure

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

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

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

Although the Town of Sturbridge has an ADA Grievance Procedure as required under the ADA, it is recommended that the sample grievance procedure as provided in Appendix D be adopted by the Board of Selectmen.

Programs/Services

Public programs and services must be provided in a manner that does not discriminate against those with disabilities or prevent them from accessing such service or program. Thus, it is critical for all departments, commissions and boards to fully disclose all activities and be readily able to adapt or respond to specific requests. Based on the survey responses received as well as a review of departmental and board operations, the various departments and boards are attempting to comply with the needs of all town residents, including those with disabilities. However, in most cases, there exists an unawareness of what actions or procedures are required or which may be allowed. Many of the departments, commissions and elected officials noted that their business with the general public was done via telephone, mail, fax, and in person. Some departments/boards did note that modifications and/or reasonable accommodations are addressed "informally" in a timely manner. Typically this has meant meeting a person in an accessible location provided that advance notice has been given. However, in these instances as well as with other certain "practices" which are in place to accommodate special needs, procedures and policies should be formalized and published for all citizens to be familiar with. As a matter of practice, the town's ADA related procedures and policies should be included in the Town Annual Report and posted on the Town's website.

For example, a hearing impaired individual may want to attend a lecture on wetlands sponsored by the conservation commission. In addition to providing a sign-language interpreter, an acceptable accommodation may be to provide a copy of the lecture in print for the individual to read. This must be done at no cost to the individual. The town should also consider the purchase of either an assistive listening device (ASD) or a personal amplifier system to enable those with aural limitations to more effectively participate in public meeting settings.

Currently town meetings are typically held at the Tantasqua High School Auditorium. Town polling (voting) occurs in the following location:

<u>Precincts</u>	<u>Polling Place Name</u>	<u>Polling Place Address</u>
1 & 2	Burgess Elementary School	45 Burgess School Road

This facility has been assessed and is described in more detail in Section IV of this Plan. The polling site has been reviewed by the Massachusetts Office on Disability (2004) and had two minor issues (change in surface level greater than ½ inch on the walkway to the South gymnasium and access aisle striping for the handicapped parking spaces). Both of these access violations were corrected shortly after the survey was conducted according to the Sturbridge Town Clerk. Another accessibility spot check was conducted in July 2008 and additional minor violations were noted. First, there are two handicapped parking spaces but only one space had an aboveground sign with the international symbol of access. A second aboveground sign needs to be installed with "van accessible" designation. The walkway from the parking lot to the accessible entrance has running slopes which exceed 5%, therefore qualifying it as a ramp and not a walkway. As a result this approach requires railings. A railing should be installed on the grass side between 34" to 38" a.f.f. with 2" edge protection. The railing on the wall side needs to be raised from 15" to 18" a.f.f. to 34" to 38" a.f.f. There are also some cracks in the walkway/ramp surface that create changes in surface level greater than ½" that need to be filled

in. If this facility remains to be used for such services, minimum accessibility standards pertaining to parking, and building access must continue to be provided.

Maintenance and Upkeep

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

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

Evaluation of Programs and Services

<u>Department</u>	<u>Programs/Services</u>	<u>Accessibility Issues</u>	<u>Current Actions</u>	<u>Needed Actions</u>
Department of Public Works DPW – Administrative	Overall administration is conducted out of the DPW Administrative Office located at New Boston Road Ext. There is limited business conducted here such as the issuance of driveway, water connection and sewer connection permits. No public meetings take place here. The bathroom and the showers as well as with the DPW garage itself are not open to the public.	There are minor accessibility issues with interior and exterior door hardware, handicapped parking and signage. The accessible route of travel to the DPW building is slightly compromised and should be resurfaced.	None.	Develop standard policies for handling requests for modifications and/or assistance. Provide any informational literature in large print. Initiate construction improvements as detailed in Section IV.

<u>Department</u>	<u>Programs/Services</u>	<u>Accessibility Issues</u>	<u>Current Actions</u>	<u>Needed Actions</u>
DPW – Highway	Located on New Boston Road Extension, the Highway Department functions include maintenance of highways/roads, safety and highway signage, sidewalks, catch basins and related storm water drainage systems.	The highway garage is not open to the public. Limited public interaction at highway office.	There is language in the 2006 General By-laws under Public Works that includes language about not allowing newspaper-dispensing devices to obstruct public ways. Section 6.50 specifically addresses that tenants and owners occupying land abutting a sidewalk must clear all ice and snow on their portion of the sidewalk within 24 hours or face a \$10.00 fine.	See DPW Administrative. Reasonable accommodations as required for employees. Initiate construction improvements as detailed in Section IV.
DPW – Water & Sewer Division.	The Water Division is located at Water Works Drive and the operations are contracted with Veolia Water North America Services, LLC.	These two buildings are pump station/filtration facilities only and are not open to the public. Water and sewer connection permits are issued through the Department of Public Works.	None.	See DPW Administrative. Reasonable accommodations as required for employees. Initiate construction improvements as detailed in Section IV.
	Sewer Division is located at New Boston Road Ext. and the wastewater operations are contracted with Veolia Water Northeast LLC.		None.	See DPW Administrative.
DPW-Water Pollution Control Facility	See DPW Water & Sewer Division.			
DPW-Recycling Center	The Recycling Center is located at the end of Breakneck Road Administration of the Recycling Center along with the issuing of permit stickers is done through the Board of Health, located on the second floor of the Town Hall.	Recycling facility is open to the public during controlled hours.	Assistance provided upon request or need.	See DPW Administrative. Reasonable accommodations as required for employees. Initiate recommendations as detailed in Section IV.

Department
Council on Aging

Programs/Services
Located at 480 Main Street, the COA provides a drop-in center, medical transportation, social services, exercise programs, educational programs, arts and crafts, blood pressure clinic, grief counseling, Shine Counseling and a Friendly Visitor Program.

Accessibility Issues
Basic building accessibility requirements met. Accommodations made for facility users. Some building modifications required.

Current Actions
Assistance provided to seniors as needed.

The COA has assistive listening devices.

Needed Actions
Develop standard policies for handling requests for modifications and/or assistance. Initiate construction improvements as detailed in Section IV.

Library

The Joshua Hyde Library is located at 306 Main Street.

Library services include book circulation, reading programs, educational services and programs, workshops

Basic building accessibility requirements met. Accommodations made for facility users. Some building modifications required.

Downloadable Audio Books and DVDs are available and the Library has the C/W Mars catalogue as well. However, no other assistive devices such as magnifiers for people with visual impairments are available.

Initiate construction and equipment improvements as detailed in Section IV.

School Department

The Burgess Elementary School is located on 45 Burgess School Road and provides educational services to grades preK-6. Numerous school-related meetings, activities, and events as well as community-wide activities take place here.

Basic building accessibility requirements met. Refer to building assessment for specific areas of non-compliance.

Special educational needs are addressed in compliance with state and federal education and S. 504 requirements.

Initiate construction improvements as detailed in Section IV to insure full program accessibility.

<u>Department</u>	<u>Programs/Services</u>	<u>Accessibility Issues</u>	<u>Current Actions</u>	<u>Needed Actions</u>
Police Department	<p>Located in the Sturbridge Public Safety Complex on 346 Main Street. Emergency/police response and patrol. Issuance of firearms ID cards and license to carry firearms cards. Public education on safety, drugs, domestic violence, etc. Accident/criminal investigations and Emergency Management functions. Information dissemination. Public interaction through person, telephone, TTY, language line services for interpreters and mail. Other assistance upon request.</p>	<p>Basic building accessibility requirements met. Refer to building assessment for specific areas of non-compliance.</p>	<p>A TTY is included as part of the enhanced 911 emergency dispatch system.</p> <p>Police personnel have participated in Emergency Preparedness events in the disability community.</p> <p>Procedures call for police personnel to act with respect toward people with mental illness.</p> <p>Hate Crimes- Includes handicap bias based on AIDS, Physical and Mental Disability.</p>	<p>Develop standard policies for handling requests for modifications and/or assistance in the police department of mobility and visually impaired individuals. Provide any informational literature in large print format. Change the word handicap to disability in policy and procedure manuals when they are updated.</p> <p>Initiate construction improvements as detailed in Section IV to insure full program accessibility.</p>
Fire Department	<p>Located at the Sturbridge Public Safety Complex on 346 Main Street. The Fire Department provides fire, rescue, and emergency medical services along with public education and awareness programs.</p>	<p>Transactions such as fire permits and fuel tank applications can be done in person, mail or telephone. Fire station garages are for equipment and vehicle storage and are not open to the general public.</p> <p>Basic building accessibility requirements met. Refer to building assessment for specific areas of non-compliance.</p>	<p>The Fire Department has an E911 and TTY System in their central dispatch center.</p>	<p>Develop standard policies for handling requests for modifications and/or assistance as may be necessary.</p> <p>Initiate construction improvements as detailed in Section IV to insure full program accessibility.</p>

Town Hall

The following departments/commissions/boards are located in the Town Hall, which serves as the primary location for general government activities in the Town of Sturbridge. Each of these, although substantially different in function, provide mostly administrative activities and primarily offer direct services to the general public who visit their respective office in the Town Hall. Specifically the Planning Department, Conservation Commission, Board of Health, Veteran's Director and Department of Inspectional Service & Code Enforcement have noted that they have a process for making reasonable modifications and the public is informed. None of the departments have initiated any specific policies or procedures relative to individuals with disabilities. General postings and notices are made within the building relative to any building procedures and practices. Most department employees noted that although individual department policies and procedures are not in place, they are generally aware that program modifications may be necessary to assist people with disabilities. Public interaction occurs through direct communication, telephone, regular mail, e-mail and internet (web site). The town's website meets ADA requirements, because website accessibility checking tools detected no accessibility errors. The building generally meets basic accessibility standards, however access to some departments and offices do not provide equal access due to insufficient clear width space within offices/departments and service counters which exceed allowable height standards. In addition to general building use, each department should develop standard policies for handling requests for modifications and/or assistance. Each department should also provide any informational literature in large print format. A TTY/TDD for building-wide use should be purchased and installed in the Board of Selectmen's Office. A new Town Hall wide telephone system is scheduled to be installed in the near future so this would be the appropriate time to have this communication system established. In addition, an ALD or personal amplifier system should be purchased for use by those with aural limitations. *Note: All public and town meetings and local, state and federal elections must be conducted in full compliance with accessibility laws and regulations.* The Recreation department offers a variety of recreational services and programs at municipally owned locations throughout the town. In addition to the adoption of formal policies and procedures to insure "equal access" to persons of all abilities, site and facility modifications will be required. Program accessibility will be achieved through the initiation of those construction improvements as detailed in Section IV.

Conservation Commission	Conduction of public meetings and hearings on wetlands issues under MGL C.131 s.40. Issuance of orders of conditions and determinations of applicability. Response to various technical assistance and information requests pertaining to wetlands and conservation matters.
Finance Department	Financial planning, procurement and investment of funds, collection of all taxes and fees, payroll and benefit administration, accounts payable, financial monitoring of the budget and maintaining comprehensive financial records. Interaction/communication through mail, fax, telephone, and e-mail
Planning Board/Town Planner	Provides support to the Planning Board and Zoning Board of Appeals (permitting, subdivision approvals, zoning bylaw proposals and comprehensive plans. Implementation and maintenance of the Geographic Information System. Provision of technical assistance on various land use, planning, and zoning matters.
Board of Health	Interpretation and enforcement of Title V of the State Environmental Code; inspections of food service establishments; health and safety inspections for residential and commercial properties; response to various technical assistance and information requests pertaining to health, safety, and septic system issues and concerns. Responsible for the operation and permit sticker distribution of the Recycling Center and oversight of the landfill operation.
Zoning Board of Appeals	Deliberations on special permits and variance requests; response to requests on zoning matters; conducts meetings hearings on appeals of decisions of the Zoning Enforcement Officer.
Assessors	Prepares annual tax recapitulation sheet; provides general real estate tax information; processes requests for abatements and exemptions; determines assessments on real estate, personal property, and vehicles; responds to requests for information.

Town Hall cont'd.

Department of
Inspectional
Service & Code
Enforcement

Enforce State building code, Massachusetts Architectural Access Board code and zoning requirements.

Town Clerk

Issuance of a variety state and town licenses, permits, and certificates; provision of information to the public on local and state government; voter registration and election assistance; provision of information on vital statistics and elections; maintains annual town census.

Board of
Selectmen/Town
Administrator

The Town Administrator serves as the administrative officer of the town; overall responsibilities of the office includes issuance of certain licenses governing the sale of liquor, food, sales of motor vehicles, and entertainment; contract negotiation and oversight; personnel administration; interact, contract, and resolve various state, federal, and local issues of concern.

Community
Preservation
Committee

Under the Community Preservation Act (MGL Chapter 44B), this Committee oversees open space preservation, creation of community housing, preservation of historic buildings and landscapes, and creation of recreation opportunities. There are specific references addressing the needs of special populations including handicapped individuals in their reports under recreational opportunities such as the Town's trail systems.

Recreation
Department

Coordination and provision of year round recreational programs and services to the residents of Sturbridge. This includes summer programs for children and young adults; specialized winter programs; sports learning and skills classes to children such as tennis and swimming programs; summer playground and swim centers and other activities.

Veteran's Agent

Varied direct assistance to town veterans; referrals for financial, medical and educational benefits; administration of department funds; other varied assistance to veterans as necessary.

Historic
Commission

The historic commission is responsible for the preservation, protection and development of the town's historical and archaeological assets and for historic preservation planning. The historic commission is also responsible for public outreach, education and advocacy concerning Sturbridge's historic resources that are important to preserve.

IV. ARCHITECTURAL BARRIERS (TRANSITION PLAN)

Format

The Town of Sturbridge, in accordance with the Americans with Disabilities Act of 1990 (ADA) regulations, has surveyed its municipal buildings and facilities to document physical barriers to access as part of the requirements for developing a transition plan. The buildings and facilities which were assessed, as dictated by the town, consist of three different categories. These are town buildings and facilities; recreational sites and facilities and town-owned privately leased facilities.

This section contains the following elements, which fulfill the requirements for the preparation of a transition plan:

- identification of physical obstacles in the town's facilities that limit the accessibility of its programs or activities to handicapped persons, and
- a description of methods or type of action to be taken to eliminate identified obstacles, and
- general cost parameters for each action to be taken, and
- establishment of a recommended completion date to achieve accessibility, and
- identification of the person, department or board responsible for implementation.

Limitations of Transition Plan

The plan does not address what is accessible, but rather obstructions to mobility. Fieldwork was performed during the months of April through June 2008. Although general recommendations are made as corrective actions to eliminate identified obstacles, it is expected that the town will be solely responsible for designing the specific construction solution in accordance with 521 CMR: Architectural Access Board Regulations or the ADAAG, whichever is appropriate.

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

Recreational Facilities and Playgrounds

Recreational facilities and playgrounds must also comply with the Americans with Disabilities Act and the Massachusetts Architectural Access Board regulations (521 CMR). Existing sites where renovation is not yet planned must still meet the requirement of "program accessibility". For example, the "program" of playgrounds or any services offered at that location must be accessible. The Federal Architectural and Transportation Barriers Compliance Board has issued

final accessibility guidelines to serve as the basis for standards which are being adopted by the Department of Justice for new construction and alterations of play areas covered by the Americans with Disabilities Act. The guidelines include scoping and technical provisions for ground level and elevated play components, accessible routes, ramps and transfer systems, ground surfaces, and soft contained play structures. The guidelines are intended to insure that newly constructed and altered play areas meet the requirements of the ADA and are readily accessible to and useable by individuals with disabilities.

Both the Federal ADA and Massachusetts AAB regulations require that playgrounds have an "accessible route" to reach playground equipment and around the playground area. Similarly, other recreational facilities must be accessible for programs and must comply with all other provisions of the ADA or AAB. For example, parking, toilet facilities, routes of travel, fixed seating, and other applicable items must be accessible to those with disabilities.

The focus of this transition plan is on program accessibility and related compliance. All future renovations or proposed new construction must fully comply with the Federal guidelines for recreation and play areas.

Feasibility (F)

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

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

Priority (P)

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

<u>Ranking</u>	<u>Description</u>
1	Physical entrance into a building
2	Access to programs and services within a building
3	Access to bathroom facilities
4	Removal of remaining architectural barriers

Costs

Cost estimates are based on projects of similar nature, unit quantity pricing (where appropriate), and R.S. Means Company, Inc. ADA Compliance Pricing Guide 2nd Edition (2004). Cost estimates are also based on the type and complexity of work. It is being assumed that simple changes (Feasibility ranking of 1 or 2) will be made through the use of town personnel

(custodial, DPW, etc.). More complex construction or those projects requiring specialized skills (Feasibility ranking of 3 or 4), would involve private contractors and include labor, overhead, and profit.

Use of the Transition Plan

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

Some Basic Accessibility Requirements (ADAAG and 521 CMR AAB)

Parking

- 8' wide space w/minimum 5' wide access aisle for cars and 8' wide access aisle for vans
- signage w/accessibility symbol
- 8'2" minimum height clearance for van accessible spaces
- hard, stable, slip-resistant surface w/a maximum cross-slope of 2% (1:50)
- space(s) must be located on the shortest accessible route of travel to an accessible facility entrance
- in general, 1 accessible space is required for every 25 total spaces
- 1 in every 8 accessible spaces, but not less than 1 space shall be van accessible

Accessible Route

- hard, stable, firm, slip-resistant surface
- 36" minimum width
- walkways require a 48" minimum width w/a 36" minimum clear width
- maximum 5% running slope (1:20)
- maximum 2% cross-slope (1:50)
- no objects between 27" and 80" above finish floor (a.f.f.) shall protrude more than 4" into the pathway
- 60" x 60" passing space every 200' if pathway is less than 60" wide
- handrails on both sides of pathway required if slope exceeds 5% (maximum 1:12 or 8.3% allowed)

Ramps

- maximum 8.3% running slope (1:12)
- maximum length of a ramp run between landings shall not exceed 30'
- 48" minimum clear width measured between the railings
- slip resistant surface
- base of ramp flush with adjacent hard and stable surface (i.e. pavement, concrete)
- 60" level area at base, all landings and top, as wide as the ramp
- 60" x 60" minimum landing wherever ramp changes direction
- continuous handrails on both sides, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape
- handrails must extend 12" beyond the top and bottom of the ramp
- handrails shall be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20" and 1-1/2" from a wall or mounted surface

Curb Ramps

- 36" minimum width
- slip-resistant, stable, firm surface
- maximum 8.3% running slope (1:12)
- maximum 2% cross-slope (1:50)

**Curb Ramps
(continued)**

- maximum 10% slope (1:10) for flared sides
- base of slope flush with street paving
- curb ramps are required on both sides of a street when connected by a crosswalk and at each corner of an intersection
- no obstructions should exist within curb ramp or approach to curb ramp (i.e. utility pole, traffic light pole, sign, etc.)

Entryways

- 32" minimum clear opening width
- 18" of clear space on the pull side of the door
- 12" of clear space required on the push side of the door
- 1/2" maximum beveled threshold
- accessible hardware required such as lever handles, loop handle, push plate, panic bar, or automatic door openers
- 60" level surface inside and outside of door at entrances (may be reduced depending on approach, push or pull, presence of door opener)
- door closers must operate such that the sweep period of the closer from an open door position of 90 degrees to closure shall take at least six seconds
- exterior hinged doors must not exceed a force of 15-lb. to pull or push open
- interior hinged doors must not exceed a force of 5-lb. to pull or push open

Controls

- for a forward reach approach, the height shall be between 15" and 48" a.f.f.; for a side reach approach, the height shall be between 9" and 54" a.f.f.

Bathrooms

General

- slip resistant flooring
- 60" diameter clear turning space
- 30" x 48" clear space in front of sink
- bottom of mirror shall be at a maximum of 40" a.f.f.

Sink

- maximum height of 34" to rim, minimum of 22" from wall to front of sink, minimum 27" clear knee space below rim, bowl depth not to exceed 6"; all pipes below sink must be wrapped; faucets must be operable with one hand or a closed fist; self-closing valves shall remain open for at least ten seconds.

Dispensers

- towel dispensers, drying devices and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers shall be at a minimum 24" a.f.f and within 36" of the rear wall

- Toilet • the centerline of the toilet shall be 18" from the nearest side wall and at least 42" from the farthest side wall; toilet seat shall be 17" to 19" a.f.f.; flush valve is to be on the approach side of the toilet
- Urinal • accessible urinals shall be stall-type or wall-hung with an elongated rim at a maximum height of 17" a.f.f.; flush valve on the approach side at a maximum height of 44" a.f.f.
- Grab Bars • 2 grabs 42" long, one located at the back wall and one located on the side wall; 1-1/4" to 1-1/2" in outside diameter with a clearance of 1-1/2" from the wall; non-rusting or acid-etched or roughened; capable of resisting 250 lbs. of force and set at a height of 33" to 36" a.f.f.
-

Public Ways: Sidewalks and Curb Ramps

Name: Sidewalks and curb ramps.

Location: Sidewalks in town center area.

Description of Facility: Public ways - sidewalks and curb ramps in town center area.

Function: Pedestrian access within public ways.

Responsible Party: Commonwealth of MA

General Description or Obstacle Which Limits Mobility or Access: According to the town, all sidewalks are within the jurisdiction of the Massachusetts Highway Department and are not the responsibility of the Town of Sturbridge. As a result, the evaluation of sidewalks was deemed outside the scope of this report. However, regardless of ownership and responsibility, all sidewalks must comply according to the stricter of the ADAAG, 521 CMR, or Massachusetts Highway Department Wheelchair Ramp Standards, whichever is appropriate. The following are standards in accordance with Sections 4.3 and 4.7 of the ADAAG and Sections 20, 21 and 22 of 521 CMR should be met throughout the town.

Standard

- Whenever sidewalks, walkways, or curbs on streets and ways are constructed, reconstructed, or repaired, curb cuts are required.
- Curb cuts shall occur whenever an accessible route crosses a curb.
- Curb cuts are required at each corner of an intersection and shall be perpendicular to the street. Single curb cuts serving two street crossings are generally not allowed.
- The maximum slope of a curb ramp shall be 1:12 (8.3%).
- The maximum cross slope of a curb ramp shall be 1:50 (2%).
- Transitions from curb cuts to walks, gutters, or streets shall be flush or free of changes in level greater than 1/2".
- The minimum width of a curb cut shall be 36", exclusive of flared sides.
- The maximum slope of a flared side shall be 10%.
- A minimum 48" level landing must be provided at top and bottom of curb ramp.
- Detectable warnings should be at those crosswalks which are considered hazardous vehicle areas.
- Clear width (36") and head room (80") requirements must be maintained on sidewalks and accessible routes.
- Width of walkways shall not be less than 48" with a minimum 36" clear width.
- Running slopes of walkways should not exceed 5% (wherever practicably feasible for sidewalks) and cross slopes should not exceed 2%.
- Walkway surfaces shall be stable and firm and shall lie generally in a continuous plane with a minimum of surface warping.
- Walkways should have a continuous common surface not interrupted by steps or changes in level greater than 1/4".
- All sidewalks/accessible routes of travel must be maintained and kept in a good quality condition including being kept free of snow and ice or other debris which would restrict access.

Public Buildings: Dept. of Public Works and Highway Garage

Name: Department of Public Works

Location: New Boston Road Ext.

Function: Highway Garage and Office/Transportation Office

Responsible Party: Selectmen

General Description or Obstacle Which Limits Mobility or Access: Basic access limitations exist including parking, accessible route to the building and door hardware. Most if not all public interactions (meetings, hearings, etc.) with the highway department are conducted elsewhere and therefore the public has little access to the building. Interior office door hardware is non-compliant. The employee bathroom and break room do not meet current accessibility requirements. However, as these are "employee only" areas, modifications may be deferred until reasonable accommodations are required in the future. The garage bays are exempt as these areas are closed to the public. As these are not "public" areas, no further action is required at the present time. With the recommended building and policy modifications accessibility can be achieved.

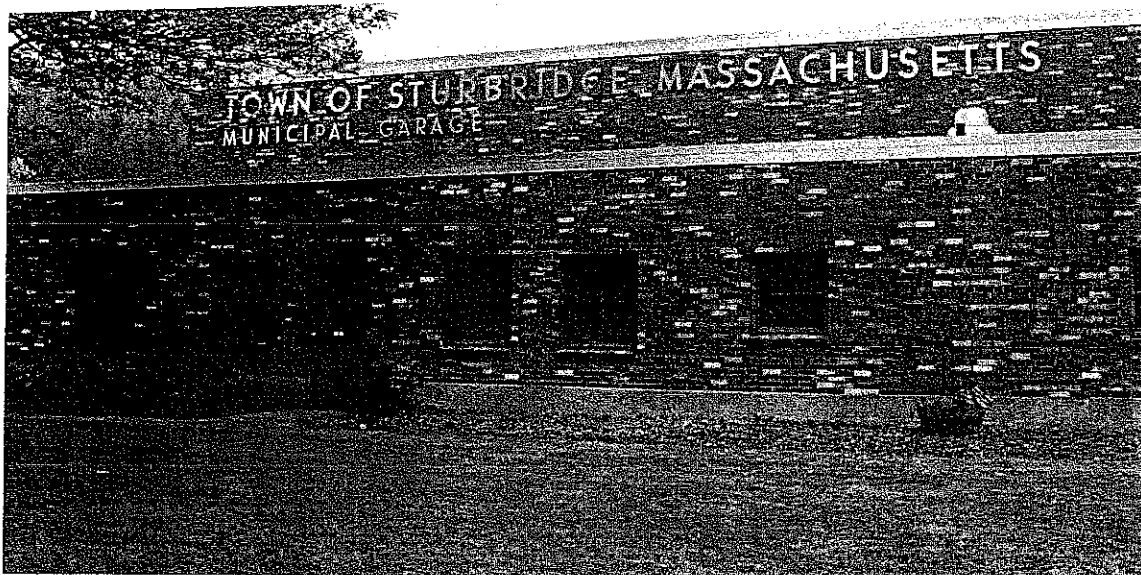
Description of Programs: Limited functions of the highway department; highway vehicle and school bus storage.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: Up to \$875

Projected Completion Date: September 2008

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. No designated accessible parking space, line striping or signage.	S. 4.6	S. 23	Designate one 8' wide (minimum) parking space w/ 8' wide van accessible access aisle. Provide related striping and accessible signage.	1	2	\$125
2. The accessible route is compromised due to an abrupt change in level surface on the walkway from the parking lot to the building entrance..	S. 4.3 S. 4.7	S. 20 S. 21	Patch and/or resurface walkway to create a smooth, firm, hard, level surface.	1	3	\$300
3. Non-compliant exterior and interior door hardware. Hardware should be easily operable by one hand or a "closed fist".	S. 4.13	S. 26	Replace existing non-compliant knob-style hardware on exterior and interior doors to accessible compliant hardware.	1	2	\$450



Public Buildings: Center School Building

Name: Center School Building

Location: Main Street

Function: Vacant building.

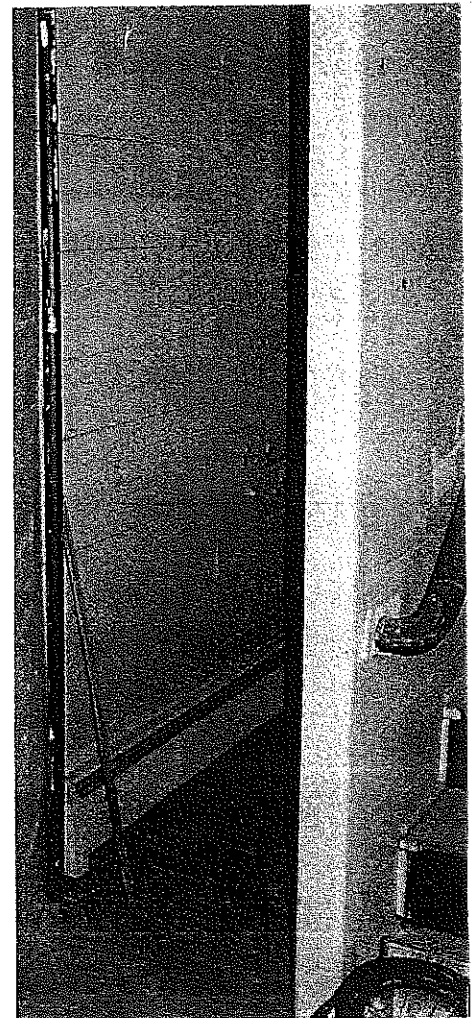
Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: Currently this circa 1852 two-story masonry building is vacant and not open to the public. It is slated for a complete renovation and rehabilitation including vertical access to all floor levels. Currently there are numerous areas of non-compliance including non-compliant parking, lack of accessible building access, uneven and irregular floor surfaces, abrupt changes in elevation, non-compliant stairs, inadequate door and hallway widths and non-compliant bathrooms among others. In its present condition, the building is not habitable or useable.

Accessibility Compliance Options: As part of the completion of the proposed building renovations, full compliance under MA 521 CMR and the Federal ADAAG is required. This applies to parking, creation of a fully compliant accessible route into and within the building and all interior finishes (door hardware, doorways, signage, bathrooms, counters, floor surfaces, stairs, railings, etc.).

Estimated Total Project Cost: Depending on the elevator location, finishes, number of fixtures, size of parking area, etc., final additional project costs related to accessibility compliance should exceed \$250,000.

Projected Completion Date: June 2010



Public Buildings: Town Hall

Name: Town Hall

Location: Main Street

Function: Vacant building.

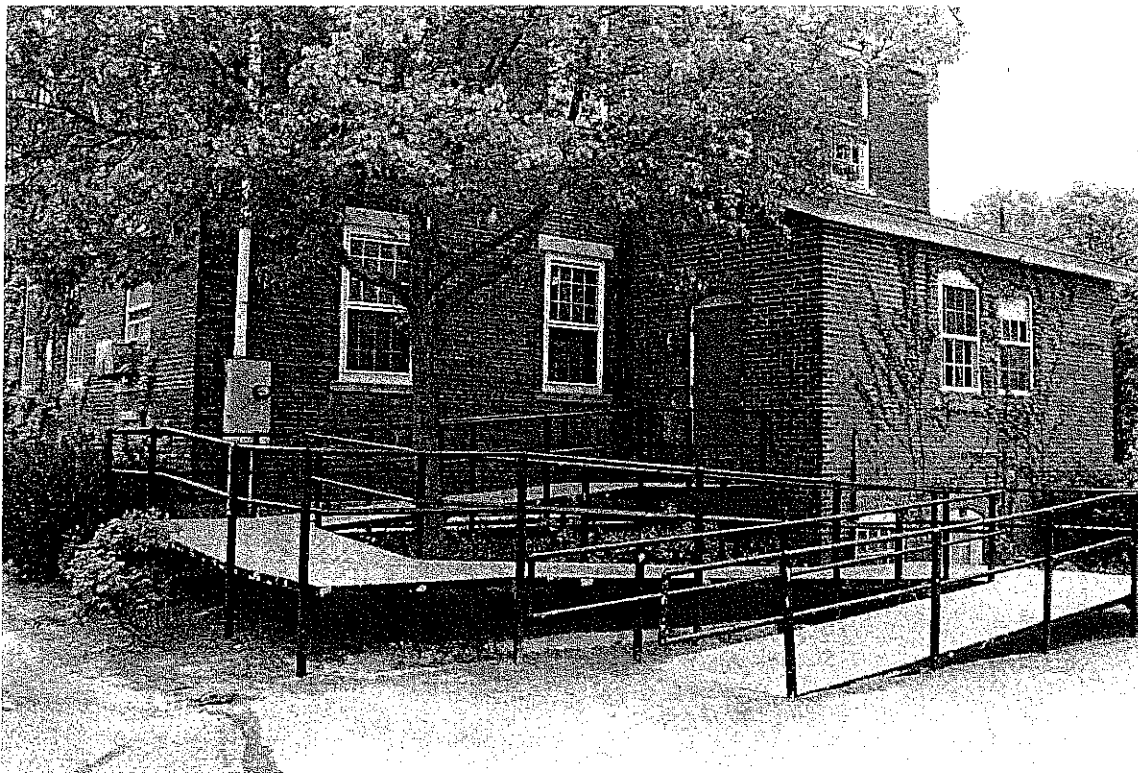
Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The two-story wooden frame town hall building is scheduled for a complete renovation and rehabilitation. Currently there are numerous areas of non-compliance and as well as granted waivers for specific conditions – all of which must be brought into full compliance as part of the proposed rehabilitation. The existing elevator, although not compliant with current accessibility regulations, has a waiver in effect which allows for its legal use and operation. An elevator fully compliant with both state and federal accessibility regulations must be installed to replace the existing elevator as part of the proposed renovation. Other areas of existing non-compliance include parking (lack of signage, inadequate number of designated spaces), door hardware, bathrooms, interior signage, counter heights, stair treads and railings and exterior ramp (top segment exceeds maximum 8.3% running slope requirement).

