

Town of Hamilton, Massachusetts
Americans with Disabilities Act (ADA)
Self-Evaluation and Transition Plan

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1 Introduction

1.1 The Americans with Disabilities Act of 1990 (ADA)

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

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

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

1.2 Who does the ADA Protect and Why is a Transition Plan Important?

The ADA provides protections to any person who 1) has a physical or mental impairment that substantially limits one or more major life activities; 2) has a history or record of such an impairment; or 3) is perceived by others as having such an impairment. This is a broad definition, but it is also important to understand that the various accessibility guidelines promulgated under the ADA either as building codes, technical guidance or best practices also enhance and expand access to *all* individuals. In addition to ADA being the law, viewing all local government service and program delivery through the lens of accessibility is just good business.

Examples of increased access improving services for all taxpayers abound. Parents pushing children in strollers, for example have easier access to a facility designed to meet or exceeds the minimum standards found under the ADA design guidelines. Improvements to web-based services, such as offering hybrid or remote meeting participation, made to provide access to those with mobility, hearing or vision impairments also work to expand access to working parents or deployed military. Older individuals in particular benefit from facility and pedestrian improvements constructed in an accessible manner.

Like many towns in Massachusetts, Hamilton is an aging community. According to U.S. Census data, the overall population increased by less than 3% from 2010 to 2020. During this same period, the population aged 65 and over increased more than 88%. In 2012, the first year the Census Bureau estimates published disability statistics, 6.2% of Hamilton's population identified as having a disability; in 2020, this statistic increased to 8.1%. Further, 29% of those aged 65 and over identified as being disabled in 2020, compared to 25% in 2012.

1.3 Guide to Using this Document

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

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

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

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

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

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

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

Section 8 – Appendices – Sample policies, and a list of resources that will be useful during implementation.

Section 9 – Attachments – The Attachments include the reports on the data gathered (facility and website audits, survey results, departmental questionnaires, etc...).

While Section 0 lists summary recommendations and plans, various sections throughout the document includes specific and more detailed recommendations, often linking to direct examples. These are presented in lists with a “check box” bullet to allow the ADA Coordinator or individual department heads to use the SETP document as a hardcopy manual. Periodically, the electronic and public copy should be updated and republished online to document progress.

2 ADA Title II Requirements Overview

2.1 Overview

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

No qualified individual with a disability shall, based on disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity (28 CFR Part 35.130 (a)).

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

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

2.2 Program Accessibility

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

A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination based on disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. (28 CFR Part 32.130 (b)(7))

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

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

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

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

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

2.3 Equally Effective Communication

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

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

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

2.4 Standards for Compliance

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

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

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

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

2.4.1 Facility Accessibility Standards

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

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

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

- One important aspect of the 2010 Standards was the inclusion of guidelines for many recreation facilities. As these were not addressed under the 1991 Standards, the 2010 Standards are the enforceable standards for such facilities and no safe harbor is permitted.
- 1991 ADA Standards for Accessible Design – Published in July 26, 1991, these standards should be used for evaluating buildings where construction started on or before March 14, 2012. They may be viewed at: https://www.ada.gov/1991ADASTandards_index.htm
- Code of Massachusetts Regulations Title 521 (521 CMR) – 521 CMR is the specialized building code for accessibility in Massachusetts and applies to all construction in the Commonwealth. While not as comprehensive as the 2010 Standards, the specific requirements under 521 CMR are more stringent and are considered additional requirements on top of the federal guidelines. They may be viewed at: <https://www.mass.gov/law-library/521-cmr>

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

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

2.4.2 Other Accessibility Standards

2.4.2.1 Outdoor Developed Areas

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

The Town should use these guidelines for developing outdoor spaces not specifically addressed in the 2010 Standards. However, caution should be used when attempting to follow these guidelines for access routes instead of accessible routes as defined in the 2010 Standards and should check with the DOJ or the Massachusetts Architectural Access Board

if questions arise in altering existing facilities or undertaking new construction projects. Of course, any requirements of 521 CMR must be followed with new construction.

2.4.2.2 Website Content Accessibility Guidelines (WCAG)

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

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

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

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

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

Although not officially adopted, these guidelines are nonetheless a best practice and should be followed on public street, sidewalk and transit projects. MassDOT has developed certain standards, and a useful guide titled Municipal Resource Guide for Walkability. This guide may be viewed here:

https://www.mass.gov/files/documents/2018/09/17/MunicipalResourcesGuideForWalkability_2018-08-24.pdf.

