



City of Attleboro, Massachusetts

PART A – Executive Summary

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Introduction

The Institute for Human Centered Design (IHCD) has prepared this report on behalf of the City of Attleboro as part of the City's on-going effort to assess the current level of Americans with Disabilities Act (ADA) compliance in programs, services and activities and City-owned facilities. In preparing for this report, IHCD teams surveyed the City's portfolio of facilities and properties that were included in the Request for Proposal.

The building facility survey set includes eight (8) public schools and 14 public buildings – including the City Hall and City Hall Annex, one (1) police station, two (2) fire stations, one (1) library, one (1) DPW facility, two (2) historic buildings, one (1) recreation center and six (6) additional municipal buildings. The outdoor facility set includes eight (8) parks, playgrounds and open spaces. Additionally, four (4) City parking garages and lots are included. The accessibility survey includes spaces where the City offers programs, services and activities to members of the public.

IHCD has submitted separate reports for each facility that was surveyed. To assist in prioritizing accessibility improvements to ensure compliance with Title II of the ADA, each of the facility reports includes an overview that identifies the most substantial accessibility issues and order of magnitude cost estimates for corrective action. Additionally, a detailed catalog that supplements the ADA Self-Evaluation narrative is also included. The catalog provides element-by-element photos of compliance issues, location and measurements – when applicable – at each assessed facility accompanied by recommendations and cost estimates for addressing each accessibility issue.

In addition, a spreadsheet of priorities for corrective action organized by type of building or location and including order-of-magnitude costs was provided to the City. When the City presents findings and recommendations to the community and receives feedback, some recommendations may need cost adjustment. These spreadsheets are a capital planning and budgeting tool – the “ADA Transition Plan” – and are intended as a long-term resource to update as work is completed. The City should make a good faith effort to complete the work in a reasonable time (IHCD recommends a three (3) to five (5) year period). The ADA regulations do not set out precise timeframes to complete the work; IHCD bases the timeframes on conversations with the Department of Justice (DOJ) and their Project Civic Access settlement agreements with municipalities.

Together, the ADA Self-Evaluation and ADA Transition Plan will enable the City to make substantial progress in meeting its ADA responsibilities. The recommendations for corrective action that apply to policies and procedures of the ADA Self-Evaluation are not included in the ADA Transition Plan since the Transition Plan spreadsheet is limited to capital accessibility issues. Policy and procedure recommendations, covered in detail in the provided *Part B – Evaluation of Non-discriminatory Policies & Practices in Programs, Services & Activities report*, are a blueprint for meeting compliance responsibilities other than capital expenses. The ADA administrative requirements help ensure that the needs of people with disabilities are addressed in all services, programs and activities that the City offers.

Most of the City-owned facilities that have been recently altered or renovated are substantially accessible and meet most architectural requirements. Continued facility alterations, and/or renovations will significantly reduce barriers and help realize the City's commitment to inclusion and equal rights. In the meantime, the greatest problems posed by existing barriers can be ameliorated by establishing policies and procedures to accommodate members of the community with disabilities. It is worth noting that the City has taken several significant steps in this direction:

- The City of Attleboro has hired a consultant (IHCD) to undertake its ADA self-evaluation (as the basis for the City's Transition Plan).
- The City of Attleboro has an ADA Coordinator in place.
- The City provides an accessibility Notice statement related to digital accessibility on the Attleboro website.

IHCD's review and recommendations of City-owned facilities is based on compliance with the 2010 ADA Standards if an element or elements are not compliant with the 1991 ADA Standards and/or 521 CMR of the Massachusetts Architectural Access Board (MAAB). Best practice and inclusive design recommendations are also provided for each property. Inclusive design recommendations include elements that are *not* required in the accessibility standards, but may create enhanced experiences for all users.

Many key facilities are generally usable by people with disabilities but are not in full compliance with current accessibility requirements. The City Hall, for instance, provides access to many programs and can be accessed by most people because the building features a largely accessible entrance and has accessible routes through the interior of the building. Yet some of the key areas, such as the large Council Chambers have accessibility issues. The Council

Chambers room is lacking an assistive listening system. In addition, two (2) service counters in the building lack a compliant 36-inch high max. portion, a key component to access some of the services provided by the City. The Council on Aging is another example of a facility that provides access to most programs, however both of the aforementioned facilities lack fully accessible toilet rooms, which many individuals with mobility disabilities require.

Facilities that are more difficult to access by people with disabilities include the Police Station and the Recreation Center in the Armory. At the Police Station, the entrance to the main lobby is not accessible because it is up a set of stairs and a directional sign and information about gaining access via the locked secondary entrance is not provided. At the Recreation Center, accessible entrances to the building (on the lower level and main level) are kept locked during business hours and there is no intercom at these doors.

The City may comply with the requirements of Title II of the ADA through means such as reassignment of programs or services to accessible buildings or delivery of services at alternate accessible sites. The City may also comply with the requirements by renovation or alteration of existing facilities and/or construction of new facilities, or any other methods that result in making the City's services, programs or activities readily accessible to and usable by individuals with disabilities. Note that a public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with its Title II obligations.