Accessibility Compliance Options: As part of the completion of the proposed building renovations, full compliance under MA 521 CMR and the Federal ADAAG is required.

Estimated Total Project Cost: Depending on the elevator location, finishes, number of fixtures and related variables, final additional project costs related to accessibility compliance should exceed \$250,000.

Projected Completion Date: June 2010



Public Buildings: Senior Center

Name: Senior Center

Location: 480 Main Street

Function: Council on aging office, senior center, drop-in lounge.

Responsible Party: COA

General Description or Obstacle Which Limits Mobility or Access: This building was substantially modified in the mid- to late 1990's. Since that time, it appears that additional activities and expansion in under-utilized space has occurred without full consideration of accessibility compliance. Overall, the senior center is substantially compliant with a number of additional modifications required for full compliance. There are a number of exterior modifications which are required including parking and access into and around the gazebo, shuffle board area and gardens. Currently there exist two designated car accessible parking spaces. Neither of these spaces are in compliance with the minimum width requirements for a standard space and accompanying access aisle nor is a van accessible space provided. Due to the available space it is recommended that one van accessible space and one car accessible space be provided. The middle portion of the ramp into the building varies from 8.5% - 9.5% and therefore exceeds the maximum allowable running slope requirement.

The building itself contains 3 levels inclusive of the basement, all of which are accessible by a full-service elevator. The main level consists of accessible bathrooms, dining area, galley-style kitchen and 3 offices. The kitchen is wholly non-compliant, however its use is limited primarily to storage of dining related items (paper goods, plastics, etc.) and warming and distribution of food. Food is not prepared in the kitchen but rather delivered to the kitchen area from off-site already prepared and warmed and then distributed by staff and volunteers to those in the dining area. Neither the cabinets, cabinet hardware, sink, countertop heights, serving counter height etc, are compliant. Should the use of this kitchen change to a more substantive and public use, including self surface from the food counter, then full compliance may be required. None of the offices/rooms throughout the building have accessible signage and most doors exceed maximum push/pull force requirements and the minimum door closing speed threshold. Coat racks located throughout the building all exceed maximum height requirements. The basement area is problematic due to non-compliant head clearance throughout due to water/sewer pipes and carrying beams. Similarly, interior public stairwell has non-compliant handrails and head clearance. The 2 doorways into the galley-style kitchen do not meet the minimum required 32" clearance.

Description of Programs: Administrative functions of council on aging, health services and screenings, social activities, nutrition programs, fitness programs and related activities.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: Up to \$56,150+

Projected Completion Date: June 2011

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. <i>Non-compliant accessible parking space, line striping and signage.</i>	S. 4.6	S. 23	<i>Designate one 8' wide accessible passenger vehicle parking space and one 8' wide van accessible parking space, separated by a 8' wide accessible access aisle. Provide related striping and accessible signage.</i>	1	2	\$100
2. <i>No accessible route of travel exists to the shuffle board area, gazebo and gardens.</i>	S. 4.3	S.20	<i>Construct a 48" wide w/36" clear width accessible pathway to and around the shuffle board area, gazebo and gardens. Construct a stable, firm, hard surface adjacent to the shuffleboard benches as companion wheelchair "seating".</i>	1	3	\$25,000+
3. <i>An 8 1/2" abrupt vertical rise exists into the gazebo. The existing door does not fully open and therefore the minimum clearance is not achieved for access into the gazebo.</i>	S. 4.3 S. 4.13 S. 4.14	S. 20 S. 25 S. 26	<i>As part of the creation of the accessible route in #2 above, construct and on-grade approach to access the gazebo which meets the slope requirements for a walkway and meets the required maneuvering clearances. Modify the existing gate so that it opens and closes properly.</i>	1	3	Included in #2 above

Senior Center continued

4.	The middle segment of the cement ramp into the building has a running slope which varies between 8.5% to 9.5% which exceeds the allowed maximum of 8.3%.	S. 4.3 S. 4.8	S. 20 S. 24	Modify the existing ramp to meet the running slope requirements.	1	3	\$2,000
5.	The existing handrails on the three sets of front stairs do not comply with the minimum 12" handrail extension beyond the bottom of the stairs.	S. 4.9	S. 27	Extend existing hand railings 12" beyond bottom step.	1	3	\$1,350
6.	Non-compliant exterior door closing speed.	S. 4.13	S. 26	The main/accessible entry door as well as all other egress doors have door closing speeds of 3 to 5 seconds. All door closers require adjusting to comply with the minimum 6 second closing speed requirement.	1	2	\$250
7.	Lack of interior accessible signage to the various permanent function rooms (dining/assembly, offices, storage, craft, etc.).	S. 4.30	S. 41	Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door(s).	2	1	\$825
8.	Non-compliant interior door closing speeds.	S. 4.13	S. 26	The doors from the elevator lobby and the door leading to the restroom lobby have door closing speeds of 3 to 5 seconds. All door closers require adjusting to comply with the minimum 6 second closing speed requirement.	1	2	\$250
9.	Three portable hallway coat racks located on the main and second floor levels exceed the maximum ht. of 54" a.f.f. for a side approach.	S. 4.2	S. 34	Purchase or install additional companion coat hooks or racks with a maximum height of 54" a.f.f.	4	2	\$375
10.	The bathrooms are substantially compliant except for the lack of compliant accessible signage, non-compliant door push/pull force; non-compliant door closing speeds and flush valves on 3 of 4 water closets that are located on the wall side of the toilet.	S. 4.13 S. 4.16 S. 4.30	S. 26 S. 30 S. 41	Adjust door closers to comply with maximum 5 lbs. interior door push/pull force requirement and minimum 6 second closing speed requirement. Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door(s). Replace non-compliant water closet tanks with those which have its flush valve on the approach side of the toilet.	3	2	\$1,000
11.	The 2 kitchen doors and door entrances have clearances e of 30" and 31" (32" min. required).	S. 4.13	S. 26	Modify entries by widening and installing compliant (34" - 36") doors.	2	3	\$2,500
12.	Interior stairs and stairwells- the interior stair well to the basement area has a non-continuous railing and a protrusion into the accessible route due to the lack of head clearance at the base (66" a.f.f. existing, minimum of 80" a.f.f. required).	S. 4.3 S. 4.4 S. 4.9	S. 20 S. 27	Modify or replace non-compliant railing so that it is continuous. Modify, as feasible, the interior stair well to provide additional 14" of clearance at landing.	2	4	Up to \$2,500+
13.	Numerous non-complaint protrusions into the accessible route of travel occur in the basement level due to low hanging pipes (72" - 75" a.f.f.).	S. 4.3 S. 4.4	S. 20	Construct barriers, wing walls and/or relocate pipes as applicable and feasible such that the minimum 80" head clearance is achieved.	2	4	Unknown - up to \$20,000+

Public Buildings: Library

Name: Joshua Hyde Library

Location: 306 Main Street

Function: Public library

Responsible Party: Library Trustees

Library. The library as a whole is to be considered as generally accessible, with a number of required modifications for full accessibility compliance. The designated accessible parking space has non complaint access aisles and signage. The main entrance vestibule does not provide adequate clearance between doors. Overall, circulation within stacks and access to books is reasonably achievable, although full compliance does not exist. Services such as the circulation desk counter, card catalogue (electronic) and printer table do not comply with maximum height and/or knee clearance requirements. The mezzanine area, although not accessible, is open to the public. Complaint accessible signage is required throughout the building. The "accessible" bathrooms on the lower level both require some minor modifications to achieve full compliance. The water fountain located between these bathrooms is too high and provides insufficient knee clearance.

Description of Programs: Library – public library reading programs, story hours, computer access.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: \$ 9,225+

Projected Completion Date: June 2010

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. <i>No designated accessible parking space, line striping or signage.</i>	S. 4.6	S. 23	<i>Designate one 8' wide (minimum) parking space w/ 8' wide van accessible access aisle. Provide related striping and accessible signage.</i>	1	2	\$125
2. <i>The accessible route (walkway) is compromised due to an abrupt change in level surface of greater than 1/2" and a 2" wide gap from the transition from asphalt sidewalk to concrete pad at the main entrance</i>	S. 4.3	S. 22	<i>Patch and repair walkway to maintain a level surface such that there are no changes greater than 1/4" in level surface.</i>	1	2	\$150
3. <i>The main entrance/vestibule area is non-compliant as the interior door does not fully extend open resulting in approximately 28" of clear width space. Furthermore, only 33" of clearance exists between doors when the interior door is opened. A minimum of 48" is required between 2 hinged or pivoted doors, plus the width of any door swinging into the space.</i>	S. 4.13 S. 4.14	S. 25 S. 26	<i>Remove interior door.</i>	1	2	\$50
4. <i>The counter height at the check-out desk is constructed at 39" a.f.f., which exceeds maximum height requirements by 5".</i>	S. 4.32 S. 8.0	S. 12	<i>Provide a minimum 36" wide counter with a maximum height of 36".</i>	2	3	\$400
5. <i>The 5 work tables on the main level provide less than 27" of knee clearance space.</i>	S. 4.32 S. 8.0	S. 35 S. 12	<i>Modify at least one work table to comply with required 27" knee clearance requirement.</i>	4	2	\$50
6. <i>The printer keyboard for public use is located on a surface 40" a.f.f. which exceeds maximum height requirements.</i>	S. 4.32 S. 8.0	S. 35 S. 12	<i>Relocate or replace fixture upon which keyboard printer resides such that the surface height is between 28" and 34".</i>	4	2	\$0

Library continued

7.	<i>The electronic card catalogue is located on a surface 38 1/2" a.f.f. which exceeds maximum height requirements.</i>	S. 4.32 S. 8.0	S. 35 S. 12	<i>Relocate or replace fixture upon which card catalogue computer resides such that the surface height is between 28" and 34".</i>	4	2	\$0
8.	<i>The microfiche table provides less than 27" of knee clearance space.</i>	S. 4.32 S. 8.0	S. 35 S. 12	<i>Modify table to comply with required 27" knee clearance requirement.</i>	4	2	\$50
9.	<i>Inadequate clear width space of the accessible route in various locations due to display racks, globe, card catalogue, etc. as well as between the book stacks</i>	S. 4.3 S. 8.0	S. 20 S. 12	<i>Rearrange items and book stacks to increase the clear width space to at least 36" within the interior accessible route of travel.</i>	2	1	\$0
10.	<i>A floor grate on the main floor level has openings of 1" which exceeds the maximum threshold of 1/2".</i>	S. 4.5	S. 29	<i>Replace floor grate to one with compliant openings.</i>	4	2	\$150
11.	<i>Lack of interior accessible signage to the office, storage and other areas on both floor levels.</i>	S. 4.30	S. 41	<i>Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door.</i>	2	1	\$650
12.	<i>A number of interior doors have hardware which is knob-style and non-compliant. Hardware should be easily operable by one hand or a "closed fist".</i>	S. 4.13	S. 26	<i>Replace door hardware with lever-type hardware or other accessible compliant hardware.</i>	2	2	\$300
13.	<i>Non-compliant push/pull force of doors to stairwell. The push/pull force is greater than 10 lbs.</i>	S. 4.13	S. 26	<i>Adjust the door closer such that the maximum 5 lbs. push/pull force is achieved.</i>	2	2	\$100
14.	<i>No accessible route exists to the mezzanine area which is open to the public.</i>	S. 4.3	S. 22	<i>Adopt a policy restricting public use of this area and retrieval of materials by staff only.</i>	2	1	\$2,500
15.	<i>Drinking fountain on lower level near bathrooms is 42 1/2" a.f.f. at spout. Existing fountain does not provide sufficient minimum 27" knee clearance. No companion "high" drinking fountain provided.</i>	S. 4.15	S. 36	<i>Install new high/low accessible compliant drinking fountain with maximum spout height of 36" a.f.f. for low and 43" a.f.f. for high fountain.</i>	4	3	\$3,500
16.	<i>Both the men's and women's bathrooms on the lower level are substantially compliant except for the lack of compliant accessible signage, non-compliant door push/pull force; no audible and visual alarms are provided; stall doors are not self closing; flush valve in women's bathroom on wall side of the toilet; and one of the grab bars in each bathroom is at 30 1/2" a.f.f., which is lower than allowed.</i>	S. 4.13 S. 4.16 S. 4.26 S.4.28 S. 4.30	S. 26 S. 30 S. 40 S. 41	<i>Adjust door closers to comply with maximum 5 lbs. interior door push/pull force requirement. Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door(s). Replace non-compliant water closet tank with one which has its flush valve on the approach side of the toilet. Adjust stall doors. Raise non-compliant grab bars to a height of 33" to 36" a.f.f. Install audible and visual alarms in both bathrooms.</i>	3	2	\$1,200

Public Buildings: Public Safety Complex

Name: Sturbridge Public Safety Complex

Location: 346 Main Street

Function: Police/fire/civil defense; detention facility.

Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The public safety complex is generally accessible and requires modifications to fully meet current accessibility requirements. The building has main, mid and lower levels. Administrative offices and dispatch are located on the main level, training rooms are on the mid level and the fire department garage on the lower level. There exists no designated handicapped accessible van parking space for complex visitors. The counter at the front desk is too high and should be lowered. Most of the rooms or offices do not have compliant signage with the same areas also requiring hardware changes due to the use of door knobs. The public bathrooms in the lobby area are generally compliant but some actions and adjustments are still required. The employee-only bathrooms and locker rooms as well as the fire department "galley-style" kitchen are non-compliant but may be treated as a "reasonable accommodation" and addressed when and if required. A 3" rise from the sally port to the booking area restricts the accessible route of travel. The holding cells (2 male, 2 female, 1 juvenile) appear to meet accessibility standards for overall maneuverability, however, the toilet/sink fixtures in each cell are non-compliant. Vertical access between floor levels does not exist, although the lower and mid floor levels can also be reached from a ground level entrance. Because of the public use of the mid level (training room) an accessible route of travel between the main and mid-floor levels should be created.

Description of Programs: Administrative functions of police and fire department, issuing of permits, departmental meetings and training, temporary holding cells.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: Up to \$117,850+

Projected Completion Date: June 2011

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. <i>No designated van accessible parking space with appropriate line striping and signage. Existing spaces (2) do not have painted access aisles.</i>	S. 4.6	S. 23	<i>Designate one 8' wide accessible passenger vehicle parking space and one 8' wide van accessible parking space, separated by a 8' wide accessible access aisle. Provide related striping and accessible signage.</i>	1	2	\$200
2. <i>The accessible route (walkway) is compromised due to an abrupt change in level surface of greater than 1/4" and a 6" wide gap from the transition from asphalt driveway to the curb cut and a 1/4" abrupt change and gap at the main entrance concrete pad.</i>	S. 4.3	S. 22	<i>Patch and repair accessible route to maintain a level surface such that there are no changes greater than 1/4" in level surface.</i>	1	2	\$150
3. <i>Curb ramp from driveway to building has a main slope of up to 9.8 % and side slopes of up to 12.5 %.</i>	S. 4.7	S. 21	<i>Reconstruct the curb cut such that the slope does not exceed 8.3 % and the flared sides do not exceed 10.0 %.</i>	1	3	\$1,200
4. <i>Non-compliant front entry door closing speeds of 5seconds.</i>	S. 4.13	S. 26	<i>Adjust the door closers of both the front door and the interior doors to the station such that the 6 second minimum closing speed is achieved.</i>	1	2	\$50
5. <i>The counter height at the dispatch area is constructed at 42 1/2" a.f.f., which exceeds the max. height requirements by 6 1/2".</i>	S. 7	S. 7	<i>Construct a counter below the window with a maximum height of 36" with a minimum of 27" knee clearance and 36" long.</i>	2	3	\$350

Public Safety Complex continued

6.	<i>A wall mounted display case in the lobby has its leading edge at 47 1/2" a.f.f. and protrudes 13" into the accessible route of travel. Protrusions of more than 4" cannot occur between 27" and 80" a.f.f.</i>	S. 4.4	S. 20	<i>Place a planter or fixed object on the floor below the display case to serve as a detectable warning.</i>	4	1	\$50
7.	<i>Lack of interior accessible signage throughout the building (approximately 50 signs required).</i>	S. 4.30	S. 41	<i>Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door(s).</i>	2	1	\$2,500
8.	<i>Non-compliant knob-style interior door hardware (approximately 40). Hardware should be easily operable by one hand or a "closed fist".</i>	S. 4.13	S. 26	<i>Replace non-complaint door hardware with lever-type hardware or other accessible compliant hardware.</i>	2	2	\$3,000
9.	<i>Interior doors have non-compliant door closing speeds and push/pull force.</i>	S. 4.13	S. 26	<i>Adjust all door closers such that the 6 second minimum closing speed and maximum 5-lb. push/pull force is achieved.</i>	2	2	\$200
10.	<i>Both the men's and women's public bathrooms in the lobby are substantially compliant except for the lack of compliant accessible signage, non-compliant door push/pull force and closing speeds; no audible and visual alarms are provided; flush valve in men's bathroom is on the wall side of the toilet; the towel dispenser is located over the sink at 54" a.f.f. which exceeds the maximum allowed forward reach range ; and the grab bars in each bathroom is at 30 1/2" a.f.f., which is lower than allowed.</i>	S. 4.13 S. 4.16 S. 4.2 S. 4.26 S. 4.28 S. 4.30	S. 6 S. 26 S. 30 S. 40 S. 41	<i>Adjust door closers to comply with maximum 5 lbs. interior door push/pull force and maximum 6 second closing speed requirements. Install accessible compliant signage with appropriate finish and contrast and character height and proportions. Raised and Brailled characters should also be included. Signage should be mounted at 60" a.f.f. o.c. adjacent to the latch side of the door(s). Replace non-compliant water closet tank with one which has its flush valve on the approach side of the toilet. Relocate towel dispenser such that it is in the allowed zone of reach. Raise non-compliant grab bars to a height of 33" to 36" a.f.f. Install audible and visual alarms in both bathrooms.</i>	3	2	\$1,200
11.	<i>Lack of compliant accessible access from sally port/garage to booking room due to a 3" abrupt change in elevation.</i>	S. 4.3	S. 20	<i>Construct a removable platform "walkway" (1:20 (5%) maximum slope) for use when necessary.</i>	1	3	\$350
12.	<i>Non-compliant mid level building access due to the ramp exceeding 8.3% running slope threshold (8.3% to 11.0% at base); non-compliant handrail heights; and exceedance of the maximum ramp run of 30 feet.</i>	S. 4.3 S. 4.8	S. 22 S. 24	<i>Remove existing ramp and railings and reconstruct to comply with the maximum 8.3% running slope and 30' maximum length between landings requirement. Install compliant handrails such that the handrails are continuous on both sides of the ramp, 1-1/4" to 1-1/2" in outside diameter, and round or oval in shape; handrails to be provided in pairs, one at a height of 34" - 38" above the ramp surface and the lower handrail at a height between 18" and 20"; handrails should extend 12" beyond the bottom and top of the ramp.</i>	1	3	\$20,000+
13.	<i>Mid-level entry door opens with difficulty and therefore exceeds push/pull force.</i>	S. 4.13	S. 26	<i>Adjust entry door such that the maximum 10-lb. push/pull force is met.</i>	1	2	\$100

Public Safety Complex continued

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|---|---------------------------------------|---|---|
| <p>14. The existing holding cells do not meet detention facility standards for accessibility as the inmate toilets are too low and too close to the wall; the drinking fountain is inaccessible due to the location and height, lack of adequate clear space and approach, inadequate control mechanisms, and lack of knee clearance.</p> | <p>S. 15</p> | <p>Modify an existing cell to comply with required toilet, drinking fountain, controls and clearance/set-back requirements.</p> | <p>4 4 \$0 - 3,500+</p> |
| <p>15. Lack of internal vertical accessible route of travel between main and lower level of building.</p> | <p>S. 4.3
S. 4.10
S. 4.11</p> | <p>S. 20
S. 28</p> | <p>Install either an internal limited use limited access (LULA) 2-story internal lift or a chairlift - whichever is allowable based on value of work threshold.</p> |



Public Buildings and Facilities: Sturbridge Recycling Center

Name: Sturbridge Recycling Center

Location: Breakneck Road

Function: Disposals of trash and recyclables

Responsible Party: Board of Health

General Description or Obstacle Which Limits Mobility or Access: Located on Breakneck Road, use of the recycling center is free to Sturbridge residents. Permit stickers are available at the Board of Health Office located in the Town Hall. The facility is staffed with three people during the hours of operation. There exists an informal policy of offering assistance to those who request it including elderly and persons with disabilities. Signage should be provided to instruct those in need how to obtain assistance. Because of the type of use and operation, coupled with the excessive cost involved to construct a fully handicapped accessible recycling center, no additional modifications are required.

Estimated Total Project Cost: \$150

Projected Completion Date: December 2008

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>Type of Action to be Taken</u>	<u>Priority</u>	<u>Feasibility</u>	<u>Cost Estimate</u>
<i>No signage exists to instruct those who need assistance in dropping off materials.</i>	<i>Provide signage that describes how those who are in need can obtain assistance in dropping off their recyclables.</i>	4	2	\$150



Public Buildings and Facilities: Town Common/Gazebo

Name: Sturbridge Town Common

Location: Corner of Main and Morse Street

Function: Town Common and band concerts

Responsible Party: Recreation Department

General Description or Obstacle Which Limits Mobility or Access: The Town Common is an area of open space near the Joshua Hyde Library and Town Hall that features a gazebo where bands perform during the Town's summer activities. The gazebo itself was compliantly constructed at its onset but age is starting to catch up with it and some of its access features need repairs such as a change in surface level of 1" where the asphalt walkway transitions to the bottom of the ramp. The handrails on the ramp are compliant as well but they are in disrepair due to rusting. There is also a plant overgrowth that is encroaching the ramp surface. The remainder of the Town Common has benches scattered throughout and a bisecting path made of concrete panels. Although the walkway meets slope and width requirements, there are some areas that grass overgrowth between the panels create surface level changes greater the ½". There are also surface level changes greater than 1" transitioning from the walkway to Main Street.

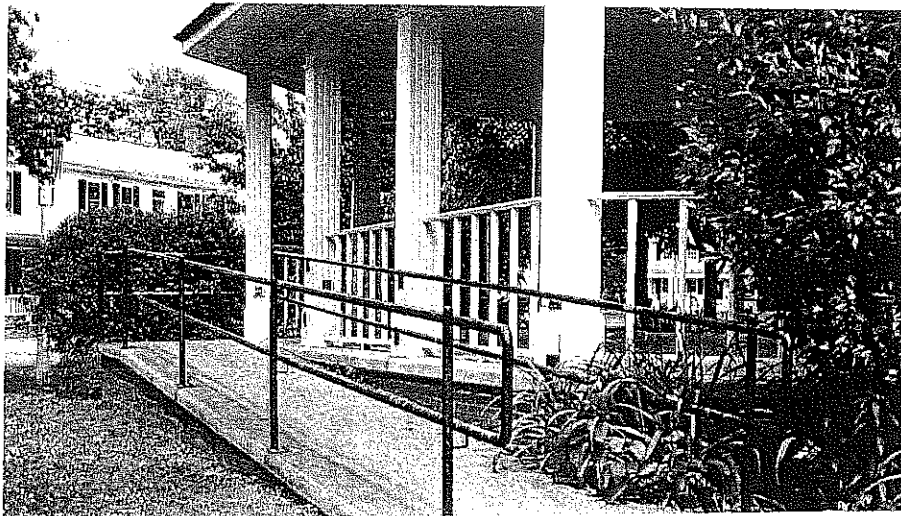
Description of Programs: Varies-public open space.

Accessibility Compliance Options: Initiate improvements and perform general maintenance as specified.

Estimated Total Project Cost: Up to \$600

Projected Completion Date: June 2008

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>ADAAG Compliance</u>	<u>MA 521 CMR Compliance</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. Transition from asphalt walkway to gazebo ramp exceeds maximum allowed for change in surface levels by ½"	S. 4.3	S. 24	Patch with bituminous concrete to create smooth transition and level surface.	2	2	\$100
2. Gazebo ramp handrails are in disrepair due to rusting.	S. 4.8	S. 24	Removed rust and repaint handrails.	2	2	\$100
3. Grass overgrowth between concrete panels in walkway creates change in surface levels greater than ½"	S. 4.3	S. 22	Remove grass overgrowth between concrete panels.	2	2	
4. Walkway in direction of Main Street has two or three areas that have sand and changes in surface level exceeding the ½" maximum.	S. 4.3.	S. 24	Remove sand and patch with bituminous concrete to create smooth transition and level surface.	2	2	100
5. No on-street parking designated accessible parking space, line striping or signage.	S. 4.6	S. 23	Designate two on-street accessible spaces. Provide related striping and accessible signage.	2	2	\$300



Public Buildings (Leased for Public Accommodation): Sturbridge Nursery School

Name: Sturbridge Nursery School Building

Location: 518 Main Street

Function: Private daycare facility (lease).

Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The Sturbridge Nursery School Building is a one-story wooden-framed structure. It is currently leased for use as a private daycare facility for toddlers and young children ages 3 to 5.

The building is wholly non-compliant and does not meet current accessibility standards. The building consists of two classrooms, a kitchen area and two bathrooms. Accessible signage is missing throughout and door hardware (knob-style) is non-compliant. The bathrooms are roughly 32" x 88" in size and do not meet accessibility requirements. The kitchen area is used by staff primarily for storage and activities with limited actual cooking and/or food preparation. At least one threshold between rooms creates an abrupt change in level surface of approximately 1". The rear door does not provide adequate clearance. The facility lacks designated accessible parking and an accessible route of travel into the building. Both the side and front entrances are inaccessible due to masonry steps with non-compliant handrails at the main/front entrance and a 6" abrupt change in elevation at the rear entrance. There is no compliant accessible route of travel from the building to the playground area or to and around the various play components. The cement "walkway" to the play area has a running slope in excess of 10.0% or twice the maximum slope allowed for walkways.

Summary: The Sturbridge Nursery School Building is on one level. As a result, simple modification of existing conditions for access into the building is possible. The existing bathrooms would also need to be expanded in order to achieve full compliance. However, overall costs including the creation of accessible routes to and around the play areas will be fairly high. The town must decide whether it is cost feasible to initiate such construction or dispose of the property. An overall summary of the major areas of non-compliance and estimated cost is provided below.

Description of Programs: Private daycare facility.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as required.

Estimated Total Project Cost: Up to \$38,250+

Projected Completion Date: July 2011

<u>Obstacle Which Limits Mobility or Access</u>	<u>Cost Estimate</u>
1. Parking, accessible route of travel to building, entrance modifications.	\$15,000+
2. Accessible route to play area and to and around play equipment.	\$10,000+
3. Bathrooms	\$12,500
4. Interior door hardware	\$150
5. Interior signage	\$100
7 Related building modifications (adjust door closers, modify thresholds, etc.)	\$500
Total	Up to \$38,250+

Public Buildings (Leased for Public Accommodation): Mass Motion Dance Studio

Name: Mass Motion Dance Studio

Location: 8 Brookfield Road

Function: Private dance studio (lease).

Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The 8 Brookfield Road Building is a one-story masonry structure. It is currently leased for use as a private dance studio for children.

Access to building and services: The building is reasonably compliant but does not fully meet current accessibility standards. The facility lacks designated accessible parking. The front entrance is accessible, although minor asphalt patching is required at entry due to an abrupt change in elevation

Main Floor Level: The building consists of a small office/reception area, waiting room, dressing room, two bathrooms (one regular and one denoted as "accessible"), two large dance studios and numerous storage closets. The clearances throughout are generally acceptable and overall maneuverability is good. However, the two doorways in the dressing room do not meet the minimum 32" minimum clear width space requirement and should be widened. Accessible signage is missing throughout and door hardware (knob-style) is non-compliant. The "accessible" bathroom is non-compliant as it has improper signage, a wholly non-compliant sink (height, levers, not wrapped below), the mirror is mounted too high (52 1/2" a.f.f.), the towel dispenser is too high (57" a.f.f.), missing floor tile creates an uneven surface, a wall cabinet protrudes into the accessible route of travel and only one grab bar exists for the water closet.

Summary: Overall modification costs for this building should be fairly minimal. Regardless, the town must decide how these improvements are to be funded. An overall summary of the major areas of non-compliance and estimated cost is provided below.

Description of Programs: Private daycare facility.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as required.

Estimated Total Project Cost: \$ 5,150

Projected Completion Date: July 2011

<u>Obstacle Which Limits Mobility or Access</u>	<u>Cost Estimate</u>
1. Designate accessible parking with striping and signage, repatch/reseal entrance surface area.	\$350
3. Bathroom (new sink, lower mirror and towel dispenser, install additional grab bar, repair floor tile, construct wing walls for cabinet, install compliant signage).	\$3,750
4. Interior door hardware	\$250
5. Room signage	\$300
7 Widen dressing room door entrances	\$500
Total	\$5,150

School Buildings: Burgess Elementary School

Name: Burgess Elementary School

Location: Off Cedar Street

Function: Public school

Responsible Party: School Committee

General Description or Obstacle Which Limits Mobility or Access: The Burgess Elementary School is a masonry one-story building which serves as a public school for grades kindergarten through six. The building has had limited accessibility improvements since its initial construction and therefore remains substantially non-compliant. None of the general use bathrooms are accessible, many of the door openings have only 27" to 28" of clearance, a number of double hallway doors do not have the minimum required 32" of clearance, door hardware throughout the building is non-compliant, no accessible signage exists, many of the hallway drinking fountains are non-compliant and the various classroom drinking fountains and bathrooms are non-compliant. Classroom bathrooms, when present, are inaccessible. The stage in the cafetorium is wholly non-compliant as it can only be accessed by stairs from the front of the stage. (Note: The South Gym stage is also non-compliant due to the lack of accessibility, but the usage to the stage is limited to storage. If the stage is put back into active student/public use then accessibility modifications will be required). A ramp at the back of the stage has non-compliant railings and a running slope that exceeds 26%. Door openings of the administrative offices provide only a 27" clear width and may require future widening as a "reasonable accommodation". The nurses' office also has only a 27" clear width and due to its use and purpose, must be widened to provide a minimum 32" wide clearance. Teacher bathrooms, teacher lounge areas, staff work areas and offices (non-public areas) are non-compliant and may require full compliance as a "reasonable accommodation" in the future. This would significantly increase estimated costs for compliance as there are at least 5 separate men's and women's staff bathrooms and which are wholly noncompliant. As a whole, the classroom areas, media area, gymnasium and cafeteria are readily accessible and maneuverability is good. The playground behind the school is non-compliant. Although part of the Miracle Maze playground can be accessed, it is generally non-compliant. As this structure is slated for removal, no further assessment was conducted. A summary of accessibility concerns is provided below. Specific compliance requirements are described and are also noted on pages x through x of this plan and in 28 CFR Part 36 (Americans with Disabilities Act Accessibility Guidelines) and Massachusetts State Building Code 521 CMR (Architectural Access Board Regulations).

In 2009, if passed by the voters at the Annual Town Meeting, a major renovation of the school will take place. As part of this effort, the south gym section of the school will be demolished and replaced with a two-story addition. Due to the magnitude of the work, it is likely that full accessibility compliance of the school will be required.

