

**Town of Brookfield
Self-Evaluation and Transition Plan
November 2018**



Prepared by:

Center for Living and Working, Inc.

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and

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188 Lower Westfield Road, Holyoke, MA 01040

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

TOWN OF BROOKFIELD – SELF-EVALUATION AND TRANSITION PLAN

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I. INTRODUCTION

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

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

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

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

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

II. AMERICANS WITH DISABILITIES ACT

Background

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

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

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

Title I: Employment

Title II: State and Local Government and Public Transportation

Title III: Public Accommodations and Services Operated by Private Entities

Title IV: Telecommunications

Title V: Miscellaneous Provisions

The Town of Brookfield 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.

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

Title I

Equal Employment Opportunity

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

Reasonable Accommodations

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

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 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 paying greater rates than those for equivalent services used by persons without hearing or speech impairments. In addition, any televised public service announcements provided or funded in whole or in part by any federal agency or instrument of the federal government must include closed captioning of the verbal content of such announcement.

Title V

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

Definition of Commonly Used Terms

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

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

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

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

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

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

Undue Hardship - an action or accommodation 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.

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

Program Accessibility

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

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

III. OTHER FEDERAL ACCESSIBILITY REGULATIONS

Architectural Barriers Act (ABA) - 1968

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

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).

Telecommunications Act - 1996

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

Help America Vote Act – 2002

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

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

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

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

Jurisdiction of 521 CMR

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

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

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

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

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

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

V.ALTERATIONS TO HISTORIC PROPERTIES

ADA 2010 Standards

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

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

Massachusetts 521 CMR

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

VI.ADA SELF-EVALUATION

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

Although the ADA only requires local governments with 50 or more employees to take additional, specific measures, it is strongly encouraged that even smaller municipalities with less than 50 employees follow the same process to 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.

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

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

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

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

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

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

Commission on Disability (MGL C40 s8J)

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

The function of a disabilities commission is to:

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

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

Brookfield Self-evaluation. The Town of Brookfield 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 on Disability.

It is recommended that the Town, through town meeting action, accept the provisions of MGL C40 s8J to establish a Commission on Disability and allow the Board of Selectmen to appoint a minimum of 5 members to serve on this board. Members are appointed to serve three-year terms.

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

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

Brookfield Self-evaluation. The Town's Grant Writer/Facilitator to the Brookfield Board of Selectmen (currently Cathy LaRocca), was recently designated as the ADA Coordinator pursuant to a vote of the Board of Selectmen. Currently, there is no indication on the Town's website that designates Cathy LaRocca as the ADA Coordinator. It is recommended that the Town add this position to its webpage as part of the Board of Selectmen's page. It is also recommended that such designation be posted in Town Hall and be listed and described in the Town's Annual Reports.

Note: The Special Education Director for the Tantasqua Regional School District is designated as the ADA Officer for the Brookfield Elementary School. The Brookfield Elementary School Psychologist and the District Special Education Director are both designated as the S. 504 Coordinator for the elementary school. These designations are both posted in the elementary school.

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

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

Brookfield Self-evaluation. Title II of the ADA requires that public entities notify participants of its non-discrimination policies. There does not appear to be such notification of non-discrimination policies relative to persons with disabilities in brochures or posted in the town hall.

A small town must provide notice to the public about its ADA obligations and about accessible facilities and services in the town. The notice must inform the public about the ADA's nondiscrimination requirements. It may also describe how the public or employees may contact specific town officials about problems with accessibility and the need for effective communication. The information must be accessible to the public, including people who have

disabilities that affect communication, such as blindness, low vision, deafness, and hearing loss. Although no specific method is required to reach the public, notice can be provided in more than one format and by using more than one type of media, such as the town's website, print, radio, or television.

Self-Evaluation survey responses to the question "Is the public informed that their programs are prepared to make reasonable modification" were mostly no or non-applicable. Many Town department personnel actually do provide reasonable modifications or accommodations such as making house calls to someone who is home-bound.

Other respondents were not aware that even though they don't offer direct services to the public such as committees, are not aware that reasonable modifications may be necessary such as communication access at meetings that are open to the public.

A sample Public Notice is provided as Attachment E.

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

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

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

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

Brookfield Self-evaluation. The Town of Brookfield has adopted an ADA Grievance Procedure as required under the ADA effective January 9, 2007. There is no mention of this policy on the Town's website including the Board of Selectmen section. It is recommended that the Town of Brookfield create a Disabilities related section on their website and post relevant information such as the Grievance Procedure, public notices that allow for accommodation requests and the designated ADA Coordinator contact information.

A sample Grievance Procedure is provided as Attachment B.

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

A municipality should have formal separate policies and procedures pertaining to the ADA and program accessibility, grievances, communications, equal opportunity and non-discrimination except when it comes to employment opportunities. A municipality should also include non-discrimination language in its employment postings and/or forms similar to that provided below.

“The Town of Brookfield is an Equal Opportunity/ Affirmative Action Employer. We assure you that your opportunity for employment with the town will be based only on your merit, without regard to race, religion, sex, age, national origin or disability”

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

The Town does not appear to have formal policies and procedures pertaining to the ADA and program accessibility, grievances, communications, equal opportunity and non-discrimination except when it comes to employment opportunities.

The Town of Brookfield is in the process of updating all their job descriptions for Town employees and committee members. These draft descriptions document Essential Functions, Competencies, Education and Experience, separately in a concise format that don't appear to screen out applicants with disabilities.

In the physical requirements/work location portion of the job description, the following paragraph appears:

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

There should be consistency in all departmental policies, procedures, and practices including the posting of employment ads, actual job descriptions, and reasonable accommodations to potential and existing employees. (See **Reasonable Accommodations**).

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

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

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

position. The town does have job descriptions that meet the general intent of providing reasonable accommodations. As previously noted, it appears that the draft job descriptions have the following language:

Physical Requirements/Work Location:

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

The job descriptions include language on the work environment and also on ADA Special Requirements including physical ability, sensory requirements, and environmental factors. The job descriptions also contain the essential functions required to do the job but typically do not list marginal duties, which should be included. It should also be noted that if a medical examination is required, it must be required of all entering employees of the same position. Medical examinations are prohibited until after a job offer has been made to the applicant. Employment can be conditioned on the results of the applicant’s post-offer medical examination.

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

Physical Requirements Suggested Wording

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

Reasonable Accommodations. The town does not appear to have a Reasonable Accommodations Policy in place for existing or potential employees. Under Title II of the ADA, reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions of his/her job. **A sample Reasonable Accommodations Policy and Request Form for adoption by the Selectmen is provided as Appendix C and D.**

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

A municipality must maintain in operable working condition those features that are necessary to provide access to services, programs, and activities. This includes door closers, sidewalks, parking space signage and striping, and ramps, among many other things. Isolated or temporary interruptions in service or

access are permitted for maintenance or repairs. However, this is deemed as short-term and not of a semi-permanent or seasonal nature.

When weather conditions such as snow and ice limit or prevent access to services, programs, and activities to or within a facility, access must be maintained to ensure that those programs are accessible. Maintenance of accessible features includes the removal of snow from accessible parking spaces; curb ramps, accessible routes of travel, and entrances. Although temporary interruptions in services due to bad weather are expected, alternate services must be provided if snow and ice cannot be cleared in a timely manner. Snow removal and removal of other obstructions within the accessible route of travel must be done to a minimum width of 36". Similarly, if an 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.

Brookfield Self-evaluation.

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

- Storage of items under accessible sinks reducing minimum toe clearance and minimum clear width requirements.
- Storage of items in bathrooms reducing required maneuvering clearances (Elementary School).
- Bathroom stall doors that no longer operate as self-closing (Elementary School).
- Entry and exit doors with excessive operating forces and closing speeds.
- Routes of travel and walkways that were deteriorated and non compliant.
- Missing elements such as signage.
- Missing protective equipment or insulation on sink plumbing.
- Deteriorating sidewalks.
- Accumulation of debris and leaves at base of curb ramps.

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

Local governments must ensure effective communication with individuals with disabilities. To ensure that communications with individuals who have hearing, vision or speech impairments, municipal governments must provide appropriate auxiliary aids. The type of auxiliary aids or services necessary to ensure effective communication will vary according to the type of communication involved and the needs of the individual. Auxiliary aids include such services or devices as sign language interpreters, assistive listening headsets, television captioning and decoders, telecommunications devices for people who are deaf such as TDD's or video phones, use of 911 telephone interpreter service, readers, Brailled materials, documents on electronic format, audio recordings and large print materials. In addition, telephone emergency services including 911 must provide direct access to individuals with speech and hearing impairments.

Municipal governments are not required to provide auxiliary aids or take any actions that would result in a fundamental alteration in the nature of a service, program, or activity or that will result in undue

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

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

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

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

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

b) Documents Are Not Posted In an Accessible Format. Municipalities will often post documents on their websites using Portable Document Format (PDF). However, PDF documents, or those in other image based formats, are often not accessible to blind people who use screen readers and people with low vision who use text enlargement programs or different color and font settings to read computer displays. The solution would be to always provide documents in an alternative text-based format, such as HTML or RTF (Rich Text Format), in addition to PDF. Text-based formats are the most compatible with assistive technologies.

c) Specifying Colors and Font Sizes. Websites are often designed in a manner such that everything is exactly the same color, size and layout. But because of one’s disability, a person with low vision does not see webpages the same as other people. Some see only small portions of a computer display at one time. Others cannot see text or images that are too small. Still others can only see website content if it appears in specific colors. For these reasons, many people with low vision use specific color and font settings when they access the Internet – settings that are often very different from those most people use. For example, many people with low vision need to use high contrast settings, such as bold white or

yellow letters on a black background. Others need just the opposite – bold black text on a white or yellow background. And, many must use softer, more subtle color combinations. Users need to be able to manipulate color and font settings in their web browsers and operating systems in order to make pages readable. Some webpages, however, are designed so that changing the color and font settings is impossible. The solution is to design websites so they can be viewed with the color and font sizes set in users’ web browsers and operating systems. Users with low vision must be able to specify the text and background colors as well as the font sizes needed to see webpage content.

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

e) Other considerations when developing websites include:

- include a “skip navigation” link at the top of webpages that allows people who use screen readers to ignore navigation links and skip directly to webpage content;
- minimize blinking, flashing, or other distracting features;
- if they must be included, ensure that moving, blinking, or auto-updating objects or pages may be paused or stopped;
- design online forms to include descriptive HTML tags that provide persons with disabilities the information they need to complete and submit the forms;
- include visual notification and transcripts if sounds automatically play;
- provide a second, static copy of pages that are auto-refreshing or that require a timed-response;
- use titles, context, and other heading structures to help users navigate complex pages or elements (such as webpages that use frames).

Brookfield Self-evaluation.

Auxiliary Aids and Services.Based on what was submitted in response to the survey as well as viewing policies and available materials, it is not clear as to what degree the Town complies with this provision, if at all. It does not appear that information of this type is available as part of regular meeting notices and postings and who to contact to arrange for providing accommodations.The town must insure that accessibility and accommodations language

appear on all meeting notices including contact information and the advance timeframe required to arrange for disability related and accommodations requests. In addition, it does not appear that the town has auxiliary aids such as TTY's, TDD's, or assistive listening systems. These should be considered for purchase and use as deemed appropriate for town services and programs.

Town Website and Internet Accessibility. Upon viewing the town's website, there appears to be areas where smaller size fonts are used, images and/or photographs lack text, and documents are presented in a pdf or scanned format. In most cases, color contrasts appear to be acceptable, but variation and standardization may be required for some users.

Based on the afore described "common website problems" and identified elements of Brookfield's website, the following should be put into place as feasible and appropriate:

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

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

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

Brookfield Self-evaluation.The Town of Brookfield does have some emergency preparedness information on its Emergency Management and Police Department webpages including the ability to sign up for the **Blackboard Connect Service** Emergency Alerts - Phone Notification System. The [Blackboard Connect](#) service allows authorized town officials to create and rapidly disseminate time-sensitive messages to every telephone number stored in the notification database. With the Blackboard Connect service, authorized users can send thousands of messages in minutes. Only authorized officials are allowed access to the system.

Polling Places

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

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

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

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

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

Brookfield Self-evaluation. Town poll voting is held on the first floor large meeting room of the Town Hall. The building and voting area are accessible with the voting location being certified by the Elections Division of the Secretary of the Commonwealth of Massachusetts as meeting the requirements under state and federal law as an accessible polling location. There is also an *AutoMARK* Voter Assist Terminal at the polling location.

VII. ADA TRANSITION PLAN

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

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

Limitations of the Transition Plan and Compliance

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

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

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

The plan does not address what is accessible, but rather obstructions to mobility. Fieldwork was performed July and August, 2018. Although general recommendations are made as corrective actions to eliminate identified obstacles, it is expected that the town will be solely responsible for designing the specific construction solution in accordance with 521 CMR: Architectural Access Board Regulations or the 2010 ADA Standards for Accessible Design, whichever is appropriate.

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

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

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

Use of the Transition Plan

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

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

Priority(P)

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

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

Feasibility(F)

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

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

Time-frame(TF)

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

<u>Time-frame</u>	<u>Description</u>
I	Immediate Term (2019-2020)
N	Near Term (2021-2024)
L	Long Term (2025-2028)

Costs

Cost estimates are based on recent projects of similar nature, unit quantity pricing (where appropriate), and R.S. Means Company, Inc. ADA Compliance Pricing Guide 2nd Edition and updated for current pricing. Cost estimates are also based on the type and complexity of work. It is being assumed that simple changes (Feasibility ranking of 1 or 2) will be made through the use of town personnel (custodial, DPW, etc.). More complex construction or those projects requiring specialized skills (Feasibility ranking of 3 or 4), would involve private contractors and include labor, overhead, and profit.

List of Buildings and Facilities

Municipal Buildings: Fire Station/EMS, Highway Garage, Merrick Library, Police Station, Town Hall, Transfer Station, Brookfield Elementary School.

Recreational and Other Public Facilities: Banister Town Common/Mall, Brookfield Cemetery, Brookfield Town Beach, Lewis Field, Mill Station Park, Town Center Area Curb Ramps and Sidewalks.

Abbreviations

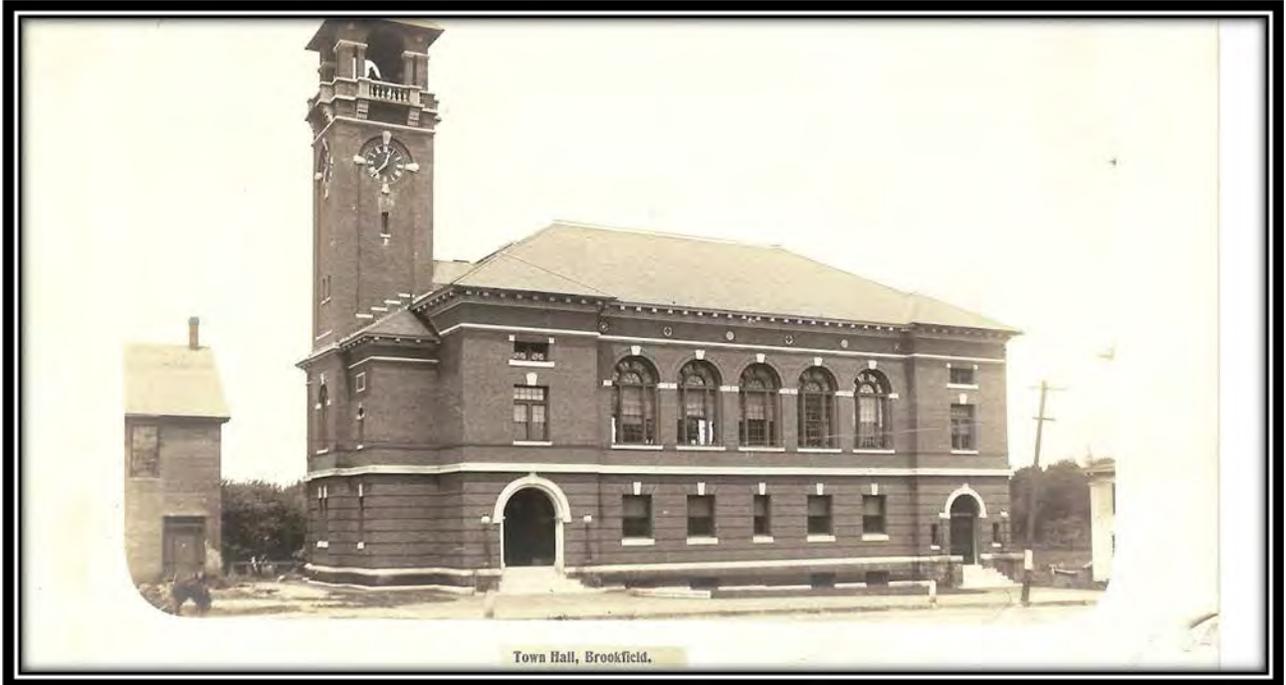
a.f.f.	above finish floor	c.f.s	clear floor space
s/b	should be	r.s	running slope
>	greater than	c.s.	cross slope
<	less than		

VIII. ASSESSMENTS

Town Hall
Merrick Library
Fire Station/EMS
Police Station
Highway Garage
Transfer Station
Brookfield Elementary School
Banister Town Common/Mall
Mill Station Park
Brookfield Town Beach
Lewis Field
Town Center Sidewalks and Curb Ramps
Brookfield Cemetery

BROOKFIELD TOWN HALL

Function and Description of Facility and Programs: The Brookfield Town Hall serves as the town's primary administration building for general governmental services. With the exception of the Board of Health Office, the first floor of town hall houses all of the offices and meeting areas of town government. The Board of Health Office is located on the second floor.



Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The “accessible” parking spaces do not meet signage, size, slope, and surface requirements. The exterior stair and ramp railings are non-compliant as the stair railings don’t extend at the top and bottom. In addition, the ramp railings don’t extend 12” beyond the ramp base. The accessible entrance door lacks a door closer, has no internal pull hardware, and lacks adequate clearance on the latch side of the door. The bathroom is not handicapped accessible, however, the town is currently in the process of seeking bids to construct a fully compliant bathroom. Interior rooms and offices have knob style non-compliant hardware and lack tactile signage. There is no vertical access to the upper levels of the building including the second floor, second floor balcony, and third floor. Stair railings are generally non-compliant due to size, location, and lack of extensions. Stair treads and risers are not uniform throughout each staircase. The first floor has non-compliant door thresholds. In addition, a number of offices have inadequate pull clearance. At least one office does not meet the minimum 32” clear width requirement at the entrance. A first floor drinking fountain is not a “high-low” fountain and protrudes into the accessible route of travel.

In considering prioritization of barrier removal, efforts should be focused on building access (parking ramp, entry), bathroom accessibility (main level), and access to programs and services on the main level (thresholds; door widths, door hardware and closing speeds, and room signage).

It should be noted that the Brookfield Town Hall is located on the National Register of Historic Places, and therefore, many of these identified areas of non-compliance may be subject to variation or exception.

Factors Affecting Town Hall Renovation Costs, Work Schedule and Requirements

Please refer to Sections IV and V of this plan for additional information on alterations to historic properties and the cost and compliance implications under 521 CMR. As the Town Hall is on the National Register of Historic Places, some work may qualify as being exempt, and therefore may significantly reduce costs. An example of this would be to retain the existing stair railings on the inside of the stair wells. The Town’s project architect would need to consult with both the Massachusetts State Historic Preservation Officer as well as the Massachusetts Architectural Access Board to determine what exemptions would be considered and then file the formal variance request as may be required.