In choosing among available methods for meeting the requirements of the ADA, the City of Attleboro shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

In order to comply with the program accessibility obligations, the City of Attleboro should consider:

1. Relocation of its programs, services and activities within a current facility.

Often the simplest solution is for the City to use what it already has in place. IHCD strongly recommends the relocation of programs, services and activities to accessible locations within current facilities when possible.

2. Relocation of its programs, services and activities to another facility.

When it is not possible to relocate them within the current facility, program, services, and

activities should be relocated to an accessible facility.

3. Renovation/alteration of City facilities to ensure access to programs, services and activities.

The City may consider the renovation of its facilities or the provision of new accessible facilities to ensure that the programs, services and activities are offered in the most integrated setting possible.

Note that any corrective actions needed to ensure program accessibility must comply with the requirements of the 2010 ADA Standards and/or 521 CMR.

Furthermore, when completing alterations/renovations, keep in mind that an alteration that decreases the accessibility of a building below the requirements for new construction at the time of the alteration is prohibited.

To determine which buildings must be made accessible, the City should consider:

- How to provide the program in the most integrated setting appropriate;
- The locations where the activities are offered;
- Which facilities are accessible and to what extent.

Key Recommendations for Municipal Facilities:

- Ensure there is an accessible route from all arrival points to those areas in the building where public programs, services and activities are provided. The Parks and Forestry building entrance door has hardware that is not operable with a closed fist. Accessible entrances to the Recreation Center – Armory are kept locked during business hours and no intercom is provided at these doors.
- If parking is provided, ensure fully accessible parking spaces are provided. There are issues with accessible parking at multiple locations such as lack of or noncompliant accessible parking spaces, access aisles and signs. For example, the Attleboro Public Library and Council on Aging lack signage designating the van accessible parking space. A van accessible parking space is not provided at the Parks and Forestry building, the Wastewater Department or the Police Station. Access aisles at accessible parking spaces at the Police Station are not compliant.

- Ensure that fully accessible toilet rooms are provided in the building. Where it is technically infeasible to provide accessible multi-user toilet rooms, provide an accessible single-user toilet room in the same area as the existing multi-user toilet rooms.
- Ensure that where programs, services or activities are offered there is a sufficient number of accessible features (accessible counters, accessible work surfaces, etc.). For example, service counters are not compliant at the Water Department or Attleboro Public Library.
- If audible communication is integral to the use of the space, provide a compliant assistive listening system. This should be a priority at the Attleboro Public Library (Balfour Room), City Hall (Council Chamber) and the Fire Department on West Street (Meeting Room).
- Ensure that those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities are maintained in operable working condition (e.g., elevators or automatic door openers). For example the lift in the City Hall Annex lacks controls that are independently operable.

Key Recommendations for Public Schools:

- Ensure that fully accessible toilet rooms are provided in each building. As mentioned before, where it is technically infeasible to provide accessible multi-user toilet rooms, provide an accessible single-user toilet room in the same area as the existing multi-user toilet rooms.
If there is a toilet room in unique rooms such as a nurse's office, ensure that a fully accessible toilet room is provided. This includes maintaining the clear floor space (free of any stored items) at all fixtures.
- Ensure that accessible sinks (with knee and toe clearance) are provided in at least one classroom per grade, if a sink or sinks are provided in those rooms. If accessible sinks are already provided, ensure they have insulated pipes.
- Ensure accessible work surfaces are provided in at least one classroom per grade. Furthermore, ensure that specialized classrooms (e.g., labs, art rooms, etc.) have accessible work surfaces.
- Ensure that all elements in the classrooms are within reach range (e.g., emergency showers, first aid kits and dispensers).
- If audible communication is integral to the use of a space, provide a compliant assistive listening system.

Key Recommendations for Parks, Playgrounds and Open Spaces:

- Ensure there is an accessible route to all elements in the park/outdoor space (baseball fields, basketball courts, playgrounds, picnic areas, toilet facilities, etc.). For example, the following image uses yellow lines to show proposed accessible routes between elements at Hayward Field:



- Ensure there is a clear floor space adjacent to the bench at team seating areas and spectator seating areas at the baseball fields, basketball courts, etc.
- Ensure that accessible routes are provided to and around playgrounds; in addition, ensure that an impact-attenuating accessible route is provided in the play area to all play components.

Note that the Massachusetts Architectural Access Board (MAAB) does not consider engineered wood fiber (EWF) to comply with its regulation requiring an accessible route to and around playground equipment.

- Where benches are provided, provide an accessible route to at least one bench in each distinct area of each park.
- Ensure that at least 5% but no less than one of amenities such as picnic tables and portable toilets are accessible.

Key Recommendations for Parking Garages and Lots:

- Ensure that exterior accessible routes are maintained in operable working condition, prevent accumulation of water, and are free of level changes greater than ¼ inch.
- Ensure the cross slope of exterior accessible routes does not exceed 1:50 (2.00%).
- Provide compliant curb ramps with landings.
- Mount visual signs so that the baseline of the lowest character is 40” min. above the ground or finished floor. (Note, parking identification signs should be 60” min. above the ground measured to the bottom of the sign and, 96” max. above the ground measured to the top of the sign.)
- Add the designation "Van Accessible" to van accessible parking spaces.