Description of Programs: Public school, place of assembly, recreational facilities.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: Up to \$311,500+

Projected Completion Date: June 2011

	Item	Cost
<u>Building Parking</u>	1. Accessible parking for the building is non-compliant. No designated van accessible spaces exist at either the front or back of the building. Four designated accessible spaces in front of the building lack adequate access aisles. Two designated accessible spaces in the back of the building near the South Gym entrance lack complaint signage (one sign missing, one sign greater than 10' from space). Two designated accessible spaces in the back of the building have signage which is mounted too high and a non-compliant access aisle. <i>Action required: Designate three 8' wide accessible passenger vehicle parking spaces with minimum 5' wide access aisle and one 8' wide van accessible parking space with a minimum 8' wide accessible access aisle at both the front and back of the building. Provide related striping and accessible signage. Signage is to be mounted between 5' and 8' to the top of the sign and no more than 10' from the head of the parking space.</i>	\$350

Building Access

1. The accessible route from the front "accessible" parking has a running slope of 11.6% from the parking lot, a greater than 1" abrupt change in level surface at the curb cut and a curb ramp running slope of up to 16%. The ramped entrance near the South Gym has non-complaint handrails (only one handrail at 15 ½" – 18 ½" a.f.f. provided). Action required: Reconstruct walkway and curb ramp at front of building to comply with running slope and curb ramp requirements. Provide paired railings at a height of 18"-20" (lower) and 34"-38" (upper) on both sides of the ramp. \$5,000
2. Main entrance approach has a running slope of 6.9% - 12.2% which exceeds maximum allowed slope requirements. No flat space exists at entrance. Action required: Reconstruct concrete walkway to the central office main entrance to comply with the maximum 5.0% running slope requirement and 5' flat space requirement and, if necessary ramp and railing requirements. Up to \$5,000+
3. Main entrance doors have closing speeds of less than 6 seconds. Action required: Modify doors to achieve closing speeds of no less than 6 seconds. \$75

Building Egress

1. Closing speed of the approximately 20 hallway, common and other public area egress doors vary from 4 to 5 seconds. Sixteen doors have a push/pull force of greater than 15 lbs. Closing speed of the approximately 15 classroom egress doors vary from 4 to 5 seconds and have a push/pull force of greater than 15 lbs. Action required: Adjust the door closers such that the 6 second minimum closing speed and the maximum 10 lbs. push/pull force are achieved. Up to \$825+

Central Office

1. Lack of accessible signage on approximately 18 rooms and offices in central office area (including nurse's office). Action required: Erect accessible Brailled signage at 60" a.f.f. o.c. adjacent to the latch side of the door(s). \$900+
2. Approximately 18 rooms and offices in central office area (including nurse's office) have knob-style hardware. Action required: Replace door hardware with lever-type hardware or other accessible compliant hardware. Up to \$1,350+
3. Nurses Office: A 27" clear width door opening exists to the nurse's office. The sink in the nurse's office is wholly non-compliant due to lack of knee clearance and lever height. The towel dispenser is too high. The bathroom is wholly non-compliant and with a 24" door and 21" clear width. Action required: Modify door opening and replace door to create a minimum 32" clear width. Replace existing sink with a fully compliant accessible sink. Lower towel dispenser. Widen bathroom doorway and construct fully compliant unisex accessible bathroom through internal expansion. Up to \$12,500+

Common Areas (hallways, foyers, miscellaneous, etc.)

1. Lack of accessible signage on approximately 14 storage/work rooms, offices, and public areas (gym, band, cafeteria, etc.) Action required: Erect accessible Brailled signage at 60" a.f.f. o.c. adjacent to the latch side of the door(s). \$700+
2. Approximately 14 storage rooms, offices, and public areas (gym, band, cafeteria, etc.) have knob-style hardware. Action required: Replace door hardware with lever-type hardware or other accessible compliant hardware. Up to \$1,050+
3. The south wing hallway light switches are greater than 57" a.f.f. which exceeds the max. 54" a.f.f. for a side approach. Action required: Lower light switches to a max. height of 54" a.f.f. for a side reach approach or 48" a.f.f. for a forward approach. \$1,500+

4. At least two non-compliant drinking fountains (non-compliant knob-style "ceramic", "Halsey Taylor" with a spout height of greater than 36" a.f.f.). Action required: Install new accessible compliant drinking fountains with maximum spout height of 36" a.f.f. Unit controls shall be side or front mounted and operable by a closed fist. If required, construct wing or flange walls to minimize any protrusion to a maximum of 4". Up to \$7,000+
5. At least two hallway and two "classroom" double doors are non-compliant due to inadequate door widths (29½") and clear widths (28"). Action required: Modify doors to create a 36" door with a 23" fixed panel at each location. Up to \$15,000+
6. The coat racks located in the hallways are 59" – 64" a.f.f. o.c. which exceeds the maximum 54" a.f.f. for a side approach. Action required: Install additional coat hooks with a height of no greater than 54" a.f.f. \$50

Auditorium

1. The only access from the front of the stage is via a set of stairs which lacks railings. A ramped walkway from the rear of the assembly area to the stage varies in slope from 22.3% to 26.2% with a 1¾" abrupt change in elevation at the ramp base and one non-complaint railing. Action required: Install a fully compliant 36" x 54" or larger vertical platform lift to access the stage area. Install compliant handrails which also extend 12" beyond the base and top of the stairs. Remove rear access non-compliant ramp. Up to \$17,500+

Classrooms

1. Approximately 36 classrooms lack compliant accessible signage (38 signs). Action required: Erect accessible Brailled signage 60" a.f.f. adjacent to latch side of door(s). \$1,900
2. Approximately 36 classrooms have interior and other knob-style hardware either between or to another classroom, storage closet or to a means of egress (50 replacement levers required). Action required: Replace door hardware with lever-type hardware or other accessible compliant hardware. Up to \$3,750+
3. Approximately 41 sinks in classrooms located throughout the school are non-compliant due to either lack of knee clearance, hardware and/or reach. Many of the accompanying dispensers (soap, towel) are mounted too high or not within adequate reach range. Action required: Modify all as required to meet required hardware, reach and clearance standards. Lower and/or relocate dispensers as required. Up to \$25,000+
4. Approximately 8 classrooms have shared non-compliant bathrooms due to inadequate maneuvering space, insufficient door clearance, non-compliant fixtures, water fountain, etc. (1 boys, 1 girls, and 1 water fountain per shared arrangement for a total of 4 separate areas). Action required: If allowed by MA State Building Code and MA Board of Education, discontinue use of all or modify all to create one unisex age appropriate arrangement per shared bathroom to meet required accessible hardware, reach and clearance standards. \$0 to \$80,000+
5. Computer room work stations have less than the required 27" knee clearance. Action required: Modify and elevate at least one work station table as may be required. \$50

Bathrooms

1. The chart on the following page summarizes the various area of non-compliance in the bathrooms of the building. Approximately 17 bathrooms were assessed. Most bathrooms failed to meet both age appropriate and accessibility compliance standards. Action required: Modifications as stated on the following page. Up to \$107,000+

Burgess Elementary School Bathrooms continued

Location	Door PP Force	Door Closing Spd	Sign	Mirror	Dispensers	Toilet Paper Dispenser	Sink	Urinal	Stall Door	Grab Bars	Water Closet	Alarms
Boy's (Main near Reading Rm)	NC	C	NC	NA	C	NC	NC	NC	NC	NC	NC	C
Girl's (Main near Reading Rm)	NC	C	NC	NC	C	NC	NC	NA	NC	NC	NC	C
Boy's (Main near V2/V4)	NC	C	NC	NA	C	NC	NC	NC	NC	NC	NC	C
Girl's (Main near V2/V4)	NC	C	NC	NC	C	NC	NC	NA	NC	NC	NC	C
Boy's (Main near Art/Cafeteria)	NC	C	NC	C	C	NC	NC	NC	NC	NC	NC	C
Girl's (Main near Art/Cafeteria)	NC	C	NC	C	C	NC	NC	NA	NC	NC	NC	C
Boy's (Main near Art/Gym)	NC	C	NC	C	C	NC	NC	NC	NC	NC	NC	C
Girl's (Main near Art/Gym)	NC	C	NC	C	C	NC	NC	NA	NC	NC	NC	C
Boy's (Pre K)	NC	C	NC	NA	C	NC	NC	NA	NC	NC	NC	C
Girl's (Pre K)	NC	C	NC	NA	C	NC	NC	NA	NC	NC	NC	C
Boy's (South Gym)	NC	C	NC	NC	C	NC	NC	NA	NA	NC	NC	C
Girl's (South Gym)	NC	C	NC	NC	C	NC	NC	NA	NA	NC	NC	C
Unisex ? (South Gym)	NC	C	NC	NC	C	NC	NC	NA	NA	NC	NC	C
Unisex ? (South Gym)	NC	C	NC	NC	C	NC	NC	NA	NA	NC	NC	C
Girl's (Near South Wing Office)	NC	C	NC	NC	C	NC	NC	NA	NC	NC	NC	C
Boy's (Near South Wing OT)	NC	C	NC	NA	C	NC	NC	NC	NC	NC	NC	C
Girl's (Near South Wing OT)	NC	C	NC	NC	C	NC	NC	NA	NC	NC	NC	C
Total Estimated Cost	\$600	\$0	\$850	\$600	\$0	\$850	\$51,000	\$12,500	\$650	\$10,200	\$29,750	\$0

NC = Non-compliant
 C = Compliant
 NA = Not Applicable

Total Estimated Cost: \$107,000+

The following standards for pre-kindergarten to third grade should be met: bottom of mirror shall be at a maximum of 31" a.f.f.; dispensers and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers should be between 14" to 17" a.f.f. for kindergarten to third grade and 14" a.f.f. for pre-kindergarten and within 36" of the rear wall; urinals shall have a minimum 29" clear width space and have a maximum rim height of 15" a.f.f.; grab bars shall be 42" long, one located at the back wall and one located on the side wall with a height of between 20" to 25" a.f.f. for kindergarten to third grade and 18" to 20" a.f.f. for pre-kindergarten; sinks shall not be higher than 30" a.f.f. with a minimum of 25" of knee clearance; seat height of water closets should be between 12" to 15" a.f.f. for kindergarten to third grade and 11 1/2" to 12 1/2" a.f.f. for pre-kindergarten; water closets should be between 15" to 18" o.c. from the nearest side wall for kindergarten to third grade and 11" o.c. for pre-kindergarten; door closers must operate such that the sweep period

of the closer from an open door position of 90 degrees to closure shall take at least six seconds; interior hinged doors must not exceed a force of 5-lb. to pull or push open; bathroom stalls shall have a coat hook 54" a.f.f.; bathroom stall doors shall be self-closing.

The following standards for fourth to sixth grade should be met: bottom of mirror shall be at a maximum of 31" a.f.f.; dispensers and similar devices must be operable with one hand or a closed fist at a maximum height of 42" a.f.f.; toilet paper dispensers should be between 17" to 19" a.f.f. and within 36" of the rear wall; urinals shall have a minimum 29" clear width space and have a maximum rim height of 15" a.f.f.; grab bars shall be 42" long, one located at the back wall and one located on the side wall with a height of 25" to 27" a.f.f.; sinks shall not be higher than 30" a.f.f. with a minimum of 25" of knee clearance; seat height of water closets should be between 15" and 17" a.f.f. and should be between 15" to 18" o.c. from the nearest side wall; door closers must operate such that the sweep period of the closer from an open door position of 90 degrees to closure shall take at least six seconds; interior hinged doors must not exceed a force of 5-lb. to pull or push open; bathroom stalls shall have a coat hook 54" a.f.f.; bathroom stall doors shall be self-closing.

<u>Rear Playground Area</u>		
1. No accessible route of travel exists to and within the play facilities and there are no accessible play components. <i>Action required: Construct an accessible route of travel to around the playscape area. Install a stable, firm and slip-resistant as well as "impact attenuating" surface around and to play equipment. Acceptable materials include interlocking rubber matting, plastic matting, poured in place rubber surfacing and specially bonded wood fibers. When play equipment is replaced, upgraded or expanded, install accessible play component.</i>		Up to \$25,000+

Park and Recreation Facilities

Name: Active town recreation and play facilities.

Location: Town-wide.

Description of Facility: Recreation Programs.

Function: Children and adult recreation programs.

Responsible Party: Recreation Committee.

General Description or Obstacle Which Limits Mobility or Access: All facilities lack fully compliant and accessible parking areas with signage. Fully compliant accessible routes of travel to facilities and playing areas are non-existent throughout all recreation areas. In general, a paved or hard packed accessible pathway (48" wide w/ a 36" clear space) from the respective parking area to all facility programs and services is required. Cedar Lake Recreation Area, Turners Field, and the Town Barn Athletic Fields lack compliant and "hard packed" accessible parking. The Sturbridge Little League baseball fields (at Burgess Elementary School) has paved parking but the spaces exceed slope requirements, lacks compliant handicapped parking signage, as well as no designated van accessible parking. With the exception of the Burgess Elementary Sturbridge Little League baseball fields, none of the portable toilets that are available are accessible. Although the Sturbridge Little League field at Burgess has an accessible portable toilet, it is not on an accessible route of travel.

Accessibility Requirements: Under Section 19 of 521 CMR, all recreation facilities shall be accessible and on an accessible route of travel that is paved or hard packed. Other components of a facility (i.e. toilet rooms, ramps, picnic tables, etc.) must also fully comply with 521 CMR. Under the ADAAG standards, at a minimum, an accessible route must be provided up to and through all play areas and equipment. Current ADAAG Supplements [inclusive of State and Local Government Facilities (1998), Children's Environments (1998), Play Areas (2000) and Recreation Facilities (2002)] are considered to be "guidelines" that have not been incorporated into the Department of Justice's accessibility standards and therefore are not enforceable. A reprint of the United States Access Board "*Summary of Accessibility Guidelines for Recreation Facilities*" and "*Summary of Accessibility Guidelines for Play Areas*" is provided in Attachment H.

Public spaces, recreational facilities and playgrounds are within the jurisdiction of ADA and therefore must conform to those standards pertaining to accessible routes, reach ranges and similar standards for ancillary features (bathroom, benches, picnic tables, water fountains, parking, etc.). Play and recreational areas must be located on an accessible route with accessible routes to the various play structures, recreational facilities and equipment. The accessible route connecting ground level components within a play area should be 60" wide with some variation allowed depending on length of travel route and size of play area. The accessible route should be stable, firm and slip-resistant and is preferred to be the same as the general route of travel. The actual playground surface must also be stable, firm and slip-resistant as well as "impact attenuating" to provide a safe fall area around play equipment. Acceptable materials include interlocking rubber matting, plastic matting, poured in place rubber surfacing and specially bonded wood fibers. The sole use of sand or recycled rubber chips, the material used in Cedar Lake play area is not in compliance with accessibility standards. Play equipment should be as accessible as possible with "guidance" pertaining to this provided in Attachment H as previously noted.

Description of Programs: Active recreation and play facilities.

Accessibility Compliance Options: Initiate improvements and remove architectural barriers as specified.

Estimated Total Project Cost: \$ 90,800

Projected Completion Date: June 2011

Cedar Lake Recreation Area: Town-wide recreational complex consisting of two tennis courts, one basketball court, a playground (ages 5-12), skate park and waterfront swimming for youth and adult sports programs. The site features bleachers adjacent to the basketball court, a pavilion with four picnic tables (2 had 12" extensions that would allow a wheelchair to fit under) and a bathhouse with a women and men's restroom. The bathhouse is only open during town sponsored activity hours and is reasonably accessible with a few minor contractor issues. A portable toilet was located a good distance away from the pavilion

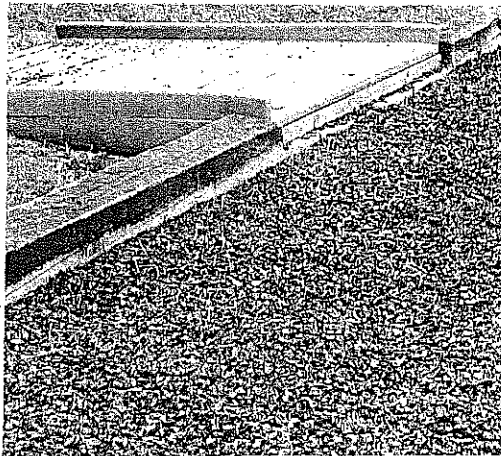
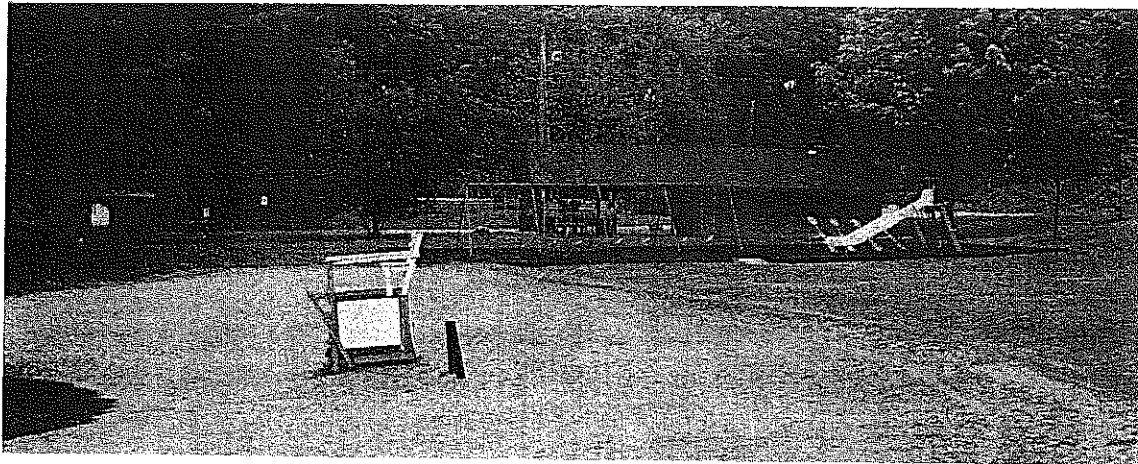
and is not accessible and it is not on an accessible route of travel. There are no designated parking spaces anywhere in this recreation area. Parking is off-street and has either unstable grass or gravel surfaces scattered throughout the various recreation areas. No accessible routes of travel exist to any of the play or seating areas. The play area lacks an accessible route of travel inside it due to the recycled rubber surface chips and although ramps are provided on each side, the transitions of the ramps to the play surface are three inches making them non-compliant. None of the play components are accessible. The Recreation Commission has a \$65,000 appropriation to renovate the playground area including the installation of a n accessible compliant surface, new play equipment and an accessible route of travel to the facility. Although compliant paths of travel and compliant seating exist within the tennis and basketball courts, access to this area is non-compliant as one must either go down a very steep asphalt walkway or through sand and grass. Entrance to the skate park is also non-compliant due to the exceedingly steep unfinished dirt and stone surface approach. The beach is a typical sandy beach with no accessible route of travel to the water.

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. <i>No designated accessible parking space, line striping or compliant signage.</i>	<i>Surface an approximately 600 s.f. area to create a firm and level parking area. Designate one 8' wide van accessible parking space and one 8' passenger vehicle accessible space with a shared 8' wide accessible access aisle. Provide related striping. Accessible signage must be placed in front of each space and at a height of between 5' and 8' to the top of the sign.</i>	1	2	\$1,500
2. <i>No accessible route of travel exists to the courts, bleachers, skate park, pavilion, play area, and beach.</i>	<i>Construct a 48" wide w/36" clear width accessible pathway to the courts, bleachers, pavilion, beach, skate park and concession stand. Insure that bleachers have compliant companion space for wheelchairs along the accessible route.</i>	1	3	\$10,000
3. <i>Lack of railings in bleachers.</i>	<i>Install accessible compliant railings.</i>	4	3	\$350
4. <i>No accessible play components</i>	<i>When play equipment is replaced, upgraded or expanded, install accessible play components.</i>	4	3	\$10,000
5. <i>No accessible route of travel exists entirely around or to and within the play facility.</i>	<i>Construct a 48" wide w/36" clear width accessible pathway to and around the play area. In addition consider the installation of a stable, firm and slip-resistant as well as "impact attenuating" surface around and to play equipment. Acceptable materials include interlocking rubber matting, plastic matting, poured in place rubber surfacing and specially bonded wood fibers.</i>	4	3	\$20,000
6. <i>Ramps to play area have change in surface levels in excess of 3".</i>	<i>Ensure that this surface level change is eliminated either by raising the compliant surface material 3" or cut into wooden boarders and create level entrances.</i>	2	2	\$200
7. <i>Portable toilet is not accessible and is not located on an accessible route of travel.</i>	<i>Replace existing portable toilet with an accessible portable toilet and relocate on an accessible route of travel.</i>	3	1	\$0
8. <i>Water fountain button by the courts has a 7 lb push force to operate.</i>	<i>Adjust so that push forces is 5 lbs or less.</i>	4	2	\$50
9. <i>Path of travel is reduced to 31" in the tennis court adjacent to the basketball court due to placement of bench.</i>	<i>Move bench away from the tennis net post to allow 36" minimum clearance.</i>	2	1	\$0

Cedar Lake Recreation Area continued

- | | | |
|--|--|----------------------|
| <p>10. Men's restroom-Lack of accessible signage. The toilet has the flush control on the wall side and is mounted 4" beyond the maximum allowed 18" from wall to centerline. The coat hook is mounted 9" higher than the 54" max allowed for side approach on the stall door, which also does not self-close. The mirror is mounted 9" higher than the max-allowed 40" from the bottom to the finished floor.</p> | <p>Install accessible compliant signage with appropriate finish and contrast and character height and proportions, raised and Brailled characters should also be included, signage should be mounted at 60" a.f.f. Move flush control to the wide side of the toilet stall. Move toilet 4" closer to sidewall. Lower coat hook 9" to 54" for side approach and lower sink mirror 9". Adjust stall door so that it self-closes.</p> | <p>3 3 \$750 +/-</p> |
| <p>11. Woman's restroom- Lack of accessible signage. The toilet is mounted 5" beyond the maximum allowed 18" from the wall to the centerline. The stall door does not self-close and the coat hook is mounted 10" higher than the maximum allowed 54" for side approach. The mirror is mounted 8" higher than the max-allowed 40" from the bottom to the finished floor.</p> | <p>Install accessible compliant signage with appropriate finish and contrast and character height and proportions, raised and Brailled characters should also be included, signage should be mounted at 60" a.f.f. Move toilet 5" closer to the side-wall. Adjust stall door so that it self closes. Mount coat hook 10" lower to 54" a.f.f. Lower mirror 8" to 40" from the bottom of it to the floor</p> | <p>3 3 \$750 +/-</p> |

Total \$33,600

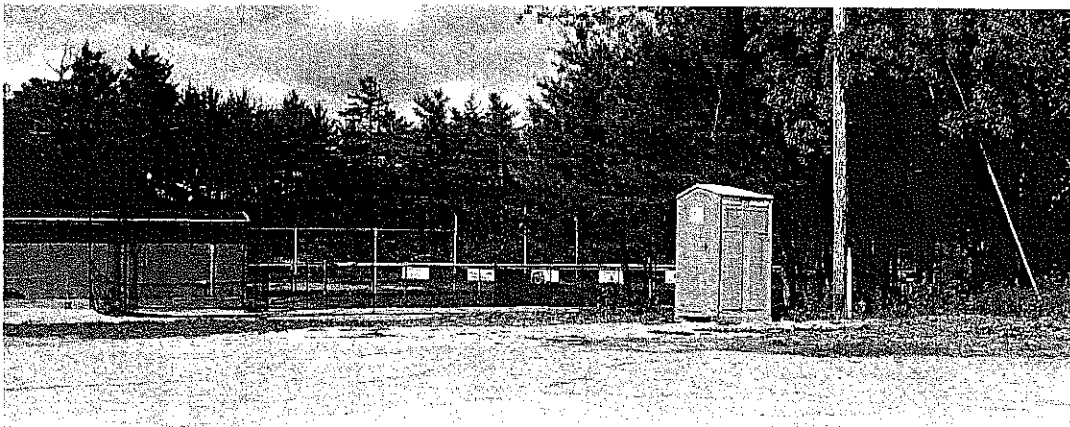


Town Barn Athletic Fields: Town-wide recreational complex consisting of a youth baseball field, youth softball/soccer fields, bleachers and portable toilets. These two fields are located on New Boston Road Ext., beyond the DPW Garage. There are no designated parking spaces with all parking occurring on either grass or dirt areas. There are no accessible paths of travel to the fields or seating areas. Each field has a portable toilet but they are not ADA compliant, nor are they on an accessible route of travel.

The first field is set up for youth little league baseball (ages 5-15) and features on-grade dugouts for the players and coaches. These dugouts are compliant when it comes to accessible seating and space. However, there is a 2- inch change in surface level between the field and the cement flooring of the dugouts. There is a batting cage adjacent to the baseball field with a hard packed dirt surface with non-compliant access due to the netting and frame. As this facility is upgraded and modified, all obstructions to access will need to be removed. There are two sets of aluminum bleachers down the right field line, but they lack accessible compliant railings. The area around the bleachers is flat, so it could accommodate accessible seating if an accessible path of travel were in place. Most spectators opt to sit behind the backstop using their own portable chairs.

The second field is used for girls softball and youth soccer practice. Access is over grass from the dirt road. There are no accessible routes of travel to the playing fields, bleachers or non-compliant portable toilet. There is one small set of wooden bleachers which lacks railings. The area around these bleachers is flat, which could reasonably accommodate wheelchair seating if a firm, hard, stable surface were in place.

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. <i>No designated accessible parking spaces, line striping or compliant signage exist at either field.</i>	<i>For each field, surface an approximately 600 s.f. area to create a firm and level parking area. Designate one 8' wide van accessible parking space with a 8' wide accessible access aisle. Provide related striping. Accessible signage must be at a height of between 5' and 8' to the top of the sign.</i>	1	2	\$3,000
2. <i>No accessible route of travel exists to the playing fields, bleachers, batting cage and portable toilets.</i>	<i>Construct a 48" wide w/36" clear width accessible pathway to the playing field, bleachers, batting cage, and portable toilet. Insure that bleachers have compliant companion space for wheelchairs along the accessible route.</i>	1	3	\$15,000 +/-
3. <i>Lack of railings in bleachers at both fields.</i>	<i>Install accessible compliant railings.</i>	4	3	\$400
4. <i>Portable toilets are not accessible and are not located on an accessible route of travel.</i>	<i>Replace existing portable toilet with an accessible portable toilet and relocate on an accessible route of travel.</i>	3	1	\$0
				Total \$18,400+

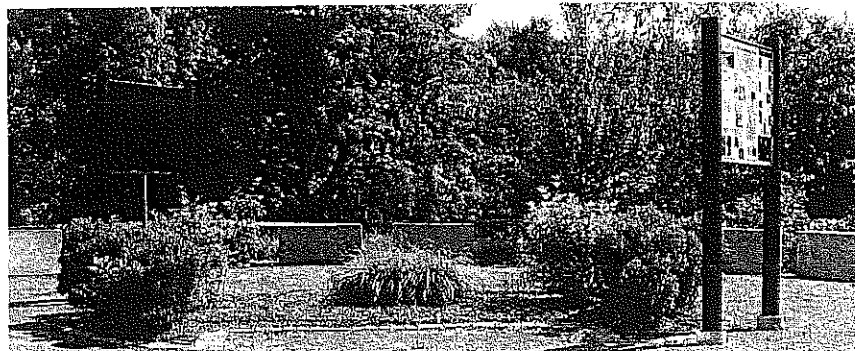


Turner's Field: Town-wide recreational area consisting of a baseball field, bleachers and a portable toilet. This field is located on Turners Club Road that is paved but narrow and in disrepair. There are no designated parking spaces at the field itself. Parking is provided behind the Millyard Market Place where there are five spaces designated as handicapped parking. However, none are van-accessible and only two of these spaces have compliant aboveground signage with no access aisles. It is also a long distance through the back of the Millyard parking lot, along a connecting road that's in disrepair through the parking area for Brier Patch Building tenants to the field. There are no accessible paths of travel to the field or seating areas. There is a portable toilet but it is not ADA compliant, nor is it on an accessible route of travel.

<u>General Description of Obstacle Which Limits Mobility or Access</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. <i>No designated accessible parking spaces, line striping or compliant signage exist at the field.</i>	<i>Surface an approximately 600 s.f. area to create a firm and level parking area. Designate one 8' wide van accessible parking space with a 8' wide accessible access aisle. Provide related striping. Accessible signage must be at a height of between 5' and 8' to the top of the sign.</i>	1	2	\$1,500
2. <i>No accessible route of travel exists to the baseball field, bleachers and portable toilet.</i>	<i>Construct a 48" wide w/36" clear width accessible pathway to the playing fields, bleachers, and portable toilet. Insure that bleachers have compliant companion space for wheelchairs along the accessible route.</i>	1	3	\$15,000+/-
3. <i>Portable toilet is not accessible and is not located on an accessible route of travel.</i>	<i>Replace existing portable toilet with an accessible portable toilet and relocate on an accessible route of travel.</i>	3	1	\$0
4. <i>Lack of railings in bleachers.</i>	<i>Install accessible compliant railings.</i>	4	3	\$300
				Total \$16,800+



Millyard Market Place Park: Small Circular Park located between the Millyard Market Place and the Brier Patch building . Access to the two informational kiosks located in the center is on a surface that is a combination of sand and stone dust. The outer edge of this park is surrounded by large rectangular cement blocks. No benches are provided. With the exception of a couple soft spots on the surface, access to the kiosks and the view of the Quinebaug River is reasonably compliant. In future upgrades, it is recommended that adding more stone dust and keeping it compacted will create a more firm, hard and stable surface.

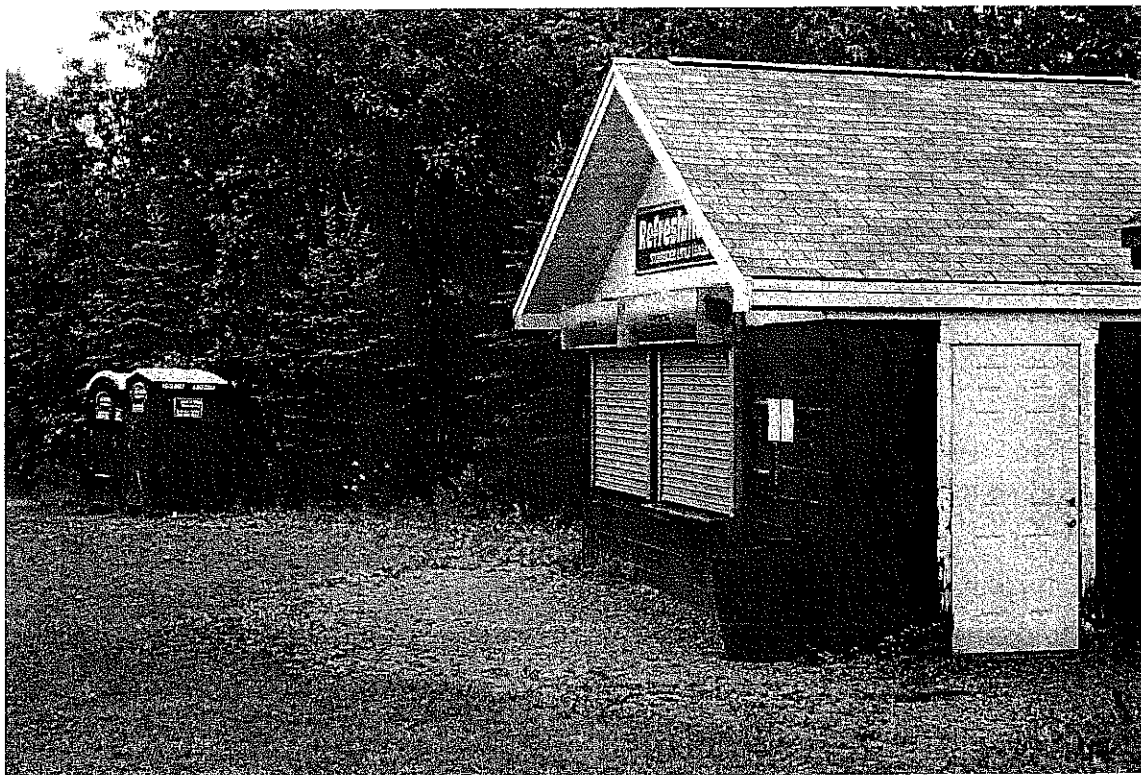


Sturbridge Little League baseball fields (at Burgess Elementary School): Little league ball fields consisting of 2 baseball fields, dugouts, a concession stand and 2 portable bathrooms (one accessible, one regular). Neither of the portable bathrooms are on an accessible route of travel. Although there are 2 designated accessible spaces (only one with compliant signage) and an access aisle, the cross slopes exceed the maximum allowable 2.0%.