In addition, the town must keep in mind the 30% rule under 521 CMR (see Section IV) which applies to all work (some exemptions exist) within a 3-year period. Thus if work that occurs within that 3-year time frame results in triggering the higher threshold of full accessibility and full building code compliance, then that work must occur, absent any MAAB variances. Again, it is critical that the Town’s project architect evaluate the costs for the various phases of desired work coupled with any proposed exemptions and variances and develop a timeline for the town on how to proceed with the Town Hall improvements. This timeline should be based on prioritization of work, need, impact and benefit, and the financial ability of the Town.

Town Hall Building Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<p>Parking There are two designated “accessible” parking spaces – one at street level, one in the town hall parking area.</p> <p>The <u>on-street parking</u> lacks a compliant access aisle; has a 3.0% running slope and 4.4% cross slope, both which exceed the maximum allowed; and due to surface deterioration a greater than ¼” abrupt change in level surface. The accessible signage designation is 17” too low.</p> <p>The <u>town hall on-site parking</u> has a cross slope which exceeds the maximum under the 2010 ADA Standards and 521 CMR. The sign notes van accessible but no access aisle is provided. The accessible sign designation is 11” too high 3’ too far from the parking space under 521 CMR.</p> <p>See Photos Town Hall 1 and 2.</p>	502	23.4 23.6	Stripe and designate one van accessible parking space at a width of either 11’ with a 5’ access aisle or 8’ with and 8’ access aisle (2010 ADA Standards). Stripe and designate one car accessible parking space at a width of 8’ with a 5’ access aisle. Signage must be set such that the signage height should be a minimum of 60” high at the bottom (2010 ADAAG Standards) and a maximum of 96” at the top (MAAB 521 CMR) and located in front of the space at a distance of no greater than 10’ from the parking space. The slopes should not exceed 2% in any direction and there should be no abrupt changes in level surface of greater than ¼”.	1	3	N	Up to \$3,000

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Directional Signage There is no directional signage at the non-accessible Central Street entrances noting the side accessible entrance.	703 216	41.1	Directional signage noting the separate accessible entrance should be provided.	1	2	L	\$150
Central Street Entrance Stairs The railings on the stairs of the two Central Street entrances do not have extensions at the top and bottom of the stairs. <i>See Photo Town Hall 3.</i>	505.10	27.4.3	Provide 12" extensions parallel to the floor at the top and a slope distance of one tread then 12" at the bottom of the stairs.	1	3	N	Up to \$1,500
Accessible Ramp The railings do not extend 12" beyond the sloped concrete. <i>See Photo Town Hall 4.</i>	505	24.5	Modify railings such that the bottom railings are the slope distance of one tread and then 12" parallel to the ground.	1	3	N	Up to \$150
There is a ½" abrupt change in level surface from the transition of asphalt to concrete and the wooden ramp. <i>See Photos Town Hall 5 and 6.</i>	403.4	22.4	Modify transition area to reduce the change in level surface to no more than ¼".	1	2	N	\$150
The railings are not contiguous at the top of the ramp near the door. <i>See Photo Town Hall 7.</i>	505.3	24.5.3	Modify railings to make them continuous.	1	3	N	\$250
The top left railing bracket is broken and not supporting the railing. <i>See Photo Town Hall 8.</i>	505	24.5	Replace bracket.	1	2	I	\$15
Accessible Entry There is self-closing door closer and the pull hardware to secure the door is at a height of 54" a.f.f. <i>See Photo Town Hall 9.</i>	404.2	26.11	See below.	-	-	-	-
There is insufficient front push clearance and door closing pull clearance at the interior latch side of the door. <i>See Photo Town Hall 10.</i>	404.2.4	26.6	Install an automatic door opener to avoid required structural modifications to achieve minimum required clearances.	1	3	N	Up to \$3,500
Door Hardware Non-compliant knob style hardware exists on all doors in town hall. If access to the upper levels is restricted, only first floor compliant door hardware is required.	404.2	26.11	Replace knob-style hardware with historical compliant door hardware that is easy to operate with one hand and that does not require tight grasping, tight pinching of the wrist to operate.	2	2	N	\$1,800 to \$4,000
Door Signage There is no tactile designation signage to identify rooms and offices on any of the floor levels. If access to the upper levels is restricted, only first floor signage is required.	703	41.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$450 to \$1,350
Drinking Fountain. The drinking fountain is non-complaint as it is not a "hi-low" fountain (211, 36.1.1), has non-compliant hardware (309, 39.5), lacks sufficient knee clearance (306, 36.2) and serves as a protruding object (307.2, 20.6.1) as the fountain has a leading edge of more than 4" into the accessible route at a height of between 27" and 80" a.f.f. <i>See Photo Town Hall 11.</i>	211 309 306 307.2	36.1.1 39.5 36.2 20.6.1	Option #1 – Discontinue use of the existing water fountain. Option #2 – remove the existing water fountain and replace with a "hi-low" water fountain. The drinking fountain must comply as follows: Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f.	4	3	N	\$0 to \$3,000

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			Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).				
Bathroom The bathroom is wholly non-complaint with inadequate clearances for wheelchair maneuverability and no accessible components (grab bars, signage, door hardware, compliant heights, etc.). See Photo Town Hall 12.	603 604 606	30	The town has final design plans and specifications to create an accessible compliant bathroom. The construction project is being bid in 2018. If the existing bathroom is modified, costs would be in the range of \$25,000. Creating an accessible bathroom in a new location will result in a much higher cost.	3	4	I	Up to \$25,000
Floor Grates Floor grates on the 1 st and 2 nd floor levels (5) have greater than ½" square openings. Grate openings cannot exceed ½" and must be perpendicular to the route of travel. See Photo Town Hall 13.	302.3	25.4	Replace or modify grates to comply with maximum ½" opening requirement.	2	2	N	Up to \$1,000
Doorway Widths The doorway to the accounting office provides only 28" clearance which does not meet the minimum 32" clear width requirement for a doorway.	404.2	26.5	Modify door opening to comply with minimum 32" wide clear opening.	1	3	N	Up to \$1,850
Assessor's Office The Assessor's Office is relocating as part of the first floor bathroom modifications. The existing counter is 2 ¼" too high (904.4, 7.2) and restricts access to the interior office to a clear width of only 23 ½" (403.5, 20.3). The threshold exceeds the maximum of ½" (404.2.5, 26.10). The door closing speed of the new office is only 2 seconds.	904.4 403.5 404.2.5 404.2.8	7.2 20.3 26.10 26.9	The counter for the new office should not exceed 36" in height and a minimum of 36" interior office clear width should be provided under 521 CMR. As part of the proposed renovations, ensure that the threshold is not greater than ½" high and beveled with no greater than a 1:2 slope. Adjust door closers such that the door closing speed is at least 6 seconds (521 CMR).	2 2	3 2	I I	NA \$0
Work Room The work room and rear hallway door closing speeds exceed that allowed.	404.2.8	26.9	Adjust door closers such that the door closing speeds are at least 6 seconds (521 CMR).	2	2	I	\$0
The work room operating force exceeds the maximum 5 lbs. for an interior door.	404.2.9	26.8	Adjust door closers such that the operating force does not exceed 5 lbs.	2	2	I	\$0
First Floor Large Meeting Room Table and Seating: Although the Selectboard meeting table has sufficient knee clearance, none of the visitor tables provide the required minimum 27" knee clearance Protruding Objects: The display case is 43¼" a.f.f. at the base and has a leading edge of 4½" into the accessible route of travel which exceeds the maximum allowed by ½". The pole under the painting is 49" a.f.f. and has a leading edge of 5½". See Photos Town Hall 14 and 15.	226.1 306.3 902.3 204.1 307.2	35.1 35.5 35.6 204.1 307.2	At least 5% or not less than 1 table shall be accessible. Tables must provide at least 27" a.f.f. of knee clearance 30" wide and 19" deep (521 CMR). The tops of tables should be 28" to 34" a.f.f. At least one visitor table should be blocked to meet the required knee clearance height or an accompanying smaller table provided. Place chairs under the display case and pole for cane detection.	2 2	2 2	I I	\$25 \$0
Door Clear Width: The entrance to the meeting room consists of two 29 ½"	404.2.3	26.5	Option 1: Modify doors to comply with minimum 32" clear width.	2	3	L	Up to \$3,000

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wide double doors with separate 26 ½" clear widths which does not meet the minimum required 32".			Option 2: Seek historic variance from the Massachusetts Historical Commission and the Massachusetts Architectural Access Board to retain existing doors.	2	1	L	\$0
			Option 3: Keep doors in a fixed open position.	2	1	L	\$0
Door Threshold: The entrance threshold exceeds the maximum of ½".	404.2.5	26.10	Modify threshold such that it is not greater than ½" high and beveled with no greater than a 1:2 slope.	2	3	L	\$350
Selectmen/Clerk/Collector Office The entrance threshold exceeds the maximum of ½".	404.2.5	26.10	Modify threshold such that it is not greater than ½" high and beveled with no greater than a 1:2 slope.	2	3	L	\$350
The flooring of the interior side of the entrance near the main hallway has a running slope of up to 7.6%. See Photo Town Hall 16.	403.3	22.3	Modify flooring so the running slope does not exceed 5%.	2	3	L	Up to \$1,000
The door opening force exceeds 5 lbs.	404.2.9	26.8	Adjust door closer such that the operating force does not exceed 5 lbs or install an automatic door opener.	2	2	I	\$0 to \$3,000
Level One Hallway The hallway flooring near the Assessor's Office and first floor Meeting Room is "warped and buckled" resulting in an abrupt change in level surface of greater than ¼" without a beveled 1:2 slope.	303	22.4	Modify flooring to eliminate buckled flooring and abrupt change in level surface.	2	3	L	Up to \$1,000
Basement Doors at the top and bottom of the stairs do not meet the minimum required closing speed requirement under 521 CMR.	404.2.8	26.9	The basement is not open to the public and currently is used for storage and to house building mechanicals. If this use does not change and no other major modifications are made to the building to trigger full compliance, then no other action is required. If the basement is converted to usable space, then full compliance will be required including door, stair railing, stair tread, flooring, and clear width modifications.	2	4	L	TBD
Stair railings are non-compliant (railings one side only, shape/size) and don't extend at the top and bottom.	505	27.00					
The stair treads are not uniform.	504.2	27.2					
The cement is deteriorated with an uneven and abrupt change in level surface of > ¼".	403.4 303	22.4					
The bottom stair tread restricts the accessible route to only 22". See Photo Town Hall 17.	403.5	20.3					
Accessible Route (Vertical Access) to 2nd Level, 2nd Level Balcony, and 3rd Level There is no accessible route between the first level and 2 nd level, 2 nd level balcony, and 3 rd level.	401	20.00	Provide a lift, if feasible, between levels and to the balcony or provide a 4-stop elevator to provide access to all levels and a lift to the 2 nd level balcony.	2	4	L	Up to \$1.0 million+
The balcony has no designated wheelchair viewing areas. See Photo Town Hall 18.	221	14.0	If access to the balcony is provided, modify the balcony to provide compliant wheelchair viewing areas.				
Stairs and Railings Throughout the building (basement, first level, second level, 3rd level, clock tower) stair railings are non-compliant as they are not provided on both sides of the stairs, are not continuous, do not have extensions at the top and bottom, and in many cases exceed the maximum allowed width.	505	27.4	Seek historic variance under ADA and 521 CMR to maintain existing historic railings. Install complaint continuous railings on the wall side of all stairways at a height of 34" – 38" to the top of the handrails, round or oval in x-section and between 1¼" – 2" in outside diameter, and with extensions at the top 12" parallel to the floor and the slope distance on one tread then 12" parallel to the floor at the bottom.	2	3	L	TBD

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In addition many of the stair treads do not have uniform riser heights and tread widths. <i>See Photos Town Hall 19, 20, and 21.</i>	504.2	27.2	As feasible, modify treads and risers to achieve compliance.	2	3	L	TBD
Second Level Bathroom The bathroom is wholly non-complaint with inadequate clearances for wheelchair maneuverability and no accessible components (grab bars, signage, door hardware, compliant heights, etc.). The threshold exceeds the maximum height for a doorway.	603 604 606 404.2	30 26.10	Discontinue use as a bathroom or modify bathroom to meet 2010 ADA Standards and 521 CMR Standards for a single user accessible toilet room.	3	4	L	Up to \$25,000
Second Level Drinking Fountain. The drinking fountain on the second floor near the Board of Health Office is non-complaint as it is not a "hi-low" fountain (211, 36.1.1), has non-compliant hardware (309, 39.5), lacks sufficient knee clearance (306, 36.2) and serves as a protruding object (307.2, 20.6.1) as the fountain has a leading edge of more than 4" into the accessible route at a height of between 27" and 80" a.f.f. <i>See Photo Town Hall 22.</i>	211 309 306 307.2	36.1.1 39.5 36.2 20.6.1	Option #1 – Discontinue use of the existing water fountain. Option #2 – remove the existing water fountain and replace with a "hi-low" water fountain. The drinking fountain must comply as follows: Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).	4	3	N	\$0 to \$3,000
Second Level Stage No railings exist on the stairs to the stage. <i>See Photo Town Hall 23.</i>	505	27.4	The existing stairs to the stage must be modified with compliant handrails on both sides of the stairs, 34" to 38" a.f.f. and with 12" extensions at the top and extensions at the bottom of one tread (sloped) then 12" parallel to the floor (505; 27.4).	2	3	L	Up to \$2,500
Third Level (former Masonic Hall) If access is achieved to the third floor, in addition to the other noted accessibility requirements, there are abrupt changes to level surface due to varying floor levels. <i>See Photo Town Hall 24.</i>	403	20.0 22.0	Modify 3 rd level interior accessible route to eliminate level surface changes.	2	3	L	TBD

Total up to \$1.1 million +

Town Hall Accessibility Assessment Photos



Photo Town Hall 1



Photo Town Hall 2

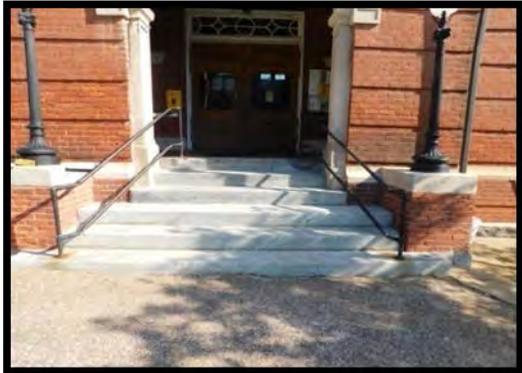


Photo Town Hall 3



Photo Town Hall 4



Photo Town Hall 5



Photo Town Hall 6



Photo Town Hall 7



Photo Town Hall 8



Photo Town Hall 9



Photo Town Hall 10



Photo Town Hall 11



Photo Town Hall 12



Photo Town Hall 13



Photo Town Hall 14



Photo Town Hall 15



Photo Town Hall 16



Photo Town Hall 17

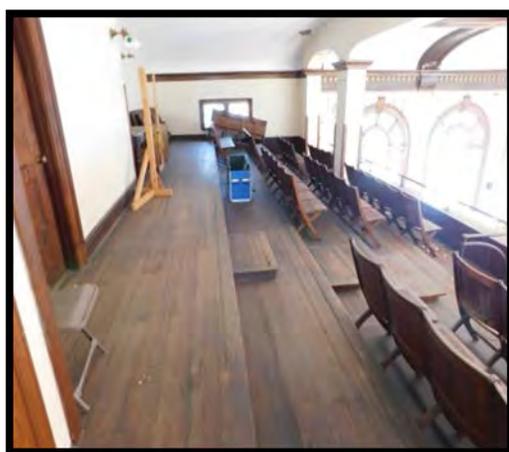


Photo Town Hall 18



Photo Town Hall 19



Photo Town Hall 20



Photo Town Hall 21

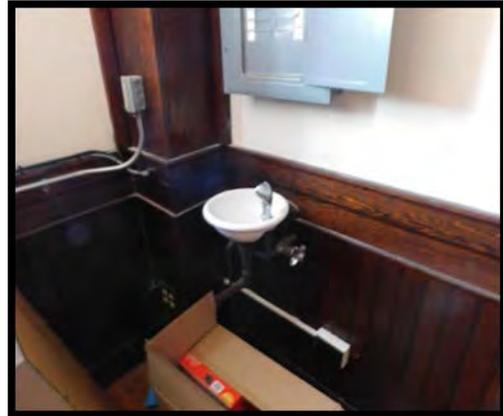


Photo Town Hall 22



Photo Town Hall 23



Photo Town Hall 24

MERRICK PUBLIC LIBRARY

Function and Description of Facility and Programs: Merrick Library is governed by an elected Board of Trustees. The building serves as a public library and offers reading programs, story hours, and computer and wireless internet access. The library also provides for free use of the library's fax machine, copier, and Notary Public service. For those with visual disabilities, the library offers reading aids and book magnifiers.



Responsible Party: Merrick Library Board of Trustees.

General Description or Obstacle Which Limits Mobility or Access: The library has undergone few changes in recent years and as a whole remains minimally accessible. A number of modifications are required to achieve full compliance under both the 2010 ADA Standards and 521 CMR. Although access into the building is achieved via a ramp, there are numerous areas of nonconformance including an excessive running slope, deteriorated surface, abrupt changes in level surface, and the lack of railing extensions. The "accessible" parking is non-compliant due to the lack of signage, lack of an accessible aisle, and an excessive cross-slope. The entrance stairs and railings are non-compliant as railings are missing and those that exist lack extensions at the top and bottom. In addition, the stair treads are deteriorated and create a tripping hazard. Doors lack signage, have knob-style hardware and do not comply with door operating force and closing speed requirements. Although the checkout counter is $\frac{3}{4}$ " too high, it is within an acceptable tolerance level and no further action is required. The two work tables do not provide sufficient knee clearance. The stacks on the first floor do not provide the minimum required clear width. There is no vertical accessible route to the mezzanine and the existing stairs are wholly non-compliant with non-conforming railings and open risers. Similarly, there is inadequate clearance between the mezzanine stacks. Finally, the bathroom on the main level is wholly non-compliant due to its limited size and non-conforming fixtures.

Note: The Merrick Library Trustees entered into a Preservation Restriction Agreement with the Massachusetts Historical Commission in 1998. This restriction limits the types of alterations that can be made to the interior and exterior of the building. Apart from minor "maintenance" type of activities, all other proposed modifications must be reviewed and approved by the Massachusetts Historical Commission.