2.5 Limitations to Hamilton's Obligations

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

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

2.5.1 Programs Viewed in Their Entirety

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

28 CFR 35.150 states:

(a) General. A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities. This paragraph does not -

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

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

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

To read the full text of this section, please visit:

<https://www.ecfr.gov/current/title-28/chapter-I/part-35/subpart-D/section-35.150>.

In particular, 28 CFR 35.150 (b) (1) Methods provides examples of ways a program access can be achieved. This shouldn't be used as a reason not to complete readily achievable projects, but the reality is that Hamilton, like most towns, has limited resources and must balance competing needs when developing capital investment priorities. As long as the Town acts in good faith to provide program access and is diligent about documenting the reasons for not addressing existing deficiencies and the efforts made to achieve equivalent facilitation, it is working within the intent of the ADA.

2.5.2 Equivalent Facilitation

Section 103 of the 2010 Standards states:

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

Advisory 103 further states:

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

Equivalent Facilitation is a tool that the Town may utilize to overcome barriers to accessibility where they have a substantial and compelling reason for non-compliance. The Town should recognize the exposure to liability and consult with Town Counsel as well as state and federal authorities if any such questions arise. As with all exceptions, the decisions and supporting documentation should be maintained by the Town and the Transition Plan provides an ideal location for such information.

2.5.3 Safe Harbor

28 CFR 35.150 (b) (2) (i) allows for an element-by-element "safe harbor" exception for elements within facilities that have not been altered on or after March 15, 2012 provided they were in compliance with the 1991 Standards when constructed. Generally speaking, this applies only to those elements for which the 1991 Standards provided guidance, such as operable control mounting height of 54" versus the 2010 standard of 48". It does not apply to elements for which no standard was included in 1991, such as play areas, meaning those areas are required to be brought up to current standards (programmatically or physically). Further, once the Town alters an element for any reason other than

achieving ADA compliance, such as restriping a parking lot or remodeling a bathroom, it loses safe harbor protection. In other words, if it was compliant with the 1991 Standards and those standards changed, it does not have to be corrected unless and until an alteration occurs.

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

2.5.4 Undue Financial Burden/Disproportionality & Technical Infeasibility

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

- First, it is the responsibility of the Town to determine, through design and analysis, and document any such decision to remain fully or partially non-compliant. The Transition Plan is an important mechanism to document such determinations.
- Second, the Town is obligated to ensure that alterations are performed to provide the maximum amount of accessibility possible up to the limits of disproportionality or technical infeasibility. Some of the deficiencies noted in the Facilities Self-Evaluation in Section 9.1 could be addressed by the Town documenting the reason for non-compliance under this section, but there is a significant risk with relying on such exceptions and the courts have not viewed such arguments favorably. This is a very high bar to get over for most towns.

2.5.5 Fundamental Alteration of a Service or Program

28 C.F.R. § 35.130(b)(7) states:

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

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

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

As with all reasoning behind intentional non-compliance, the decisions process and supporting evidence should be carefully documented and preserved.

2.5.6 Exceptions

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

The full text can be found here:

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

3 Administrative Requirements of the ADA

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

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

3.1 Public Notice

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

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

3.1.1 Findings

The Town provides a public notice on the Town's website which can be viewed here:

<https://www.hamiltonma.gov/government/town-manager/american-disabilities-act/>

While the public notice provides most required elements, the following should be addressed:

- Copies of the notice must be posted in conspicuous areas in public buildings (i.e., bulletin boards, service counters, etc...)
- Notice on website does not specifically identify the ADA Coordinator nor provide complete contact information. The notice does state that individuals requesting an accommodation should contact the Town Manager and provides an address, and anyone with a complaint or grievance should contact the Assistant to the Town Manager and provides an address.
- Notice is not easily found on website, as it is within the Town Manager subpage. A search bar does not navigate to the notice within a single click. There is no direct or obvious path to find the notice or accessibility information in general.

3.1.2 Recommendations

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

- Publish the ADA Notice in all the materials distributed by the Town; post copies in public locations in the Town's buildings at locations where the notice has yet to be posted. It is acceptable to create a short version or post a link depending on the media platform.
- Include the ADA Notice on Town social media pages.
- Provide the name and complete contact information for the Town's ADA Coordinator and revise the notice to have all requests for accommodation or complaints addressed to that individual rather than multiple individuals.