General Description of Obstacle Which Limits Mobility or Access

	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>Cost Estimate</u>
1. <i>Lack of compliant designated accessible parking spaces, line striping and fully compliant signage.</i>	<i>Relocate "accessible" parking to a level area and reconstruct to create compliant firm and level parking spaces. Designate one 8' wide van accessible parking space and an 8' wide passenger vehicle space with a shared 8' wide accessible access aisle. Provide related striping. Accessible signage must be at a height of between 5' and 8' to the top of the sign.</i>	1	2	\$2,000
2. <i>No accessible route of travel exists to the baseball fields, concession stand and accessible portable toilet.</i>	<i>Construct a 48" wide w/36" clear width accessible pathway to the playing fields, concession stand and accessible portable toilet.</i>	1	3	\$20,000+/-
3. <i>Portable toilet is not located on an accessible route of travel.</i>	<i>Relocate accessible portable toilet to an accessible route of travel.</i>	3	1	\$0

Total \$22,000+



V. POLICIES AND PROCEDURES

Based upon discussions with local officials, the town does not have formal policies and procedures pertaining to the ADA and program accessibility, employment, non-discrimination, grievances, equal opportunity, and communications.

A number of model policies and procedures are provided as Appendices to address these areas, which can be adapted more specifically by the town for its own use. The adoption of these policies and procedures may also require specific actions by the town including developing partnerships with other agencies and organizations, employee training, implementation of specific practices, and the purchasing of equipment.

Under the ADA, a person is considered a qualified individual with a disability if s/he can perform essential functions of the job with or without reasonable accommodation.

Although the ADA does not require an employer to have job descriptions, they can be used as evidence of the essential functions of the job. Job descriptions should be up-to-date and should differentiate between the essential and the marginal duties of the position. Although the town has job descriptions which meet the general intent of this, more detail pertaining to essential functions and physical/minimal limitations should be included in current and new job descriptions. Non-essential functions are those which are not absolutely necessary for the job, although they might be convenient for the employer. If a medical examination is required, it must be required of all entering employees for the same position. Medical examinations are prohibited until after a job offer has been made to an applicant. Employment can be conditioned on the results of the applicant's post-offer medical examination.

<u>Policy/Language</u>	<u>Appendix</u>
Non Discrimination Policy	C
ADA Grievance Procedure	D
Employment/Pre-employment Criteria	E
Equal Opportunity Policy	F
Effective Communication	G

VI. SUMMARY

General

The Sturbridge Accessibility Plan is a planning document intended to comply with state and federal accessibility regulations. A primary goal of the plan is to provide an evaluation of the town's programs, services, and facilities to determine whether or not they are on the whole accessible to people with disabilities. This includes the identification of physical barriers to public buildings, sites and services owned or operated by the town. Recommendations on how to make services and facilities accessible are provided, as well as a general estimate of cost for the removal of architectural barriers. Sample policies and procedures as required under the Americans with Disabilities Act are also included as part of the overall plan.

Programs and Services

The active participation of the town's ADA Coordinator including monitoring, education, notification, and outreach is critical to the successful implementation of this accessibility plan. This includes assistance in the development of formal departmental practices and procedures to address the needs of the disabled. In order to insure equal access to town services and programs, alternative accessible formats and options must be readily available. It must also be assured that town facilities are regularly maintained to insure accessibility compliance.

Architectural Barriers

The removal of town-wide barriers to access public programs and services can be accomplished through a variety of means ranging from procedural and policy changes to the actual removal of architectural barriers on public property. The total cost of barrier removal is summarized below. However subject to changes in programming and facility use, this cost can be substantially reduced.

<u>Facility Type</u>	<u>Total Estimated Cost</u>
Public Buildings/Facilities	\$996,350+
Public Buildings (Leased for Public Accommodation)	\$43,400+
Recreation Facilities	\$115,800+
Total	\$1,155,550+

Policies and Procedures

The town does not have formal separate policies and procedures pertaining to the ADA and program accessibility, employment, non-discrimination, grievances, equal opportunity, and communications. It also lacks a formal "Commission on Disabilities". As part of this Accessibility Plan, model policies and procedures are provided to address those "missing" areas, which can be adapted more specifically by the town for its own use. The adoption of these policies and procedures may also require specific actions by the town including developing partnerships with other agencies and organizations,

employee training, implementation of specific practices, and the purchasing of equipment.

Recommendations

- Create a Commission on Disabilities under MGL Chapter 40 section 8J
- Adopt the recommended grievance procedure as provided in Appendix D for the resolution of accessibility related complaints concerning employment, services, programs, and activities.
- Continue to revise and replace existing job descriptions for town employees with job descriptions which clearly describe the essential functions of each position as well as any necessary physical requirements.
- Adopt policies pertaining to non-discrimination, employment, equal opportunity, and effective communication (See Appendices C, E, F, and G).
- Formalize any "informal practices" pertaining to providing assistance or access to programs and services. This should include postings and the publication of the same in a written format. As a matter of practice, the town's ADA related procedures and policies should be published in the Town Annual Report and on the Town's website.
- Purchase and install a teletypewriter (TTY) or telecommunication device for the deaf (TDD) for use in the selectmen's office to allow a centralized communication point to town services (Estimated cost of \$350).
- Purchase and install an assistive listening device (ASD) or a personal amplifier system to enable those with aural limitations to more effectively participate in public meetings (Estimated cost of \$2,500).
- Undertake required changes in policies and procedures as well as structural modifications to insure that all public elections and all public meetings, including town meetings, are in full compliance with equal and full access requirements.
- Remove architectural barriers as identified in Section IV of this Accessibility Plan.

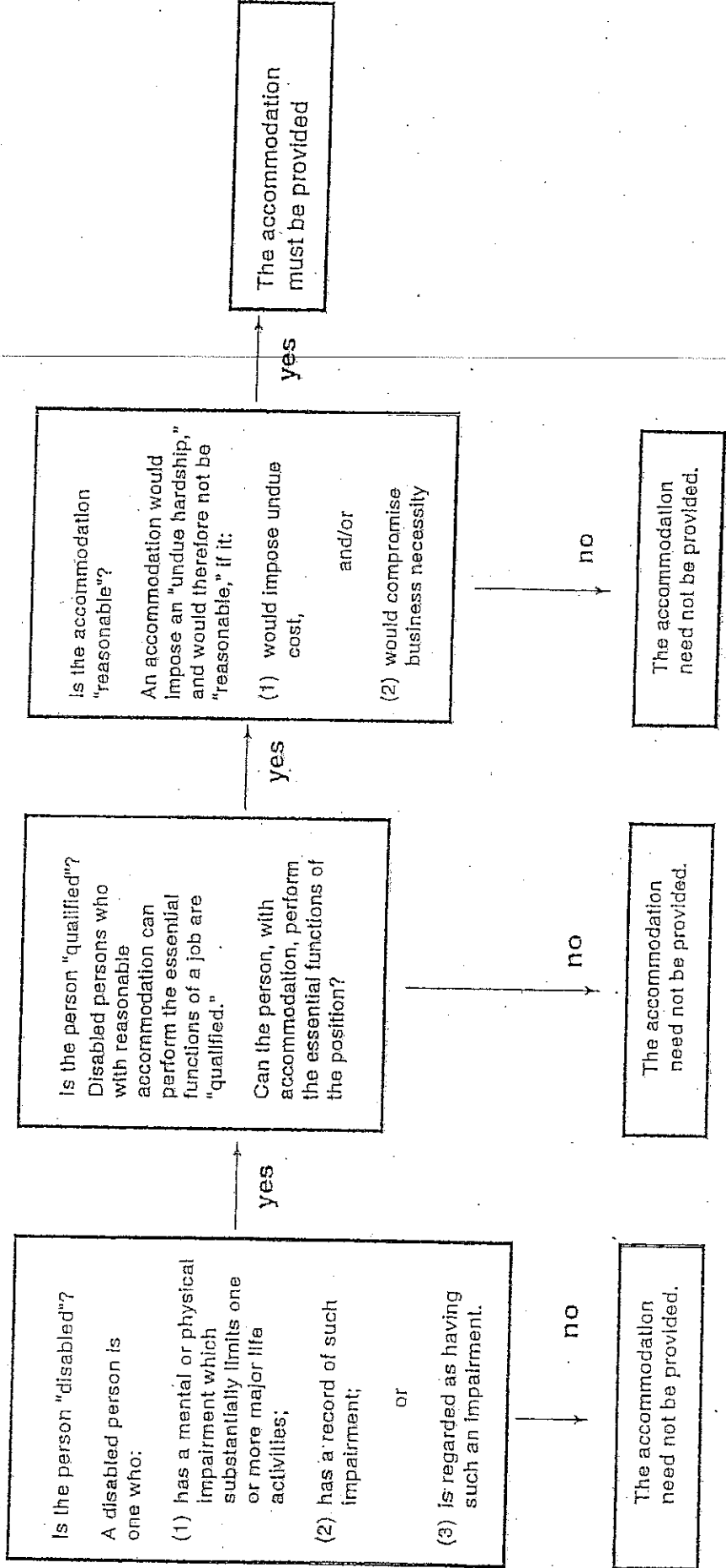
APPENDICES

Appendix A:	Accommodations Decision Chart
Appendix B:	Self-evaluation Memo and Survey Form
Appendix C:	Non Discrimination Policy
Appendix D:	ADA Grievance Procedure
Appendix E:	Employment/Pre-employment Criteria
Appendix F:	Equal Opportunity Policy
Appendix G:	Effective Communication
Appendix H:	U.S.A.B. Accessibility Guidelines for Recreational Facilities and Play Areas
Appendix I:	Comments on "Draft" Accessibility Plan

Appendix A: Accommodations Decision Chart

Accommodations Decisions Chart

If a request for accommodation is made, the following chart can assist the employer in the decision-making process regarding provision of the accommodation.



Appendix B: Self-evaluation Memo and Survey Form

MEMO

To: Sturbridge Town Departments/Commissions/Boards

From: Mike Kennedy, Access/Outreach Coordinator
Center for Living & Working, Inc. (CLW)

Date: March 4, 2008

Reference: Sturbridge Self-evaluation and Transition Plan

The Town of Sturbridge recently appropriated funding to complete a self-evaluation and transition plan in compliance with the Americans with Disabilities Act (ADA). Sturbridge Town Administrator James J. Malloy initiated a competitive procurement process to select a qualified consultant to undertake this effort upon which my firm, in conjunction with James M. Mazik, AICP Consulting Services was selected to proceed on this very important project.

The ADA was enacted in 1990 as a civil rights law that prohibits the exclusion of people with disabilities from the right of equal opportunity. Title II of the ADA mandates each local government to conduct a self-evaluation of its operations and develop a transition plan, which identifies physical barriers to accessibility.

It is also a requirement of certain state and federal funding programs that a self-evaluation and transition plan be completed in order to be eligible to apply for grant funds. The town may be considering submitting grant applications in the near future to address accessibility needs for some its public facilities. The completion of this self-evaluation and transition plan will allow the town to secure such funding.

What is a self-evaluation?

A self-evaluation is an evaluation of municipal operations to determine whether or not they are "on the whole" accessible to people with disabilities. The four areas of self-evaluation are sites, services and programs, general communications, and employment practices.

What is a transition plan?

Public entities are also required to develop a transition plan in order to; (1) identify barriers to accessibility, (2) create a list of potential modifications, and (3) develop a timeline for removing the identified architectural barriers.

YOUR COOPERATION IS NEEDED !!!!!

Self-evaluation Survey Form

Each department or municipal provider of a service will be asked to complete the attached survey form. It will take only a few minutes to complete. Please return your completed survey form to James Malloy by Friday, March 21, 2008. After we review the surveys, we may need to contact you directly to clarify some of your responses and to ask a few additional questions.

Transition Plan

As part of this process, we will also need to physically inspect various public facilities in Sturbridge. If you have jurisdiction over a certain building, we may need to contact you directly to arrange for a convenient time to undertake this assessment.

Again your cooperation is greatly appreciated and we look forward to working with each of you. If you have questions, you can contact me at (508) 755-1401 or e-mail me at mkennedy@centerlw.org and you can also contact Jim Mazik of James M. Mazik Consulting Services at (413) 265-9454 or e-mail him at jmazik14@comcast.net

Mike Kennedy

Sturbridge Self-evaluation Survey

Department/Board/Commission: _____

1. Location of department/program (name of building, floor level, street address: _____)
2. Describe the function of the department and any programs it offers or services that it provides.

-
- Are there any circumstances in which the participation of a person with a disability in any program or service offered by your department would be restricted or excluded?
 - Are any of these exclusions or restrictions necessary to the operation of the program/department or to the safety of non-disabled persons?
 - Are staff aware it may be necessary to modify program policies or practices to enable people with disabilities to participate in and benefit from the programs?
 - Is the public informed that these programs/services are prepared to make reasonable modifications?
 - Does the department/program have a formal or informal process for responding to requests for modifications?

- Briefly describe general office/service communications. Specifically, how is information disseminated and communicated? Are there assistive devices or auxilliary aids (ie. TTY, TDD, sign language interpreter) which are used or available?

- Are there any circumstances in which a person with a disability would be asked to pay a fee or meet any other requirements not imposed on other program/service participants? If yes, describe.

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

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

3. Employment Practices.

- Please list the number of full- and part-time employees.
- Has any of these staff declared a disability? If yes, describe.
- Are there any required formal tests as a condition of employment? If yes, describe.
- Do any of the positions have formal job descriptions? If so, state which position and attach a copy of the job description as well as a sample job ad.

Appendix C: Non Discrimination Policy

Non Discrimination Policy

The Town of Sturbridge does not discriminate on the basis of disability. Program applicants, participants, members of the general public, employees, job applicants, and others who are entitled to have access to all town programs, activities, and services will not be discriminated against on the basis of disability.

Copies of this notice as well as other policies and procedures may be available, upon request, in standard or alternate print formats to include large print, audio tape, Braille, and computer disk. The town's grievance procedures, self-evaluation, transition plan and ADA policies, practices, and procedures, are readily available, upon request.

Appendix D: ADA Grievance Procedure

Town of Sturbridge Grievance Procedure

The following grievance procedure is established to meet the requirements of the Americans with Disabilities Act. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in employment practices and policies or the provision of services, activities, programs and benefits by the Town of Sturbridge.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, telephone number of complainant and location, date and description of the problem. Reasonable accommodations, such as personal interviews or a tape recording of the complainant, will be made available for persons with disabilities who are unable to submit a written complaint.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to the Sturbridge ADA Coordinator, Town Hall – 308 Main Street, Sturbridge, MA 01566

Within fifteen calendar after receipt of the complaint, the ADA Coordinator will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the ADA Coordinator will respond in writing, and where appropriate in a format accessible to the complainant such as audiotape. The response will explain the position of the Town of Sturbridge and offer options for substantive resolution of the complaint.

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

Within 15 calendar days after receipt of the appeal, the Sturbridge Board of Selectmen or their designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting the Board of Selectmen or their designee will respond in writing, and where appropriate in a format accessible to the complainant such as audiotape, with a final resolution of the complaint.

All complaints received by the ADA Coordinator, appeals to the Sturbridge Board of Selectmen or their designee and responses from the ADA Coordinator and the Sturbridge Board of Selectmen or their designee will be kept by the Town of Sturbridge for at least three years.

Appendix E: Employment/Pre-employment Criteria

Employment/Pre-employment Criteria

Reasonable Accommodation Policy

The Town of Sturbridge strives to make employment opportunities and programs available to people from every race, color, religion, sex, national origin, age, disability, or veteran status and does not discriminate against any person based on these "categories". The town is committed to supporting people of various needs and abilities and will make every effort to provide a healthy, caring environment for all staff and the public.

It is the policy of the Town of Sturbridge that no otherwise qualified individual with a disability shall be excluded from employment solely by reason of her/his disability.

It is understood that the obligation to comply with this policy is not decreased by any state or local law or other requirement that, based on disability, imposes inconsistent or contradictory prohibition. Any prohibitions or limits upon the eligibility of qualified individuals with disabilities to practice any occupation or profession are not allowed under this policy.

It is the policy of the town that reasonable accommodations will be made for any qualified applicant or employee unless the town can demonstrate that the accommodation imposes an undue financial or administrative hardship on the operation of the town.

Notice of availability of reasonable accommodations for job applicants will be included in postings and advertisements and will be made available upon request to applicants with disabilities during the pre-employment process if necessary to provide equal opportunity to secure employment with the Town of Sturbridge.

All prospective employees will be informed at the initial interview that the Town of Sturbridge does not discriminate on the basis of disability and that requests for reasonable accommodations needed for the performance of essential job functions or for the enjoyment of other benefits of employment should be made by prospective employees following receipt of a conditional offer of employment.

Persons with a disability employed by the Town of Sturbridge may request reasonable accommodations from their immediate supervisor or from the town's ADA Coordinator. Requests for accommodations can be made at any time as they become necessary to perform essential job functions, or utilize benefits enjoyed by employment. These requests must be made both verbally and in writing describing the nature and purpose of the requested accommodation. Assistance will be made available upon request to any individual who needs assistance in identifying or documenting the reasonable accommodation needed.

A decision regarding reasonable accommodation requests will be made within thirty (30) working days of the submission of the request. The effectiveness of the accommodation and need for modification will be assessed during the first month of use.

The final decision concerning any requested accommodation that may represent an undue financial or administrative hardship will be made by the ADA Coordinator. Applicants or employees have the right to appeal the denial of any accommodation request using the ADA Grievance Procedure. In the case of a denial on undue hardship by the ADA Coordinator, the employee or applicant may appeal in writing within thirty (30) working days to the Board of Selectmen.

Employment Testing and Pre-employment Inquiry

The Town of Sturbridge shall not use any employment test or other selection criteria that screens out or tends to screen out individuals with disabilities.

The town shall not make any pre-employment inquiries or conduct a pre-employment medical examination of an applicant to determine whether the applicant is an individual with a disability or the nature or severity of the disability.

The town will ask no questions of applicants, before employment related to physical or mental impairment and no such questions shall appear on any written application form it may use. No medical examination shall be required for prospective employees unless it is a bonafide necessity for the position in question. No medical examination shall be required before a conditional offer of employment has been made. All pertinent medical information obtained in such instances shall be considered as confidential and shall be available only to supervisory personnel and certain others who have a legitimate need for the information. A written record of anyone inspecting the medical information in a personnel file will be maintained.

The town may make pre-employment inquiries to determine an applicant's ability to perform job-related functions.

All job selection criteria and/or tests that may be utilized will be examined to ensure that they reflect only bonafide job related qualifications and do not tend to screen out otherwise qualified persons with disabilities. In making such determinations the input and assistance of persons with disabilities may be sought and engaged.

Employment Training Assistance

It is the policy of the Town of Sturbridge that staff training and development activities provided will include information about the ADA employment requirements. All employees and volunteers will receive a briefing on the ADA and the town's ADA policies and procedures.

Appendix F: Equal Opportunity Policy

Equal Opportunity Policy

General Policy Statement

It is the policy of the Town of Sturbridge to ensure that persons with disabilities are provided maximum opportunity to participate in and benefit from programs, services, and activities offered by the town. It is the town's goal that such participation as equal as possible to that of non-disabled persons. Therefore, the town's primary focus will be architectural modifications, assistive listening devices and equipment, and sign language interpreters upon request and availability. This approach may not always be feasible or sufficient to ensure equal access and benefit.

In providing its services, programs, and activities the Town of Sturbridge shall not:

- Deny a qualified individual with a disability the opportunity to participate in or benefit from a benefit, service, or activity.
- Afford a qualified individual with a disability the opportunity to participate in or benefit from any aid, benefit, or service that is not equal to that offered to others.
- Deny a qualified individual with a disability the opportunity to participate as a member of planning or advisory boards, commissions, or any other entity of the Town of Sturbridge.
- Limit a qualified individual with a disability the enjoyment of any right, privilege, advantage, or opportunity received by other individuals receiving the aid, benefit, or service.

It is the policy of the Town of Sturbridge to ensure that persons with disabilities are provided maximum opportunity to participate in and benefit from programs, services, and activities. It is the goal that such participation is in the same manner as that of non-disabled persons. Toward achieving this, the town has a primary focus to identify barriers to access and remove or modify them to use assistive devices or procedures when necessary.

Reasonable Modifications Policy

The Town of Sturbridge shall make a reasonable program or service modification whenever a person requests such an accommodation, unless it can be demonstrated by the town that such an accommodation would impose an undue burden or fundamental alteration to the program or service. Final decisions regarding requests for reasonable modifications will be made by the ADA Coordinator in a timely manner. These modifications shall be made within thirty (30) working days of the request or as soon as is reasonably possible. Individuals seeking to contest a denial of a request for reasonable modifications will be given a copy of the grievance procedure in the format appropriate for their needs.

The town will comply with all applicable Federal and State laws and regulations relative to the use of assistive equipment, including trained service animals. In addition, no arbitrary restrictions or limitations will be placed on the type or number of assistive

equipment items, including service animals, that people with disabilities may bring with them to town facilities.

Eligibility Requirements

Any prohibitions or limits upon the eligibility of qualified individuals with disabilities to receive services or practice any occupation or profession are not allowed under this policy.

Assurance Regarding Surcharges

It is the policy of the Town of Sturbridge that surcharges are never charged to participants (nor any other interested party or person) for reasonable accommodations under any circumstances. Such accommodations include, but are not limited to:

American Sign Language (ASL) interpreters, Computer Aided Real Time (CART) translators, architectural accessibility, computer accessibility hardware or software, Braille material, listening devices, closed captioning, etc.

Integrated Services Assurance

The Town of Sturbridge strives to ensure that all of its services, programs, and activities are provided in the most integrated setting possible. People with disabilities will not be required to participate in separate programs even if separate programs that are specifically designed to meet the need of persons with disabilities are offered.

Services will not be provided to any person with a disability in a manner or at a location different from that available to other service recipients unless the potential for removal of architectural barriers or the use of assistive devices and equipment have been found to be inadequate or inappropriate to the needs of the individual. In all cases, the affected individual will be fully involved in the consideration and decision-making process.

Significant Assistance Assurance

It is the policy of the Town of Sturbridge that programs to whom the town provides significant support or who the town sponsors may not discriminate against people with disabilities.

Accessible Transportation Policy

It is the policy of the town that whenever transportation services are provided they will be accessible to participants in town programs regardless of disability. When transportation services are provided and an individual is in need of accessible transportation they should make their request in writing to the ADA Coordinator. Requests must be made at least five (5) days in advance of the need. As with all of the town's transportation services, all requests are subject to the availability of space. When a request cannot be met, notice will be given as soon as possible and at least one (1) day before the requested date of service.

If a person needs a wheelchair van every effort will be made to accommodate this need. If the town is providing transportation for anyone to or from a particular event or service and someone requests wheelchair accessible transportation, then the town will be responsible for the arrangement and the cost of that transportation.

Community Referral Assurance

Whenever the Town of Sturbridge participates in or funds programs or makes references to other programs or services, it is the policy that such programs and services must be accessible or usable by a person with a disability. The town will gather information regarding which of the programs or services that it refers people to are accessible, and those that are not. The town will make efforts to gather at least one accessible provider in each of the categories of service in which the town makes referrals.

Appendix G: Effective Communication

Effective Communication

Effective Communication

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

The town is making efforts to ensure that emergency alarm devices in all public areas are both visual and auditory. Emergency evacuation procedures have been developed for each facility which includes evacuation of people with disabilities. The individual responsible for coordinating training for emergency evacuation for each facility has been designated. Information on emergency evacuation procedures will be provided to people verbally, in written format, or in alternate format forms as needed.

TTY/TDD Assurance

It is required to have a TTY/TTD device at the 911 emergency numbers. It is recommended that a TTY/TDD be purchased and installed at the Office of the Board of Selectmen for use by all Town Hall general government services. The town shall also be familiar with the MassRelay VOICE/TTY Relay Service System at 800-439-2370 (TTY), 1-800-439-0183 (Voice) or 711 for Voice and TTY within Massachusetts. All telephone receptionists and primary staff will be trained on the use of the TTY. All publications of telephone numbers for town offices, employees, or services shall also list the TTY number or the relay system number as being available.

Alternative Format Policy and Procedure

It is the policy of the Town of Sturbridge to make all documents, publications, and materials used in town business available to all persons who require them in alternate formats. Procedures have been established for the provision of alternate formats to include large prints, audiotape, Braille, and computer diskettes.

Large print, short audio tapes and computer diskette formats will be prepared by town employees who have been identified by the ADA Coordinator and trained in the necessary skills and procedures.

A request to the ADA Coordinator for alternative format documents should be made fourteen (14) days in advance of the event or activity whenever possible. If materials in Braille are being requested then the request must be made thirty (30) days in advance of the event. Every attempt will be made to meet the request. The materials will be provided at no charge. If the request cannot be met, an alternative effective format will be offered. The person making the request will be informed as soon as possible but at least five (5) days in advance of the event or activity.

Materials describing the town services, programs, or upcoming events will be available in alternative formats such as large print or audio format. All materials will include the words "ASL interpreters upon request and availability".

Interpreter Services Policy

It is the policy of the Town of Sturbridge that sign language interpreters, assistive listening devices, readers, or scribes will be provided upon request to ensure equally effective communication. Requests should be made at least fourteen (14) days prior to the event, service, program or meeting. Every reasonable effort will be made to meet the request. When an ASL interpreter is needed, the town will make every effort to provide one.

A request to the ADA Coordinator for interpreter services should be made fourteen (14) days in advance of the event or activity whenever possible. Every attempt will be made to meet the request. The service will be provided at no charge to the person needing the accommodation. If the request cannot be met, an alternative effective format will be offered. The person making the request will be informed as soon as possible but at least five (5) days in advance of the event or activity.

Assistive Listening Device Assurance

The Town of Sturbridge shall provide or obtain assistive listening devices when requested for either group or individual settings. This may be accomplished by using an available assistive equipment loan program. This may include amplified phone handsets and TV decoders or amplifiers etc.

Training Assurance

It is the policy of the Town of Sturbridge that staff training and other staff development activities provided will include training on the use of a TTY/TDD if provided, the operator relay service, and other equipment necessary to ensure effective communication. Staff will receive training in procedures and policies on receiving and handling requests for auxiliary aids and services and for ensuring that primary consideration is given to the type of service or format preferred by the person with a disability. Training on effective communication is given during orientation and at a yearly staff refresher training.

**Appendix H: U.S.A.B. Accessibility Guidelines for
Recreational Facilities and Play Areas**



UNITED STATES ACCESS BOARD

amusement rides · boating facilities · fishing piers & platforms · golf courses · miniature golf · sports facilities · swimming pools & spas

accessible sports facilities



a summary of
accessibility guidelines
for recreation facilities

JUNE 2003

A FEDERAL AGENCY COMMITTED TO ACCESSIBLE DESIGN

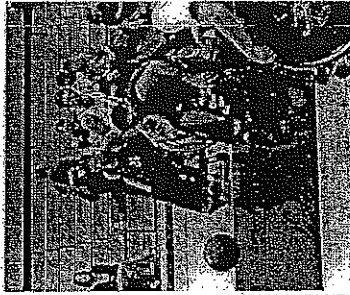
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This information has been developed and reviewed in accordance with the Access Board's information quality guidelines (www.access-board.gov/infoquality/html).

Cover photo, center: Scot Goodman

Accessibility Guidelines for Recreation Facilities



Introduction

The Americans with Disabilities Act (ADA) is a comprehensive civil rights law that prohibits discrimination on the basis of disability. The ADA requires that newly constructed and altered state and local government facilities, places of public accommodation, and commercial facilities be readily accessible to, and usable by, individuals with disabilities. The ADA Accessibility Guidelines (ADAAG) is the standard applied to buildings and facilities. Recreational facilities, including sports facilities, are among the facilities required to comply with the ADA.

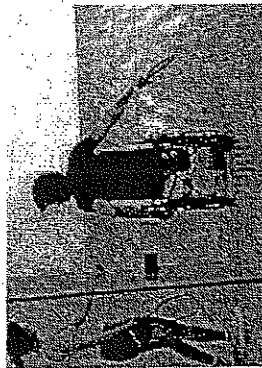
The Access Board issued accessibility guidelines for newly constructed and altered recreation facilities in 2002. The recreation facility guidelines are a supplement to ADAAG. As a supplement, they must be used in conjunction with ADAAG. References to ADAAG are mentioned throughout this summary. Copies of ADAAG and the recreation facility accessibility guidelines can be obtained through the Board's website at www.access-board.gov or by calling 1-800-872-2253 or 1-800-993-2822 (TTY). Once these guidelines are adopted by the Department of Justice (DOJ), all newly designed, constructed and altered recreation facilities covered by the ADA will be required to comply.

The recreation facility guidelines cover the following facilities and elements:

- Amusement rides
- Boating facilities
- Fishing piers and platforms
- Miniature golf courses
- Golf courses
- Exercise equipment
- Bowling lanes
- Shooting facilities
- Swimming pools, wading pools, and spas

This guide is intended to help designers and operators in using the accessibility guidelines for sports facilities. These guidelines establish minimum accessibility requirements for newly designed or newly constructed and altered sports facilities. This guide is not a collection of sports facility designs. Rather, it provides specifications for elements within a sports facility to create a general level of usability for individuals with disabilities. Emphasis is placed on ensuring that individuals with disabilities are generally able to access the sports facility and use a variety of elements. Designers and operators are encouraged to exceed the guidelines where possible to provide increased accessibility and opportunities. Incorporating accessibility into the design of a sports facility should begin early in the planning process with careful consideration of accessible routes.

The recreation facility guidelines were developed with significant public participation. In 1993, the Access Board established an advisory committee of 27 members to recommend accessibility guidelines for recreation facilities. The Recreation Access Advisory Committee represented the following groups and associations:



- American Ski Federation
- American Society for Testing and Materials (Public Playground Safety Committee)
- American Society of Landscape Architects
- Beneficial Designs
- City and County of San Francisco, California, Department of Public Works
- Disabled American Veterans
- Environmental Access
- Golf Course Superintendents Association of America
- Hawaii Disability and Communication Access Board
- International Association of Amusement Parks and Attractions
- Katherine McGuinness and Associates
- Lehman, Smith, and Wiseman Associates
- Michigan Department of Natural Resources
- National Council on Independent Living
- National Park Service
- National Recreation and Park Association
- New Jersey Department of Community Affairs
- Outdoor Amusement Business Association
- Paralyzed Veterans of America
- Professional Golfer's Association
- Self Help for Hard of Hearing People
- States Organization for Boating Access
- Universal Studios
- U.S. Army Corps of Engineers
- U.S. Forest Service
- Y.M.C.A. of the U.S.A.
- Walt Disney Imagineering

The public was given an opportunity to comment on the recommended accessibility guidelines, and the Access Board made changes to the recommended guidelines based on the public comments. A notice of proposed rulemaking (NPRM) was published in the Federal Register in July 1999, followed by a five-month public comment period. Further input from the public was sought in July 2000 when the Access Board published a draft final rule soliciting comment. A final rule was published in September 2002.



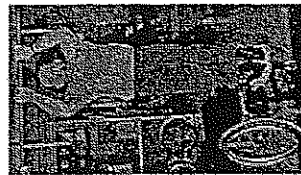
CURT BEHMER

"Whenever a door is closed to anyone because of a disability, we must work to open it... Whenever any barrier stands between you and the full rights and dignity of citizenship, we must work to remove it, in the name of simple decency and justice. The promise of the ADA... has enabled people with disabilities to enjoy much greater access to a wide range of affordable travel, recreational opportunities and life-enriching services."