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<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<p>Parking The designated accessible parking space is located on the street and lacks both an access aisle and signage. The space is not van accessible and exceeds the maximum allowed cross slope. See Photo Merrick Library 1.</p>	502	23.4 23.6	Due to its on-street location and limited alternatives, at a minimum signage should be installed adjacent to the designated space. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space.	1	2	I	\$100
<p>Accessible Ramp There are numerous abrupt changes in level surface that exceed the maximum allowed as well as severe areas of deterioration. The surface at the door threshold approaches a 3" height differential. See Photos Merrick Library 2 and 3.</p> <p>The running slope of the lower segment of the ramp varies up to 8.7% whereas the running slope of the top of the ramp varies from 8.6% to 9.1%.</p> <p>The railings do not extend 12" beyond the ramp at the base. See Photo Merrick Library 4.</p> <p>The railings on one side are offset outside the ramp with a greater than 2" drop-off with no edge protection. See Photo Merrick Library 5.</p>	403.4 404.2	22.4 26.10	Reconstruct cement ramp surface to eliminate abrupt changes and deteriorated surfaces. The running slope must not exceed 8.3%.	1	3	N	\$7,500
	405.2	24.2	See above.				
	505.10	24.5	Provide handrail extensions at the base of the ramp.	1	3	N	\$350
	405.9	24.8	Provide a curb or barrier that prevents a 4" diameter sphere within 4" of the ground surface along the exterior side of the ramp.	1	3	N	Up to \$500
<p>Ramp Entrance The accessible entrance door has a 2 to 3 seconds closing speed (minimum of 6 seconds required under 521 CMR).</p>	404.2.8	26.9	Adjust door closers such that the door closing speed is at least 6 seconds.	1	2	I	\$0
<p>Front Entrance Stairs The railings for the stairs at the front entrance are non-compliant due to the height of the top railing (28" a.f.f.), the lack of a railing on one side and the lack of top and bottom extensions. See Photos Merrick Library 6.</p> <p>One stair at the front entrance is deteriorated and not uniform. See Photos Merrick Library 7.</p>	505.4 505.2 505.10	27.4	Replace or modify existing railings with railings that are between 34" to 38" in height (505.4, 27.4); are located on both sides of the stairs (505.2, 27.4) and have a 12" extension parallel to the ground at the top and an extension sloped the distance of one tread then 12" parallel to the ground (505.10, 27.4)	1	3	N	Up to \$2,500
	504.2	27	Repair stair to eliminate deteriorated and abrupt changes in level surface.	1	3	N	Up to \$500
<p>Front Entrance The front entrance door has a 4 seconds closing speed (minimum of 6 seconds required under 521 CMR).</p> <p>The door hardware is non-compliant knob-style hardware.</p>	404.2.8	26.9	Adjust door closers such that the door closing speed is at least 6 seconds.	1	2	I	\$0
	404.2	26.11	Door hardware must be operable with a closed fist or loose grip and shall not require tight grasping or tight pinching of the wrist to operate. As there is a preservation restriction on the building governing the replacement of architectural features such as original door hardware, leave the original hardware in place and install an automatic door opener.	1	3	N	Up to \$3,500

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<p>Signage There is no tactile designation signage for 6 interior doors (main level and mezzanine).</p>	703	41.1	Install accessible compliant designation on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$150
<p>Door Hardware Non-compliant knob style hardware exists on 6 interior doors (main level and mezzanine).</p>	404.2	26.11	Replace knob-style hardware with door hardware that is easy to operate with one hand and that does not require tight grasping, tight pinching of the wrist to operate. <i>(Note: MHC approval may be required).</i>	2	2	n	\$300
<p>Protruding Objects The mirror on the main floor level is 56½" a.f.f. at the base and has a leading edge of 5" into the interior accessible route of travel which exceeds the maximum allowed by 1".</p>	204.1 307.2	20.6.1	Remove the mirror.	2	2	I	\$0
<p>Carpets and Rugs A rug in the reading room on the main floor is not secured to the floor and serves as a tripping hazard. <i>See Photo Merrick Library 8.</i></p>	302.2	29.3	Secure or remove rug.	2	1	I	\$0
<p>Tables and Seating None of the two (2) work/meeting tables on the first level provide the required minimum 27" knee clearance.</p>	226.1 306.3 902.3	35.1 35.5 35.6	At least 5% or not less than 1 table shall be accessible. Tables must provide at least 27" a.f.f. of knee clearance 30" wide and 19" deep (521 CMR). The tops of tables should be 28" to 34" a.f.f. At least one table should be blocked to meet the required knee clearance height or an accompanying smaller table provided.	2	2	I	Up to \$100
<p>Floor Grates A floor grate on the main level has a greater than ½" opening and is parallel to the route of travel. Grate openings cannot exceed ½" and must be perpendicular to the route of travel. <i>See Photo Merrick Library 9.</i></p>	302.3	25.4	Replace or modify the grate to comply with maximum ½" opening and perpendicular to the route of travel requirement.	2	2	N	\$300
<p>Controls Three light switch controls exceed the maximum allowed height for a forward or side reach under the 2010 ADA Standards.</p>	308.2 308.3	6.5 6.6	Lower light switches to no more than 48" a.f.f.	4	3	L	\$750
<p>Stack Clear Widths The clear width to the stacks is reduced to less than the required 36" as follows due to the placement of tables as well as the stacks themselves. Clear widths vary from 22" to 35". <i>See Photos Merrick Library 10 and 11.</i></p>	403.5	12.2.2	To the extent possible move items as required to achieve minimum 36" clear width. Due to the historic preservation restriction on the building, it may not be possible to further alter the stacks or remove any of the stacks. Removing stacks will further reduce the already extremely limited display space for books. Additional discussion w/MHC and design considerations are required.	2	4	L	TBD
<p>Bathroom The main level bathroom is wholly non-complaint with inadequate clearances for wheelchair maneuverability and no</p>	603 604 606	30	Discontinue use as a bathroom or modify bathroom to meet 2010 ADA Standards and 521 CMR Standards for a single user accessible toilet room. Modification will	3	4	L	Up to \$25,000

Merrick Public Library Accessibility Assessment Photos



Photo Merrick Library 1



Photo Library 2



Photo Library 3



Photo Library 4

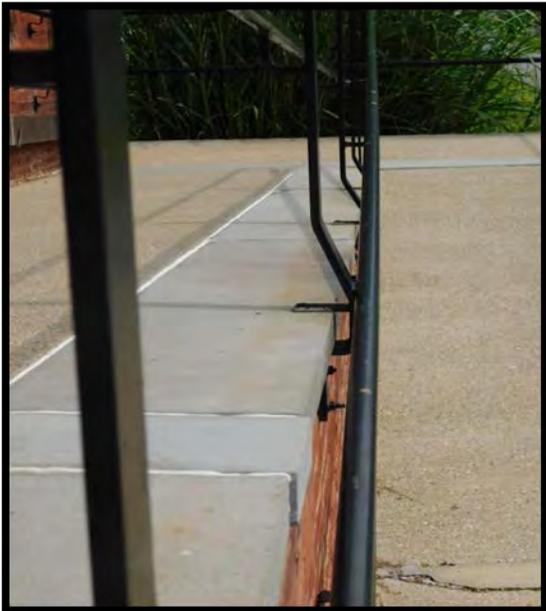


Photo Library 5



Photo Library 6

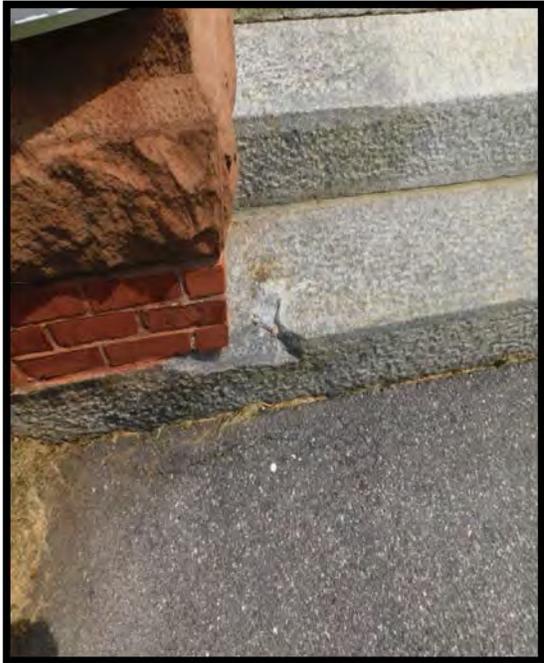


Photo Library 7



Photo Library 8

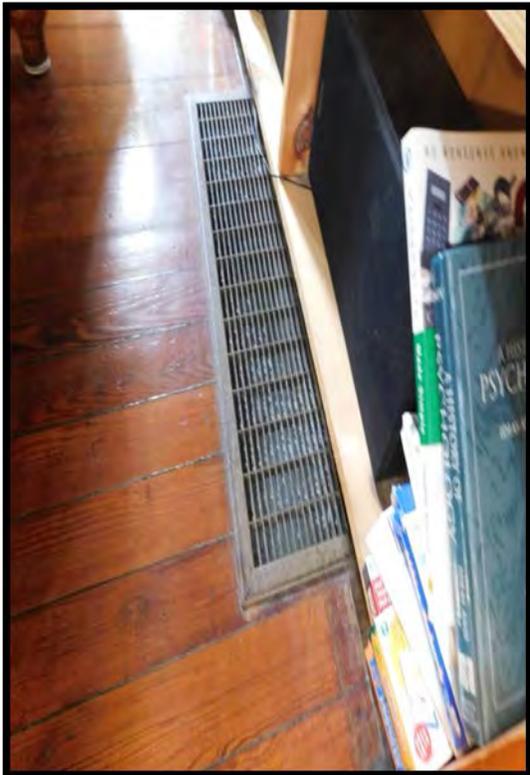


Photo Library 9



Photo Library 10



Photo Library 11



Photo Library 12



Photo Library 13



Photo Library 14

FIRE STATION

Function and Description of Facility and Programs: The Fire Department is made up of 30 men and women who provide 24 hour fire protection on a paid on call basis. The fire chief is the only career employee. The department is structured as follows: Fire Chief, Assistant Chief, two Captains, two Lieutenants, 21 Firefighters, and 3 Auxiliary personnel. The department provides fire suppression, rescue, and hazardous materials response in addition to code enforcement inspections and fire prevention activities. The Department operates three fire engines, a tender, three forest fire units, a squad, and a boat out of one station. The department was organized in 1855, enjoying a long history of commitment and service to the community. Emergency medical response is provided at the paramedic level by Brookfield Emergency Medical Services, a municipal agency housed in the fire station.



Responsible Party: Fire Chief, Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The Fire Department/EMS Building is generally not open to the public on a regular basis. The building is locked during fire/EMS calls with access limited to a side door into a garage bay. The side entry door is on-grade, has sufficient clear width and has accessible compliant hardware, however the threshold height exceeds that allowed. In addition, there is no 5' landing in front of the door. The entry door is directly into one of the truck storage bays, increasing the potential for visitor injury due to non-compliant changes in level surface and protruding objects. The "accessible route" to the rear of the building which contains the office, meeting room, and bathroom is between a stored boat and emergency response vehicles. Most interior doors lack tactile signage and compliant hardware. The bathroom off the meeting room used by the general public is wholly non-compliant.

As noted, the fire station is not generally open to the public. However, when public access occurs, the Chief makes accommodations for permits, etc., as the main office is restricted by a roughly 3" abrupt change in level surface. As there are no civilian functions, all firefighters must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform. As a result, unless the current practices and policies change, physical modifications would be limited to the accessible route into and within the building and the large meeting room and accompanying bathroom on the main level. There are, however, specific changes in "notice" that should be undertaken. The Fire Department web page should to be updated to include information on how to obtain permits. Similar notices and information should also be posted in the Town Hall and at the Fire Station on an exterior notice board.

Fire Station Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<p>Signage There is a lack of formal directional signage in the front of the building.</p>	703	41.1	Install directional signage noting the accessible main entrance at the side of the building.	1	2	I	\$50
<p>Exterior Accessible Route The accessible route the side door lacks sufficient maneuvering clearance and has a 1" threshold which exceeds that allowed by ½" See Photo Fire Station 1.</p>	404.2 404.2.5	26.6 26.10	Modify accessible route to provide a 5' level landing (2% or less) including reducing the threshold to no more than ½" with a bevel.	1	3	N	Up to \$500
<p>Interior Accessible Route The interior accessible route to the Fire/EMS Offices has 2 – 3 "protruding objects" as they extend more than 4" at a height of between 27" and 80" a.f.f. into the accessible route. This includes the boat trailer, truck mirrors, and other items. See Photo Fire Station 2. A floor/drain grate to the meeting room has 1" square openings. Grate openings cannot exceed ½" and must be perpendicular to the route of travel. See Photo Fire Station 3.</p>	204.1 302.3	20.6.1 25.4	Place orange cones below the protruding object for cane detection. Replace or modify grates to comply with maximum ½" opening requirement.	2 2	1 2	I N	\$0 \$200
<p>Door Hardware Non-compliant knob style hardware exists on 3 interior doors.</p>	404.2	26.11	Replace knob-style hardware with door hardware that is easy to operate with one hand and that does not require tight grasping, tight pinching of the wrist to operate	2	2	N	\$150
<p>Door Signage There is no tactile designation signage for 4 interior doors (3 offices, door to the meeting room). There is also no tactile directional signage to the meeting room. See Photo Fire Station 4.</p>	703	41.1	Install accessible compliant designation signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Install accessible compliant directional signage on the to identify the meeting room.	2	2	I	\$125
<p>Meeting Room Bathroom The bathroom is substantially non-complaint. The opening provides only 30" of clearance which is 2" too narrow. There is no tactile signage on the latch side of the entry door or at the bathroom storage closet.</p>	404.2.3 73	26.5 41.1	Widen entry and replace door to provide a minimum of 32" clear width or replace door hinges with off-set hinges. Install accessible compliant designation signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and	3 3	3 2	N N	Up to \$1,500 \$25

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			proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).				
The sink lacks knee and toe clearance and is 1" too high. <i>See Photo Fire Station 5.</i>	306.2 306.3 606.3	30.9.3 30.9.2	Replace the existing sink with a sink that is no more than 34" a.f.f. to the top of the rim and with a minimum of 27" knee and 9" toe clearance. Piping must be wrapped, insulated, or guarded (606.5, 30.9.5).	3	3	N	\$500
The mirror is 9 3/4" too high.	603.3	30.11	Lower the mirror so that the bottom of the reflecting surface is no more than 40" a.f.f.	3	2	N	\$0
The door hardware of the bathroom entry and the interior storage closet (2 doors) is knob style. <i>See Photo Fire Station 5.</i>	404.2	26.11	Replace knob-style hardware with door hardware that is easy to operate with one hand and that does not require tight grasping, tight pinching of the wrist to operate	3	2	N	\$150
There are no towel or soap dispensers.	309.4 308.2 308.3	30.12 39.5 30.12	Locate dispensers no more than 42" a.f.f. (521 CMR). Dispensers should be operable with one fist and should not exceed 5 lbs of operating force to use.	3	2	N	\$100
There are no grab bars. <i>See Photo Fire Station 6.</i>	309	30.8	Install 42" long grab bars (side bar no > 12" from the interior corner, rear bar no > than 6" from the interior corner) at a height of 33" to 36" a.f.f. to the top of the gripping surface.	3	2	N	\$400
The coat hook is 16" too high.	308.2 308.3	30.6.1	Lower coat hook to no more than 48" a.f.f. under the 2010 ADA Standards.	3	2	N	\$0

Total up to \$3,700

Fire Station Accessibility Assessment Photos



Photo: Fire Station 1



Photo: Fire Station 2



Photo: Fire Station 3



Photo: Fire Station 4



Photo: Fire Station 5



Photo: Fire Station 6

POLICE STATION

Function and Description of Facility and Programs: The Brookfield Police Station is relatively new having been built in 2016. Similar to the Fire/EMS Station, although the Police Department has 24-hour police coverage, the station may not be open to the public when officers are on patrol. Dispatch is handled from the New Braintree State Police Barracks. The department currently consists of 15 police officers including one chief, one sergeant, three patrolmen, and 10 reserve officers. All police officers must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform. The Chief handles administrative functions for the department with assistance from a full-time administrative assistant.



Responsible Party: Board of Selectmen.

General Description or Obstacle Which Limits Mobility or Access: The Police Station is substantially compliant with some minor exceptions. The sole designated accessible parking at the station is non-compliant. The accessible route to the building exceeds the maximum allowed running slope for a walkway. Doors exceed maximum operating force and minimum closing speeds. Most interior doors lack tactile signage. Coat hooks exceed the maximum allowed reach range under both 521 CMR and the 2010 ADA Standards. The booking room bathroom is wholly non-compliant. The break room stove is non-compliant as the controls are not on the front of the stove. However, as civilian functions are limited to one clerical staff and all police officers must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform, the stove modifications would only be required as a reasonable modification if necessary. Similarly, the patrolman’s shower and bathroom coat hooks exceed the maximum reach range under the 2010 ADA Standards by 13”. Again, as all officers must meet strict physical requirements, the coat hooks would need to be lowered to no more than 48” a.f.f. only as a reasonable modification.

Police Station Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
Parking The designated accessible space does not have an access aisle. The designated accessible parking space must also be van accessible. The accessible sign is 14" too low at the bottom of the sign. See Photo Police Station 1 .	502	23.4 23.6	Stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards). Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space. The slopes should not exceed 2% in any direction.	1	2	I	\$150
Accessible Route Approximately 8' to 10' of the accessible route to the building has a running slope of up to 7.6% which far exceeds the maximum of 5% for a walkway. See Photo Police Station 2 .	403.3	22.3	Reconstruct the affected asphalt walkway such that the running slopes are no greater than 5.0% or provide compliant railings for that segment exceeding 5%.	1	3	I	Up to \$2,700
Door Closing Speeds The door closing speed for the entrance door, visitor bathroom, meeting room, and officer's locker/bathroom exceeds that allowed.	404.2.8	26.9	Adjust door closers such that the door closing speed is at least 6 seconds (521 CMR).	1	2	I	\$0
Door Operating Force The visitor bathroom door, meeting room door, and officer locker/bathroom door have an operating force of in excess of the maximum 5 lbs. for an interior door.	404.2.9	26.8	Adjust door closer such that push/pull force does not exceed 5 lbs.	1	2	I	\$0
Signage There is no tactile signage for the station entrance, six interior rooms and storage closets, the booking room (sally port, booking area, bathroom, interview room), officer shower area, and officer bathroom.	703	41.1	Install accessible compliant designation signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$325
Reach Range The LTC book holder in the foyer area is 14 1/2" too high.	308.2 308.3	6.5 6.6	Lower holder to a height of no more than 48" a.f.f.	4	1	I	\$0
Booking Area Sink The pipe guard below the sink was not in place at the time of inspection. See Photo Police Station 3 .	606.5	30.9.5	Re-install pipe guard.	3	2	I	\$0
Foyer Bathroom The coat hook is 13" too high.	308.2 308.3	30.6.1	Lower coat hook to no more than 48" a.f.f. under the 2010 ADA Standards.		2	I	\$0
The toilet paper is 4" too low under 521 CMR.	309.4	30.7.6	Raise toilet paper dispenser to a minimum of 24" a.f.f. and below the grab bars.		2	I	\$0
The bathroom lacks audible and visual alarms.	215 701	40.0	Provide an audible/visual alarm complying with NFPA 72		3	I	

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<p>Booking Room Bathroom The bathroom in the booking area is wholly non-compliant, the water closet is too high, lacks grab bars and has a non-compliant sink (too high, lacks knee clearance). See Photo Police Station 4.</p>	604 606 609	30.0	<p>Option 1: As feasible construct an accessible compliant bathroom adhering to water closet and sink heights, setbacks, and clearance requirements. Install grab bars that meet length, height, and setback requirements.</p> <p>Option 2: Replace existing water closet and sink in entirety and replace solely with an accessible compliant sink.</p> <p>Option 3: Discontinue use and have all prisoners use the visitor bathroom in the foyer.</p>	3	3	L	\$0 to \$20,000
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Total up to \$23,175

Police Station Accessibility Assessment Photos



Photo: Police Station 1



Photo: Police Station 2



Photo: Police Station 3



Photo: Police Station 4

HIGHWAY GARAGE

Function and Description of Facility and Programs: The Highway Garage serves as the office of the Highway Superintendent as well as storage for department trucks, vehicles and related equipment.



Responsible Party: Board of Selectmen.