- Consider creating a dedicated email account for public notices, grievance procedure complaints, and other questions around accessibility issues. This can be automatically forwarded to the ADA Coordinator, Town Administrator (or other designee), and any other staff to ensure email contacts are received and addressed in a timely manner, as well as avoid having to update the public notices should the person in the ADA Coordinator role leave the position. This will also allow for easier documentation and archiving of complaints and their resolutions.
- Create a single landing page on the Town's website with the public notice, grievance procedure (discussed in Section 3.3), and contact information for the ADA Coordinator (Section 3.2). Multiple options for contacting the ADA Coordinator and submitting a grievance should be provided, including direct links to do either online and with minimal clicks. It is recommended that this landing page also include links to resources that individuals with disabilities, their caretakers, or the general public may find helpful. Links to resources can be found in Appendix 8.2

See Appendix 8.1.1 for a Proposed Public Notice. There is no "Accessibility" section, icon, or link on the landing page for the Town's main page to help people easily navigate to information on accessibility; this is a best practice.

3.2 Designation of Responsible Employee/ADA Coordinator

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

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

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

It is often the case that the physical solution to an architectural barrier is often the most expensive and takes the longest to achieve. An effective ADA Coordinator will understand how to achieve a satisfactory resolution to ensure program access by researching best practices, attending training, and communicating with impacted individuals. Building inspections professionals already are subjected to significant professional education and recertification requirements, so it is important that Town officials not only provide the necessary resources to fulfill dual roles, but also issue clear expectations for the position.

3.2.1 Findings

While the Town of Hamilton does include in their public notice (see Section 3.1.1) one individual (Town Manager) with responsibility for responding to requests for accommodation, and one individual (Assistant to Town Manager) to whom complaints can be reported, it does not have a designated ADA Coordinator responsible for overall ADA Compliance.

3.2.2 Recommendations

The Town should appoint an ADA Coordinator to be responsible for overall ADA compliance and coordinating the efforts of the organization to achieve the goals of the Transition Plan.

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

Once the appointment has been made, the existing Job Description for the position should be modified to include the following elements:

- Essential Duties and Responsibilities should include:
 - Serves as the Town's ADA Coordinator;
 - Addresses requests for accommodations for individuals with disabilities as needed;
 - Manages all aspects of the Town's Grievance Procedure, including working with complainants, staff and vendors to resolve any barriers to program or facility access; and
 - Conduct periodic inspections and audits of Town properties, programs and communications to ensure accessibility is maintained.
- Language should be added to the "Essential Training and Experience Required to Perform Essential Functions" section to reflect the need for a thorough knowledge of Title II requirements and a general understanding of building code, websites, and communications as they relate to accessibility requirements under the ADA.

3.3 Adoption of a Grievance Procedure

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

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

3.3.1 Findings

Although the public notice (see Section 3.1.1) does indicate the individual to whom accessibility complaints should be addressed and to whom requests for accommodation should be directed, the Town does not have an adopted or complete Grievance Procedure. Specifically:

- Complete and easy to follow contact information is not provided;
- Processes and/or procedures by which a complaint can be addressed are not described, nor is a timeline to resolve such issues stated.
- Publication of the public notice containing information on how to file a grievance is only posted on the Town's website and is not easily accessible.

3.3.2 Recommendations

The Town should adopt, publish and post a formal grievance procedure, including providing multiple opportunities and methods by which an individual can submit a complaint or grievance. The Town should also ensure that

The key elements that need to be included are:

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

- Requirements for documenting the complaint, including correspondence and any actions taken, including retention requirements of at least three years, or as required under Massachusetts records retention laws.

A sample Grievance Procedure can be found in Appendix 8.1.2.

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

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

3.4 Self-Evaluation of Programs and Services & Transition Plan

The final administrative requirements under Title II require the Town to 1) conduct a *self-evaluation* of its programs, policies, and facilities, and 2) develop a *transition plan* to improve access over a reasonable period of time and within the resources available. If a Section 504 evaluation and plan was previously done, self-evaluations are permitted to only examine those programs and services which were not previously assessed.

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

3.4.1 Self-Evaluation Process

The study team presented an overview of the SETP process at a kick-off meeting onsite with Town staff. Following this meeting, a questionnaire was distributed to all department directors that was designed to collect an inventory of programs/services provided by that department. The inventory gathered data on major “bundles” of services that share commonality in the resources they rely on, the individuals or groups they serve, and the general manner in which the service is delivered.