President George W. Bush, New Freedom Initiative, February 1, 2001

Sports Facilities

The recreation facility guidelines described in this guide focus on the accessible features of unique sports-related elements in newly designed or newly constructed and altered facilities. Other provisions contained in ADAAG address elements commonly found within a sports facility, such as accessible vehicle parking spaces, exterior accessible routes, doors, assembly sections, and toilet and bathing facilities. ADAAG addresses only the built environment (structures and grounds). The guidelines do not address operational issues. Questions regarding operational issues should be directed to the Department of Justice, 1-800-514-0301 or 1-800-514-0383 (TTY).

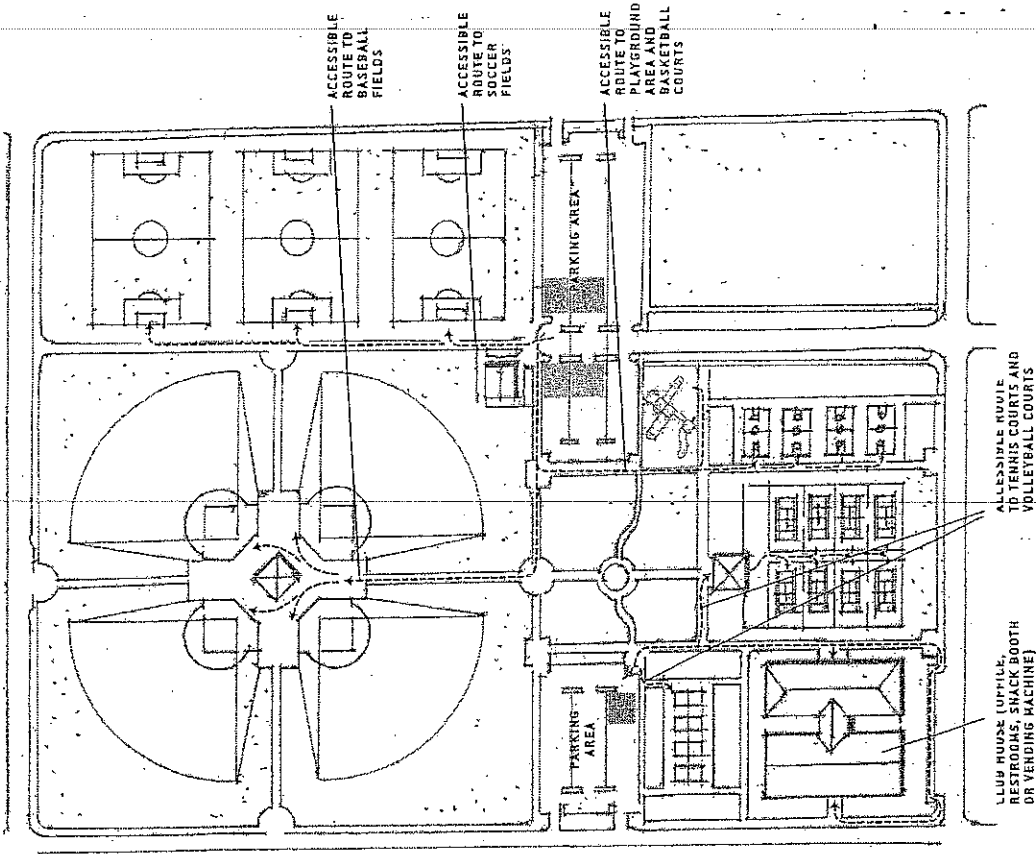


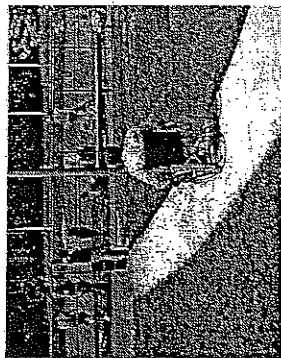
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Facilities and elements covered include:

- Areas of indoor and outdoor sports activity, including court sports (such as tennis, volleyball and racquetball), sports fields (such as softball, football, lacrosse, baseball, and soccer) and other sports (such as gymnastics and wrestling)
- Dressing, fitting, and locker rooms
- Team or player seating areas
- Exercise equipment and machines

ACCESSIBLE ROUTE CONNECTING VARIOUS ELEMENTS OF A MULTI-USE FACILITY





ACCESSIBLE ROUTE CONNECTING TO A SPORTS FIELD

- Saunas and steam rooms
- Animal containment areas for public use such as petting zoos and passageways along animal pens at fairs
- Bowling lanes
- Shooting facilities

These recreation facility guidelines do not apply to:

- Raised structures used for refereeing, judging, or scoring a sport
- Animal containment areas not for public use
- Raised boxing rings and wrestling rings
- Water slides (as long as an accessible route is provided to the base)

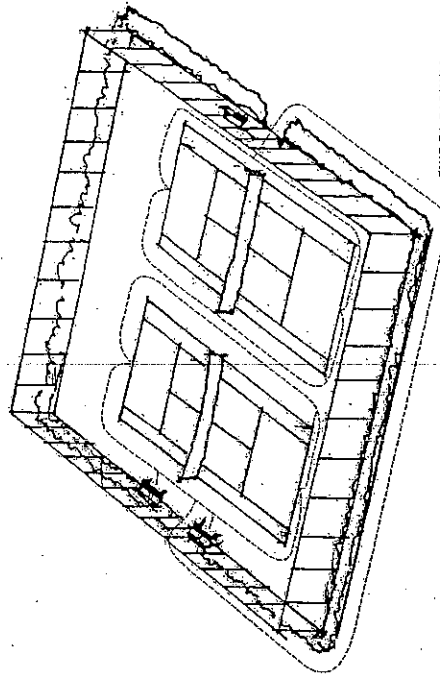
Accessible Routes

Accessible routes are continuous, unobstructed paths connecting all accessible elements and spaces of a building or facility. The accessible route must comply with ADAAG provisions for the location, width (minimum of 36 inches), passing space, head room, surface, slope (maximum of 1:12 or 8.33%), changes in level, doors, egress, and areas of rescue assistance, unless otherwise modified by specific provisions outlined in this guide. Facilities must provide accessible routes connecting all accessible elements and spaces within areas of indoor or outdoor sports activities. If not all elements need to be accessible, only those that are accessible must be connected with an accessible route.

The guidelines apply to "fixed" facilities and elements. They do not cover equipment that is frequently moved. For example, a wrestling mat or badminton net may be portable and moved regularly.

Court Sports

Where courts are provided, an accessible route must connect each court. Accessible routes must comply with all ADAAG requirements, such as width and changes in level or surface, and must *directly* connect both sides of the court. Players must not be required to traverse through another court to get to the other side of their court. This is especially critical in sports like tennis, in which changing sides of the court is part of the game. No additional accessibility guidelines apply once on the court.



ACCESSIBLE ROUTE CONNECTING COURT SPORTS

Areas of Sport Activities

An "area of sport activity" is a broad term intended to cover a diverse number of indoor and outdoor sports fields and areas. This includes, but is not limited to: basketball courts, baseball fields, running tracks, soccer fields, and skating rinks.

The "area of sport activity" is "that portion of a room or space where the play or practice of a sport occurs." For example, football fields are defined by boundary lines. In addition, a safety border is provided around the field. Players may temporarily be in the space between the boundary lines and the safety border when they are pushed out of bounds or momentum carries them forward when receiving a pass. So in football, that space is used as part of the game and is included in the area of sport activity.

Accessible routes must connect each area of sport activity. Areas of sport activities must comply with all ADAAG requirements, except that they are exempt from the requirement that surfaces must be stable, firm, and slip resistant, and from the restrictions on carpets, grating, and changes in level. They are also exempt from restrictions on protruding objects. These provisions are not required inside of the area of sport activity since they may affect the fundamental nature of the sport or activity. For example, an accessible route is required to connect to the boundary of a soccer field, but there is no requirement to change the surface of a field to an accessible surface.

Where light fixtures or gates are provided as part of a court sport or other area of sport activity, they must comply with ADAAG provisions for controls and operating mechanisms, and for gates and doors.

Animal Containment Areas

If the public has access to an animal containment area, accessible routes must connect to each animal containment area. Examples may include petting zoos, petting farms, public pathways for viewing livestock display tents, or other areas where the public has access to animals. These areas must comply with all ADAAG requirements, except the requirements that surfaces be stable, firm, and slip resistant and the restrictions on

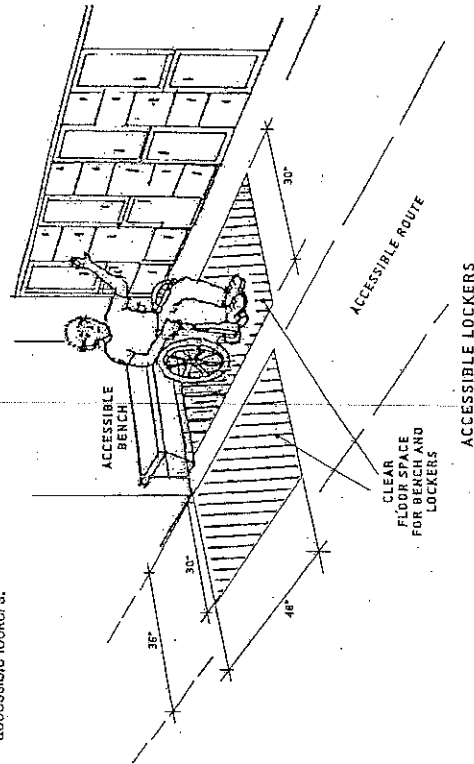
changes in level since some surfaces need to be absorbent. Accessibility is not required in areas that are for animal handlers and not for public use.

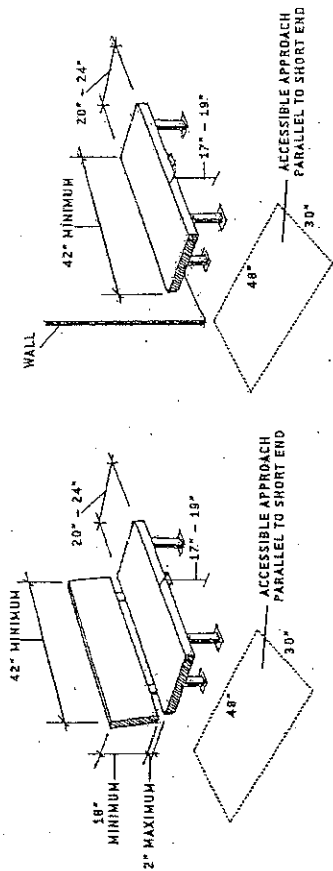
Dressing, Fitting, or Locker Rooms

When provided, dressing, fitting, or locker rooms must be accessible and comply with all ADAAG provisions. If they are in a cluster, 5 percent, or at least one must be accessible. There must be an accessible route through the door and to all elements required to be accessible in the room. Operating mechanisms provided on accessible lockers must also meet ADAAG provisions for their operation and height.

Lockers

If lockers are provided, at least 5 percent, but not less than one of each type (full, half, quarter, etc.) must be accessible. Accessible benches should be located adjacent to the accessible lockers.





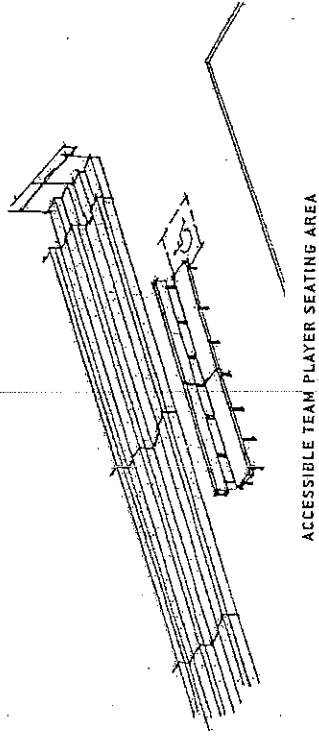
ACCESSIBLE BENCH

Benches

Accessible benches are required in dressing, fitting, and locker rooms, and where seating is provided in saunas and steam rooms. Benches must have a clear floor space positioned to allow persons using wheelchairs or other mobility devices to approach parallel to the short end of a bench seat. In saunas and steam rooms, this floor space may be obstructed by readily removable seats.

Benches must have seats that are a minimum of 20 inches to a maximum of 24 inches in depth and 42 inches minimum in length. The seat height should be a minimum of 17 inches to a maximum of 19 inches above the finished floor. If the bench is not located next to a wall, the bench must have back support that is 42 inches minimum in length and extends from a point 2 inches maximum above the seat to a point 18 inches minimum above the bench. Benches must be strong enough to withstand a vertical or horizontal force of 250 pounds applied at any point on the seat, fastener, mounting device, or supporting structure. The provisions for benches are not intended to apply to park benches or other benches used for sitting or resting.

If benches are located in wet areas, the surface must be slip-resistant and designed not to accumulate water.



ACCESSIBLE TEAM PLAYER SEATING AREA

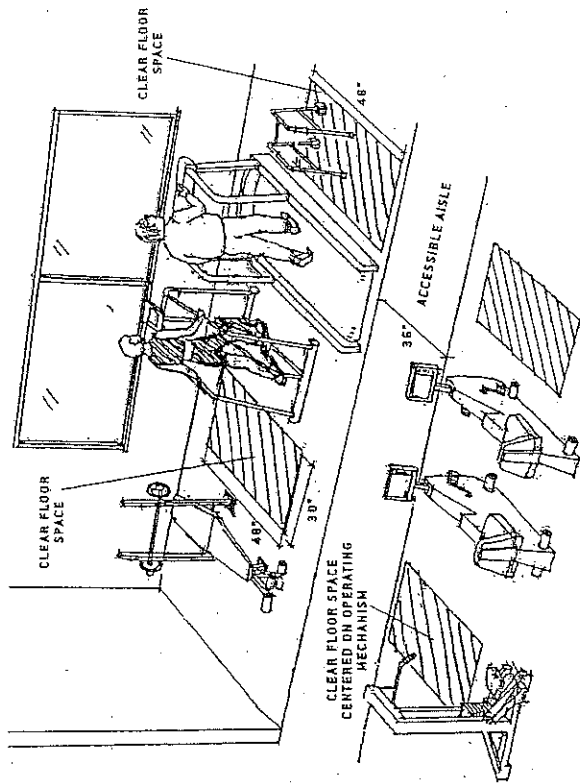
Team Player Seating Areas

Where provided, fixed team or player seating areas must contain the number of wheelchair spaces and companion seats required by ADAAG (based on the number of seats provided), but not less than one space. One option is to provide a clear space adjacent to a fixed bench, with the bench serving as companion seating. If designers and operators are designing a field or court that will serve a variety of wheelchair sports, exceeding the minimum requirements will better accommodate participants.

Wheelchair spaces in the team player seating areas are exempt from the requirements related to admission price and line of sight choices in assembly areas. It is recommended that ramps be used wherever possible for accessible routes connecting team or player seating areas and areas of sport activity. However, a platform lift may be used as part of an accessible route to team player seating areas.

Saunas and Steam Rooms

If saunas or steam rooms are in a cluster, at least 5 percent, but not less than one of each type must be accessible. The wheelchair turning space in the sauna or steam room must comply with ADAAG, except that it can be obstructed by readily removable seats. If seating is provided, at least one bench must be accessible. Doors cannot swing into any part of the clear floor or ground space required for benches.



CLEAR SPACE REQUIREMENTS AROUND EXERCISE EQUIPMENT

Exercise Equipment and Machines

At least one of each type of exercise equipment or machine must have clear floor space of at least 30 by 48 inches and be served by an accessible route. If the clear space is enclosed on three sides (e.g., by walls or the equipment itself), the clear space must be at least 36 by 48 inches.

Most strength training equipment and machines would be considered different types. For example, a bench press machine is different from a biceps curl machine. If operators provide both a biceps curl machine and free weights, both must meet the guidelines in this section even though both can be used to strengthen biceps. Likewise, cardiovascular exercise machines, such as stationary bicycles, rowing machines, stair climbers and treadmills, are all different

types of machines. But if the only difference in equipment provided is that they have different manufacturers, but are the same type, only one must comply.

Clear floor space must be positioned to allow a person to transfer from a wheelchair or to use the equipment while seated in a wheelchair. For example, to make a shoulder press accessible, the clear floor space should be next to the seat. But the clear floor space for a bench press designed for use by a person using a wheelchair would be centered on the operating mechanisms. Clear floor space for more than one piece of equipment may overlap. For example, where different types of exercise equipment and machines are located next to other pieces of equipment, the clear space may be shared. (See figure "Clear Space Requirements Around Exercise Equipment" on page 12.)

The exercise equipment and machines themselves do not need to comply with the ADAAG requirements regarding controls and operating mechanisms.

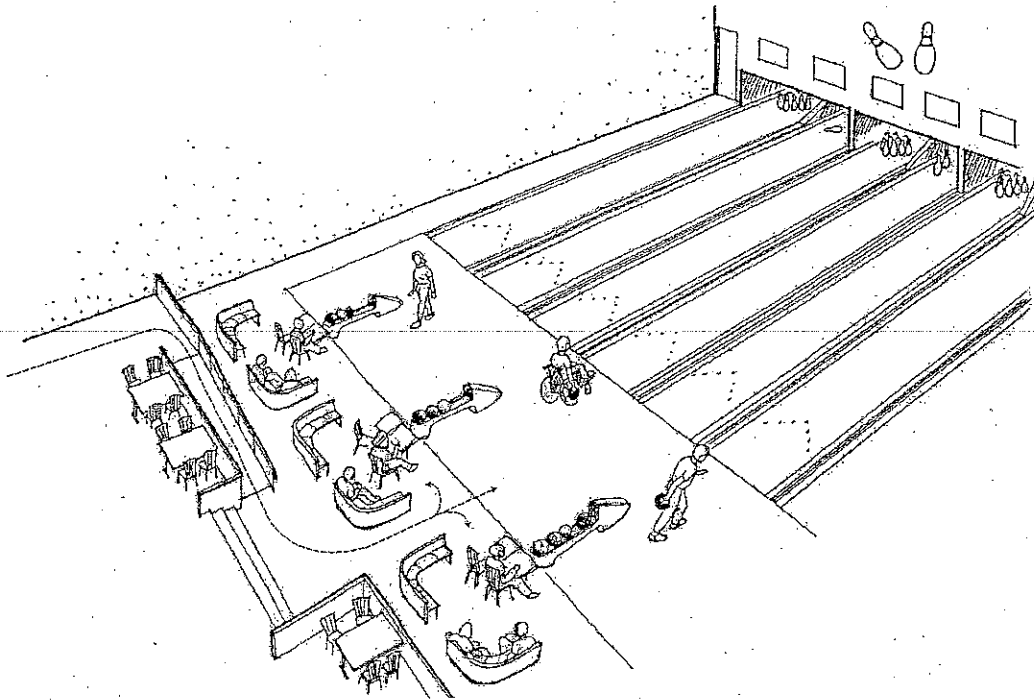
Designers and operators are encouraged to select exercise equipment that provides fitness opportunities for persons with lower body extremity disabilities.

Shooting Facilities

If facilities provide fixed firing positions, at least 5 percent, but not less than one of each type of fixed firing position must be served by an accessible route. Fixed firing positions must have a 60-inch diameter space with slopes not steeper than 1:48 so a wheelchair user can turn around and have a level place from which to shoot.



PHANTZ VETERANS OF AMERICA



ACCESSIBLE ROUTE CONNECTING ACCESSIBLE LANES AND TEAM PLAYER AREAS

Types of different firing positions include positions with different admission prices, positions with or without weather covering or lighting, and positions that support different shooting events (e.g., muzzle loading rifle, small bore rifle, high power rifle, bull's eye pistol, action pistol, silhouette, trap, skeet, and archery).

Bowling Lanes

At least 5 percent, but not less than one, of each type of bowling lane must be accessible. Unlike other areas of sport activity, only those team or player seating areas that serve accessible lanes must be connected with an accessible route and comply with seating requirements. Spectator seating in bowling facilities is addressed in ADAAG and will require wheelchair spaces, companion seating, and designated aisle seats.

More Information

You can obtain copies of the recreation facility guidelines, which include sports facilities, and further technical assistance from the U.S. Access Board at www.access-board.gov, 1-800-872-2253, or 1-800-993-2822 (TTY).

ACCESSIBLE PLAY AREAS

A Summary of Accessibility Guidelines
for Play Areas



U.S. Access Board
Summary of Accessibility Guidelines
for Play Areas

INTRODUCTION

The Americans with Disabilities Act (ADA) is a comprehensive civil rights law that prohibits discrimination on the basis of disability. The ADA requires that newly constructed and altered State and local government facilities, places of public accommodation, and commercial facilities be readily accessible to, and usable by, individuals with disabilities. Recreational facilities, including play areas, are among the facilities required to comply with the ADA.

The Architectural and Transportation Barriers Compliance Board - often referred to as the "Access Board" - has developed accessibility guidelines for newly constructed and altered play areas. The play area guidelines are a supplement to the Americans with Disabilities Act Accessibility Guidelines (ADAAG). Once these guidelines are adopted as enforceable standards by the Department of Justice, all newly constructed and altered play areas covered by the ADA will be required to comply. These guidelines also apply to play areas covered by the Architectural Barriers Act (ABA).

Summary

This guide is intended to help designers and operators in using the accessibility guidelines for play areas. These guidelines establish minimum accessibility requirements for newly constructed and altered play areas. This guide is not a collection of playground designs. Rather, it provides specifications for elements within a play area to create a general level of usability for children with disabilities. Emphasis is placed on ensuring that children with disabilities are generally able to access the diversity of components provided in a play area. Designers and operators are encouraged to exceed the guidelines where possible to provide increased accessibility and opportunities. Incorporating accessibility into the design of a play area should begin early in the planning process with consideration to layout, circulation paths, and the selection of play components.

The play area guidelines were developed with significant public input and carefully considered the balancing of costs, safety, and accessibility. The Access Board sponsored a Regulatory Negotiation Committee to develop proposed guidelines. The public was given an opportunity to comment on the proposed guidelines and the Access Board made changes to the proposed guidelines based on the public comments. The Regulatory Negotiation Committee represented the following groups and associations:

American Society of Landscape Architects	National Easter Seal Society
ASTM Public Playground Committee	National League of Cities
ASTM Soft Contained Play Committee	National Parent-Teacher Association
ASTM Playground Surfacing Systems Committee	National Recreation and Park Association
International Play Equipment Manufacturers Association	Spina Bifida Association of America
National Association of Counties	TASH
National Association of Elementary School Principals	United Cerebral Palsy Association
National Child Care Association	U.S. Access Board
National Council on Independent Living	

This guide is designed to assist in using the play area accessibility guidelines and is divided into the following sections:

- Where Do the Play Area Guidelines Apply?
- What is a Play Component?
- How Many Play Components Must Be on an Accessible Route?
- What Are the Requirements for Accessible Routes?
- What Other Accessibility Requirements Apply to Play Components?
- Soft Contained Play Structures

Copies of the play area accessibility guidelines and further technical assistance can be obtained from the U.S. Access Board, 1331 F Street, Suite 1000 NW, Washington, DC 20004-1111; 800-872-2253, 800-993-2822 (TTY); www.access-board.gov. Alternate formats of this document are also available upon request.

October 2005



U.S. Access Board
Summary of Accessibility
Guidelines for Play Areas

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Play Area Terms

Many terms are used throughout this guide to describe the play area guidelines. Familiarity with these terms is important when applying the guidelines. Other definitions are provided in ADA/ABA.

ABA - Architectural Barriers Act

Access Board - An independent Federal agency that develops accessibility guidelines under the ADA and other laws. The Access Board is also known as the Architectural and Transportation Barriers Compliance Board.

Accessible - Describes a site, building, facility, or portion thereof that complies with the play area guidelines.

Accessible Route - A continuous unobstructed path connecting all accessible elements and spaces of a building or facility. Inside the boundary of the play area, accessible routes may include platforms, ramps, elevators, lifts. Outside the boundary of the play area, accessible routes may also include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts.

ADA - Americans with Disabilities Act.

Alteration - An alteration is a change to a building or facility that affects or could affect the usability of the building or facility or part thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance is not an alteration unless it affects the usability of the facility (*see section on alterations for more details*).

Amusement Attraction - Any facility, or portion of a facility, located within an amusement park or theme park, that provides amusement without the use of an amusement device. Examples include, but are not limited to, fun houses, barrels, and other attractions without seats.

ASTM - American Society for Testing and Materials.

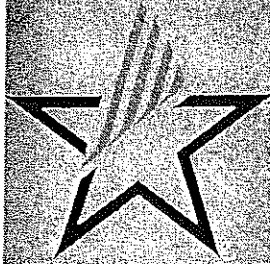
Berm - A sloped surface at ground level designed to ascend or descend in elevation.

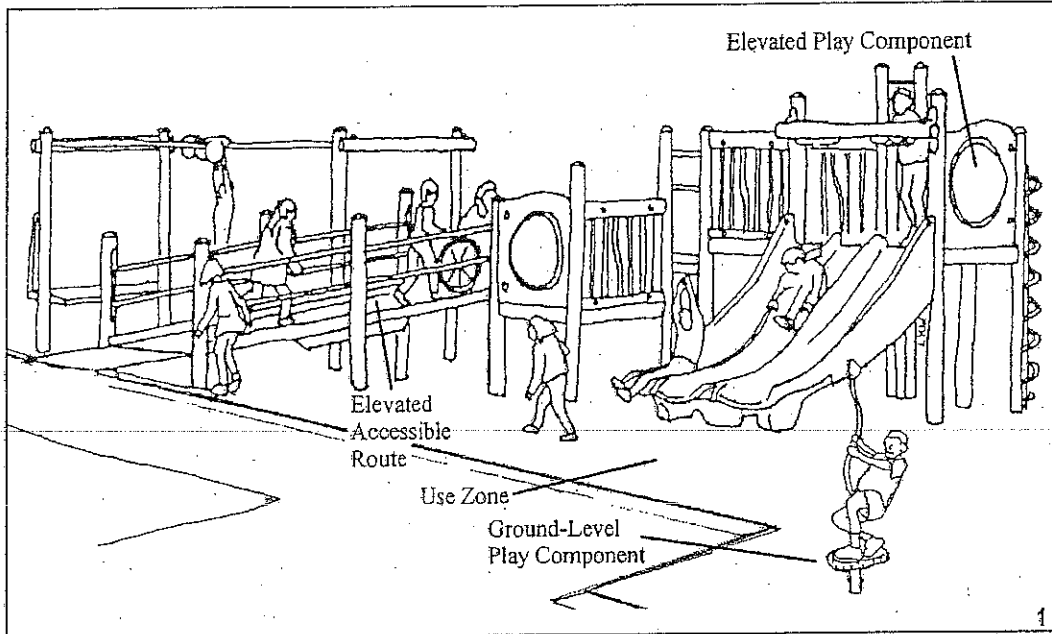
Clear - Unobstructed.

Composite Play Structure - Two or more play structures attached or functionally linked, to create one integral unit that provides more than one play activity (*ASTM F 1487-01*).

Cross Slope - The slope that is perpendicular to the direction of travel (*see running slope*).

Elevated Play Component - A play component that is approached above or below grade and that is part of a composite play structure consisting of two or more play components attached or functionally linked to create an integrated unit providing more than one play activity.





Facility – All or any portion of buildings, structures, site improvements, elements and pedestrian routes or vehicle ways located on a site.

Ground Level Play Component – A play component that is approached and exited at the ground level.

Play Area – A portion of a site containing play components designed and constructed for children.

Play Component – An element intended to generate specific opportunities for play, socialization, or learning. Play components may be manufactured or natural, and may be stand alone or part of a composite play structure.

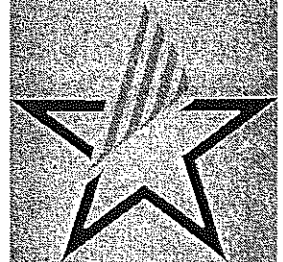
Ramp – A walking surface that has a running slope of greater than 1:20.

Running Slope – The slope that is parallel to the direction of travel (*see cross slope*).

Site – A parcel of land bounded by a property line or a designated portion of a public right-of-way.

Soft Contained Play Structure – A play structure made up of one or more components where the user enters a fully enclosed play environment that utilizes pliable materials (e.g., plastic, netting, fabric).

Use Zone – The ground level area beneath and immediately adjacent to a play structure or piece of equipment that is designated by ASTM F 1487 Standard Consumer Safety Performance Specification for Playground Equipment for Public Use for unrestricted circulation. This is the play surface upon which it is predicted a user would land when falling from or exiting the equipment.



WHERE DO THE PLAY AREA GUIDELINES APPLY?

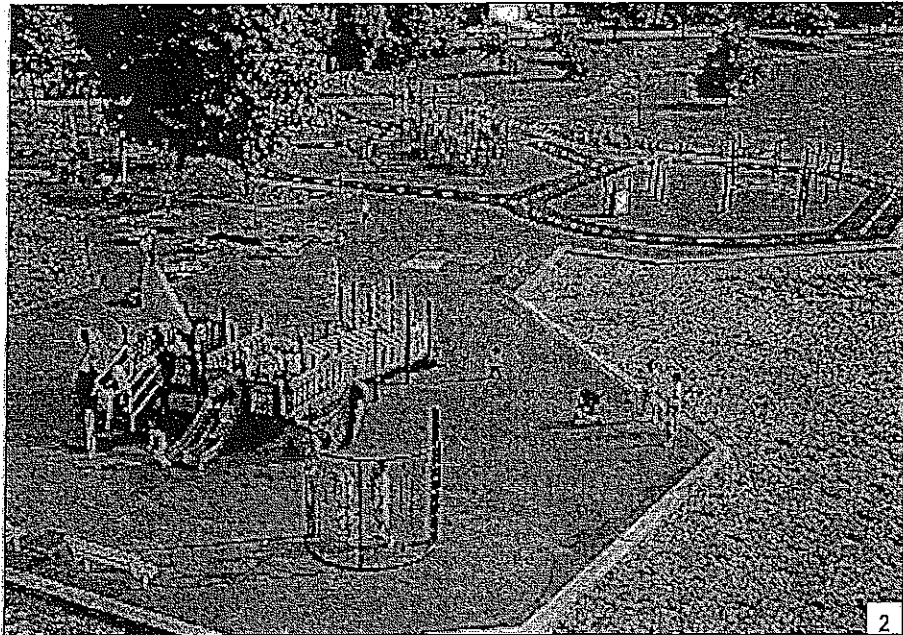
New Construction

The play area guidelines in this guide apply to all newly designed or constructed play areas for children ages 2 and older.

This includes play areas located in a variety of settings: parks, schools, childcare facilities, shopping centers, and public gathering areas. Owners or operators of newly constructed play areas are responsible for complying with these guidelines.

The play area guidelines do not apply to:

- Family childcare facilities where the proprietor resides
- Amusement attractions
- Religious entities



This large play area designed for the same age group is part of a public park system. The total of all the play components in this play area - which includes multiple composite structures - must be counted when applying the play area guidelines.

Alterations

The play area guidelines also apply to existing play areas where alterations occur. Further information regarding the application of the play area guidelines to altered play areas can be found on page 39.

Equivalent Facilitation

Designs that result in products or technologies as alternatives to those prescribed, provided substantially equivalent or greater accessibility and usability.

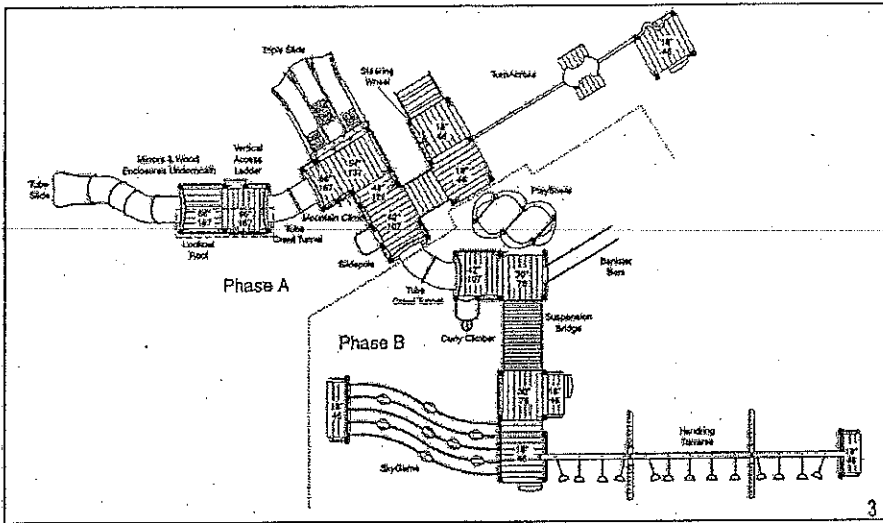
Equivalent facilitation is the concept of utilizing innovative solutions and new technology, design, or materials in order to satisfy the guidelines. These alternative solutions provide equal access and take advantage of new developments, but may differ technically from specific guidelines.