General Description or Obstacle Which Limits Mobility or Access: The building consists of the highway superintendent's office, a break room with male/female "accessible" bathrooms, and an accompanying garage with multiple bays. The garage area is not open to the general public. The facility lacks designated accessible parking. The highway superintendent's entrance door has a non-compliant closing speed. With the exception of the bathrooms, the interior doors lack tactile signage. The bathrooms are substantially compliant but for some minor items that need to be addressed. This includes removing coat racks and cabinets that restrict clearances and maneuverability. The sink in the breakroom area/superintendent's office is too high and lacks knee clearance. The knobs on the stove are not on the front face of the stove. All highway personnel must meet strict physical requirements which a person with a mobility limiting disability would not be able to perform. As a result, unless the current practices and policies change and interior spaces are open to the general public, physical modifications would be limited to parking, door closing speed and signage, and bathroom modifications as described below. Break room modifications (sink, stove, etc.) would only be required as a reasonable modification as may be necessary.

Highway Garage Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
Parking There is no designated accessible parking space inclusive of access aisle and signage. The designated accessible parking space must also be van accessible.	502	23.4 23.6	Stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards). Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space. The slopes should not exceed 2% in any direction.	1	2	I	\$150
Highway Entrance The door closing speed exceeds that allowed.	404.2.8	26.9	Adjust door closers such that the door closing speed is at least 6 seconds (521 CMR).	1	2	I	\$0
Highway Doors Three interior doors lack compliant accessible signage.	703.4	41.1	Install accessible compliant signage on the latch side of each door (where allowable) with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$75
Men's Bathroom and Women's Bathroom The following applies to <u>both</u> bathrooms:							
The bathroom tactile signage is too high.	703.4	41.1	Lower signage such that the tactile characters on the signs are 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character.	3	2	I	\$0
The doors exceed the maximum door opening force for an interior door and does not meet the minimum required closing speed under 521 CMR.	404.2.8 404.2.9	26.9 26.8	Adjust door closers such that the door closing speed is at least 6 seconds (521 CMR) and the operating force is no greater than 5 lbs.	3	2	I	\$0
The metered sink faucets exceed the maximum 5 lbs operating force.	309	30.9.6	Adjust the faucets to comply with the maximum 5 lbs. operating force.	3	3	I	\$100
The mirrors are too high.	603.3	30.11	Lower mirrors such that the bottom of the reflecting surface is no higher than 40" a.f.f.	3	2	I	\$0
The toilet paper dispensers are too low under 521 CMR and the men's dispenser is too close to the toilet.	604.7	30.7.6	Relocate the dispenser so they are between 7" and 9" in front of the toilet measured to the centerline of the dispenser and they are a minimum of 24" a.f.f.	3	2	I	\$0
The coat hooks are too high under the 2010 ADA Standards.	308.2 308.3	30.6.1	Lower coat hooks to no more than 48" a.f.f.	3	2	I	\$0
A coat rack in the men's room and a cabinet in the women's room reduces the minimum required clearances at the toilet and maneuverability.	403.5 604.3	6.3 6.4 20.3	Remove all obstructions within the bathrooms that restrict or reduce maneuverability and minimum required clearances.	3	1	I	\$0
See Photos Highway 1 – 4.							

Total up to \$325

Highway Garage Accessibility Assessment Photos



Photo 1: Highway (parking)



Photo 2: Highway (signage)



Photo 3: Highway (bathroom signage)

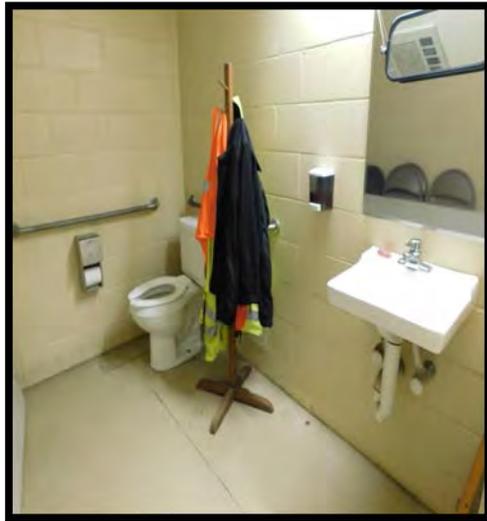
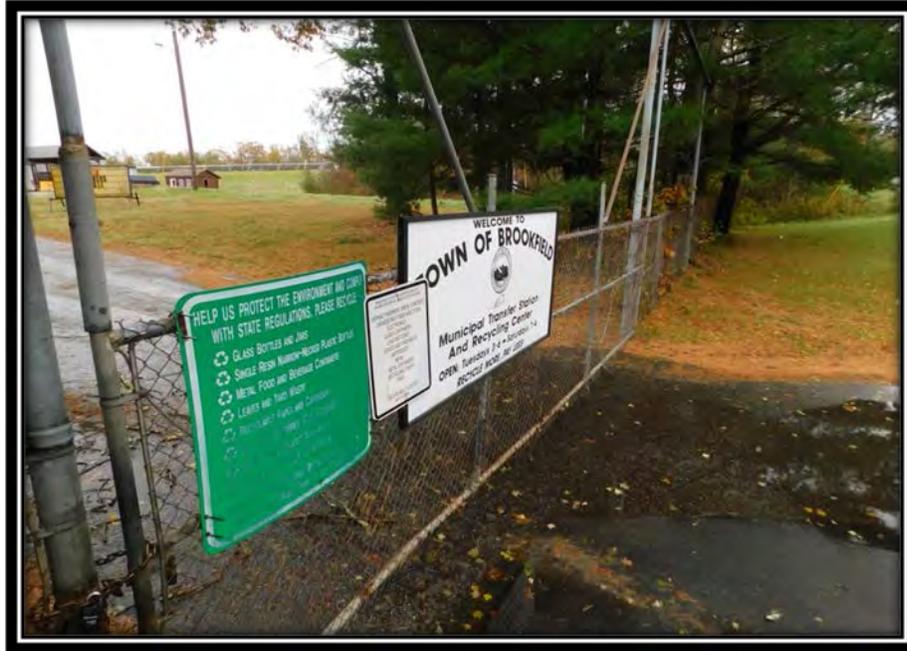


Photo 4: Highway (bathroom)

TRANSFER STATION

Function and Description of Facility and Programs: The transfer station is open to the public two days per week. The facility consists of a tire bin, newspaper bin, a number of small inaccessible buildings (some closed to the public), a “Take It or Leave It” Building, a non-compliant portable toilet, and 3 clothing drop bins (Salvation Army, American Red Cross, and Planet Aid).



Responsible Party: Board of Health

General Description or Obstacle Which Limits Mobility or Access: There is no designated accessible parking. There is no accessible route of travel to the various bins and buildings. Most of the buildings have 1” to 6” changes in level surface from the ground to the floor level of the building or access is achieved through the use of non-compliant stairs and railings. Many of the buildings with changes in level surface to access are not open to the public. The “Take It or Leave It” Building, although minimally compliant with on-grade access and a slightly less than 32” clear width at the entrance, has limited maneuverability once inside the building. The clothing drop bins exceed maximum reach range under the 2010 ADA Standards. The portable toilet is not accessible and is not on a level surface.

Because of the type of use and operation, coupled with the excessive cost involved to construct a fully handicapped accessible transfer station, modest modifications are required provided that certain policies and procedures are put into effect. Personnel must be available during the times of operation to assist anyone with the proper disposal of their materials in bins or in storage buildings. Signage should also be provided on site to instruct those in need how to obtain assistance for access to the recycling bins, clothing drop bins, and other areas as may be required.

Transfer Station Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
Parking There is no designated accessible parking space inclusive of access aisle and signage. The sole accessible parking space must also be van accessible.	502	23.4 23.6	Stripe and designate a van accessible parking space with van accessible signage at a width of either 11' with a 5' access aisle or 8' with and 8' access aisle (2010 ADA Standards). Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located in front of the space. The slopes should not exceed 2% in any direction.	1	2	I	\$150
Tire/Newspaper Bins Stair treads and risers not uniform. Handrails lacking or provided on one side only, lack extensions and are at the improper height. See Photos Transfer Station 1 and 2.	504 505	27.2 27.4	As feasible, modify stairs. Provide continuous railings on both sides of the stairs at a height of 34" – 38" a.f.f. to the top of the railings. Handrails should extend 12" parallel to the floor at the top of the stairs and the slope distance of one tread then 12" parallel at the bottom.	2	3	N	Up to \$500
Portable Toilet The portable toilet is not an accessible portable toilet and is not on a level surface. See Photo Transfer Station 3.	213	30	Replace the existing portable toilet with an accessible portable toilet or add an additional accessible portable toilet. Relocate the accessible toilet so it is on an accessible route of travel.	3	2	I	NA
Take It or Leave It Building Although the on-grade access into the building is minimally met with 31" of clear width, there is limited maneuverability inside the building due to placement of objects and items.	403.5	20.3	Re-arrange the placement/storage/display of items in the building to achieve a minimum of 36" clear width or 32" for a distance of no more than 24".	2	1	I	\$0
Clothing Drop Bins The clothing drop bins (Salvation Army, American Red Cross, Planet Aid) are 12" to 24" above the maximum reach range under the 2010 ADA Standards. See Photos Transfer Station 4.	308	6.6	As feasible, request the host agencies to provide bins that meet reach range requirements.	2	1	I	\$0

Total up to \$650

Transfer Station Assessment Photos



Photo Transfer Station 1



Photo Transfer Station 2



Photo Transfer Station 3



Photo Transfer Station 4

BROOKFIELD ELEMENTARY SCHOOL



Description of Facility: The original building of the Brookfield Elementary School was built roughly 60 – 70 years ago. A two-story addition was constructed within the past 20 years. The school houses approximately 230 students for grades K – 6.

General Description or Obstacle Which Limits Mobility or Access: The front and rear parking spaces are non-compliant. The accessible route from the rear parking to the building has an excessive running slope. The bathrooms (Nurse, Administration, Staff, Student) have numerous non-compliant elements. Door closing speeds are too fast and operating forces in excess of the maximum allowed for both interior and exterior doors. The interior ramp between Building B and Building C has non-compliant running slopes. The Cable Access Room, Media Room, and Cafetorium either lack or have non-compliant vertical accessible routes of travel. Reach ranges throughout the building are non-compliant. Many of the rooms do not have compliant tactile signage. Both the Pre-k and Large Playgrounds lack accessible routes of travel to the playgrounds, around the play areas, and to the play components.

Brookfield Elementary School Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<p>Main Entrance Parking There is one accessible parking space for the main entrance. The space is not designated as van accessible, is 5" too narrow, lacks an access aisle, and has a sign that is 7" too low. See Photo Brookfield Elementary 1.</p>	502	23.4 23.6	Initiate site work to expand the accessible parking space into the adjacent grassed area to allow for an 8' wide van accessible space with an 8' wide striped access aisle. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR). The slopes of the expanded parking space should not exceed 2% in any direction.	1	3	N	Up to \$3,500
<p>Rear Entrance Parking There are 2 designated car accessible spaces at the rear entrance. Only one sign is provided and is located in front of the access aisle. The running and cross slopes exceed the maximum 2.0% threshold. See Photo Brookfield Elementary 2.</p>	502	23.4 23.6	Reconstruct and repave the existing parking spaces to comply with the maximum 2.0% running and cross slope thresholds. Provide signage at the front of each space with one designated as van accessible. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR). Spaces should be 8' feet wide and can share an 8' wide (521 CMR) access aisle.	1	3	N	Up to \$2,500
<p>Main Entrance Both the main entrance exterior door and the interior double doors have closing speeds that do not meet the minimum of 6 seconds under 521 CMR.</p>	404.2.8	26.9	Adjust door closers such that the closing speed is at least 6 seconds.	1	2	I	\$0
<p>Rear Entrance The existing "walkway" from the accessible parking to the rear entrance has a running slope that varies up to 6.8% (5.0% max allowed for walkway; 8.3% max allowed for a ramp w/railings). The entrance landing has a slope in excess of 2.0%.</p> <p>The airphone buzzer is 64½" a.f.f. which exceeds side and forward reach range thresholds by 16½". See Photo Brookfield Elementary 3.</p>	403 404 405 308	22.3 25.0 6.5 6.6	Reconstruct/repave "walkway" as feasible to comply with the maximum 5.0% accessible route threshold. Reconstruct landing to achieve the maximum 2.0% running and cross slope thresholds. Lower airphone buzzer to no more than 48" a.f.f.	1 1	3 3	L N	Up to \$5,000 \$200
<p>Nurse's Office The phone is 63" a.f.f. which exceeds side and forward reach range thresholds by 15" under the 2010 ADA Standards.</p> <p>The towel dispenser by the sink is 54½" a.f.f. which exceeds side and forward reach range thresholds by 6½" under the 2010 ADA Standards.</p> <p>The sink does not provide any knee clearance and has non-compliant knob-style hardware. See Photo Brookfield Elementary 4.</p>	308 308 306.2 306.3 309	6.5 6.6 6.5 6.6 30	Lower telephone to no more than 48" a.f.f. Lower dispenser to no more than 48" a.f.f. Modify or replace the sink so there is a 30" wide space with a minimum of 27" knee clearance at a height of no more than 34" a.f.f. The piping under the sink should be wrapped, insulated or guarded with compliant hardware (operable w/one hand with no twisting of the wrist).	2 2 4	3 2 3	I I N	\$100 \$0 \$500

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Four interior doors lack tactile signage.	703	41	Install accessible compliant signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$100
<p>Nurse's Bathroom</p> <p>The grab bars are ½" too low (604.9; 30.15) and due to the allowed height range, no tolerances apply. The toilet paper dispenser is 2½" too low (604.5; 30.15). The mirror is 8½" too high (603.3, 30.11). The flush control of the water closet is not on the approach side (604.6, 30.7). See Photo Brookfield Elementary 5.</p> <p><i>Note: A shower with a 2" lip is used for storage and not in active service as a shower. If the shower is put back into use, then modifications will be required to eliminate the 2" vertical obstruction.</i></p>	603.3 604.5 604.6 604.9	30	Raise the grab bars to a height of 33" to 36" a.f.f. Relocate the toilet paper dispenser so it is a minimum of 24" a.f.f. (521 CMR) and 7" to 9" in front of the water closet measured to the centerline of the dispenser. Lower the mirror so that the bottom of the reflecting surface is no higher than 40" a.f.f. Replace the water closet tank, or if required, the water closet such that the flush control is on the approach side.	3	3	N	\$350
<p>Administration Office</p> <p>A message holder outside the office door (7¼" protrusion at 36½" a.f.f. at its leading edge) exceeds the maximum allowed protrusion of 4".).</p> <p>The copy room lacks tactile signage.</p> <p>The office counter is 6½" too high.</p> <p>The conference room phone is 60" a.f.f. which exceeds side and forward reach range thresholds by 12" under the 2010 ADA Standards.</p> <p><i>Note: The conference room sink lacks knee clearance but is not in service. If the sink is put back into use, then it will need to be modified or replaced with a compliant sink.</i></p>	204.1 307.2 703 904.4 308	20.6.1 41 7.2 6.5 6.6	Place a fixed object below the message holder. Install accessible compliant signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards). Construct a 36" wide counter below the existing counter at a height of no more than 36" a.f.f. Lower telephone to no more than 48" a.f.f.	2 2 2 2	2 2 3 3	I I N I	\$0 \$50 \$350 \$100
<p>Administration Office Bathrooms</p> <p>There are three bathrooms in the administration area – two wholly non-compliant bathrooms in the conference room and one wholly non-compliant bathroom in the adjoining front office. All bathrooms have insufficient door widths; have non-compliant fixture and</p>	404.2 604 606 609 306 605 603	26.5 30 6.5 6.6 41.2	See Table 1. Adult Bathroom Facility Compliance Requirements.	3	3	N	Up to \$40,000

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water closet heights; lack grab bars, and have inadequate clearances (knee, toe, maneuvering). The removal of the common wall (assuming non-structural) of the 2 adjacent conference room bathrooms should be considered to make one unisex accessible bathroom. The remaining bathroom could be designated a regular unisex bathroom. See Photo Brookfield Elementary 6.	308 703.4						
Buildings B and C Hardware & Signage Door Hardware. Non-compliant knob style hardware is located on the storage doors by B-4 and in some of the classrooms (C4). Signage. Compliant accessible directional and designation signage is lacking throughout the buildings including classrooms, storage doors, administrative offices, media room, mechanical, custodian totaling roughly 30 required signs.	404.2 703	26.11 41	Replace all knob-style hardware with door hardware that is easy to operate with one hand and that does not require tight grasping, tight pinching of the wrist to operate. Install accessible compliant signage on the latch side of each door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2 2	2 2	N I	\$225 \$750
Buildings B and C Interior Doors with Closers Interior doors w/closers do not fully comply with maximum allowed operating force (5 lbs.) and minimum closing speed (6 seconds) requirements.	404.2	26.8 26.9	Adjust door closers such that push/pull force does not exceed 5 lbs. and door closing speed is at least 6 seconds (521 CMR).	4	2	I	\$0
Building B Drinking Fountain The drinking fountain is non-complaint as it is not a "hi-low" fountain as required under the ADAAG and lacks sufficient knee clearance. See Photo Brookfield Elementary 7.	211 305 306.2 306.3 307 309 602.5 602.6 602.4 602.3	36	Option #1 – Discontinue use of the existing water fountain. Option #2 – remove the existing water fountain and replace with a "hi-low" water fountain. The drinking fountain must comply as follows: Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).	4	3	N	\$0 to \$3,000
Building B Men's Staff Bathroom The accessible tactile signage is mounted on the door.	703	41	Install accessible compliant signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for	3	2	I	\$25

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			character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).				
The grab bars are 1" too low and due to the allowed height range, no tolerances apply.	604.9	30.15	Raise the grab bars to a height of 33" to 36" a.f.f.	3	2	I	\$0
The towel dispenser and soap dispenser both exceed the maximum height of 42" under 521 CMR.	308	30.12	Lower dispensers to no more than 42" a.f.f.	3	2	I	\$0
The mirror is 2" too high (603.3, 30.11).	603.3	30.11	Lower the mirror so that the bottom of the reflecting surface is no higher than 40" a.f.f.	3	2	I	\$0
The toilet paper dispenser is mounted above the grab bars which is non-compliant under 521 CMR. See Photo Brookfield Elementary 8.	604.7	30.7.6 30.8.5	Relocate the toilet paper dispenser so that it is 7" min – 9" max in front of the water closet measured to centerline of dispenser with at least 1½" of clearance below the grab bar and a minimum of 24" a.f.f	3	2	I	\$0
<u>Building B Women's Staff Bathroom</u>							
The accessible tactile signage is mounted on the door.	703	41	Install accessible compliant signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	3	2	I	\$25
The rear and side grab bars are 1" and ½" too low and due to the allowed height range, no tolerances apply.	604.9	30.15	Raise the grab bars to a height of 33" to 36" a.f.f.	3	2	I	\$0
The towel dispenser, soap dispenser, sanitize dispenser, and hygiene dispenser exceed the maximum height of 42" under 521 CMR.	308	30.12	Lower dispensers to no more than 42" a.f.f.	3	2	I	\$0
The mirror is 2" too high (603.3, 30.11).	603.3	30.11	Lower the mirror so that the bottom of the reflecting surface is no higher than 40" a.f.f.	3	2	I	\$0
The toilet paper dispenser is mounted above the grab bars which is non-compliant under 521 CMR.	604.7	30.7.6 30.8.5	Relocate the toilet paper dispenser so that it is 7" min – 9" max in front of the water closet measured to centerline of dispenser with at least 1½" of clearance below the grab bar and a minimum height of 24" a.f.f.	3	2	I	\$0
<u>Building B Boy's and Girl's Bathrooms (Assume Ages 5-8; Gr. K-3 Standards)</u>							
The following applies to the Building B Boy's and Girl's Bathrooms.							
The door clear widths are only 28".	404.2	26.5	Modify doorway and replace door such that the minimum clear width of 32" is achieved.	3	3	N	Up to \$25,000
Signage is mounted on the door.	703	41	Install accessible compliant signage on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for				

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			character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).				
The light switches, soap dispensers, and towel dispensers are all greater than 40" a.f.f. <i>Note: The boy's towel dispenser is not on an accessible route.</i>	308	30.19 30.20	Lower the dispensers to no higher than 40" a.f.f. under the 2010 ADA Standards and the switches to no higher than 36" under 521 CMR. Relocate boy's towel dispenser so it is on an accessible route.				
The sinks exceed the maximum rim height of 30" a.f.f.	606	30.15	Lower or replace sinks so that the rim heights do not exceed 30" a.f.f. under 521 CMR with a minimum of 25" a.f.f. knee clearance to the bottom of the apron.				
The sink piping is not guarded, insulated, or recessed.	606.5	30.9.5	Wrap or insulate the piping.				
The cold and hot water metered faucets do not stay open for at least 10 seconds.	606.4	30.9.6	Adjust the metered faucets so that the valves stay open for a minimum of 10 seconds.				
None of the water closets are accessible and lack minimum clearances (604.9, 30.14). The height of the water closets are 16" - 17" a.f.f. which exceed the maximum height range by 1" to 5" (604.9, 30.14). None of the stalls have grab bars (604, 609; 30.15, 30.8). The coat hooks exceed 55" in height (308).	604.9 308 609	20.14 30.15 30.8	Combine 2 stalls in each bathroom to create one accessible stall. The water closet centerline should be 11" to 15" to the near wall and 42" from the far wall (521 CMR). The seat height should be 12" to 15" a.f.f. Grab bars (42" long) should be mounted at a height of 20" - 25" a.f.f and no more than 6" from the interior corner (521 CMR). The grab bar thickness should be 1½" to 1½" under 521 CMR. The coat hooks should be lowered to no more than 40" a.f.f. under the 2010 ADA Standards.				
The following applies to the Building B Boy's Bathroom only:							
The urinal exceeds the maximum height of 15" a.f.f. under 521 CMR by 2".	605	30.17	Lower the urinal to no more than 15" a.f.f at the top of the rim.				
See Photos Brookfield Elementary 9 and 10.							
Building B Hallway Coat Hooks Hallway coat hooks are 46" a.f.f with approximately 44 coat hooks per closet area. See Photo Brookfield Elementary 11.	308	NA	Lower at least 5% of the coat hooks (at least 2) in each closet area to a height of no more than 40" a.f.f. under the 2010 ADA Standards.	4	2	I	\$0
Building B Classrooms B1 – B9 Tables/Desks. Tables/desks vary in height and knee clearance which do not all meet the 24" knee clearance and range allowance for a desk top height of 26" – 30".	902.4	NA	Raise one table/desk per room as may be required or one table/desk to use on a rotation basis per classroom to achieve minimum table height of 26" a.f.f. to maximum height of 30" a.f.f. with 24" minimum knee clearance (27" preferred if table height allows).	2	2	I	\$0
Soap and towel dispensers vary in height up to 47" a.f.f.	308	30.19	Lower to no higher than 40" a.f.f.	4	3	N	\$0
The phones vary in height up to 62" a.f.f. which exceeds side and forward reach range thresholds by 15" under the 2010 ADA Standards.	308	6.5 6.6	Lower telephone to no more than 48" a.f.f.	2	3	I	Up to \$1,000
Classroom Sink and Bubbler. The classroom "bubblers" as part of the sink fixture exceed the spout height for	606 602	30.15 30.16 36	Remove bubblers or replace/modify sink and bubbler unit so that the spout is no greater than 3½" from the front edge, spout height is no greater than 30" a.f.f. and	2	3	L	Up to \$10,000

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<p>children and are too far from the front edge. The sinks lack knee and toe clearance. See Photo Brookfield Elementary 12.</p> <p>Each classroom has a deadbolt on its door for security reasons. The deadbolts are mounted at a height of roughly 64" a.f.f. which exceeds the maximum reach range under the 2010 ADA Standards by 16".</p>	<p>308.2</p> <p>308.3</p>	<p>6.5</p> <p>6.6</p>	<p>the faucet is operable with one hand and with no more than 5 lbs. operating force. The sink height at the rim s/b no higher than 30" a.f.f. under 521 CMR with a minimum of 24" knee clearance under the 2010 ADA Standards.</p> <p>As required as a reasonable accommodation, provide an additional deadbolt or lower the existing deadbolt to a height of no more than 48" a.f.f.</p>	<p>4</p>	<p>2</p>	<p>I</p>	<p>\$0</p>
<p>Media Room</p> <p>Six interior doors lack tactile signage.</p> <p>The phone is 63" a.f.f. which exceeds side and forward reach range thresholds by 15" under the 2010 ADA Standards.</p> <p>There are no railing extensions at the base of the exterior stairs.</p> <p>There is no accessible route from the main level to the computer lab.</p> <p>See Photo Brookfield Elementary 13.</p>	<p>703</p> <p>308</p> <p>505</p> <p>206</p>	<p>41</p> <p>6.5</p> <p>6.6</p> <p>27.0</p> <p>20.00</p>	<p>Install accessible compliant signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p> <p>Lower telephone to no more than 48" a.f.f.</p> <p>Extensions would be an obstruction into the accessible route of travel – no action required.</p> <p>A vertical lift or ramp must be provided to achieve access to the computer lab from the main level.</p>	<p>2</p> <p>2</p> <p>-</p> <p>2</p>	<p>2</p> <p>3</p> <p>-</p> <p>3</p>	<p>I</p> <p>I</p> <p>-</p> <p>I</p>	<p>\$150</p> <p>\$100</p> <p>-</p> <p>Up to \$15,000</p>
<p>Tables/Desks</p> <p>Tables/desks vary in height and knee clearance which do not meet the 24" knee clearance and range allowance for a desk top height of 26" – 30".</p>	<p>902.4</p>	<p>NA</p>	<p>Raise one table/desk per room as may be required or one table/desk to use on a rotation basis per classroom to achieve minimum table height of 26" a.f.f. to maximum height of 30" a.f.f. with and 24" minimum knee clearance (27" preferred if table height allows).</p>	<p>2</p>	<p>2</p>	<p>I</p>	<p>\$0</p>
<p>Building B Classroom Bathrooms B1 – B4</p> <p>The following applies to the Building B1 – B4 Classroom Bathrooms.</p> <p>Signage is mounted on the doors.</p> <p>The sink piping is not guarded, insulated, or recessed.</p>	<p>703</p> <p>606.5</p>	<p>41</p> <p>30.9.5</p>	<p>Install accessible compliant signage on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p> <p>Wrap or insulate the piping.</p>	<p>3</p>	<p>3</p>	<p>N</p>	<p>Up to \$3,500</p>

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The cold and hot water metered faucets do not stay open for at least 10 seconds.	606.4	30.9.6	Adjust the metered faucets so that the valves stay open for a minimum of 10 seconds.				
None of the stalls have grab bars.	604 609 308	30.8 30.15	Grab bars (42" long) should be mounted at a height of 20" – 25" a.f.f and no more than 6" from the interior corner (521 CMR). The grab bar thickness should be 1¼" to 1½" under 521 CMR.				
The toilet paper dispenser is more than 12" too high and not centered properly in front of the water closet.	604.9	30.14	Relocate the toilet paper dispenser so that it is 7" min – 9" max in front of the water closet measured to centerline of dispenser with at least 1½" of clearance below the grab bar and 17" to 19" a.f.f.				
The following applies to the Classrooms B1 and B3 Bathrooms: The flush control of the water closet is not on the approach side.	604.6	30.7	Replace the water closet tank, or if required, the water closet such that the flush control is on the approach side.				
The following applies to the Classrooms B1 and B2 Bathrooms: The water closets are only 37" o.c. to the far wall or closest edge of the next fixture (sink).	604.9	30.14	Move sinks a minimum of 5" to achieve required minimum maneuvering clearance.				
See Photos Brookfield Elementary 14 and 15.							
Interior Ramp Between Building B and Building C The 2-run ramp near which connects Buildings B and C buildings has running slopes which exceed the maximum of 8.3% as follows: Lower Segment: 9.0% to 10.2% Middle Segment: 8.6% to 11.3% Upper Segment: 9.4% to 10.6%	405.2	24.2	Option 1: Modify/reconstruct ramps to comply with the maximum running slope requirement of 8.3%. Option 2: Due to the cost associated with full compliance, the jurisdiction should consider the possibility of "disproportionality" under the ADA and a variance under 521 CMR (if required) as the costs necessary to provide the compliant accessible route of travel will exceed 20% of the costs to other accessibility related costs associated with the building and the achieved benefit would be unsubstantial. Such costs would impose an "undue hardship" on the jurisdiction and the means and methods to correct would considered not to be "readily achievable".	2	4	L	TBD
The top railing adjacent to Room C1 is roughly 1" too low. See Photo Brookfield Elementary 16.	405.8 505.4	24.5	Unbolt the railing and raise so that the top of the railing gripping surface is between 34" and 38" a.f.f.	2	2	N	\$0
Building C Hallway Phone A hallway phone exceeds the maximum reach range under the 2010 ADA Standards (308.2, 308.3; 6.5, 6.6) and also is a protruding object as the phone has a leading edge of 5" into the accessible route of travel which exceeds the maximum allowed by 1" at a height of between 27" and 80" a.f.f. (204.1,307.2; 20.6.1).	308.2 308.3 204.1 307.2	6.5 6.6 20.6.1	Lower the phone to a height of no more than 48" a.f.f. and place a small fixed object under the phone for cane detection.	4	3	N	\$150

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Building C Classrooms C1 – C7							
Tables/Desks. Tables/desks vary in height and knee clearance which do not all meet the 24" knee clearance and range allowance for a desk top height of 26" – 30".	902.4	NA	Raise one table/desk per room as may be required or one table/desk to use on a rotation basis per classroom to achieve minimum table height of 26" a.f.f. to maximum height of 30" a.f.f. with 24" minimum knee clearance (27" preferred if table height allows).	2	2	I	\$0
Soap and towel dispensers vary in height up to 47" a.f.f.	308	30.19	Lower to no higher than 40" a.f.f.	4	3	N	\$0
The phones vary in height and exceed side and forward reach range thresholds under the 2010 ADA Standards.	308.2 308.3	6.5 6.6	Lower telephone to no more than 48" a.f.f.	2	3	I	Up to \$1,000
Classroom Sink and Bubbler. The classroom "bubblers" as part of the sink fixture exceed the spout height for children and are too far from the front edge. The sinks lack knee and toe clearance.	606 602	30.15 30.16 36	Remove bubblers or replace/modify sink and bubbler unit so that the spout is no greater than 3½" from the front edge, spout height is no greater than 30" a.f.f. and the faucet is operable with one hand and with no more than 5 lbs. operating force. The sink height at the rim s/b no higher than 30" a.f.f. under 521 CMR with a minimum of 24" knee clearance under the 2010 ADA Standards.	2	3	L	Up to \$8,000
Each classroom has a deadbolt on its door for security reasons. The deadbolts are mounted at a height of roughly 64" a.f.f. which exceeds the maximum reach range under the 2010 ADA Standards by 16".	308.2 308.3	6.5 6.6	As required as a reasonable accommodation, provide an additional deadbolt or lower the existing deadbolt to a height of no more than 48" a.f.f.	4	2	I	\$0
The following applies to Classroom C5: There are 5 different sets of stairs with only one stairway providing a single and non-continuous railing with no extensions (505, 27.4). There is no vertical accessible access to the lower level of the room (206, 20.0). See Photos Brookfield Elementary 17 and 18.	505 206	27.4 20.0	A vertical lift or ramp system must be provided to achieve access to the lower level.	2	4	L	Up to \$25,000
Building C Cable Access Room							
The telephone exceeds side and forward reach range thresholds under the 2010 ADA Standards.	308.2 308.3	6.5 6.6	Lower telephone to no more than 48" a.f.f.	2	2	N	\$150
A television monitor at a height of 75" a.f.f. at its base protrudes more than 4" into the accessible route of travel and therefore is considered a protruding object.	204.1 307.2	20.6.1	Place a fixed object below the monitor for cane detection.	4	2	I	\$0
There are 4 sets of stairs (2 with one stair tread and 2 with three stair treads) which have non-compliant railings due to size (505.7; 27.4) and lack extensions at the top and bottom (505.10, 27.4). See Photo Brookfield Elementary 19.	505.7 505.10	27.4	Handrails must be round or oval in x-section and 1¼" to 2" in outside diameter. The railings must extend 12" at the top of the stairs parallel to the floor and a slope distance of one tread then 12" parallel to the floor at the bottom.	2	3	N	Up to \$3,500
There is no accessible route of travel from the upper level to the lower level	206	20.0	A vertical lift, ramp, or ramp/lift combination must be provided to achieve access to the lower level.	2	4	L	Up to \$25,000

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containing the "recording studio". See Photo Brookfield Elementary 20 .							
The exit stair railings do not extend at the base.	505.10	27.4	Modify railings to add bottom extensions a slope distance of one tread then 12" parallel to the ground.	2	3	N	\$600
Building C Cable Access Room Bathroom Both of the bathrooms (one not in service) are wholly non-compliant. Both bathrooms have insufficient door widths; have non-compliant fixture and water closet heights; lack grab bars, and have inadequate clearances (knee, toe, maneuvering). One bathroom would need to be expanded and modified to achieve compliance.	404.2 604 606 609 306 605 603 308 703.4	26.5 30 6.5 6.6 41.2	See Table 1. Adult Bathroom Facility Compliance Requirements.	3	3	N	Up to \$40,000
Building C Classroom Bathrooms C1, C2, C4, C5 (Assume Ages 5-8; Gr. K-3 Standards) The following applies to the Classroom Bathrooms C1, C2, C4, and C5. One bathroom per classroom should be modified to achieve compliance. This may require combing two bathrooms into one where allowed.							
The door clear widths are roughly 25".	404.2	26.5	Modify doorway and replace door such that the minimum clear width of 32" is achieved.	3	3	N	Up to \$35,000
Signage is mounted on the door.	703	41	Install accessible compliant signage on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).				
The light switches and soap dispensers are greater than 40" a.f.f.	308	30.19 30.20	Lower the dispensers to no higher than 40" a.f.f. under the 2010 ADA Standards and the switches to no higher than 36" under 521 CMR.				
The mirrors are nearly 20" too high under 521 CMR.	NA (103)	30.18	The bottom of any mirror provided above a sink shall be set with the bottom edge of the reflecting surface no higher than 31" a.f.f.				
The sink faucets in some of the bathrooms are non-compliant and require twisting of the wrist.	309	30.9.6	Faucets must be operable with one hand, a closed fist, or a loose grip. As applicable, replace existing faucets with lever-type or self-metered faucets.				
The sink piping is not guarded, insulated, or recessed.	606.5	30.9.5	Wrap or insulate the piping.				
The toilet paper dispenser is more than 6" too high and not centered properly in front of the water closet.	604.9	30.14	Relocate the toilet paper dispenser so that it is 7" min – 9" max in front of the water closet measured to centerline of dispenser with at least 1½" of clearance below the grab bar and 17" to 19" a.f.f.				
None of the water closets are accessible and do not meet required clearances (604.9, 30.14). None of the	604.9 308	20.14 30.15	Modify one bathroom per classroom as follows: The water closet centerline should be 11" to 15" to the				

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stalls have grab bars (604, 609; 30.15, 30.8). The flush control on some of the water closets are not on the approach side (604.6, 30.7). <i>See Photo Brookfield Elementary 21.</i>	604.6	30.7	near wall and 42" from the far wall (521 CMR). Grab bars (42" long) should be mounted at a height of 20" – 25" a.f.f and no more than 6" from the interior corner (521 CMR). The grab bar thickness should be 1¼" to 1½" under 521 CMR. As required, replace the water closet tank, or if required, the water closet such that the flush control is on the approach side.				
Building C Hallway Bathrooms Near C5 and C6 The accessible tactile signage is mounted on the door.	703	41	Install accessible compliant signage on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	3	2	I	\$25
The sink faucets do not stay open for at least 10 seconds.	606.4	30.9.6	Adjust faucets so they stay open for at least 10 seconds.	3	3	I	\$150
The toilet paper dispensers are mounted above the grab bars which is non-compliant under 521 CMR.	604.7	30.7.6 30.8.5	Relocate the toilet paper dispensers so that they are 7" min – 9" max in front of the water closet measured to centerline of dispenser with at least 1½" of clearance below the grab bar and a minimum of 24" a.f.f	3	2	I	\$0
The grab bars are up to 7" too low.	604.9	30.15	Raise the grab bars to a height of 33" to 36" a.f.f.	3	2	I	\$0
Bathroom C6 only: The operating force of the door is 10 lbs. which exceeds the maximum allowed (404.2, 26.8). The water closet is only 17" o.c. to the nearest side wall which does not meet the 18" requirement of 521 CMR (604.2, 30.7.2).	404.2 604.2	26.8 30.7.2	Adjust the door closer so the operating force does not exceed 5 lbs. The water closet is loose – minor adjustment and re-securing required to achieve 18" clearance to the centerline of the toilet.	3	2	I	\$0
Building C Exit to Pre-K Play Area No accessible route exists from the school building to the ground level due to an 11" height differential. <i>See Photo Brookfield Elementary 22.</i> No accessible route exists to and around the 2 different play areas or to the primary play structures. <i>See Photo Brookfield Elementary 23.</i>	402 1008.2	19.7 20.0	Construct a ramp in accordance w/405 and 24.0 to access the ground level. The ramp cannot have a running slope in excess of 8.3% and should have a minimum of 4' between railings with railing heights of 34" to 38" a.f.f for the upper railing and 18" to 20" a.f.f. for the bottom railing. Construct an accessible route compliant with width and slope (2% cross, 5% running) requirements to the play structure elements (5' wide minimum). The accessible route must be stable, firm, and slip resistant. Construction options include compacted stone dust, asphalt, concrete, poured in place products, etc. Costs will vary depending on product used. Play area ground surfaces must comply with ASTM F 1951 and ASTM F 1292.	2	3	L	\$Up to \$25,000
Building A Level 1 Cafetorium The drinking fountain is not a "high-low" fountain. <i>See Photo Brookfield Elementary 24.</i>	211	36	Option #1 – Discontinue use of the existing water fountain. Option #2 – remove the existing water fountain and replace with a "hi-low" water fountain. The drinking fountain must comply as follows:	4	3	N	Up to \$3,000