WHERE DO THE PLAY AREA GUIDELINES APPLY?

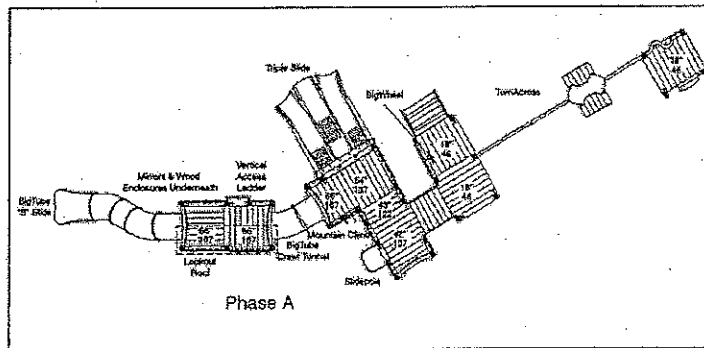
Phasing in Play Areas

When play areas are constructed in phases, they must continue to meet the play area guidelines throughout construction. The initial phase area must meet the guidelines, and then at each successive phase the whole play area must be reassessed to assure compliance.

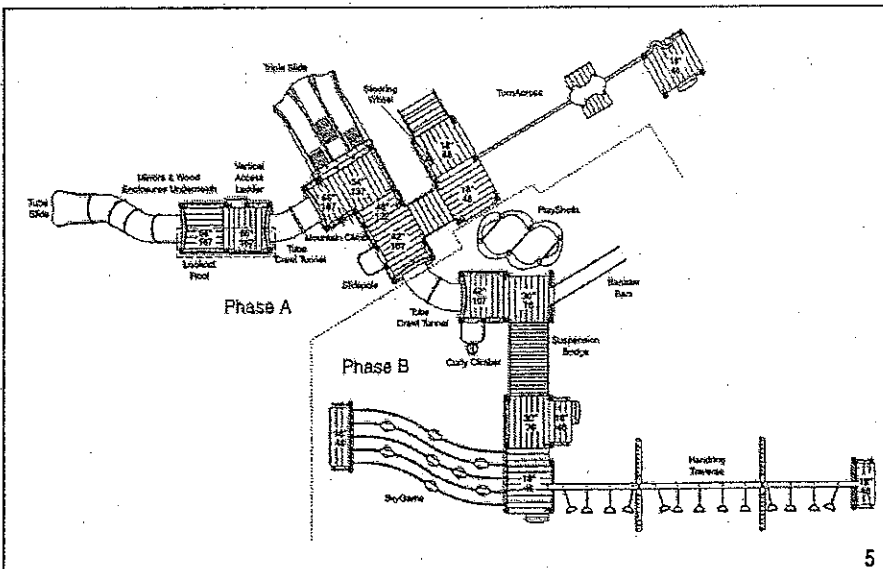


This play area will be installed in two phases. As each phase is completed, the entire play area must be reevaluated for compliance.

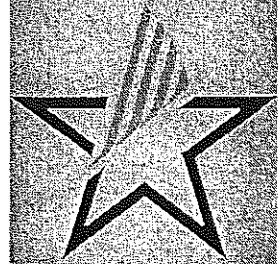
Prior to phase one, the first structure is evaluated for compliance, since the guidelines are based on a minimum number of play components required to be on an accessible route.



At the onset of phase two, the play area is reevaluated in its entirety.



"Phased designs" are play areas developed to be installed in different stages, allowing the play area to grow in a planned manner while accommodating budgets, fund raising, or community approval processes.



U.S. Access Board
Summary of Accessibility
Guidelines for Play Areas

WHERE DO THE PLAY AREA GUIDELINES APPLY?

Play Areas Separated by Age

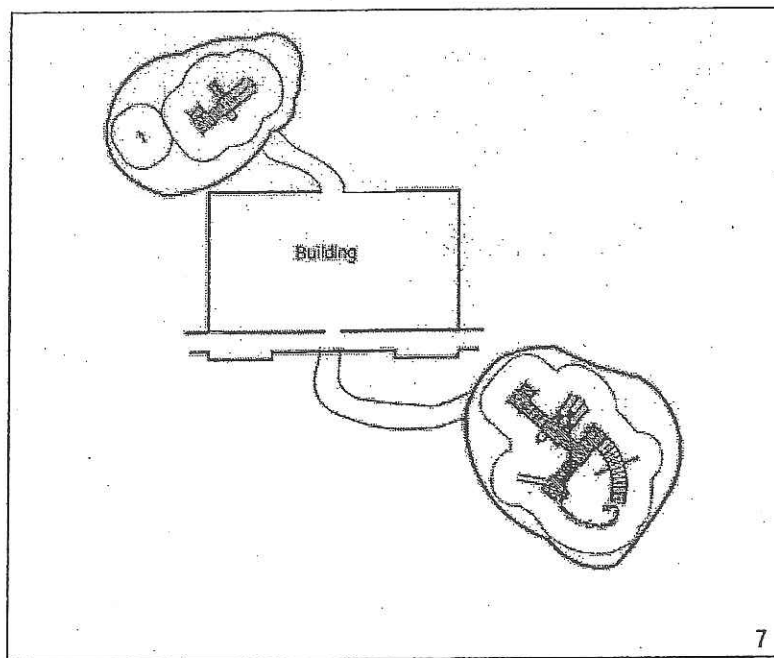
To reduce the risk of injury, safety guidelines recommend separate play areas for different age groups. In applying the guidelines, play areas designed for different age groups should be considered separately.

A play area designed for 2 to 5 year-olds is considered separate from one for 5 to 12 year-olds. Therefore, compliance with the guidelines must be considered for each individual play area.



This dual play area designed for 2 to 5 year-olds and 5 to 12 year-olds shares resilient surfacing. Each section must be evaluated separately.

Geographically Separated Play Areas



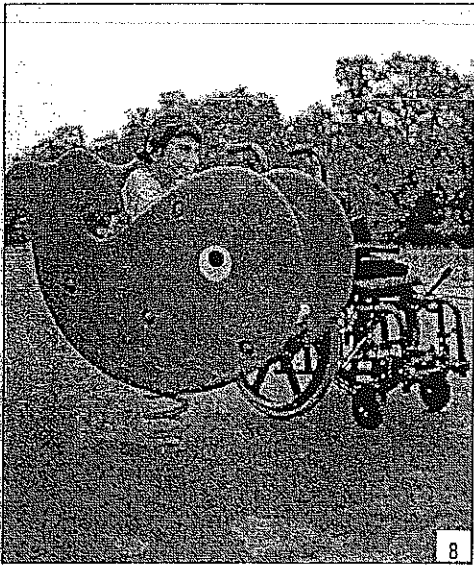
Large geographical spaces may contain several play areas within one park setting. Where play areas are geographically separated on a site, they are considered separate play areas. The accessibility guidelines apply to each play area.



Play Components

A play component is an element designed to generate specific opportunities for play, socialization, and learning. Play components may be manufactured or natural, and may stand alone or part of a composite play structure. Swings, spring riders, water tables, playhouses, slides, and climbers are among the many different play components.

For the purpose of these guidelines, ramps, transfer systems, steps, decks, and roofs are not considered play components. These elements are generally used to link other elements on a composite play structure. Although socialization and pretend play can occur on these elements, they are not primarily intended for play.



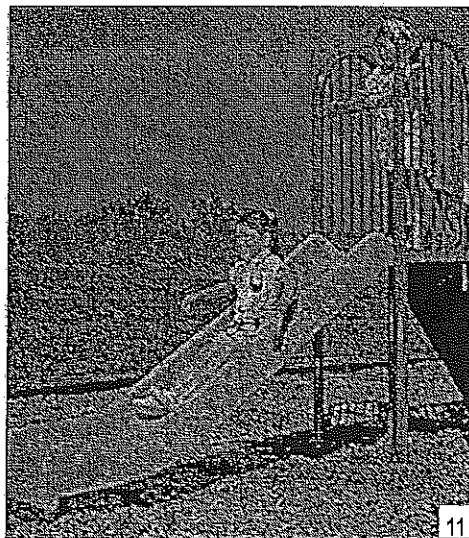
Spring rider



Climber



Swing



Slide



WHERE DO THE PLAY AREA GUIDELINES APPLY?

When applying the play area guidelines, it is important to identify the different play experiences play components can provide.

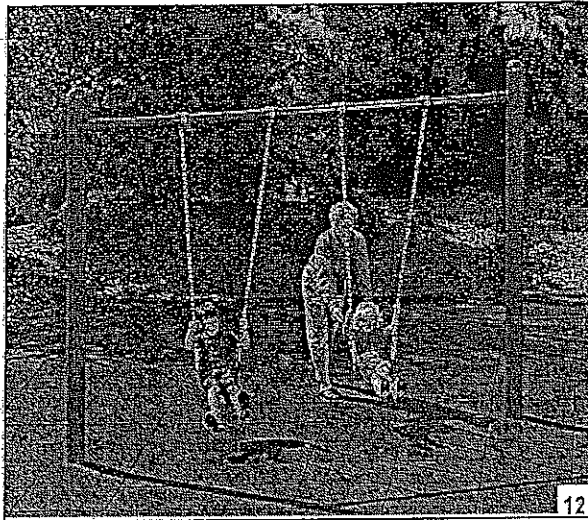
Different "Types"

At least one of each type of play component provided at ground level in a play area must be on an accessible route.

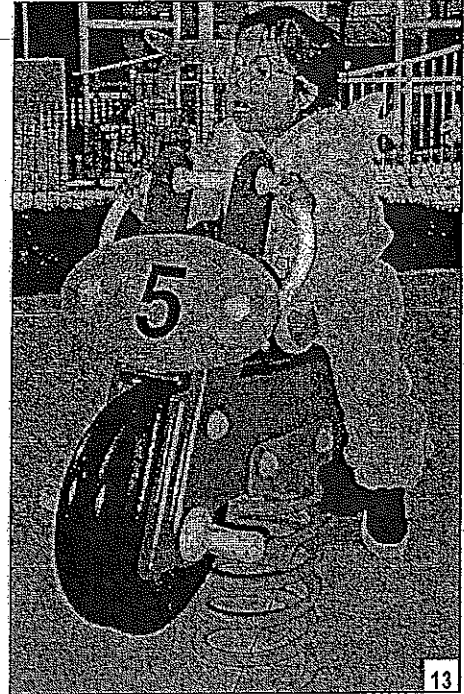
Different "types" of play components are based on the general experience provided by the play component. Different types include, but are not limited to, experiences such as rocking, swinging, climbing, spinning, and sliding.

"Rocking" is an example of horizontal movement that can be backwards, forwards, sideways or even circular in nature.

"Sliding" is an example of rapid descent that utilizes the force of gravity.



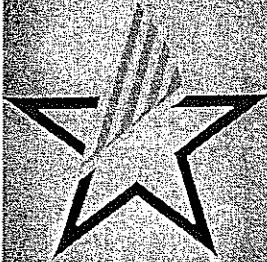
A Swinging Type



A Rocking Type

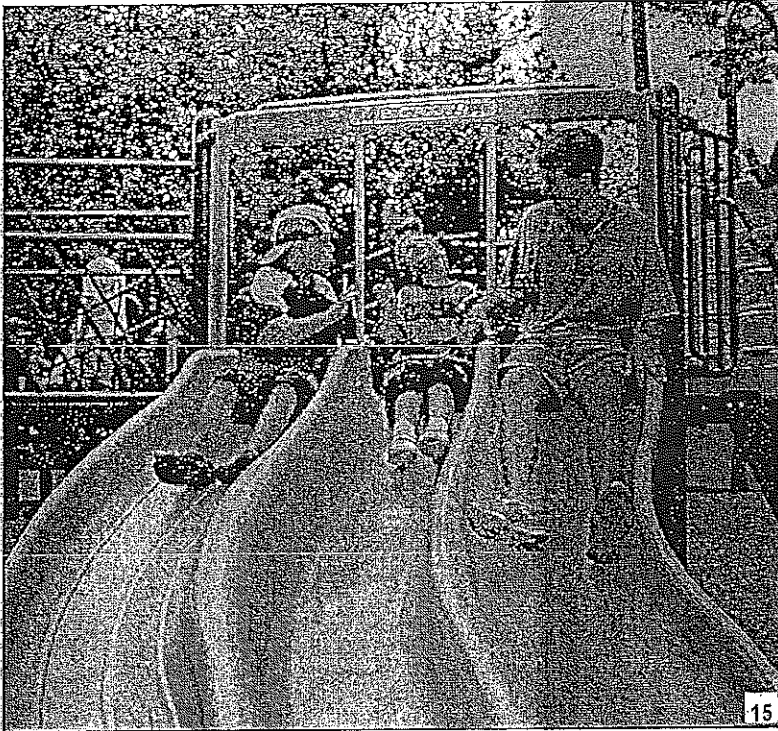


This single play component provides one type of play experience for multiple individuals.



WHAT IS A PLAY COMPONENT?

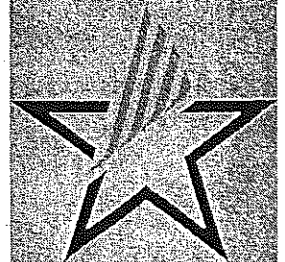
The number of individuals who can play on a play component at once does not determine the quantity of play components provided in a play area. A play component can hold many children but is considered one type of play experience - or one play component - in the play area.



Examples of Sliding Types



While a spiral slide provides a slightly different experience from a straight slide, the primary experience - a sense of rapid descent or sliding - is common to both activities. Therefore, a spiral slide and a straight slide are considered one "type" of play experience.



WHAT IS A PLAY COMPONENT?

Elevated Play Components

An elevated play component is a play component that is approached above or below grade and is part of a composite play structure. Play components that are attached to a composite play structure and that can be approached from a platform or deck area are considered elevated play components.

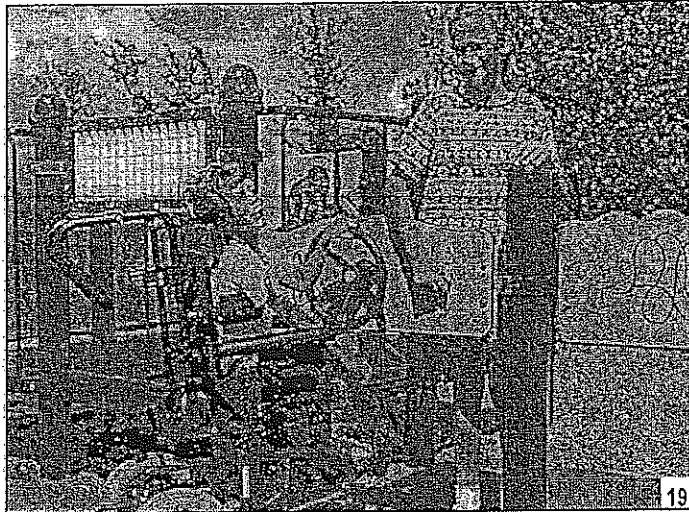


This climber is considered an elevated component, since it can be approached or exited from the ground level or above grade from a platform or deck on a composite play structure.

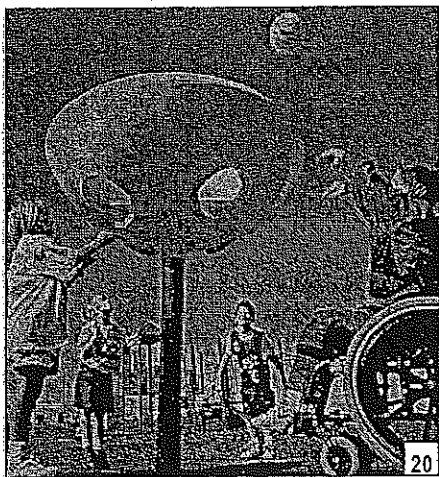


Ground-Level Play Components

Ground-level play components are items that can be approached and exited at ground level. For example, a child approaches a spring rider at ground level via the accessible route. The child may ride then exit directly back onto the accessible route. The activity is considered ground level because the child approaches and exits it from the ground-level route.



Ground-level play components may be part of a composite structure.



Ground-level components may also be free-standing in a play area.

When more than one ground-level play component is required on an accessible route, the play components must be integrated. Designers should consider the optimal layout of ground-level play components to foster interaction and socialization among all children. Grouping all ground-level play components accessed by children with disabilities in one location does not constitute integration.

"Ground-level components" are approached and exited at ground level.

Ground-level play components may include items such as swings, spring riders, and panels.

Freestanding slides are considered ground-level components for the purpose of these guidelines. An accessible route must connect to the ladder or steps and to the exit of the slide. While this solution does not provide access for all children, it gives many individuals the opportunity to access play components.



HOW MANY PLAY COMPONENTS MUST BE ON AN ACCESSIBLE ROUTE?

Ground-Level Play Components

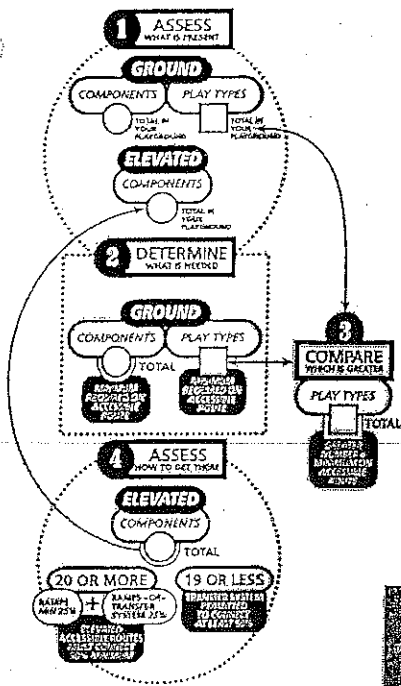
There are two requirements addressing how many ground-level play components must be on an accessible route:

- One of Each Type
- Ground-Level Requirements based on the number of Elevated Play Components

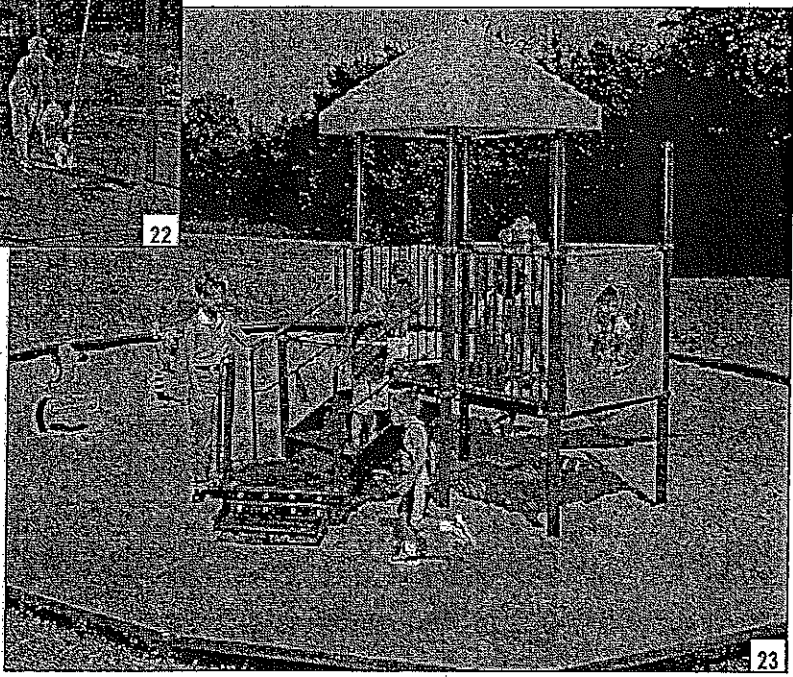
One of Each Type

At least one of each type of ground-level play component that is present in the play area must be on an accessible route.

As an example, this play area includes a composite play structure, two spring riders and a swing set (see inset). To meet the requirement, an accessible route must connect to at least one spring rider and one swing for one of each type of ground-level play experiences which are present in the play area.



22



23

The above step-by-step guide is intended to assist when applying the play area guidelines. A detailed description is provided on page 17.

A "ground-level play component" is a play component that is approached and exited at the ground-level.



HOW MANY PLAY COMPONENTS MUST BE ON AN ACCESSIBLE ROUTE?

Ground Level Requirements Based on Elevated Play Components

The number and variety of ground-level play components required to be on an accessible route is also determined by the number of elevated components provided in the play area.

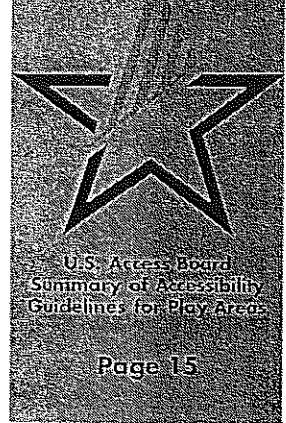
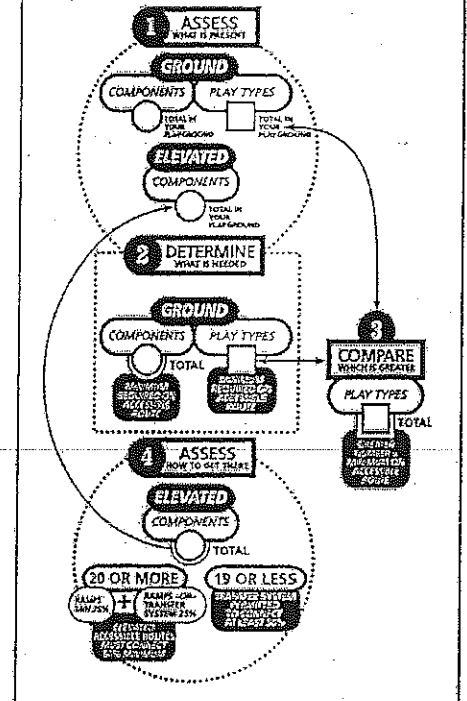
The intent of this requirement is to provide a variety of experiences for individuals who choose to remain with their mobility aids, or choose not to transfer to elevated play components.

Table 240.2.1.2

Number of elevated play components provided	Minimum number of ground-level play components required to be on accessible route	Minimum number of different types of ground-level play components required to be on accessible route
1	Not applicable	Not applicable
2 to 4	1	1
5 to 7	2	2
8 to 10	3	3
11 to 13	4	3
14 to 16	5	3
17 to 19	6	3
20 to 22	7	4
23 to 25	8	4
More than 25	8 plus 1 for each additional 3 over 25, or fraction thereof	5

If ramps provide access to at least 50 percent of the elevated play components - which must include at least three different play types - then additional ground-level components are not required.

In the play area shown on page 14, the composite structure has four elevated play components (bubble panel, slide, steering wheel, and tic-tac-toe panel). According to the table, a minimum of one ground level play component must be provided, and a minimum of one different type. The spring rider or swing can be used to meet the "one of each type" requirement and can also be used to meet the minimum number determined by Table 240.2.1.2.



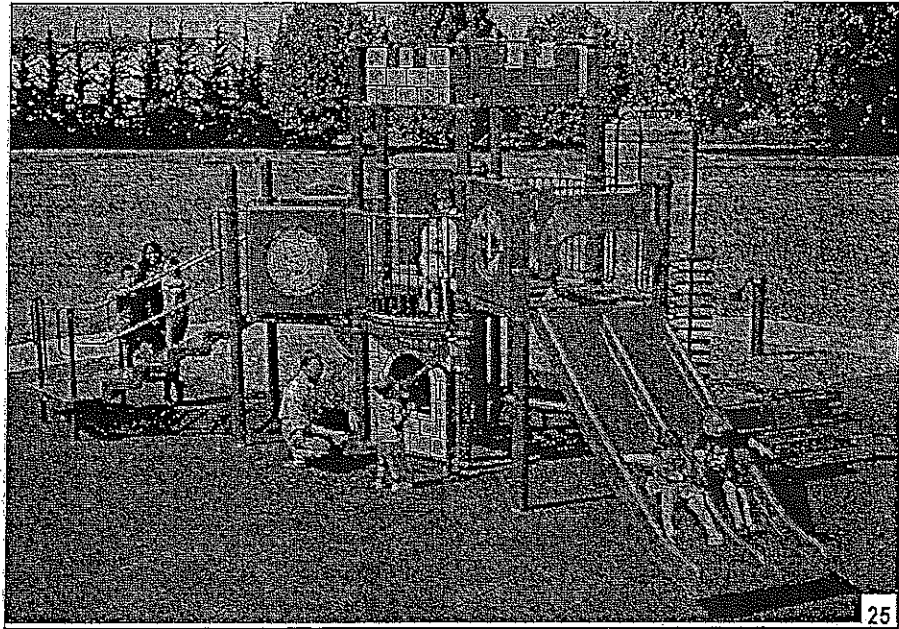
HOW MANY PLAY COMPONENTS MUST BE ON AN ACCESSIBLE ROUTE?

Elevated Play Components

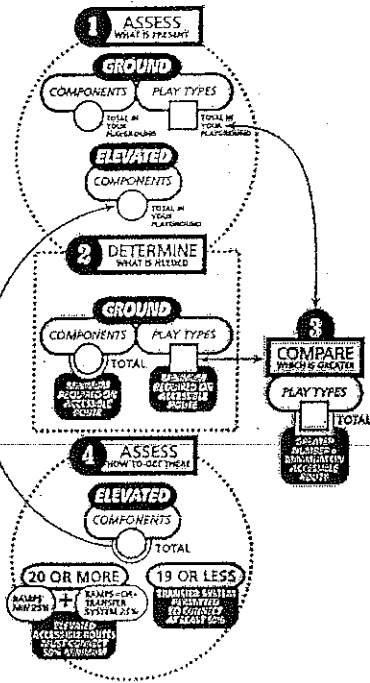
At least 50 percent of the elevated play components must be on an accessible route.



Play areas with 20 or more elevated components must use ramps to connect a minimum of 25 percent of those components. A transfer system or ramps may connect the other elevated play components required on an accessible route.



Play areas with less than 20 elevated play components may use a transfer system instead of ramps to connect at least 50 percent of the elevated components.



The above step-by-step guide is intended to assist when applying the play area guidelines. A detailed description is provided on page 17.

An "elevated" play component is a play component reached from above or below grade and is part of a composite play structure.

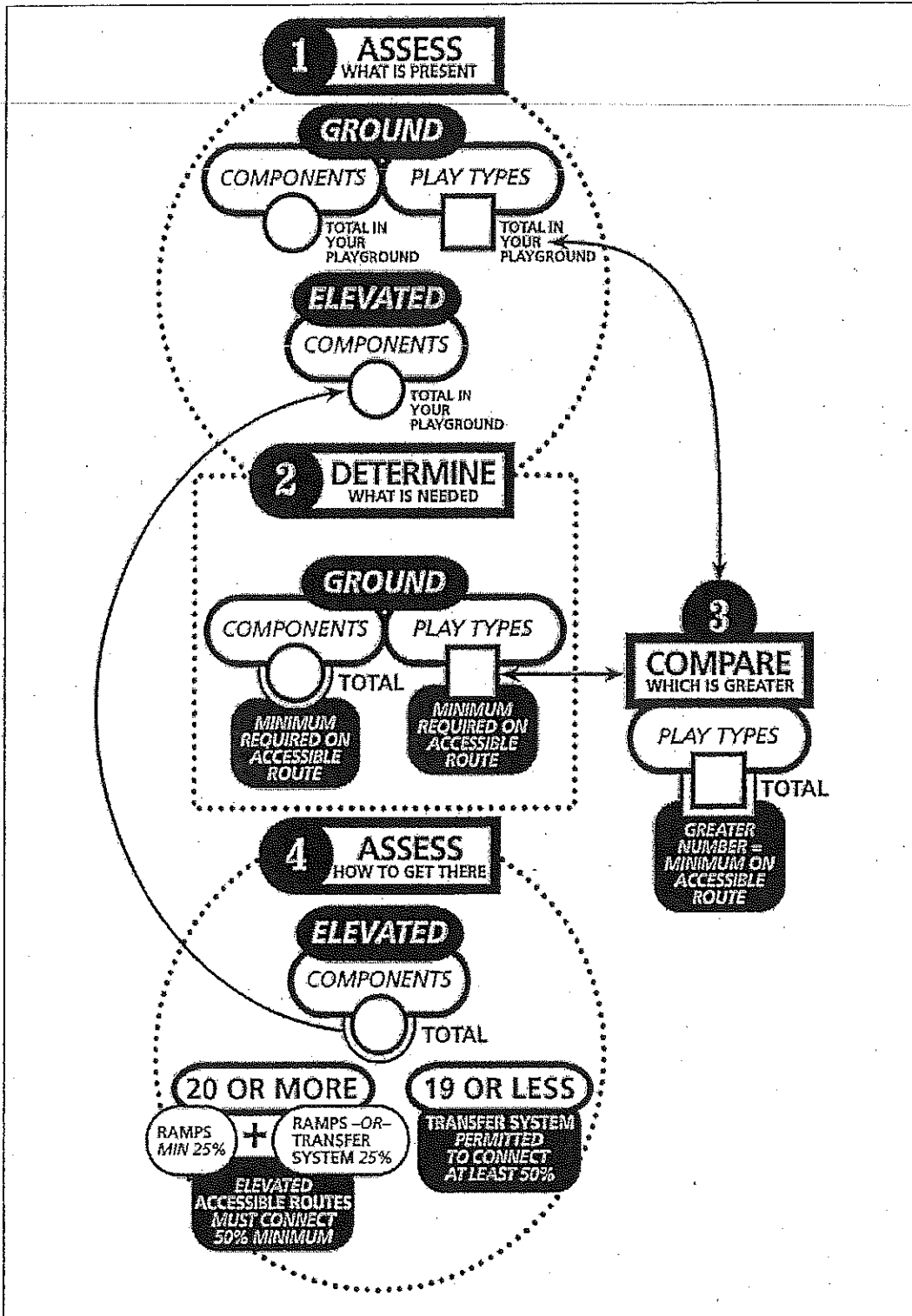


STEP-BY-STEP GUIDE ON APPLYING GUIDELINES

Step-by-Step Guide

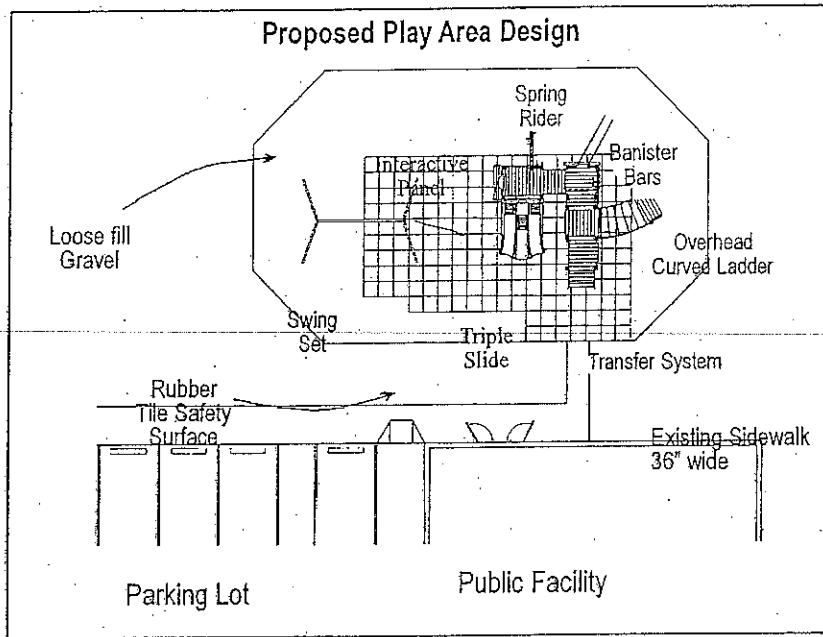
The following step-by-step guide has been provided to assist in evaluating a play area for meeting the minimum requirements of these guidelines. The guide has been arranged in four steps and provides spaces to fill in numeric values of play components for evaluating a specific play area design.

The step-by-step guide is used throughout the remainder of this guide as a key, shown in the upper corner of each new section where it applies.



PLAY AREA EVALUATION EXAMPLE

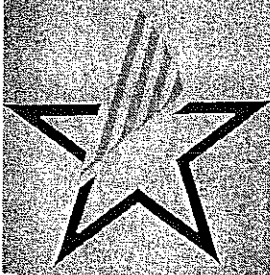
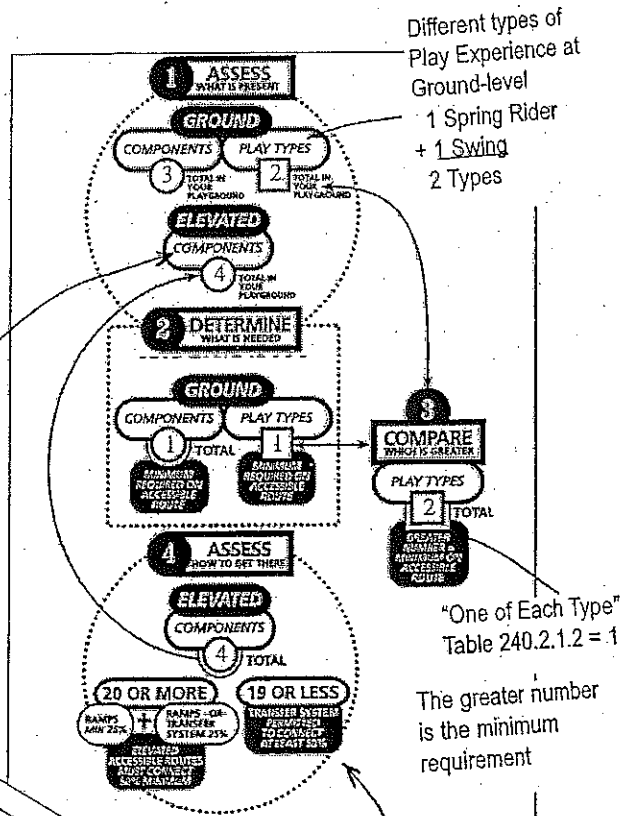
The example below illustrates a proposed design for a new play area. Each section illustrated in the flow chart provides guidelines for the following design tasks:



- Determining the number of play components
- Assessing the variety of play types
- Determining how many play components must be on an accessible route
- Determining when ramps are required and when transfer systems are permitted

Refer to this example while reviewing the concepts explained in this guide, to review how accessibility guidelines are applied to play area designs.

Total # of elevated components
 1 Triple Slide
 1 Interactive Panel
 1 Overhead Curved Ladder
 + 1 Banister Bars
 4 total.



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Number of elevated play components provided	Minimum number of ground-level play components required to be on accessible route	Minimum number of different types of ground-level play components required to be on accessible route
1	1	1
2 to 4	1	1
5 to 7	2	2
8 to 10	3	3
11 to 13	4	4
14 to 16	Not applicable	Not applicable
17 to 19	Not applicable	Not applicable
20 to 22	Not applicable	Not applicable

WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

ADAAG chapter 4 addresses accessible routes that connect the play area to the school, parking lot, or facility that it serves. Operators or owners of play areas are subject to all the other requirements of the ADA, including the obligation to provide individuals with disabilities an equal opportunity to enjoy the play area provided by that facility.

This section describes the various features of accessible routes within a play area, including location, clear width, slope, and accessible surfaces.

Accessible Routes

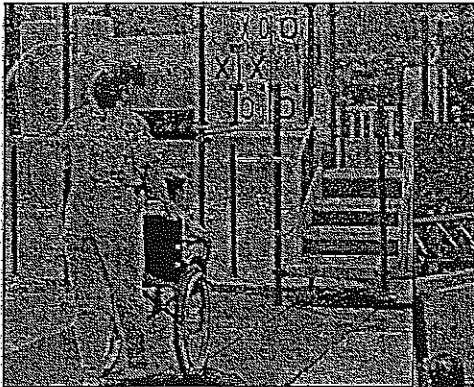
An accessible route is a pathway specifically designed to provide access for individuals with disabilities, including those using wheelchairs or mobility devices.



Accessible routes inside the boundaries of play areas are addressed in the play area guidelines. Technical provisions address the width, slope, and surface of both ground-level and elevated accessible routes.

There are two types of accessible routes:

- Ground-level
- Elevated



This ground-level route connects ground components and the transfer system which connects elevated components.

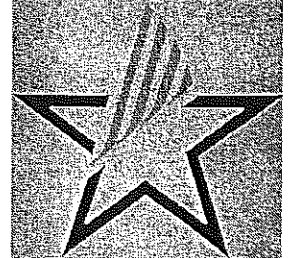
This elevated route connects elevated play components on a composite structure.



The accessible route must connect all entry and exit points of accessible play components.

Clear floor space required at play components and maneuvering space can overlap the accessible route.

Incorporating additional circulation space around high-use play components creates extra room for movement and accessibility for everyone using the play area.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

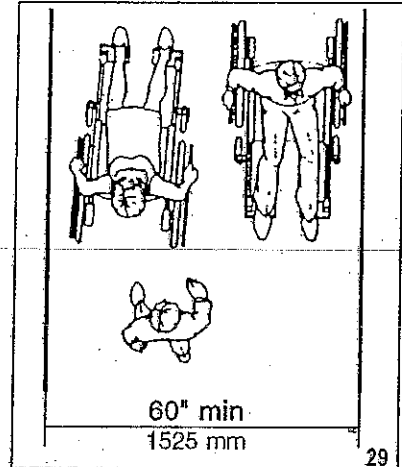
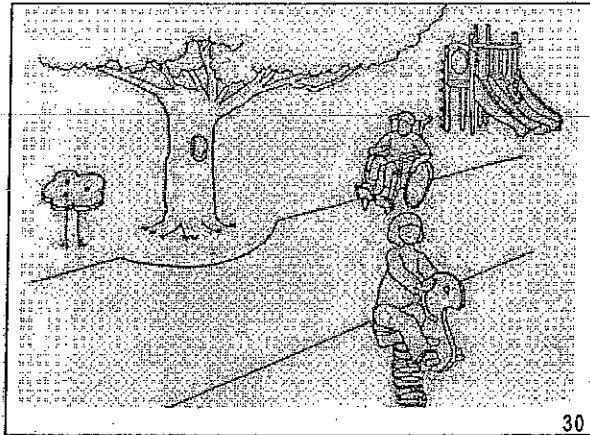
Ground-Level Accessible Routes

The 80-inch vertical clearance applies to ground-level routes only, and not elevated routes. This allows features like protective roofs and sun shelters to be present.

A ground-level accessible route connects play components at ground level.

- 60 inches (1525 mm) minimum clear width
- 1:16 maximum slope

The route may narrow down to 36 inches (915 mm) for a distance of 60 inches (1525 mm). This permits flexibility to work around site design features like existing equipment or trees.

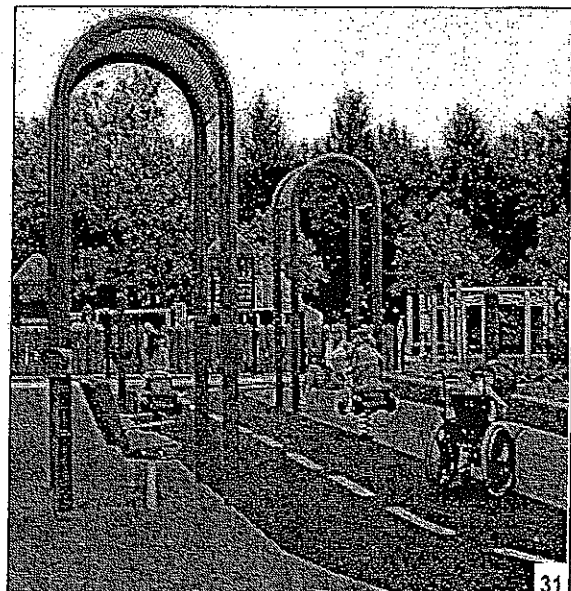


The required 60-inch width enables two wheelchairs to pass each other or to change direction.

Smaller play areas - those that are less than 1,000 square feet (304.8 square meters) - may have ground-level accessible routes that are 44 inches (1120 mm) clear width. A wheelchair turning space must be provided where the route exceeds 30 feet (9.14 mm) in length.

At ground level, objects may not protrude into the 60-inch wide space of an accessible route up to or below the height of 80 inches (2030 mm), measured above the accessible route surface. The 80-inch clearance applies only to the 60-inch accessible route, and is not required for the entire play area.

The play area provides a fun accessible roadway theme. The protective shelters for the benches have been set outside the boundary of the route providing the 80 inches of clearance required on the route.



WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Ground-Level Accessible Routes

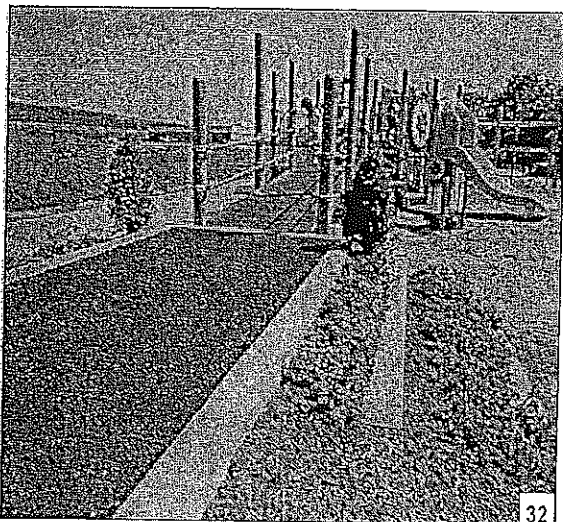
Maximum Slope at Ground Level

The maximum allowable slope for a ground-level accessible route is 1:16.

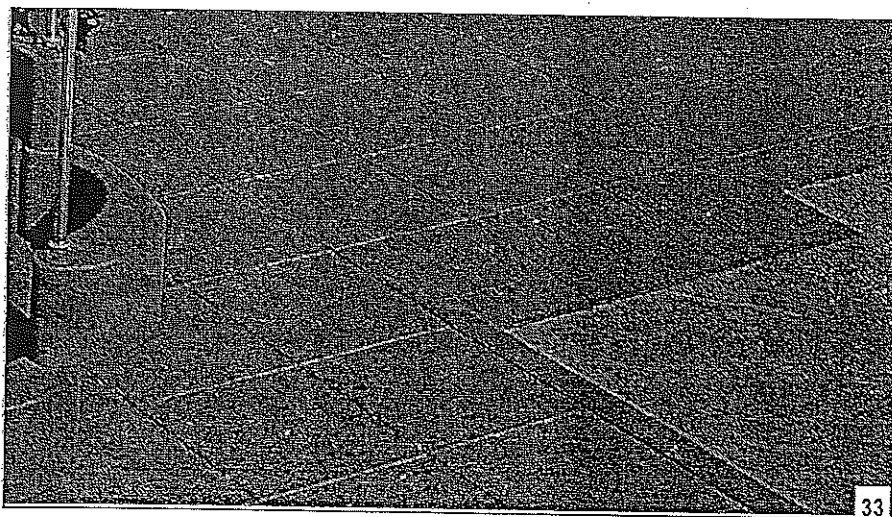
Berms are sometimes used to provide access to elevated play areas. A berm may be a natural sloped surface that is present in a hilly play area site, or a ground-level route built with slopes.

Designers are encouraged to consider edge protection and handrails on berms where there may be a drop-off. Remember the maximum slope of this "ground-level accessible route" is 1:16.

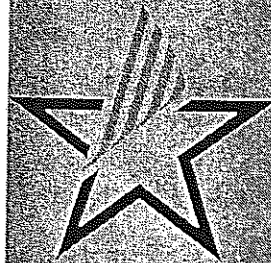
However, handrails are not required on ground-level accessible routes. This is permitted since the handrails may become a safety hazard in the "use zone."



This play area provides a bermed accessible route.



To accommodate a height change along the perimeter of a play area - like these rubber safety tiles placed on an asphalt surface - an allowable 1:12 slope is utilized for the transition at the boundary of the play area.



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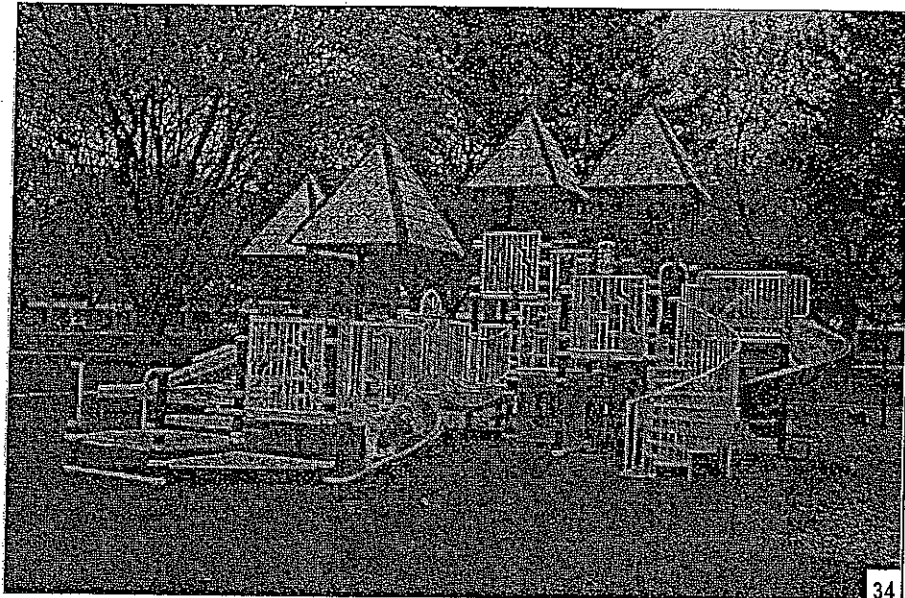
WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Accessible Ground Surfaces

Ground surfaces along accessible routes, clear floor or ground spaces, and maneuvering spaces, must comply with the American Society for Testing and Materials (ASTM) F 1951-99 *Standard Specification for Determination of Accessibility to Surface Systems Under and Around Playground Equipment*.

This standard assesses the accessibility of a surface by measuring the work an individual must exert to propel a wheelchair across the surface. The standard includes tests of effort for both straight-ahead and turning movements, using a force wheel on a rehabilitation wheelchair as the measuring device. To meet the standard, the force required must be less than that which is required to propel the wheelchair up a ramp with a slope of 1:14.

When selecting ground surfaces, operators should request information about compliance with the ASTM F 1292-04 standard.



Accessible surfaces can include impact-attenuating tiles made of recycled rubber and engineered wood fiber that meet the ASTM requirements for accessibility and safety. The design can be created so safety is not compromised for individuals using the play area where both standards are applied.

Accessible Surfaces Located In The Use Zone

If located within the use zone, accessible ground surfaces must also be impact attenuating and meet ASTM F 1292-04 *Standard Specification for Impact Attenuation of Surface Systems Under and Around Playground Equipment*.

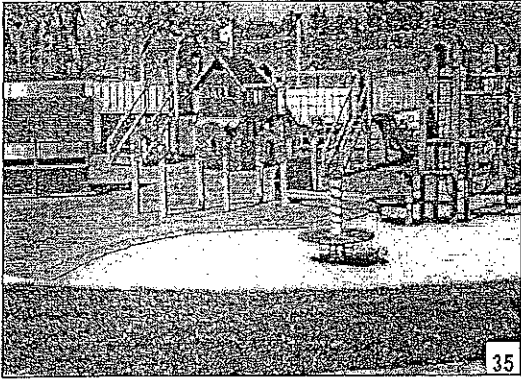
The "use zone" is a ground level area beneath and immediately adjacent to a play structure or piece of equipment that is designated for unrestricted circulation around the equipment. It is predicted that a user would fall and land or exit the equipment on the surface of the use zone.

The American Society for Testing and Materials (ASTM) has established safety standards for play areas including resilient surfaces. For further information or to purchase these standards, contact ASTM, 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959, www.astm.org.

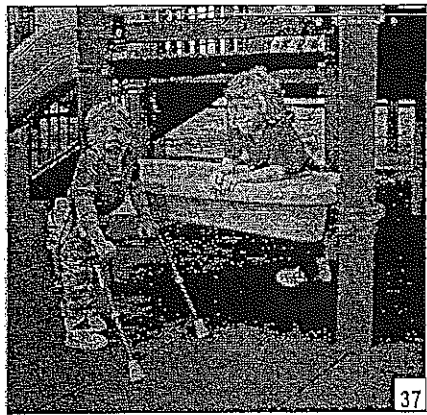
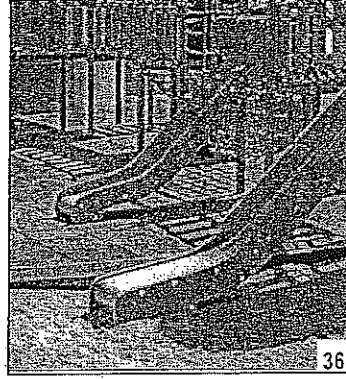


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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

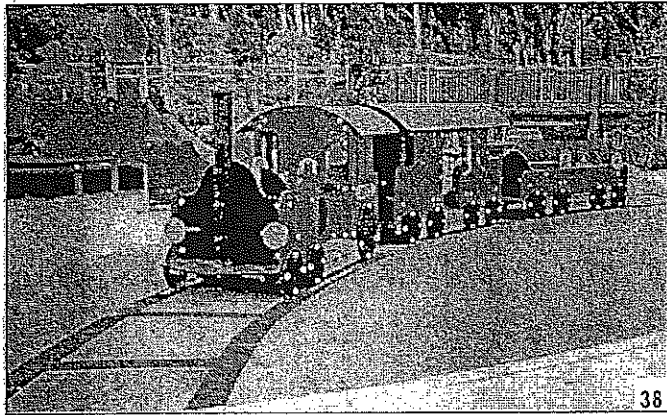


Accessible and non-accessible surfaces can be combined to provide variety and excitement in the play area.



Rubber surfacing tiles facilitate access in this play area.

Ground surfaces must be inspected and maintained regularly and frequently to ensure continued compliance with the ASTM F 1292-04 standard. The frequency of maintenance and inspection of resilient surfacing depends on the amount of use and the type of surfacing installed.



Accessible surfacing can be designed to complement the theme of the play area, while providing full access and visually integrating the surface into the overall design. Individuals of all abilities will enjoy the added benefits of an imaginative design.

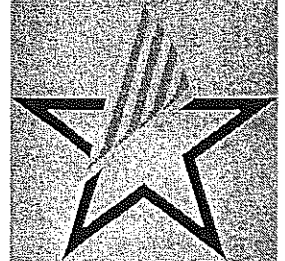
Engineered wood fiber surfaces will require frequent maintenance to comply with the ASTM F 1292-04 standard because of surface displacement due to user activity or other factors.

Designers and operators are likely to choose materials that best serve the needs of each play area. The type of material selected will affect the frequency and cost of maintenance.



At the time of this publication, rubber surfacing and some engineered wood fiber products meet the ASTM F 1951-99 standard. The fact that a specific product meets the ASTM 1951-99 standard does not necessarily mean that all other similar products will meet the standard.

Operators interested in selecting surfaces to comply with the play area guidelines should consult individual product manufacturers to determine compliance with ASTM F 1951-99.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

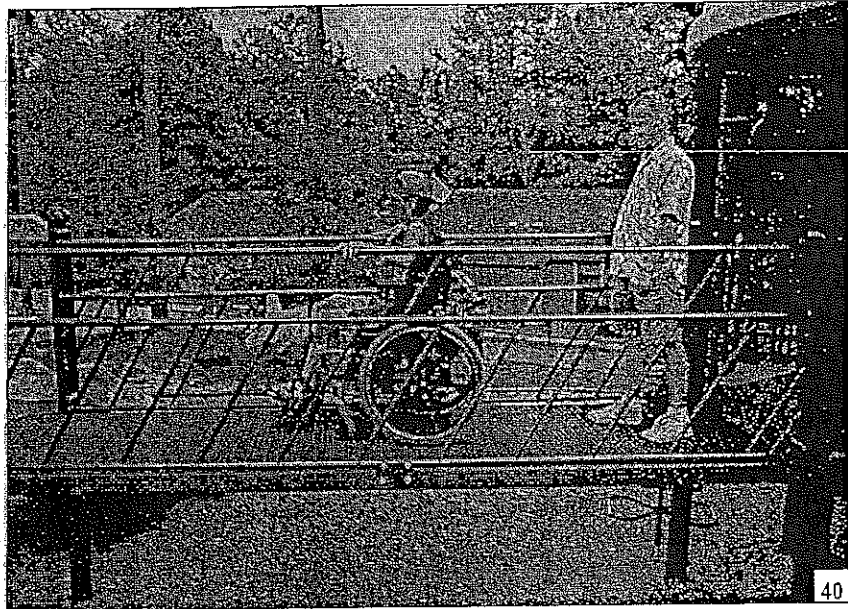
Elevated Accessible Routes

An elevated accessible route is the path used for connecting elevated play components.

Elevated accessible routes must connect the entry and exit points of at least 50 percent of the elevated play components provided in the play area.

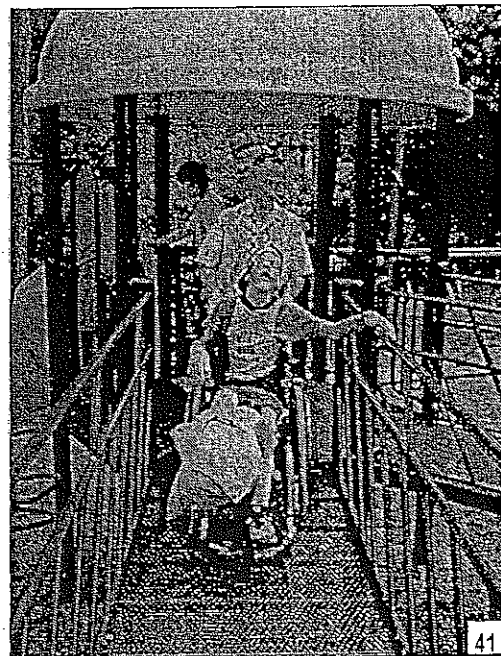
Two common methods for providing access to elevated play components are ramps and transfer systems. Ramps are the preferred method since not all children who use wheelchairs or other mobility devices may be able to use - or may choose not to use - transfer systems.

"Ramps" serve as a continuation of the accessible route from the ground allowing individuals who use mobility devices to access elevated components. The guidelines require that play areas containing 20 or more elevated play components provide ramp access to at least 25 percent of those elevated components.

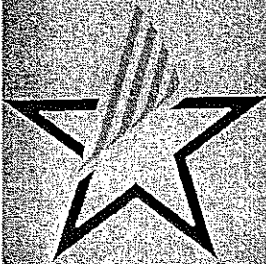


This photo illustrates an elevated accessible route:

- 36-inch (915 mm) clear width
- 32-inch (815 mm) narrowed width permitted for 24-inch (610 mm) length to accommodate features in the composite structure
- 12-inch (305 mm) rise maximum per ramp run
- Top of handrail gripping surfaces shall be 20 inches (510 mm) minimum to 28 inches (710 mm) maximum above the ramp surface



The 80-inch vertical clearance height does not apply to elevated accessible routes. This allows for the use of features such as roofs and sun shelters.



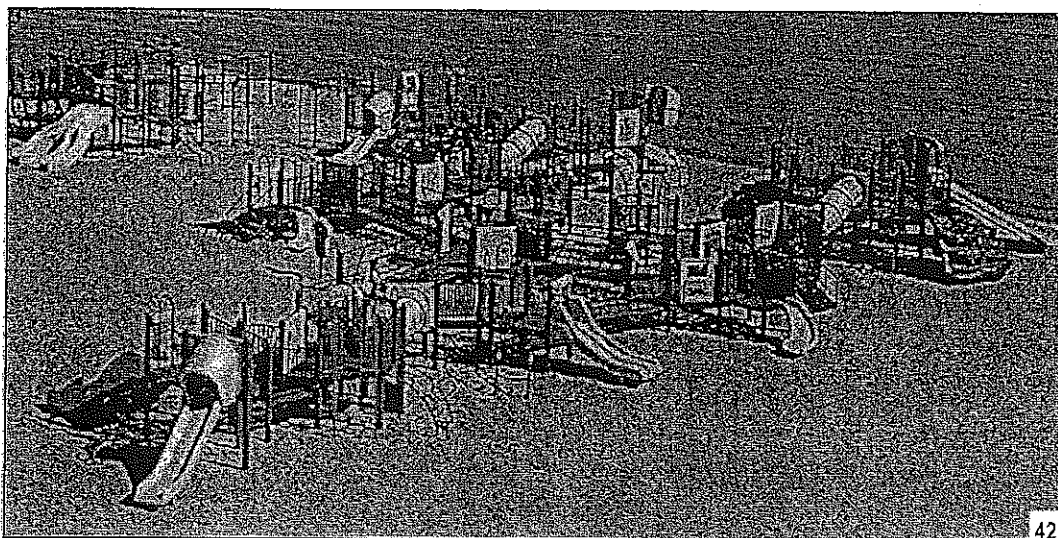
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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

When Ramps Are Required

Ramps are required on composite structures with 20 or more elevated play components and must connect to at least 25% of the elevated play components.

Ramps allow individuals who use wheelchairs and mobility devices to access elevated play components in composite play structures without transferring.



This play area has more than 20 play components and provides ramp access to elevated play components. The ramp system, consisting of ramp runs and landings, must connect to at least 25 percent of the elevated play components. The balance of the elevated play components required to be on an accessible route may be connected by the ramp system, or by a transfer system.

Rise of a ramp is the amount of vertical distance the inclined or slanted surface ascends or descends. A ramp run is a length of a continuous sloped surface that is ascending or descending. For example, to reach a 12-inch high deck or platform, a designer could use a 12-foot ramp with the maximum 1:12 slope, or a 14-foot ramp with a less steeper 1:14 slope.

Platform lifts, also known as "wheelchair lifts," may be considered for providing access to elevated play components when appropriate.

Where applicable, platform lifts complying with ADA/ABA Accessibility Guidelines chapter 4 and applicable state and local codes are permitted as a part of an accessible route. Because lifts must be independently operable, owners and operators should carefully consider the appropriateness of their use in unsupervised settings.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

"Ramps" are sloped surfaces that provide individuals who use mobility devices with access to elevated components.

Ramps

For each elevated ramp run:

- 12-inch (305 mm) maximum rise
- 1:12 maximum slope
- 36-inch (915 mm) minimum clear width



Landings

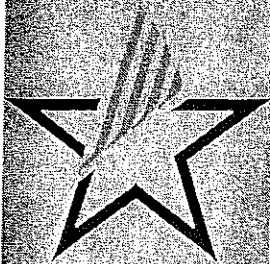
Landings are the level surfaces at the top and bottom of each ramp run.

- Must be as wide as the ramp they connect to
- A minimum length of 60-inches (1525 mm)
- If ramps change direction, the minimum landing size must be 60 inches (1525 mm) wide to accommodate a turn

Maneuvering Space Where Ramps are Provided

At least one maneuvering space must be provided on the same level as the play component. The space must have a slope no steeper than 1:48 in all directions (see page 34 for further details).

ADA/ABA Accessibility Guidelines addresses additional requirements for ramps and landings including edge protection, cross slope, surfaces, and outdoor conditions.



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Handrails

Handrails are required on both sides of ramps connecting elevated play components. Handrails must comply with the following:

- Clearance between handrail gripping surfaces and adjacent surfaces and shall not be 1 1/2 inches (38mm) minimum.
- Handrail gripping surfaces shall be continuous along their length and shall not be obstructed along their tops or sides. The bottoms of handrail gripping surfaces shall not be obstructed for more than 20 percent of their length. Where provided, horizontal projections shall occur 1 1/2 inches (38mm) minimum below the bottom of the handrail gripping surface.



In this case, additional handrails have been provided.

Handrails are required to comply with ADA/ABA 505. However, extensions on handrails in the play area are not required. This is to prevent children running into protruding rails in the play area.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

When Transfer Systems Are Used

A "transfer system" is an alternative to a ramp system in play areas where there are less than 20 total elevated play components.

The transfer system must connect to the ground-level accessible route and provide access to at least 50 percent of the elevated play components.

A transfer system provides access to elevated play components within a composite system by connecting different levels with transfer platforms and steps.

A transfer system provides access to elevated play components without the use of a wheelchair or mobility device. At least 50% of the elevated play components can be connected by a transfer system in play areas with less than 20 elevated components. In play areas with 20 or more elevated play components, transfer systems may be used to connect up to 25% of the elevated play components and the rest of the elevated play components required to be on an accessible route must be connected by a ramp.



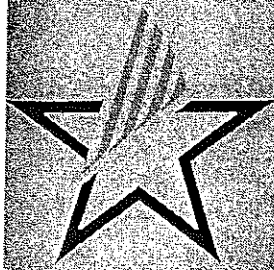
A transfer system typically consists of a transfer platform, transfer steps, and transfer supports.

Where a transfer system is provided, a combination of transfer platforms and transfer steps provide a continuous accessible route to elevated play components. A transfer system provides individuals the space necessary to physically transfer up or down in a composite play structure. Where provided, a 24-inch (610 mm) minimum width is necessary for individuals moving around a structure.



Playful features can be part of the transfer system, providing interactive experiences from both an elevated or ground level approach.

Consider the distance someone must travel to reach play components accessed by transfer systems. On page 31, the illustration shows a transfer system placed directly next to the slide. Access to this type of elevated play component has been carefully designed to minimize the distance someone must transfer to reach it.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Transfer Platforms

A transfer platform is a platform or landing that an individual who uses a wheelchair or mobility device can use to lift or *transfer* onto the play structure and leave the wheelchair or mobility device behind at ground-level.



- 11 inches (280 mm) to 18 inches (455 mm) height of top surface
- Minimum 24 inches (610 mm) wide
- Minimum 14 inches (355 mm) deep
- Unobstructed side

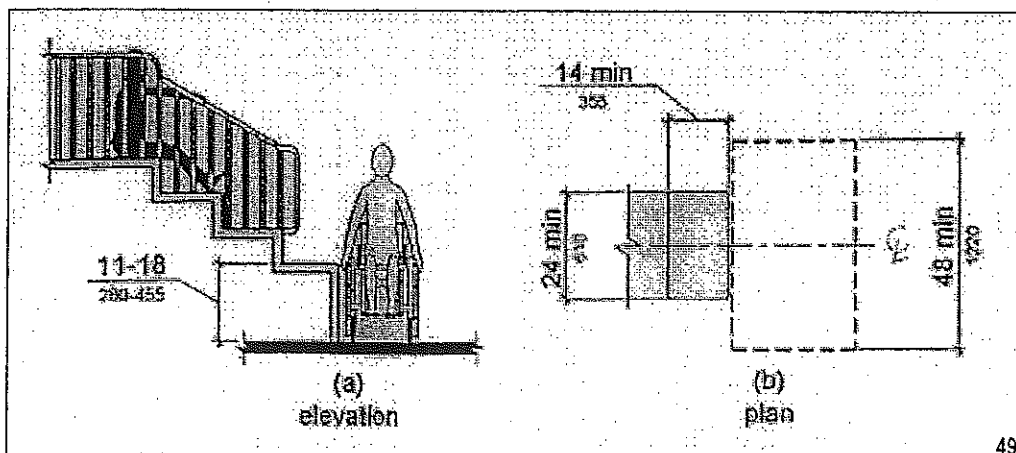
Adding a transfer step that leads to the ground's surface increases access for children exiting components at the ground level.

Transfer steps in a play area are not required to satisfy the general ADAAG stair requirements.

Maneuvering space and clear space is not required on elevated structures or at elevated play components reached by a transfer system.

Clear floor or ground space - used for parking wheelchair or mobility devices (commonly called "wheelchair parking") - is required at the transfer platform.