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			Protruding objects compliance of no > 4" protrusion between 27" and 80" a.f.f. (307); 30"x48" clear space requirement (305), and knee/toe clearance (306). Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2). The spout s/b 15" min from wall and 5" max from the front edge of the unit (602.5). Flow of water 4" high min and spout located max 5" from front (602.6). The spout height s/b 36" max. a.f.f. for "low" and 38" min a.f.f. to 43" max a.f.f. for "high". The controls s/b operable w/one fist; no > 5 lbs force (309.4).				
The telephone, towel dispenser, and hand sanitizer are all too high under the 2010 ADA Standards.	308.2 308.3	6.5 6.6	Lower telephone and dispensers to no higher than 48" a.f.f. under the 2010 ADA Standards.	4	3	N	\$200
The towel dispenser does not adhere to compliant operable controls as it requires twisting of the wrist. See Photo Brookfield Elementary 25.	309.4	30.12 39.5	Replace with a towel dispenser that is continuous, can be operated with a closed fist, and does not require twisting of the wrist.	4	2	I	\$50
There are no railings on the stairs to the stage. See Photo Brookfield Elementary 26.	505	27.4	Provide continuous handrails on both sides of a section of the stairs, round or oval in x-section, 34" to 38" a.f.f. to the top of the handrails, with extensions at the top (12" parallel to the floor) and bottom (slope distance of one tread then 12" parallel to the floor).	2	3	I	Up to \$350
The stage stair treads have a projection of greater than ½" without a curved or beveled nosing.	504.5	27.3	Modify underside of treads to reduce projection to no more than ½".	2	3	I	Up to \$350
The ramp to the stage lacks railings. See Photo Brookfield Elementary 26.	405.8 505	24	Provide paired railings at a height of 34" to 38" a.f.f. and 18" to 20" a.f.f. with an outside diameter of 1½" to 2" and 12" extensions at the top and bottom.	2	3	I	Up to \$5,000
The ramp approach has a greater than 1" change in level surface. See Photo Brookfield Elementary 27.	403.4 303	22.4	Modify ramp approach to create a beveled approach of no more than ½" in height and beveled with a no greater than 1:2 slope.	2	3	I	\$200
The upper segment of the ramp to the stage has a running slope which varies from 8.7% to 9.2% which exceeds the maximum allowed of 8.3%.	405.2	24.2	Modify the ramp by extending its length to reduce the running slope to no more than 8.3% for the entire length of the ramp.	2	3	I	Up to \$750
<i>Note: The cafetorium tables with seating were not in place at the time of inspections as the floor was getting prepped for cleaning.</i>	226.1	35.1	At least 5% of the seating must have a minimum table height of 26" a.f.f. to a maximum height of 30" a.f.f. with 24" minimum knee clearance (27" preferred if table height allows).	2	2	I	Up to \$250
Building A Level 1 Staff Dining							
Two phones exceed the side and forward reach range thresholds by over 12" under the 2010 ADA Standards.	308.2 308.3	6.5 6.6	Lower the phones to a height of no more than 48" a.f.f. under the 2010 ADA Standards.	4	3	N	\$200
A time clock is a protruding object as it has a leading edge of 6¼" into the accessible route of travel which exceeds the maximum allowed by 2¼" at a height of between 27" and 80" a.f.f. (204.1, 307.2; 20.6.1).	204.1 307.2	20.6.1	Place a small fixed object under the phone for cane detection.	4	1	I	\$0
The towel dispenser and hand sanitizer are roughly 53" a.f.f. which exceeds	308.2 308.3	6.5 6.6	Lower the dispensers to a height of no more than 48" a.f.f. under the 2010 ADA Standards.	4	2	I	\$0

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side and forward reach range thresholds by 5" under the 2010 ADA Standards. The sink does not provide any knee clearance and is 2" too high.	306.2 306.3	30	Modify or replace the sink so there is a 30" wide space with a minimum of 27" knee clearance at a height of no more than 34" a.f.f. The piping under the sink should be wrapped, insulated or guarded with compliant hardware (operable w/one hand with no twisting of the wrist).	4	3	N	\$500
<u>Building A Level 1 Kitchen</u> The office, bathroom, and 2 storage rooms lack tactile accessible signage.	703	41	Install accessible compliant signage on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	2	2	I	\$100
The towel dispenser, hand sanitizer, soap dispenser, and a coat rack all exceed side and forward reach range thresholds under the 2010 ADA Standards.	308.2 308.3	6.5 6.6	Lower the dispensers to a height of no more than 48" a.f.f. under the 2010 ADA Standards. Provide at least one coat hook at a height of no more than 48" a.f.f.	4	2	I	\$0
The sink is not wrapped or insulated (606.5, 30.9.5) and protrudes more than 4" into the accessible route of travel at a height of between 27" and 80" a.f.f. (204.1, 307.2; 20.6.1). See Photo Brookfield Elementary 28 .	606.5 204.1 307.2	30.9.5 20.6.1	Insulate or wrap the sink piping. Provide wing walls on each side of the sink for cane detection.	4	2	I	Up to \$250
<u>Building A Level 1 Kitchen Bathroom</u> The rear grab bar is ½" too low.	609.4	30.8.2	Raise the grab bar to a height of between 33" and 36" a.f.f.	3	2	I	\$0
The flush control is not on the approach side.	604.6	307.5	Replace the water closet tank, or if required, the water closet such that the flush control is on the approach side.	3	3	I	Up to \$350
The piping below the sink is not fully wrapped or insulated.	606.5	30.9.5	Insulate or wrap the piping.	3	2	I	\$0
The towel dispenser is 4" too high under 521 CMR.	308.2 308.3	30.12	Lower dispenser to a height of no more than 42" a.f.f.	3	2	I	\$0
The toilet paper dispenser is located over the grab bars which is not allowed under 521 CMR.	604.7 309.4	30.7.6	Relocate the toilet paper dispenser so that it is 7" min – 9" max in front of the water closet measured to centerline of dispenser with at least 1½" of clearance below the grab bar and a minimum of 24" a.f.f	3	2	I	\$0
<u>Building A Level 1 Classrooms A101 – A113 and Level 2 Classrooms A211 – A213</u> Tables/Desks. Tables/desks vary in height and knee clearance which do not all meet the 24" knee clearance and range allowance for a desk top height of 26" – 30".	902.4	NA	Raise one table/desk per room as may be required or one table/desk to use on a rotation basis per classroom to achieve minimum table height of 26" a.f.f. to maximum height of 30" a.f.f. with 24" minimum knee clearance (27" preferred if table height allows).	2	2	I	\$0
Soap dispensers, towel dispensers, and hand sanitizers vary in height up to 56" a.f.f.	308	30.19	All dispensers should be no higher than 44" a.f.f. Lower as may be required for children age 9 – 12 under the 2010 ADA Standards.	4	3	N	\$0
The phones vary in height up to 60"	308	6.5	Lower telephone to no more than 48" a.f.f. under the	2	3	I	Up to

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a.f.f. which exceeds side and forward reach range thresholds by 15" under the 2010 ADA Standards.		6.6	2010 ADA Standards.				\$3,900
Classroom Sink and Bubbler. When in place, the classroom "bubblers" as part of the sink fixture exceed the spout height for children and are too far from the front edge. The sinks lack knee and toe clearance.	606 602	30.15 30.16 36	Remove bubblers or replace/modify sink and bubbler unit so that the spout is no greater than 3½" from the front edge, spout height is no greater than 30" a.f.f. and the faucet is operable with one hand and with no more than 5 lbs. operating force. The sink height at the rim s/b no higher than 30" a.f.f. under 521 CMR with a minimum of 24" knee clearance under the 2010 ADA Standards.	2	3	L	Up to \$23,000
Each classroom has a deadbolt on its door for security reasons. The deadbolts are mounted at a height of roughly 60" a.f.f. which exceeds the maximum reach range under the 2010 ADA Standards by 12".	308.2 308.3	6.5 6.6	As required as a reasonable accommodation, provide an additional deadbolt or lower the existing deadbolt to a height of no more than 48" a.f.f.	4	2	I	\$0
<u>Building A Level 1 Boy's and Girl's Bathrooms (Assume Ages 9-12; Gr. 4-6 Standards)</u>							
The following applies to the Building A Level 1 Boy's and Girl's Bathrooms.							
Signage is mounted on the doors.	703	41	Install accessible compliant signage on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	3	2	I	\$50
The operating force of the doors exceed the maximum allowed under 521 CMR.	404.2.9	26.8	Adjust door closers such that the operating forces do not exceed 5 lbs.	3	2	I	\$0
The closing speed of the doors do not meet the minimum 6 seconds under 521 CMR.	404.2.8	26.9	Adjust the door closers such that the closing speeds are at least 6 seconds.	3	2	I	\$0
The light switches are 10" too high.	308	30.20	Lower the light switches to no higher than 36" a.f.f.	3	3	N	\$350
The sinks are 1½" too high under 521 CMR.	606	30.15	Lower sinks so that the top of the rims are no greater than 30" a.f.f. (521 CMR) with at least 24" of knee clearance (2010 ADA Standards).	3	3	N	Up to \$750
The sink piping is not guarded, insulated, or recessed.	606.5	30.9.5	Wrap or insulate the piping.	3	2	I	\$50
The stall doors are not self closing.	604.8	30.6	Adjust or replace self-closing hinge on the stall doors.	3	2	I	\$0
The boy's stall is missing a coat hook and the girl's stall is 10" too high under the 2010 ADA Standards.	308.	30.6	Coat hooks should be no higher than 44" a.f.f.	3	2	I	\$10
The side and rear grab bars are 5" to 7" too high under the standards for children age 9-12 or grades 4-6.	604.9	30.15	Lower the grab bars to a height of 25" to 27" a.f.f. to the top of the gripping surface.	3	2	I	\$0
The water closets are up to nearly 2" too high.	604.9	30.14	Replace the water closets with ones that are 15" to 17" a.f.f. to the top of the seat.	3	3	I	Up to \$1,000

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The toilet paper dispensers are above the grab bars (boy's) or too high and not centered (girl's).	604.9	30.14	Relocate the toilet paper dispensers so that they are 7" min – 9" max in front of the water closet measured to centerline of dispenser with at least 1½" of clearance below the grab bars and 17" to 19" a.f.f	3	2	I	\$0
The following applies to the Building A Level 1 Boy's Bathroom only: Sanitizers and soap dispensers are up to 9" too high.	308	30.19	Lower the dispensers to no higher than 44" a.f.f. under the 2010 ADA Standards.	3	2	I	\$0
The following applies to the Building A Level 1 Girl's Bathroom only: The sink faucets do not stay open for a minimum of 10 seconds.	606.4	30.9.6	Adjust the metered faucets so that the valves stay open for a minimum of 10 seconds.	3	3	I	\$100
The flush control of the water closet is not on the approach side.	604.6	307.5	Replace the water closet tank, or if required, the water closet such that the flush control is on the approach side.	3	3	I	Inc. above
See Photo Brookfield Elementary 29.							
<u>Building A Level 1 Staff Bathroom</u>							
The accessible tactile signage is mounted on the door.	703	41	Install accessible compliant signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	3	2	I	\$25
The grab bars are ½" too low and due to the allowed height range, no tolerances apply.	604.9	30.15	Raise the grab bars to a height of 33" to 36" a.f.f.	3	2	I	\$0
The towel dispenser and soap dispenser both exceed the maximum height of 42" under 521 CMR.	308	30.12	Lower dispensers to no more than 42" a.f.f.	3	2	I	\$0
The toilet paper dispenser is mounted above the grab bars which is non-compliant under 521 CMR. The sanitary napkin dispenser is located over the grab bars and is 4" too high under the 2010 ADA Standards.	604.7	30.7.6 30.8.5	Relocate the toilet paper dispenser so that it is 7" min – 9" max in front of the water closet measured to centerline of dispenser with at least 1½" of clearance below the grab bar and a minimum of 24" a.f.f. Relocate the sanitary napkin dispenser so it is not over the grab bars and is no higher than 48" a.f.f.	3	2	I	\$0
<u>Building A Level 2 Staff Lounge</u>							
A telephone and towel dispenser both exceed the side and forward reach range thresholds under the 2010 ADA Standards.	308.2 308.3	6.5 6.6	Lower the telephone and towel dispenser to a height of no more than 48" a.f.f. under the 2010 ADA Standards.	4	3	N	\$200
The sink does not provide any knee clearance and is 2" too high.	306.2 306.3	30	Modify or replace the sink so there is a 30" wide space with a minimum of 27" knee clearance at a height of no more than 34" a.f.f. The piping under the sink should be wrapped, insulated or guarded with compliant hardware (operable w/one hand with no twisting of the wrist).	4	3	N	\$500
<u>Building A Level 2 Gymnasium</u>							
The accessible tactile signage of the Girl's Dressing Room is mounted on the door.	703	41	Install accessible compliant signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest	2	2	I	\$0

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<p>The benches in the Girl's and Boy's Dressing Rooms are not wide enough, do not provide back support, and lack adequate clear width.</p> <p style="color: red;">See Photo Brookfield Elementary 30.</p>	903.3	19.4	<p>character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p> <p>An accessible bench must be provided in each dressing room. Seats must be a minimum of 42" long and 20" to 24" deep with back support or affixed to a wall. The back support s/b 42" long minimum from a point 2" above the seat surface to a point 18" above the seat surface. The bench height s/b 17" to 19" a.f.f. A minimum 36" clear width must be maintained between the bench and wall or shelving. (903; 19.4).</p>	4	3	L	Up to \$1,000
<p><u>Building A Level 2 Boy's and Girl's Bathrooms (Assume Ages 9-12; Gr. 4-6 Standards)</u></p> <p>The following applies to the Building A Level 2 Boy's and Girl's Bathrooms.</p>							
<p>The Girls' Bathroom Signage is not mounted on the latch side of the door.</p>	703	41	<p>Install accessible compliant signage on the latch side of the doors with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).</p>	3	2	I	\$25
<p>The operating force of the doors exceed the maximum allowed under 521 CMR.</p>	404.2.9	26.8	<p>Adjust door closers such that the operating forces do not exceed 5 lbs.</p>	3	2	I	\$0
<p>The closing speed of the doors do not meet the minimum 6 seconds under 521 CMR.</p>	404.2.8	26.9	<p>Adjust the door closers such that the closing speeds are at least 6 seconds.</p>	3	2	I	\$0
<p>The cold and hot water metered faucets do not stay open for at least 10 seconds.</p>	606.4	30.9.6	<p>Adjust the metered faucets so that the valves stay open for a minimum of 10 seconds.</p>	3	3	I	\$100
<p>The Boy's Bathroom light switch is 10" too high.</p>	308	30.20	<p>Lower the light switch to no higher than 36" a.f.f.</p>	3	3	N	\$175
<p>The sinks are 1¼" to 1½" too high under 521 CMR.</p>	606	30.15	<p>Lower sinks so that the top of the rims are no greater than 30" a.f.f. (521 CMR) with at least 24" of knee clearance (2010 ADA Standards).</p>	3	2	N	Up to \$750
<p>The sink piping is missing insulation.</p>	606.5	30.9.5	<p>Wrap or insulate the piping.</p>	3	2	I	\$50
<p>The stall doors are not self closing.</p>	604.8	30.6	<p>Adjust or replace self-closing hinge on the stall doors.</p>	3	2	I	\$0
<p>The boy's stall is missing a coat hook and the girl's stall is 9½" too high under the 2010 ADA Standards.</p>	308.	30.6	<p>Coat hooks should be no higher than 44" a.f.f.</p>	3	2	I	\$10
<p>The side and rear grab bars are 5" to 7" too high under the standards for children age 9-12 or grades 4-6.</p>	604.9	30.15	<p>Lower the grab bars to a height of 25" to 27" a.f.f. to the top of the gripping surface.</p>	3	3	I	\$0
<p>The Boy's water closet is 2" too high (604.9, 30.14) and the flush control is not on the approach side (604.6, 307.5).</p>	604.9 604.6	30.14 307.5	<p>Replace the water closet with one that is 15" to 17" a.f.f. to the top of the seat and has the flush control on the approach side.</p>	3	2	I	Up to \$500

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The Girl's water closet is ½" too high (604.9, 30.14) and is 1" too far from the near wall and ½" too close to the far wall (604.9, 30.14).	604.9	30.14	Replace the water closet with one that is 15" to 17" a.f.f. to the top of the seat, 15" to 18" from the centerline of the water closet to the near wall and at least 42" from the far wall.	3	2		Up to \$500
The toilet paper dispensers are too high and not centered properly (Girl's).	604.9	30.14	Relocate the toilet paper dispensers so that they are 7" min – 9" max in front of the water closet measured to centerline of dispenser with at least 1½" of clearance below the grab bars and 17" to 19" a.f.f	3	2	I	\$0
Building A Level 2 Men's and Women's Staff Bathrooms							
The accessible tactile signage is mounted on the door.	703	41	Install accessible compliant signage on the latch side of the door with appropriate finish and contrast and character height and proportions, raised and brailled characters should also be included. Tactile characters on signs s/b 48" min. a.f.f.. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Characters must meet the ADA Standards for character height, finish and contrast, accompanied by Grade 2 Braille (703 ADA Standards).	3	2	I	\$50
The sink piping is missing insulation.	606.5	30.9.5	Wrap or insulate the piping.	3	2	I	\$50
The toilet paper dispensers are mounted above the grab bars which is non-compliant under 521 CMR.	604.7	30.7.6 30.8.5	Relocate the toilet paper dispensers so that they are 7" min – 9" max in front of the water closet measured to centerline of dispenser with at least 1½" of clearance below the grab bar and a minimum of 24" a.f.f.	3	2	I	\$0
The water closets are 2" too close to the nearest sidewall under 521 CMR.	604.2	30.7.2	Modify/move the water closets so that they are 18" to the center line of the toilet to the nearest sidewall.	3	3	N	Up to \$1,000
The faucet of the Men's sink have an operable force of > 5 lbs. and do not stay open for at least 10 seconds.	309 606.4	30.9.6	Adjust faucet to comply with maximum 5 lbs. operating force and to have the faucets stay open for at least 10 seconds.	3	3	I	\$100
The flush control of the Women's water closet is not on the approach side.	604.6	30.7.5	Replace the water closet tank, or if required, the water closet such that the flush control is on the approach side	3	3	N	Up to \$500
Large Playground Near Building A							
No accessible route exists to the playground, swings, or to the ballfield. There is a 6" to 8" change in surface from the playground to the swings. The rubberized surface of the main playground has areas of missing, frayed, or loose surface. See Photos Brookfield Elementary 31 and 32.	402 1008	19.7 20.0	Construct an accessible route to the play ground, swings and ballfield. The accessible route should be a minimum of 4' wide with no more than a 2% cross slope and 5% running slope. The accessible route must be stable, firm, and slip resistant. Construction options include asphalt, concrete, or compacted stone dust. Repair the rubberized surface to maintain a level surface with no abrupt changes.	2	3	L	\$2,500 to \$5,500
The playground bench and the ball field seating lacks a level surface area for wheelchairs. See Photos Brookfield Elementary 33 and 34.	221.2 802.1	14.0 19.0	Create approach and wheelchair viewing area at the playground bench and the ballfield seating. Spaces should be 36" wide x 60" deep per wheelchair. If paired, spaces can be reduced to 33" in width. If a front/rear approach, the depth can be reduced to 48" as opposed to 60" for a side approach	2	3	L	Up to \$250

Estimated Total Cost: Up to \$327,145 +/-

Table 1: Adult Bathroom Facility Compliance Requirements

		2010 ADAAG	MAAB 521 CMR	
Doorway/Entrances				
Signage	703.4	Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Latch side of door. See exceptions.	41.1	Latch side of door; approach w/in 3"; 60" a.f.f. to centerline of sign.
Hardware	404.2.7	Operable with a closed fist or loose grip	26.11.1	Operable with one hand; roughened surface for hazard areas (26.11.4).
Hardware height	404.2.7	34" to 48" a.f.f.	26.11.2	36" to 48" a.f.f.
Door closing speed	404.2.8.1	5 sec. min. form 90 degrees to 12 degrees from the latch.	26.9	At least 6 seconds.
Door opening force	404.2.9	Interior hinged / sliding/folding-5 lbs	26.8.1	Exterior hinged-15 lbs; interior hinged / sliding/folding-5 lbs.
Doorway width	404.2.3	Clear width of 32" minimum.	26.5	Clear opening of 32" min.
Threshold	404.2.5	Not > 1/2" high. Raised thresholds comply with 302 and 303 (between 1/4" and 1/2" s/b beveled w/slope no > 1:2(50%)).	26.10	Not > 1/2" high, beveled w/no > 1:2 slope. Sliding door thresholds not > 3/4" high and beveled w/no > 1:4 slope.
Handrails - clearance	505.5	1 1/2" minimum.	27.4.7	1 1/2" from wall. Recessed if max 3" recess and 18" above handrail.
Single User Toilet Room				
Door	213 404.2.3 603.2	In-swing allowed if min. 30"x48" c.f.s. beyond swing of the door (603.2). 32" min. clear width (404.2.3).	30.4	In-swing allowed if self closing device and min. 30"x48" c.f.s. beyond swing of the door.
Clear floor space	604.3.1	60" x 56" minimum.	30.5, 6.3	Clear floor space required (30.5); 60" diameter or a 36" x 60" "T" (6.3).
Toilet Stalls				
# standard accessible stalls	213.3.1	At least one.	30.6	One must be provided
# alternate accessible stalls	213.3.1	If 6 or > stalls/urinals at least one alternate accessible stall must ALSO be provided	30.6	If 6 or > stalls at least one alternate accessible stall must ALSO be provided
Standard Accessible Stall				
Size	604.8.1.1	60" wide x 56" deep for wall hung water closets; 60" wide x 59" deep for floor mounted water closets.	30.6.1	60" wide x 72" deep.
Water closet location	604.2	On rear wall.	30.6.1	On 60" wall.
Door width	404.2.3	32" minimum clear opening, swings out.	30.6.1	32" clear opening, swings out or slides
Door hinge and closing	604.8.1.2 404.2.7	Self-closing hinge; pull device on both sides (604.8.1.2); operable parts 34" min. to 48" max. a.f.f. (404.2.7).	30.6.1	Self-closing hinge; pull device on both sides; lock at approx. 36" a.f.f.
Latch side clear space	604.8.1.2	42" min. clear space for side approach to door; door opening s/b 4" max. on side wall or partition farthest from water closet. If door on side, opening s/b 4" max. from front partition.	30.6.1	18" clear space on latch side of door.
Coat hook	603.4 308	Forward (308.2)/side (308.3) reach 15" to 48" max. a.f.f.	30.6.1	Max. 54" a.f.f.
Grab bar location	604.5	Provided on side wall closet to water closet and rear wall. Side wall bar 42" long, 12" max. from rear wall and extending 54" min. from rear wall. Rear wall bar s/b 36" long min. and extend from center of water closet 24" min on transfer side and 12" min on opp. side.	30.8	2 grab bars, 42" long, 1 on back wall above water closet, one on side wall closet to water closet. See Grab bars.