The 48-inch long side (1200 mm) of the "wheelchair parking" space must be parallel to the 24-inch (610 mm) side of the transfer platform.



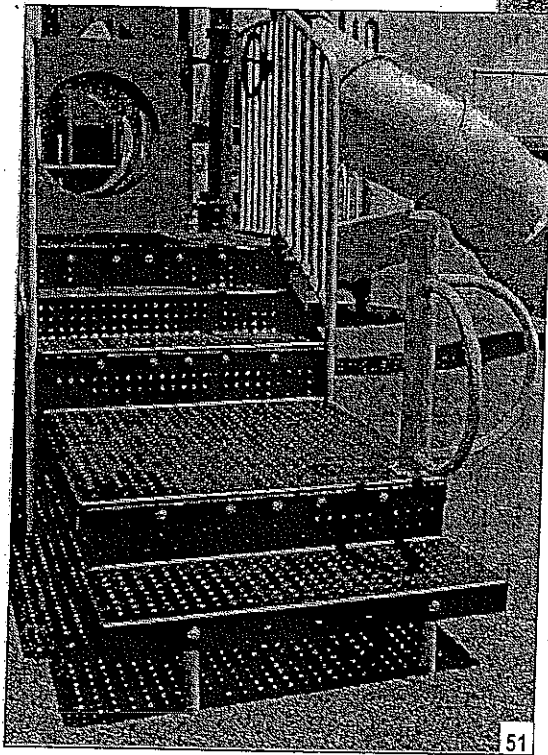
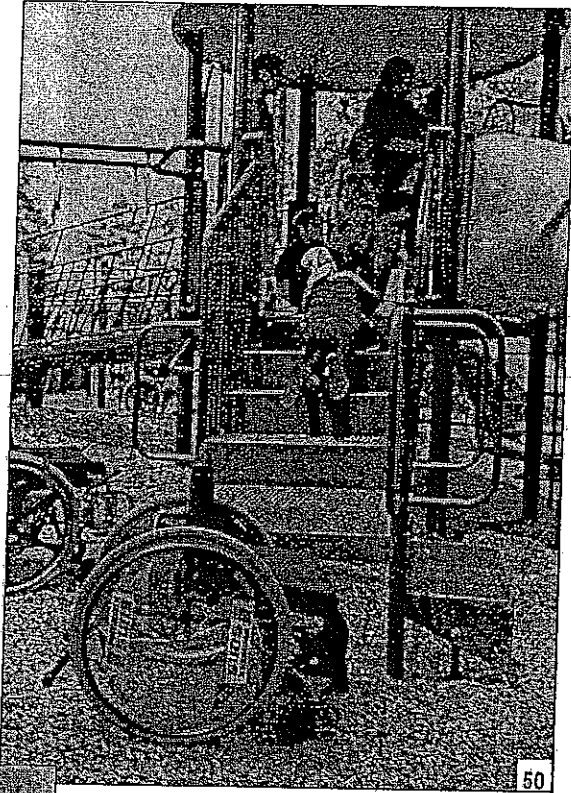
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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

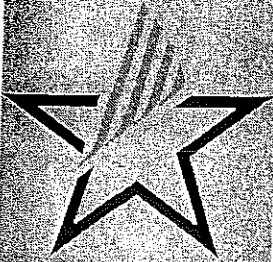
Transfer Steps

Transfer steps are level surfaces in a composite structure that can be used for transferring from different levels to access play components.

- Minimum 24 inches (610 mm) wide
- Minimum 14 inches (355 mm) deep
- 8 inches (205 mm) maximum height



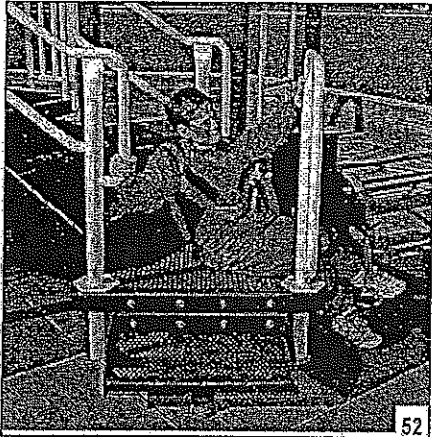
Play areas intended for smaller children should provide steps at smaller height increments. This will accommodate smaller sized children who must lift or "bump" up each step.



WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Transfer Supports

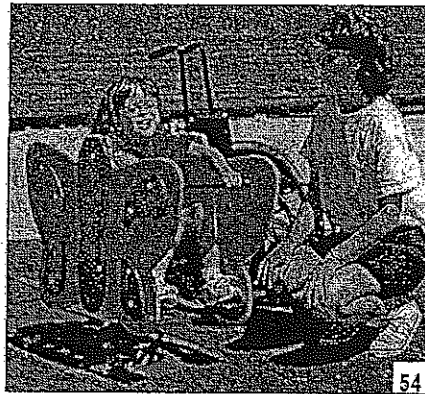
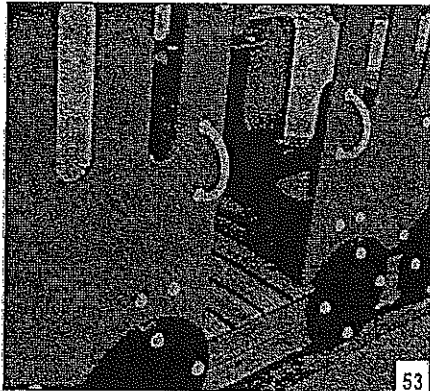
Transfer supports must be provided on transfer platforms and transfer steps at each level where transferring is the intended method of access.



Materials in a variety of different shapes and sizes are used to manufacture transfer supports including metal, plastic, and rope.

A means of support is required when transferring into the entry or seat of a play component.

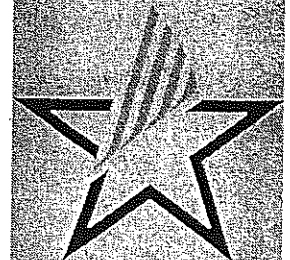
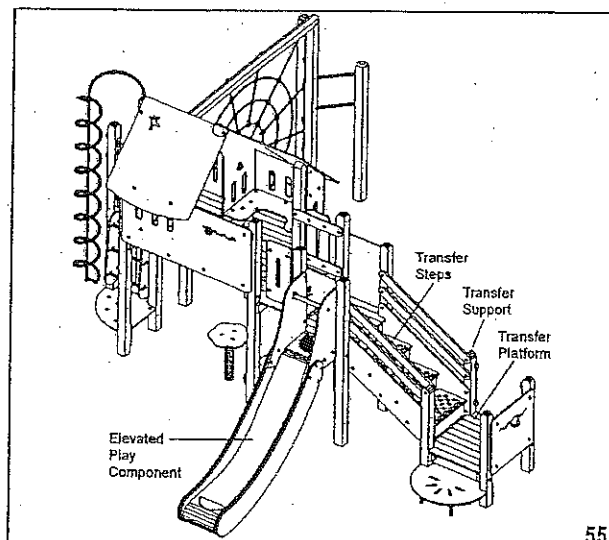
Transfer supports assist individuals with transferring and general mobility. They include handrails, handgrips, or custom designed handholds.



Aesthetically pleasing cut-out shapes and other design enhancements can provide hand supports for transferring.

Consideration must be given to the distance between the transfer system and the elevated play components it is intended to facilitate. Designers should minimize the distance between the point where a child transfers from a wheelchair or mobility device and the elevated play destination.

This transfer system provides access to exciting elevated play experiences like sliding while minimizing the distance individuals must traverse.



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WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

Connected Elevated Components

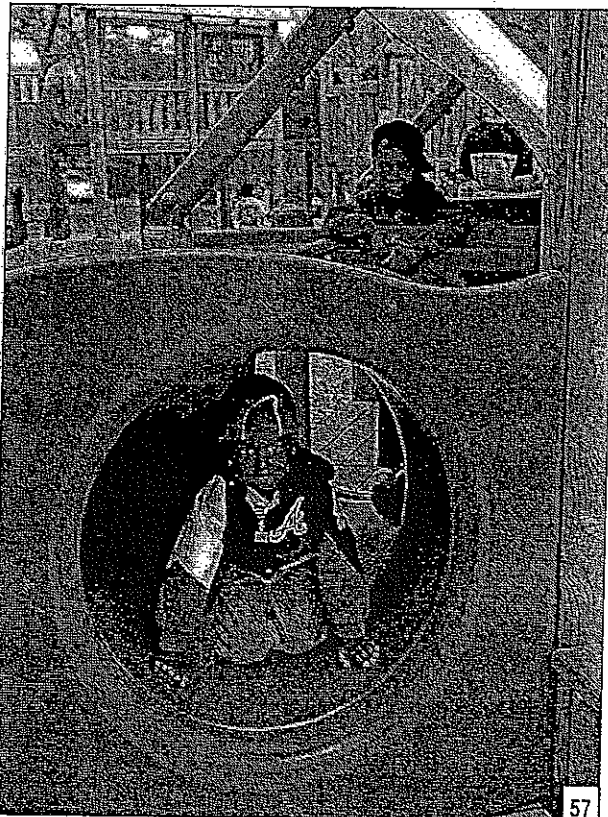
When transfer systems are used, an elevated play component may connect to other elevated play components, providing an innovative, accessible route.

Elevated play components that are connected to other play components count toward fulfilling the requirement for the number of elevated components on an accessible route where transfer systems are used.

A crawl tube is an elevated play component in this composite structure. Going through the tunnel provides access to additional activities on the other side.



Consideration should be given to how a play component is utilized when it is selected to connect to other elevated play events. When a transfer system is provided, children move through a play component like this crawling tube, using their own strength without a mobility device.



Providing variety and excitement through elevated play spaces benefits all children. Tunnels and tubes make "getting there" an activity in itself.



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WHAT OTHER ACCESSIBILITY REQUIREMENTS APPLY TO PLAY COMPONENTS?

The play area guidelines address accessible routes connecting play components along with certain spaces that are crucial to making a play area usable for children with disabilities. The other requirements for play components are provided to promote general usability, with application to a variety of play components. Additional features will assist in making play components more accessible to more children. Designers are encouraged to consider components with back support, increased space for maneuvering adjacent to the play component, and other features that promote independent use.

Clear Floor or Ground Space

Clear floor space - also known as ground space - provides unobstructed room to accommodate a single stationary wheelchair and its occupant at a play component on an accessible route.

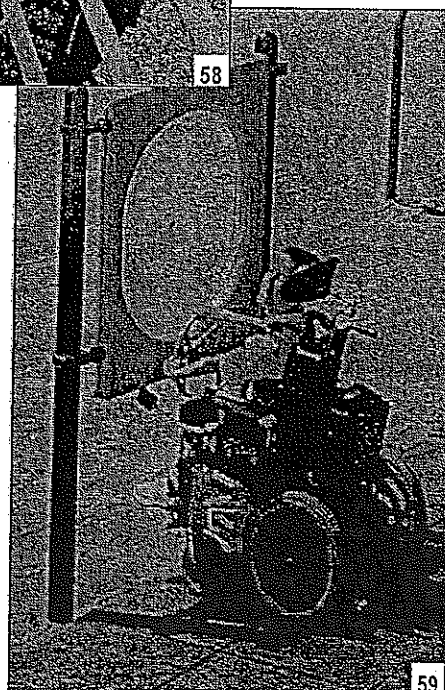
- 30-inch (760 mm) by 48-inch (1220 mm) minimum area
- May overlap accessible routes and maneuvering spaces
- Slope not steeper than 1:48 in all directions



The clear floor space is permitted to overlap onto the landing area to provide access to this elevated window activity.

Play components come in a variety of shapes and sizes facilitating a broad range of experiences. A specific location for clear floor or ground space has not been designated. Each play component is unique and the spaces must be placed in the best location for the situation.

This interactive play component has a clear ground space that allows front or side reach interaction.



Elevated play components accessed by transfer systems do not require maneuvering or clear floor spaces since mobility devices are left at ground level.

Clear floor or ground space is also sometimes called "wheelchair parking space."

The minimum clear floor or ground space on a composite structure may be positioned for a forward or parallel approach. It may overlap accessible routes and maneuvering spaces.



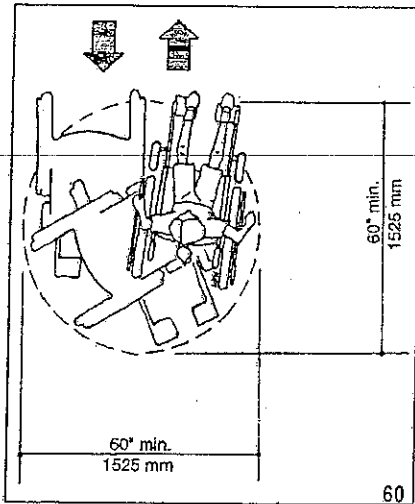
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WHAT OTHER ACCESSIBILITY REQUIREMENTS APPLY TO PLAY COMPONENTS?

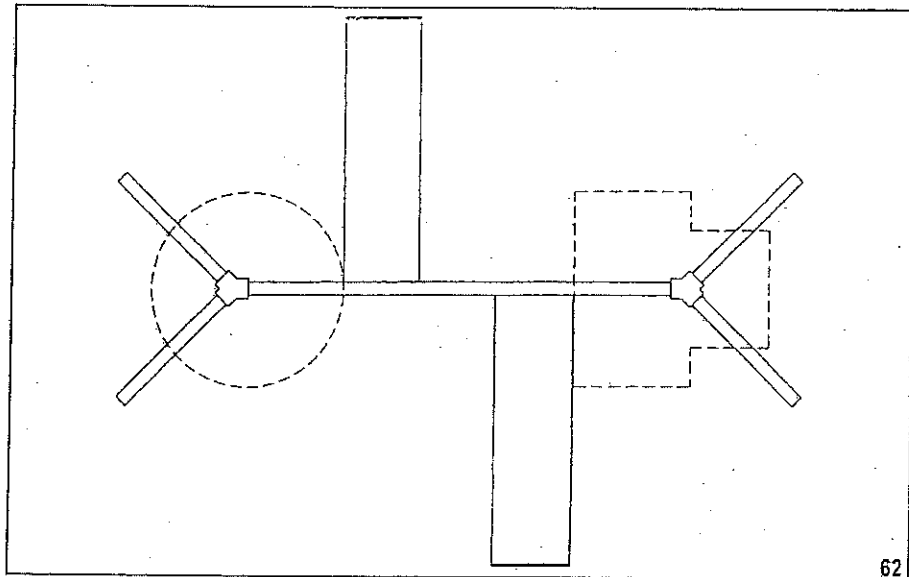
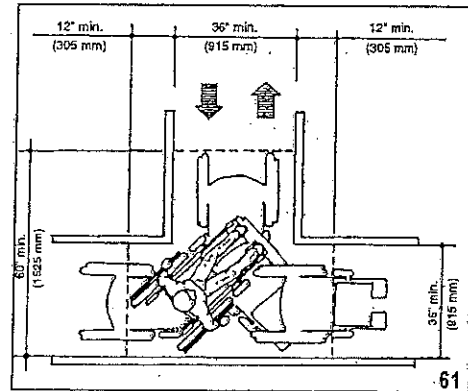
Maneuvering Space

Maneuvering space is defined as the space required for a wheelchair to make a 180-degree turn. At least one maneuvering space must be provided on the same level as elevated play components.

When providing access to ground level and elevated play components by ramps, space allowances to accommodate wheelchairs and mobility devices are required.

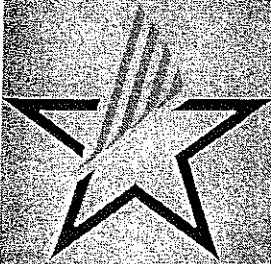


- A 60-inch (1525 mm) turning circle permits individuals with mobility devices to turn around
- A 60-inch (1525 mm) T-Shaped turn allows an individual to change directions by making a series of multi-point turns
- Slope not steeper than 1:48 in all directions



Maneuvering space is required for swings and must be located adjacent to the swing. This illustration shows options for either a 60-inch turning circle or a T-shaped turn. While this illustration shows the maneuvering space to the side of the swing, the space may be located behind or in front of the swing as long as it is immediately adjacent to the swing.

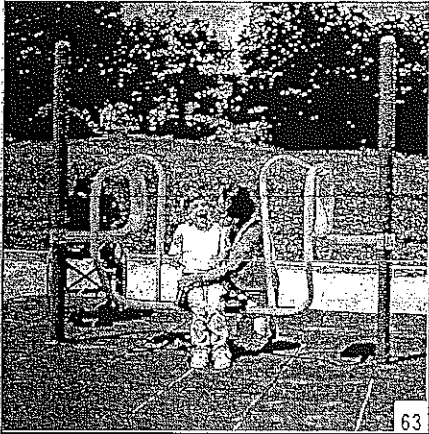
Objects are not permitted to protrude into ground level maneuvering spaces at or below 80 inches (2030 mm) above the ground or floor surface.



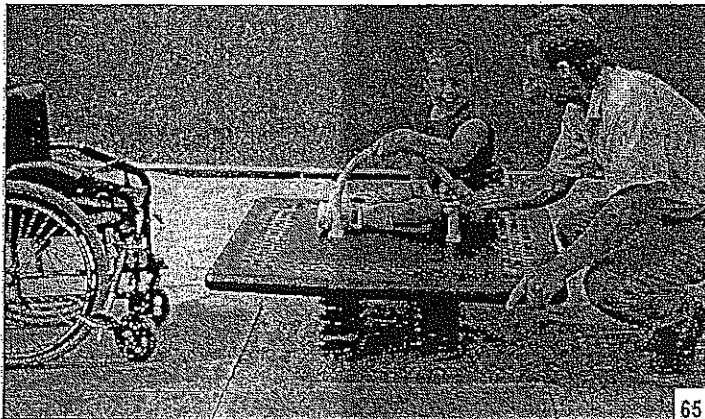
WHAT OTHER ACCESSIBILITY REQUIREMENTS APPLY TO PLAY COMPONENTS?

Entry Points and Seats

Entry points and seats are features of play components where individuals would transfer, sit, or gain access. When play components are located on an accessible route, the height required to transfer directly to the entry point or seat of a play component has a minimum of 11 inches (280 mm) and a maximum of 24 inches (610 mm). A mid-level height of 18 inches (455 mm) is recommended.

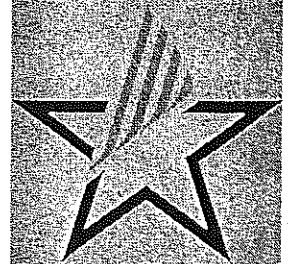


Examples of entry points and seats include swing seats, spring rocker seats, and crawl-tube openings.



Consider design features like open sides, back supports, and hand supports to help facilitate easy transfer and access.

The height of the entry point of a slide is not specified.



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WHAT OTHER ACCESSIBILITY REQUIREMENTS APPLY TO PLAY COMPONENTS?

Play Tables

Play tables may be located at a ground or elevated level in a composite play structure. Consider the route, clear floor space and maneuvering spaces for tables intended to be accessible to individuals who use wheelchairs.

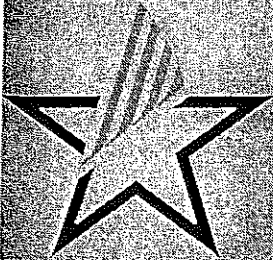
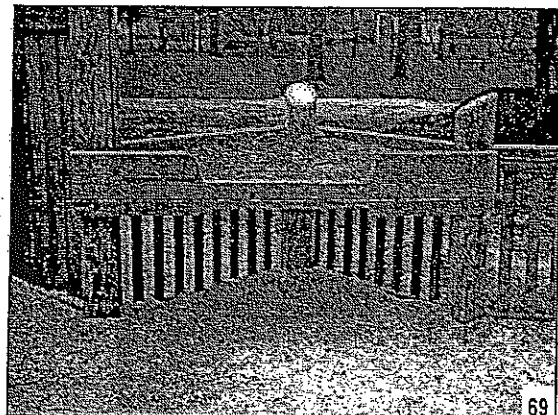
Play tables are surfaces, boards, slabs, or counters that are created for play. This includes tables designed for sand and water play, gathering areas, and other activities. Where play tables are located on an accessible route, the wheelchair knee clearance minimums are:

- 24 inches (610 mm) high minimum
- 30 inches (760 mm) wide minimum
- 17 inches (430 mm) deep minimum



Play tables designed primarily for children under 5-years-old, may provide a parallel approach instead of knee clearance if the rim is a maximum of 31 inches (785 mm) high.

The edge of this elevated sand table has been designed to provide access by providing a generous opening. The tops of rims, curbs, or other obstructions that would prevent access to a table surface should be 31 inches (785 mm) maximum in height.



WHAT OTHER ACCESSIBILITY REQUIREMENTS APPLY TO PLAY COMPONENTS?

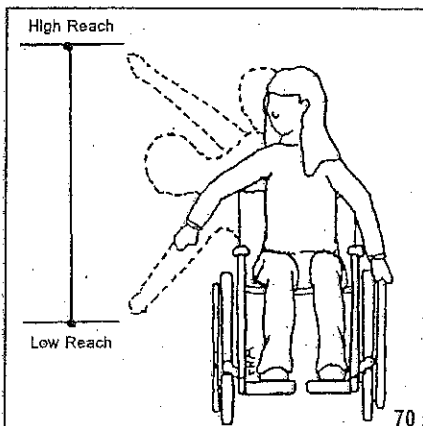
Reach Ranges (Advisory)

The play area guidelines include advisory information on recommended reach ranges.

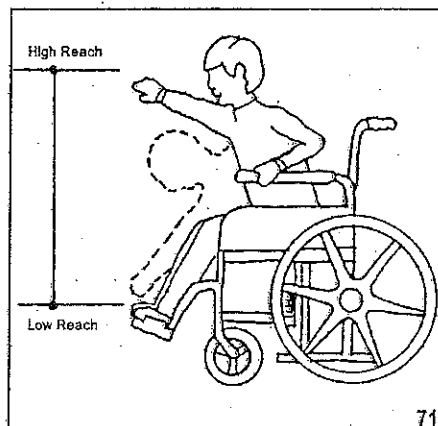
Reach ranges are the recommended designated regions of space that a person seated in a wheelchair can reasonably extend their arm or hand to touch, manipulate, move, or interact with an object or play component.

Reach ranges should be considered when providing play components with manipulative or interactive features for children who use wheelchairs. Recommended forward or side reach ranges are:

- 20 to 36 inches for 3 to 4 year-olds
- 18 to 40 inches for 5 to 8 year-olds
- 16 to 44 inches for 9 to 12 year-olds

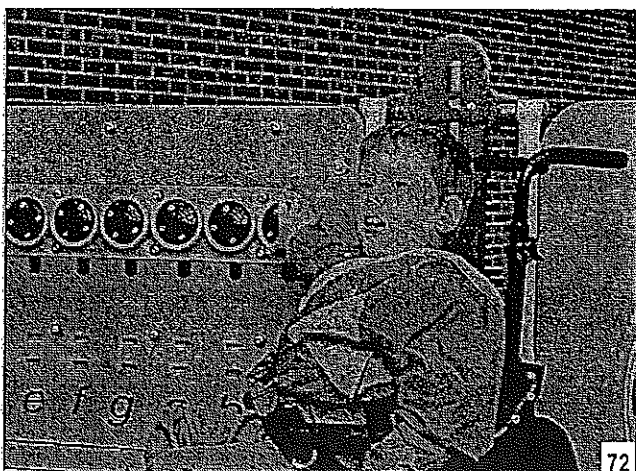


Side Reach



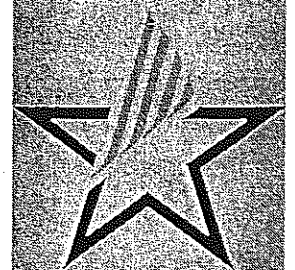
Forward Reach

The reach ranges appropriate for use by children who use wheelchairs to access play components are intended for ground-level components, and elevated components accessed by ramps. Reach ranges are not appropriate for play components reached by transfer systems.



Appropriate reach range heights will vary depending on how the play component is accessed. This interactive panel is mounted at a height appropriate for a child who uses a wheelchair.

The reach ranges in this guide are recommendations that should be considered when designing play components with manipulative features intended for use by individuals who use wheelchairs.



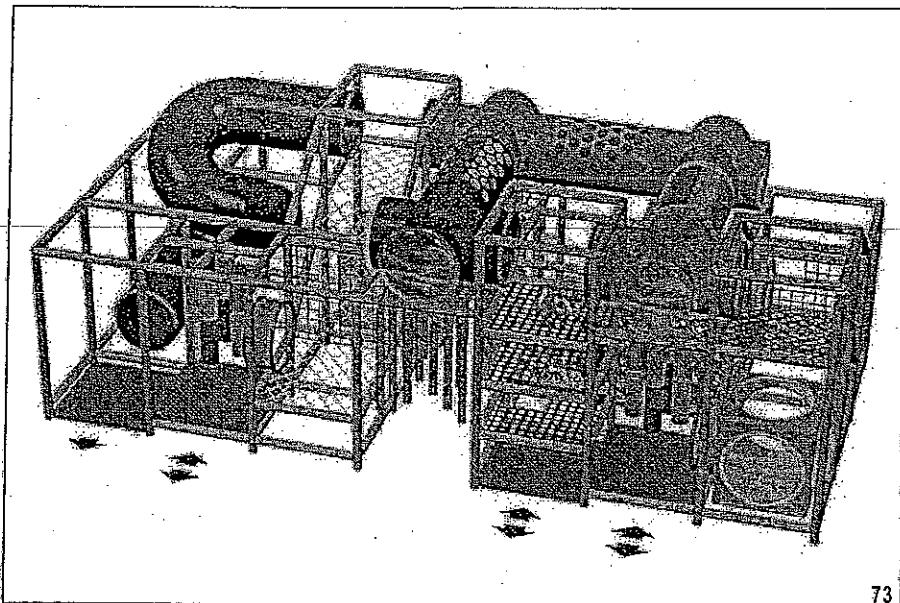
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SOFT CONTAINED PLAY STRUCTURES

"Soft contained play equipment" is a play structure made of one or more components on which an individual enters a fully enclosed play environment that uses pliable materials such as plastic, soft padding, and fabric.

Soft contained play structures must provide at least one entry point on an accessible route when three or fewer entry points are provided.

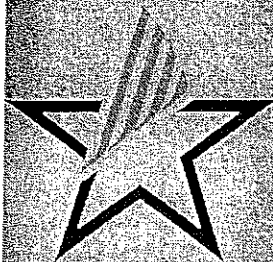
If four or more entry points are provided, at least two entry points must be located on an accessible route.



Soft contained play environments typically have limited entrance and exit locations, with play components integrated into the system design.



Transfer systems or platform lifts can serve as a part of an accessible route connecting entry points on soft-contained play structures.



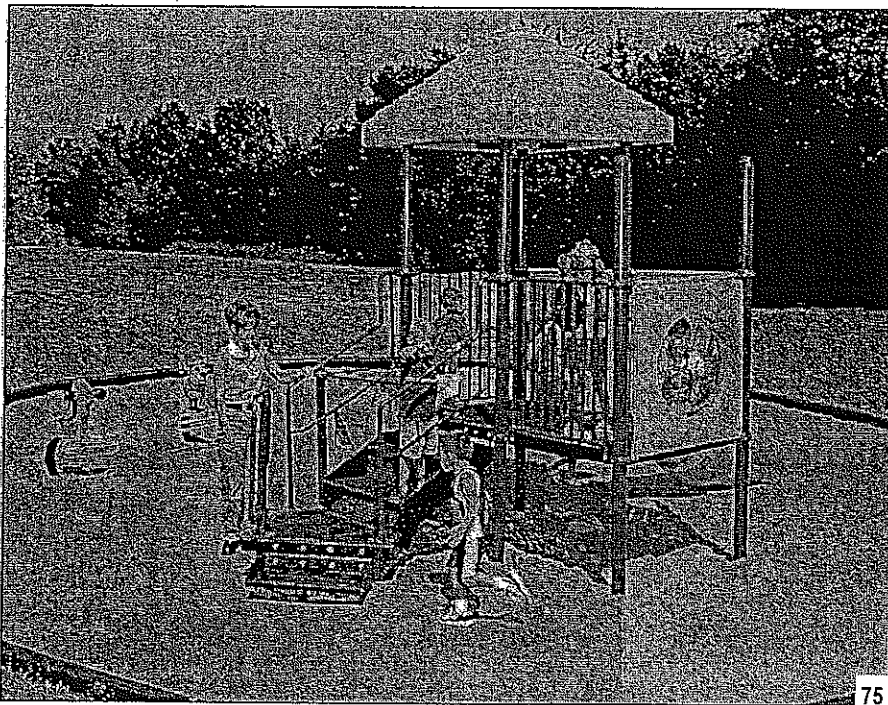
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ALTERATIONS

The play area guidelines apply to alterations made to existing play areas that affect, or could affect, the usability of the play area. Examples include removing a climbing play component and replacing it with a spring rocker, or changing the ground surfacing.

Alterations provide an opportunity to improve access to existing play areas. Where play components are altered and the ground surface is not, the ground surface does not have to comply with the ASTM F 1951-99 standard for accessible surfaces unless the cost of providing an accessible surface is less than 20 percent of the cost of the alterations to the play components.

If the entire ground surface of an existing play area is replaced, the new ground surface must provide an accessible route to connect the required number and types of play components. The requirements for accessible routes are explained on page 19.

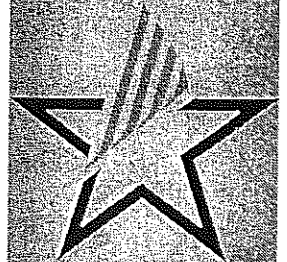


This play area was altered by adding two spring rockers. The seat of at least one spring rocker is between 11 inches (280mm) and 24 inches (610mm) maximum, and clear floor or ground space and maneuvering space is provided. If the ground surface is replaced in the future, an accessible route would have to be provided to the spring rocker.

Normal maintenance activities such as replacing worn ropes or topping off ground surfaces are not considered alterations.

If play components are relocated in an existing play area to create safe use zones, the guidelines do not apply, provided that the ground surface is not changed or extended for more than one use zone.

Replacing the entire ground surface does not require the addition of more play components.



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ACKNOWLEDGEMENTS

The Access Board would like to thank the following manufacturers for their generous assistance and for supplying appropriate photographs or illustrations: Bob Leathers, Columbia Cascade, GameTime, KOMPAN, Landscape Structures, Little Tikes, Miracle, Olympic Recreation, Playworld Systems, and Recreation Creations.

The numerical listing below shows the source of each photo or illustration.

Top Cover Photo - KOMPAN	38. KOMPAN
Bottom Cover Photo - Miracle	39. KOMPAN
1. KOMPAN	40. GameTime
2. Little Tikes	41. GameTime
3. KOMPAN	42. GameTime
4. KOMPAN	43. Playworld Systems
5. KOMPAN	44. Landscape Structures
6. Little Tikes	45. Miracle
7. KOMPAN	46. Landscape Structures
8. Little Tikes	47. Little Tikes
9. KOMPAN	48. Landscape Structures
10. KOMPAN	49. KOMPAN
11. Landscape Structures	50. Game Time
12. Miracle	51. Recreation Creations
13. KOMPAN	52. Miracle
14. Little Tikes	53. KOMPAN
15. GameTime	54. Playworld Systems
16. Playworld Systems	55. KOMPAN
17. GameTime	56. KOMPAN
18. Little Tikes	57. KOMPAN
19. Landscape Structures	58. Olympic Recreation
20. Miracle	59. Playworld Systems
21. Recreation Creations	60. KOMPAN
22. Miracle	61. KOMPAN
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26. Columbia Cascade	65. Landscape Structures
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28. GameTime	67. Playworld Systems
29. KOMPAN	68. Landscape Structures
30. Elizabeth Garufi	69. Bob Leathers
31. Little Tikes	70. KOMPAN
32. Playworld Systems	71. KOMPAN
33. KOMPAN	72. Miracle
34. Columbia Cascade	73. GameTime
35. KOMPAN	74. Access Board
36. KOMPAN	75. Miracle
37. Little Tikes	