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Water Closets				
Clear floor space (no stall)	NA	NA (Stall 60" wide x 56" deep)	30.7.1	30" x 48"
Location	604.2	Centerline s/b 16" to 18" max from nearest sidewall, except that water closet s/b 17" min to 19" max from the side wall in an ambulatory accessible compartment.	30.7.2	Centerline s/b 18" from nearest sidewall, at least 42" from farthest sidewall, and 42" clearance from front of water closet to nearest wall/fixture
Height	604.4	17"-19" a.f.f. to top of seat.	30.7.3	17"-19" a.f.f. to top of seat.
Flush control	604.6 308	Hand operated or mounted (604.6). 15" min. to 48" max reach range (308).	30.7.5	Mounted on wide side no > 44" a.f.f.
Toilet paper dispensers	604.7 309.4	7" min and 9" max in front of water closet measured to centerline of dispenser. Outlet s/b 15" min and 48" max a.f.f. S/not be behind grab bars and be a continuous flow (604.7). Operable parts per 309.4.	30.7.6	Mounted on side wall closest to toilet, centerline of roll s/b min. of 24" a.f.f.
			30.8.5	Dispensers shall not be mounted above grab bars.
Grab Bars				
Grab bar location	609.4 604.5	See Standard Accessible Stalls.	30.8.1	Side grab bar s/b no >12" from interior corner; rear grab bar s/b no > 6" from interior corner.
Grab bar height	609.4	33" – 36" a.f.f. to top of gripping surface.	30.8.2	33" – 36" a.f.f.; tank/flushometer variances of height and length.
Grab bar thickness	609.2	Circular x-sect. outside diameter 1¼" min. to 2" max.; Non-circular x-sect. 2" max. and perimeter of 4" min. and 4.8" max.	30.8.3	1 ¼" – 1 ½" diameter.
Grab bar material	NA	NA	30.8.4	Non-rusting, acid-etched or roughened.
Spacing	609.3	1 ½" between wall & grab bar. Space between grab bars & projecting objects above s/b 12" min.	30.8.3	1 ½" between wall and grab bar. Nothing mounted above.
Sink				
Clear floor space	606.2 305	Forward approach clear floor space of 30"x48"(305.3).	30.9.1 6.3	60" diameter, no more than 19" underneath the sink. 30"x48" forward approach.
Height	606.3	Rim no > 34" a.f.f.	30.9.2	Rim no > 34" a.f.f. Sink min. 17" from wall to front of the sink.
Knee clearance	306.2 306.3	Knee clearance is 9" to 27" a.f.f.; 25" deep max. at 9" a.f.f. or 11" deep min at 9" a.f.f. and 8" deep min at 27" a.f.f. Width of knee clearance s/b 30" wide min (306.3). Toe clearance as part of c.f.s. 17" min – 25" max, 9" high a.f.f., 30" wide (306.2).	30.9.3	27" min. from floor to underneath; 8" from front to back (deep). Minimum of 9" of toe clearance. Toe clearance as part of c.f.s. a max. of 6" of the 48" of c.f.s. may extend into the toe space.
Depth	NA	NA	30.9.4	Not > 6 ½".
Piping	606.5	Insulated, protected, no sharp/abrasive surfaces.	30.9.5	Recessed, insulated or guarded.
Faucets	606.4 309	Operable w/one hand w/max 5 lbs force required (309). Metering faucets must be open 10 secs min (606.4).	30.9.6	Operable w/one hand. If self-closing valves, must be open min. 10 seconds
Urinals				
Required #	213.3.3	Where more than 1 urinal provided, at least one s/b accessible.	30.10	If one or more urinals, at least one must be accessible.
Height	605.2	Stall or wall hung; rim maximum of 17" a.f.f.; 13½" deep from outer face of rim to back of fixture.	30.10.1	Stall or wall hung; elongated rim; maximum of 17" a.f.f.
Clear floor space	605.3 305	Forward approach clear floor space of 30"x48" (305.3).	30.10.2 6.3	Front approach 30"x48" and 60" diameter turning radius (6.3); 29" clearance between urinal shields (30.10.2).
Flush control	605.4 308 309	Hand operated or automatic (309.4); 15" min – 48" max a.f.f. reach range (308).	30.10.3	Hand operated, automatic; no > 44" a.f.f.

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Mirror				
Height	603.3	If over lavatory/countertop, bottom of mirror no > 40" a.f.f.; if not over lav/counter no > 35" a.f.f. if full length, top s/b 74" min a.f.f.	30.11	Bottom of mirror no > 40" a.f.f.
Dispensers				
Location	205	S/b located on an accessible route.	30.12	One of each device w/in zone of reach
Operation	309.4	Operable w/one fist; no > 5 lbs force.	30.12 39.5	Operable w/one fist; no > 5 lbs force (39.5).
Height	308.2 308.3	Side (308.3) and forward (308.2) reach 15" – 48" a.f.f.	30.12	42" max. a.f.f.
Controls and Receptacles				
Location	205	S/b located on an accessible route.	30.13 39.00 6.5, 6.6	One of each on an accessible route (30.13); all controls s/b at least 18" from an interior corner (39.00); forward reach 15"–48" a.f.f. (6.5); side reach 9"–54" (6.6).
Height	308.2 308.3	Side (308.3) and forward (308.2) reach 15" – 48" a.f.f.	6.5, 6.6	Forward reach max. of 48" a.f.f. Side reach max. of 54" a.f.f..
Operation	309.4	Operable w/one fist; no > 5 lbs force.	30.13 39.5	Operable w/one fist; no > 5 lbs force (39.5).
Clear floor space	305	Forward approach clear floor space of 30"x48" (305.3).	6.4 39.2	Minimum 30"x48" (6.4, 39.2).
Signage				
Location	703.4	Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character. Latch side of door. See exceptions.	41.2.1	Wall adjacent to latch side of door or nearest adjacent wall. Reach allowance s/b within 3" of signage.
Height	703.4	Tactile characters on signs s/b 48" min. a.f.f. from baseline of lowest character and 60" max. a.f.f. to baseline of highest character.	41.2.2	60" a.f.f. to centerline of sign.
Character proportion	703.5.4	Characters s/b selected from fonts where the width of the uppercase letter "O" is 55% min and 110% max of the height of the uppercase letter "I".	41.3	Width to ht. (3:5-1:1) and stroke-width- height (1:5-1:10).
Character height	703.5.5	Sized according to viewing distance. See Table 703.5.5.	41.4	Sized according to viewing distance.
Brailled characters	703.3 703.4	Grade 2 Braille. Domed or rounded shape (703.3). See Table 703.3.1 for Braille dimensions. Height (703.4).	41.5	Letters/numbers raised 1/32"; upper case; Grade 2 Braille; raised characters 5/8" but no > 2".

Brookfield Elementary School Accessibility Assessment Photos



Photo Brookfield Elementary 1



Photo Brookfield Elementary 2



Photo Brookfield Elementary 3



Photo Brookfield Elementary 4



Photo Brookfield Elementary 5



Photo Brookfield Elementary 6



Photo Brookfield Elementary 7



Photo Brookfield Elementary 8



Photo Brookfield Elementary 9



Photo Brookfield Elementary 10



Photo Brookfield Elementary 11



Photo Brookfield Elementary 12



Photo Brookfield Elementary 13



Photo Brookfield Elementary 14



Photo Brookfield Elementary 15

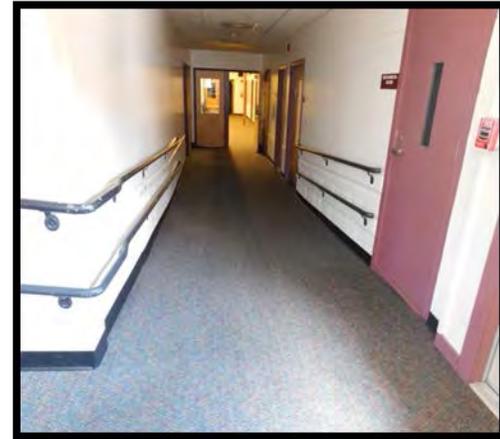


Photo Brookfield Elementary 16

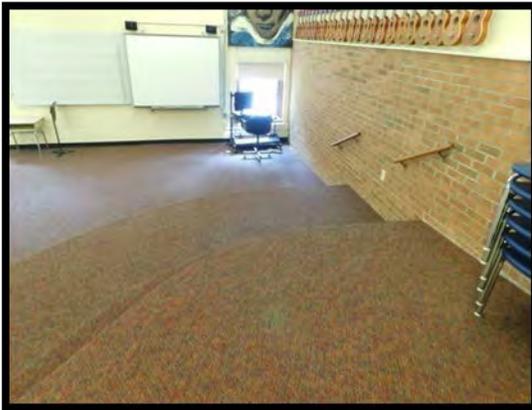


Photo Brookfield Elementary 17



Photo Brookfield Elementary 18



Photo Brookfield Elementary 19



Photo Brookfield Elementary 20



Photo Brookfield Elementary 21



Photo Brookfield Elementary 22



Photo Brookfield Elementary 23



Photo Brookfield Elementary 24



Photo Brookfield Elementary 25



Photo Brookfield Elementary 26



Photo Brookfield Elementary 27



Photo Brookfield Elementary 28



Photo Brookfield Elementary 29



Photo Brookfield Elementary 30



Photo Brookfield Elementary 31



Photo Brookfield Elementary 32



Photo Brookfield Elementary 33



Photo Brookfield Elementary 34

BANISTER TOWN COMMON/MALL

Function and Description of Facility and Programs: The historic town common is not only a town landmark but also serves as a passive recreational area, green space, and location for civic events and activities. The common contains a gazebo, 7 benches (2 fixed, 5 moveable), a drinking fountain, monuments/memorials, lawn area, and a paver walkway to the gazebo.



Responsible Party: Board of Selectmen

General Description or Obstacle Which Limits Mobility or Access: The gazebo is not accessible to those with mobility limiting disabilities as the walkway to the gazebo has an uneven and unlevel surface and has an abrupt change in level surface of more than 2" at the top of the "ramp" into the gazebo. The paver Walkway/ramp is also overgrown with weeds and grass further restricting access. The ramp into the gazebo has railings on one side only, which do not fully comply with ramp railing standards. The walkway and ramp have non-compliant running slopes. The fixed benches do not have a wheelchair companion space. The sole drinking fountain is not accessible due to its height and configuration.

Banister Town Common/Mall Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
<p><u>Accessible Route to Gazebo</u> The accessible route to the gazebo has sunken, heaved, and uneven pavers creating an uneven and unlevel surface. The “walkway” approach has a running slope that varies up to 7%. .</p>	402 403	20 22	Reconstruct the walkway so that it has a compliant width (48” wide with minimum 36” clear width) and compliant slope requirements (2% maximum cross, 5% maximum running) with no unbeveled abrupt changes in level surface of more than ¼” to the gazebo. Construction options include compacted stone dust, pavers, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant.	2	3	N	Up to \$15,000
<p>The ramp to the gazebo has a running slope of up to 11.0%. A railing is provided on one side only with the lower railing being 1” too high.</p>	405.2 505.4	24.2 24.5	Reset the existing railing so that the lower railing is between 18” – 20” a.f.f. to the top of the railing and the upper railing is 34” – 38” a.f.f. to the top of the railing. Provide an additional paired railing at the opposite side of the ramp which does not have a railing.	2	3	N	Up to \$1,500
<p><u>Benches</u> There are 9 benches on the common (2 fixed, 7 moveable), none of which are on an accessible route nor have a wheelchair area.</p>	402 403 221.2 802.1	20 22 14 19	Relocate one moveable bench so it is adjacent to the walkway to the gazebo. Create a wheelchair area next to one of the fixed benches. Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. The wheelchair space should be 36” wide x 60” deep per wheelchair. If a front/rear approach, the depth can be reduced to 48” as opposed to 60” for a side approach.	2	3	N	\$100
<p><u>Drinking Fountain</u> The drinking fountain is non-compliant as it is not “hi-low”, lacks knee clearance and exceeds maximum height requirements for accessibility.</p>	211 306 602	36.0	Discontinue use of the fountain or provide a compliant “low” drinking fountain on an accessible route with at least 27” knee clearance; 30” clear width; a spout height of no greater than 36” a.f.f.; and operable controls (operable w/one fist and no > 5 lbs. operating force).	4	3	L	\$0 to \$3,500
<p>See Photos Banister 1 - 3.</p>							

Total up to \$20,100

Banister Town Common/Mall Accessibility Assessment Photos



Photo Banister 1



Photo Banister 2



Photo Banister 3

MILL STATION PARK

Function and Description of Facility and Programs: Picnic and viewing area overlooking railroad tracks.



Responsible Party: Recreation Commission

General Description or Obstacle Which Limits Mobility or Access: The Mill Station Park area is wholly compliant with the exception of accessible signage for the designated accessible parking space. Running slopes, cross slopes, parking space and access aisle widths and picnic tables are all accessible compliant.

Mill Station Park Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
Parking There is no accessible signage for the designated parking space.	502	23.6	Provide accessible signage. Signage must be set such that the signage height should be a minimum of 60" high at the bottom (2010 ADAAG Standards) and a maximum of 96" at the top (MAAB 521 CMR) and located no more than 10' away from and in front of the space.	2	2	I	\$50

BROOKFIELD TOWN BEACH

Function and Description of Facility and Programs: The Brookfield Town Beach consists of parking, a boat launch area, a handicapped accessible portable toilet, a town beach and a “walkway” to the beach.



Responsible Party: Recreation Commission

General Description or Obstacle Which Limits Mobility or Access: The “walkway” to the beach is angular stone which is loose and unstable and is also severely rutted. In addition the running slope varies up to 12% from the parking area to the beach. An existing bench is not on an accessible route. The “accessible” portable toilet is not on a level surface and has a change in level surface of 2” to enter the structure.

Brookfield Town Beach Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
The portable toilet is not on a level surface (2.8%) and has a greater than 2" change in level surface from the concrete to the portable toilet to get inside. <i>See Photo Town Beach 1.</i>	403.4	22.4.	Reconstruct the pad to be level (2.0% slope or less) or relocate the portable toilet. Modify the entrance into the portable toilet to eliminate the 2" change in level surface.	2	3	I	\$100 to \$500
No accessible route exists to the bench. <i>See Photo Town Beach 2.</i>	402	19.0 20.0	Option 1: Construct an accessible route (maximum 2% cross slope, 5% running slope) to the bench with a wheelchair area compliant with width (60" x 36") and slope (no > 2%) requirements. Option 2: Relocate bench so it is near an accessible route.	2	3	L	\$0 to \$500
The approach to the beach has running slopes varying from 8% to 12%, has excessive rutting, and consists of an unstable stone surface. <i>See Photo Town Beach 3.</i>	402	19.0 20.0	Construct an accessible route compliant with width and slope (2% cross, 5% running) requirements or a ramped approach of no greater than an 8.3% running slope with paired railings (34" – 38" top; 18" – 20" bottom) and 48" between railings.	2	3	L	Up to \$35,000

Total up to \$36,000

Town Beach Accessibility Assessment Photos



Photo Town Beach 1



Photo Town Beach 2



Photo Town Beach 3

LEWIS FIELD

Function and Description of Facility and Programs: Lewis Field is a multi-purpose recreational facility near the center of town which consists of a basketball court, soccer field, 2 baseball fields, a pavilion, a concession building, a playground, and a portable toilet.



Responsible Party: Recreation Commission

General Description or Obstacle Which Limits Mobility or Access: There are no accessible routes of travel to any of the playing fields, pavilion, concession building, playground or portable toilet. There is no accessible route of travel around and within the playground. The designated “accessible” parking spaces are non-compliant as they are on a sloped grass surface.

Accessibility Requirements:

General

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

Walkways

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

Playgrounds

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

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

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

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

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

ASTM F 1951 establishes a uniform means to measure the characteristics of surface systems in order to provide performance specifications to be used when selecting materials for use as an accessible surface under and around playground equipment (not the accessible route). Surface

methods that comply with this standard and are located in the use zone must also comply with ASTM F 1292 for “impact attenuating” to provide a safe fall area around play equipment.

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

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

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

Proposed Changes in 521 CMR

59.4 Accessible Routes

An *accessible route* shall be provided to reach playground equipment and around the *perimeter of the playground for the following play components:*

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

Lewis Field Accessibility Assessment

General Description of Obstacle	2010 ADAAG	MAAB 521 CMR	Type of Action to be Taken	P	F	TF	Cost Estimate
<p>Parking The 4 designated “accessible” spaces are wholly non-compliant. The signage is 4” to 7” too low. The parking is located on grass and on a sloped terrain. No formal striping exists. See Photo Lewis Field 1.</p>	208 502 703.7.2 302 206	23.0 20.0	Reconstruct parking (at least 2 spaces) to comply with slope requirements of no greater than 2.0% and surface requirements of firm, stable, and slip resistant. Provide striping for parking spaces and access aisles such that at least one is van accessible (11’ wide - 5’ access aisle or 8’ wide – 8’ access aisle) and the other 2 car accessible (8’ wide – 5’ access aisle). Provide signage (one van) at a height of at least 60” a.f.f. to sign bottom nor more than 96” to the sign top. A compliant accessible route must be provided to the parking spaces.	1	3	I	Up to \$7,500
<p>Portable Toilet Although the portable toilet is a larger accessible unit, it is not on an accessible route (grassed, ruts, tree roots, etc.) and the access to the floor of the portable toilet has a greater than 1½” change in level surface to the ground. See Photo Lewis Field 2.</p>	402 403 404.2	20 22 26.10	Either relocate the portable toilet or create an accessible route to the toilet facility. Modify the ground surface at the site to be level and to have a beveled or smooth transition from the ground into the portable toilet structure.	3	3	I	\$0 to \$1,000
<p>Accessible Routes Accessible routes of travel do not exist for the soccer field, basketball court, 2 baseball fields including dugouts, pavilion, concession building, playground, and playground benches. There exists a 3” change in level surface from the ground level to the pavilion. In addition, wheelchair designated spaces are required next to bleachers and other viewing areas. See Photos Lewis Field 3 - 6.</p>	402 403	20 22	Construct accessible routes compliant with width and slope (2% cross, 5% running) requirements to the soccer field, basketball court, 2 baseball fields and dugouts, pavilion, concession building, and to and around the playground and to the playground benches. There should be no greater than a ¼” change in level surface along the route or up to a ½” to access a structure or facility if beveled with a slope of no greater than 1:2. Wheelchair viewing spaces (60” x 36” for a side approach) should also be provided at each bleacher seating, viewing area and at the playground benches. Construction options include compacted stone dust, asphalt or similar surfaces that meet the requirement of stable, firm, and slip resistant. Costs will vary depending on material used.	1	3	L	\$5,000 to \$15,000
<p>Baseball Field Gates The existing gates (6) to the baseball fields do not comply with the 2010 ADA Standards for a smooth surface within 10 inches of the ground on the push side for the full width of the gate.</p>	404.2	NA	Remove gates or install smooth plating at base of gate.	1	2	N	\$300
<p>Door Hardware The concession booth door and pavilion door have non-compliant knob hardware.</p>	404.2	26.11	Replace knob-style hardware with door hardware that is easy to operate with one hand and that does not require tight grasping, tight pinching of the wrist to operate.	2	2	N	\$100
<p>Concession Booth Window Height The concession booth windows/service counters are 5” to 9” too high for that</p>	904.5	17.6.2	Create a 36” wide counter no higher than 34” a.f.f. below the existing window opening.	2	3	I	\$100

Town of Brookfield Self-Evaluation and Transition Plan

<p>of a food service counter. See Photo Lewis Field 7.</p>							
<p><u>Interior of Playground Accessible Route</u></p>							
<p>No accessible route exists within the play area to ground level components or to the primary play structure. The existing surface is pea stone, which is non-compliant for a route of travel. See Photo Lewis Field 8.</p>	402	19.7	<p>Construct an accessible route and to the play structure elements and to the ground components (5' wide minimum). The accessible route must be stable, firm, and slip resistant. Construction options include compacted stone dust, asphalt, concrete, poured in place products, etc. Costs will vary depending on product used. Play area ground surfaces must comply with ASTM F 1951 and ASTM F 1292.</p> <p>An accessible play element and a ground component should be added to the play area.</p>	2	3	L	<p>Up to \$26,000</p>
	403	20.0					
	1008.2	22.0					

Total up to \$50,000+

Lewis Field Assessment Photos



Photo Lewis Field 1



Photo Lewis Field 2



Photo Lewis Field 3



Photo Lewis Field 4



Photo Lewis Field 5



Photo Lewis Field 6



Photo Lewis Field 7



Photo Lewis Field 8

TOWN CENTER SIDEWALKS AND CURB RAMPS

Function and Description of Facility and Programs: The assessment of public sidewalks, curb ramps, and crosswalks within the town was limited to portions of Central Street, the town common area, and segments along Route 9. Although the jurisdiction of the sidewalks and curb ramps along Route 9 fall within the jurisdiction of the Commonwealth, they still were assessed for accessibility compliance. Walkways or sidewalks should be not less than 48" wide with a minimum 36" of unobstructed travel (clear width). If the slope of the natural topography is greater than 1:20 (5%), a ramp is not required. Whenever a walkway crosses or joins streets, public ways, driveways, or parking lots, it must blend to a common level with a slope no greater than 1:20 (5%) or a curb cut shall be installed. Any raised islands in crossings shall be cut through level with the street or have curb cuts at both sides and a level area at least 48 inches long between the curb cuts in the part of the island intersected by the crossings.



In summary, the 2010 ADA and MA 521 CMR Standards for curb ramps are generally as follows:

- 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 not allowed. Crossings entering into private driveways or adjoining streets are not allowed.
- The maximum running slope of a curb ramp shall be 1:12 (8.3%).
- The maximum cross slope of a curb ramp shall be 1:50 (2%).
- The maximum slope of a flared side shall be 1:10 (10%).
- The minimum width of a curb cut shall be 36", exclusive of flared sides.

- Transitions from curb cuts to walks, gutters, or streets shall be flush or free of changes in level greater than ¼" or between ¼" and ½" if beveled.
- Detectable warnings with truncated domes are required under the 2010 ADA Standards.
- Clear width (36") and head room (80") requirements must be maintained on sidewalks and accessible routes.
- 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.

Responsible Party: Highway Department and Board of Selectmen (town owned public ways)

General Description or Obstacle Which Limits Mobility or Access:

As noted, the assessment of public sidewalks, curb ramps, and crosswalks within the town was limited to Center Street, the town common area, and segments along Route 9. With the exception of segments of sidewalk along Route 9 (in proximity of the Clambox Restaurant) and Central Street, requirements are generally met. The Route 9 sidewalks and isolated segments on Central Street had severe deterioration and abrupt changes in level surface making maneuverability impossible. A number of street intersections involve non-compliant curb ramps and/or crosswalks due to lack of detectable warning strips, lack of a curb cut, and excessive slopes. In addition, on Central Street there were at least three transition areas to a driveway where the cross slope exceeded the maximum (2.0%) allowed under both 521 CMR and the 2010 ADA Standards.

Curb Ramps and Crosswalks

Location	Photo	Detectable Strips	Compliant Curb Cut/Ramp	Compliant Slope	Top Level Surface
Central St. & Sherman St.	CR1 – CR3	No (3)	Yes. See (a) below.	No (10.2%)	No (13.1%)
Central St. & Prouty St.	CR-4	No (2)	Yes	Yes	Yes
Central St. & Pleasant St.	CR-5	No (2)	No (3" granite curb on Town Hall side)	Yes	Yes
Central St. @ Gables	CR-6	No(1)	No (5" asphalt curb on Gables side)	NA	NA
Central St. @ School	CR-7	No (3)	Yes. See (b) below.	No (20.4% and 9.2%)	Yes
Central St. & Rte. 9	CR-8	None at Rte 9 crossing (2)	No. See (c) below.	NA	NA
Prouty St. & Rte. 9	CR-9	No(2)	No (> 1" granite curbing on 1 side)	Yes	Yes
Prouty St. & Rte. 148	CR-10	No (2)	Yes	No (> 10% on Prouty side)	Yes
Bannister Town Common	CR11–CR14	No (14)	Yes (13). See (d) below.	Yes (13)/ No (1) – See (e).	Yes

Additional Comments:

- a) Accumulation of leaves and debris at base of curb ramp at Central Street and Sherman Street.
- b) Change in level surface of more than 1" at Central St. curb ramps at Brookfield Elementary School.
- c) The crosswalk at Central Street crossing Route 9 to Maple Street is non-compliant as it lacks curb ramps, detectable warning strips and the crosswalk begins/ends at a parking lot on the Maple Street side and in the street on the Central Street side.
- d) The crosswalk from Bannister Common across Common Street is non-compliant as it ends in the

street and not at the sidewalk.
 e) Curb ramp on River Street side (crossing to Common/Central Street) has a running slope that varies from 8.3% to 9.8%.

Sidewalks

Location	Photo	Compliant Width	Compliant Slope	Deteriorated/ Uneven Surface	Protruding Object
Central: Sherman to Pleasant	SW-1	No. See (a)	Yes	Yes	No
Central: At 24 Central Street	SW-2, 3	Yes	No. See (b)	Yes	No
Central: At 25 Central Street	SW-2, 3	Yes	No. See (b)	Yes	No
Central: At 28 Central Street	SW-2, 3	Yes	No. See (b)	Yes	No
Central: Near Gables/School	SW-4	No. See (c)	Yes	Yes. See (c)	No
Prouty: Central to Route 9		No. See (c)	Yes	Yes. See (c)	No
Prouty: Rte 9 to Rte 148/Lewis F.	SW-5	Yes	Yes	Yes	No
Central: Town Hall to Common		Yes	Yes	Yes	No
Bannister Town Common		Yes	Yes	No	No
Rte 9: Quaboag St. to Mill St.	SW6-10	No. See (d)	No. See (d)	Yes. See (d)	Yes. See (d)

Additional Comments:

- a) Sidewalk width is less than 36" in spots.
- b) Greater than a 9% cross slope at driveway (maximum 2% allowed).
- c) Less than 32" of paved width and severe sidewalk deterioration resulting in > 1" abrupt changes in level surface and uneven and unlevel surface.
- d) Assessment area applies to sidewalk in vicinity of houses #38 - #48. Severe areas of deterioration and abrupt changes in level surface of up to 3" due to telephone pole installation and poor quality restoration; telephone poles and mailboxes restrict clear widths to less than 24" and in one instance to 12"; mailboxes serve as a protruding object into the accessible route of travel; sidewalk past house #38 and adjacent to stone wall is restricted to roughly 28" and lacks asphalt in places.

Town Center Sidewalks and Curb Ramps Accessibility Assessment

<u>General Description of Obstacle</u>	<u>2010 ADAAG</u>	<u>MAAB 521 CMR</u>	<u>Type of Action to be Taken</u>	<u>P</u>	<u>F</u>	<u>TF</u>	<u>Cost Estimate</u>
Curb Ramps	303 403 405.2 406.2 406.4 406.3 406.6 705	21 22	Compliant curb ramps should be in place at all crosswalk locations. Crosswalks and curb ramps must intersect with a sidewalk (not street or parking lot). The running slopes of the curb ramps should not exceed 8.3% (405.2, 21.3). The transition to the road surface should be no greater than ¼" or up to ½" if beveled (303, 21.4). The minimum width of the curb ramp should be 36" (406.4, 21.6) with a maximum slope of 10% for flared sides, if any (406.3, 21.7). Detectable warning strips with truncated domes should be installed at the base of the curb ramp (705).	2	3	N	Up to \$35,000
Sidewalks	403	22	Sidewalks should have a cross slope of no more than 2%. Level surface changes should be no more than ¼" or up to ½" if beveled. The sidewalks should be not less than 48" wide with 36" clear width (Exception: reduction to 32" for no > than 24" if no less than 48" apart). Surface must be stable, firm, and slip resistant.	2	3	N	Up to \$45,000

Town of Brookfield Self-Evaluation and Transition Plan

Protruding Objects	204 307.2	20.6.1	All items (mailboxes) that protrude more than 4" into the sidewalk between a height of 27" and 80" should be removed	2	1	N	\$0
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Total up to \$80,000

Town Center Sidewalks and Curb Ramps Accessibility Assessment Photos

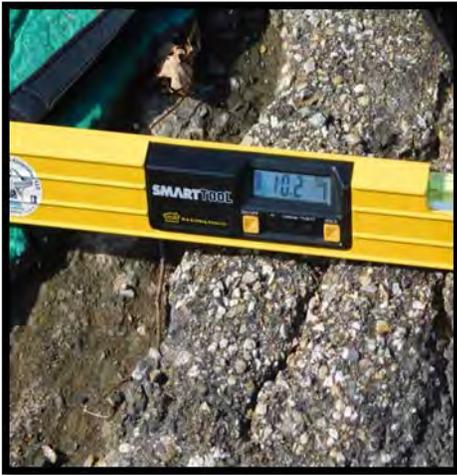


Photo: CR 1



Photo: CR 2



Photo: CR 3

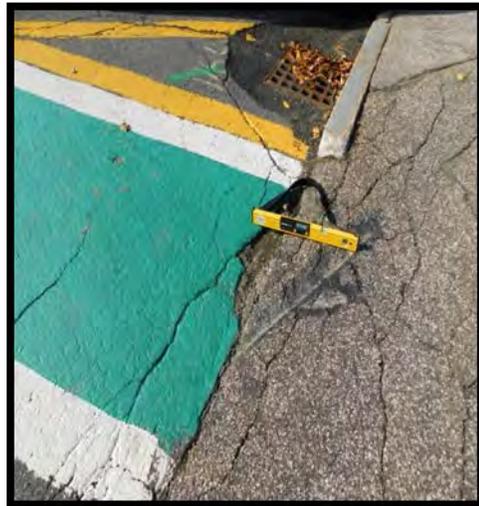


Photo: CR 4

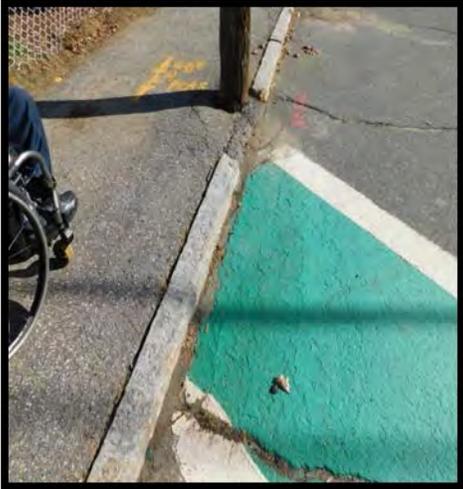


Photo: CR 5



Photo: CR 6



Photo: CR 7



Photo: CR 8



Photo: CR 9



Photo: CR 10



Photo: CR 11



Photo: CR 12



Photo: CR 13



Photo: CR 14



Photo: SW 1

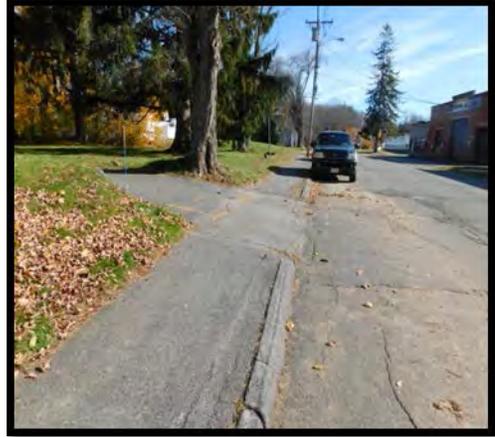


Photo: SW 2



Photo: SW 3



Photo: SW 4



Photo: SW 5



Photo: SW 6



Photo: SW 7

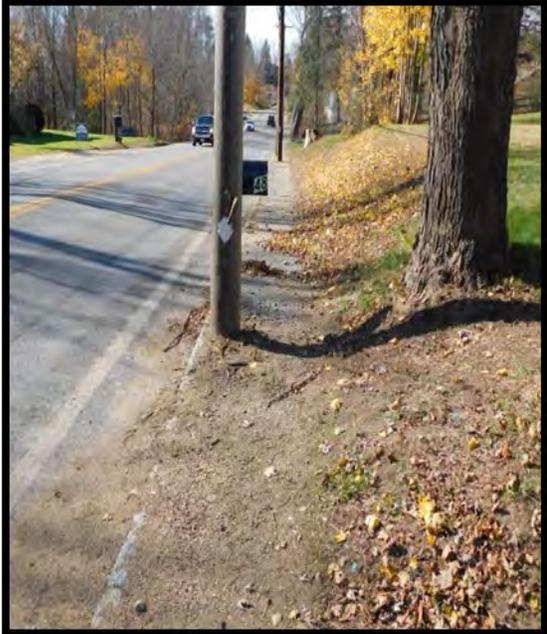


Photo: SW 8



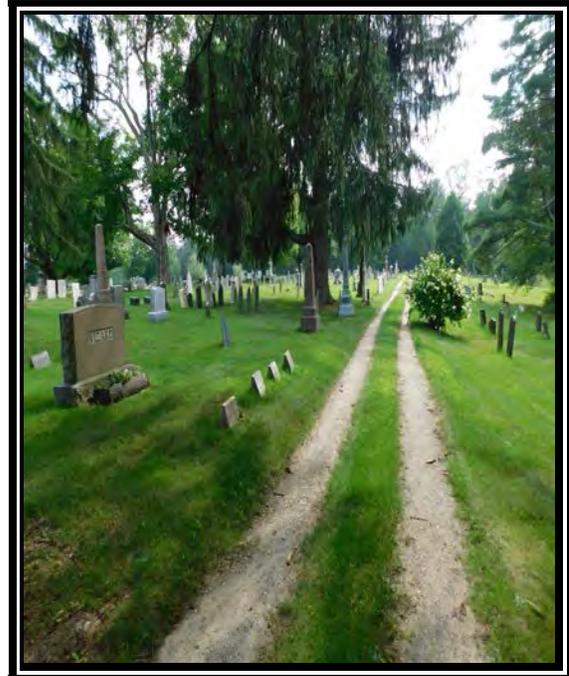
Photo: SW 9



Photo: SW 10

BROOKFIELD CEMETERY

Function and Description of Facility and Programs: Burial grounds for the deceased. No formal “public” services or programs occur at these sites.



Responsible Party: Cemetery Commission

General Description or Obstacle Which Limits Mobility or Access: There is no dedicated public access or accessible routes to this area. The cemetery does not have walkways within its interior and is limited solely to vehicular access via a road surface. As a result the cemetery and its gravestones can be viewed from the inside of a motor vehicle. If there are certain areas of the cemetery or gravestones that are unique or of special interest, then a brochure could be developed identifying these, inclusive of a photograph and narrative and made available at town hall or placed in an outdoor brochure holder at the cemetery entrance. No physical modifications are required at the present time.

APPENDICES

Appendix A: Survey Form

Appendix B: Grievance Procedure

Appendix C: Reasonable Accommodations Policy

Appendix D: Reasonable Accommodations Request Form

Appendix E: Public Notice

Appendix A: Survey Form

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

9. 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.

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

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

12. Employment Practices.

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

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

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

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

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

Appendix B: Grievance Procedure

SAMPLE

Town of Brookfield
Grievance Procedure Under
The Americans With Disabilities Act

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

The Town of Brookfield’s Personnel Policy governs employment-related complaints of disability discrimination. The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem.

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

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

ADA Coordinator
c/o Board of Selectmen’s Office
Town Hall – 6 Central Street
Brookfield, MA 01506

Phone: 508.867.2930

Fax: 508.867.50911

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

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

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

Within 15 calendar days after receipt of the appeal, the Brookfield Selectboard or designee will meet with the complainant to discuss the complaint and the possible resolutions.

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

All written complaints received by the Brookfield ADA Coordinator, appeals to the Brookfield Selectboard and responses from these two offices will be retained by the Brookfield Selectboard for a at least 3 years.

Appendix C: Reasonable Accommodation Policy

SAMPLE

Town of Brookfield

Reasonable Accommodation Policy

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

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

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

ADA Coordinator

c/o Board of Selectmen's Office
Town Hall – 6 Central Street
Brookfield, MA 01506

Phone: 508.867.2930

Fax: 508.867.50911

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

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

Appendix D: Reasonable Accommodation Request Form

TOWN OF BROOKFIELD
REQUEST FOR REASONABLE ACCOMMODATION FORM

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

TO BE COMPLETED BY REQUESTOR

Print Name _____ Date _____

Phone (work) _____ (personal) _____

City Employee Applicant for Employment Other (please explain) _____

Dept/Div _____ Job Title _____

APPLICANT

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

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

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

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

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

EMPLOYEE

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

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

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

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

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

Requestor's Signature _____

Date _____

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

Appendix E: Public Notice

SAMPLE

Town of Brookfield
Public Notice Under
The Americans With Disabilities Act

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

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

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

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

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

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

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

ADA Coordinator
c/o Board of Selectmen’s Office
Town Hall – 6 Central Street
Brookfield, MA 01506

Phone: 508.867.2930
Fax: 508.867.50911

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