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

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

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

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

In addition to the questionnaire, the study team also:

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

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

3.4.2 Transition Plan Process

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

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

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

4.1 Overview & General Townwide Findings

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

4.1.1 Customer Service

Questionnaire responses indicated that staff across all departments take active measures to provide ADA-compliant customer service. Staff initiatives included working with customers or employees to accommodate their needs to the

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

4.1.1.1 Recommendations

The current staff practices of accommodating individual requests should be memorialized in standard operating procedures and policies as applicable and appropriate. In general, providing the required Public Notice as recommended in Section 8.1.1 and developing an easily accessible and comprehensive accessibility web page recommended in Section 5.2.2 will meet this recommendation.

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

4.1.2 Maintenance of Accessible Facilities

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

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

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

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

While the departmental surveys did not indicate any issues with maintenance, the Public Input Survey (discussed in Section 6.2.2.2) indicated maintenance of sidewalks is a significant concern, which was also observed by the site visit teams at many facilities. Further, the placement of trashcans and furniture often created barriers by overlapping clear floor space, accessible routes, and maneuvering space. Training for staff should include an overview of common barriers and routine inspections by the ADA Coordinator should be performed.

4.1.2.1 Recommendations

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

- Staff training on placement of furniture, trash cans and other items so as not to obstruct accessible routes, clear floor space and maneuvering clearances.
- Regular inspections and testing of assistive listening devices.
- If outsourced, contracts for maintenance on facilities and rights-of-way should be modified to specifically require accessible routes, clear floor spaces and maneuvering spaces be kept clear. For

example, janitorial contractors should be instructed not to place trash cans within latch-side clearance of bathroom doors or in knee space under accessible counter. For right-of-way mowing and vegetation control, contractors should ensure limbs are kept trimmed above 80" and weeds between sidewalk slabs and at ramps be removed.

- Require ADA Coordinator to conduct periodic inspections at all facilities for compliance. Ideally, this should be done through the Job Description but including in the ADA SETP as policy will suffice.

4.1.3 Emergency Preparedness, Evacuation Plans, and Emergency Shelters

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

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

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

4.1.3.1 Findings

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

4.1.3.2 Recommendations

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

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

- Identify Public Transportation to the shelters; especially for those who have physical/medical disabilities.
- Determine that the (Community Emergency Response Team) CERT is robust enough to manage the shelter(s); identify/develop a roster and POC for the CERT/ Identify CERT members with "additional" skill sets.
- Develop listing of sheltering Vet services for those who have both "pets" and service animals.
- Develop listing of sheltering medical capabilities beyond the American Red Cross (ARC), and or the FD.
- Develop listing or process to engage the Visiting Nurse Association (VNA) to assist at the shelter(s).
- 16% of the population is non-English speaking; need a POC for translation services and availability as well as American Sign Language (ASL) interpreters.
- Emergency Operations Center (EOC) and back-up EOC - These facilities need to be ADA compliant as well, as some personnel who maybe staffing certain functions/positions may have special needs. These positions need to be identified, including any accommodations necessary for workspace, electronics etc.

4.1.4 Service Animals

It is important for the Town to have a clear policy on service animals, as their use has grown substantially in the last decade. While the public notice posted to the Town's website noted service animals are welcomed at Town offices,

there is no Town-wide policy providing guidance, so it is recommended that one be adopted. A sample policy can be found in Appendix 8.1.3. A suitable policy should clearly define what is and is not a service animal, limitations, handler responsibilities and under what circumstances a service animal can be removed or prohibited.

4.2 Town Department Programs and Services

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

4.2.1 Town Hall Departments

4.2.1.1 Town Hall Facility Summary

Constructed in 1898, this building presents significant accessibility challenges, including a lack of access to the second floor by elevator. There is office space available on the first floor in which these departments may meet with clients, residents, and visitors. However, there is not a dedicated computer to process paperwork, accept payments or provide other services that are readily available on the second-floor office spaces. There is a phone provided on the first floor to contact offices located on the second floor, but this is not posted on the Town's website, noticed in the building, or in any other posted contact information.

The following departments have offices located on the second-floor:

- Finance Director/Accounting
- Director of Planning and Inspections
- Building Department
- Conservation Agent
- DPW Offices

The full audit of Town Hall is included in Attachment 9.1. Due to the high traffic and intensity of use at Town Hall, the study team recommends that all items identified in the report be addressed within 2-3 years. Priority mitigation should include:

- Exterior parking and accessible routes on the site and connecting the entrances due to high visibility should be completed within 18 months.
- Designation of the toilet rooms as unisex and modifying one to be fully accessible, including providing appropriate directional signage; complete within 1 year.
- Provide an alternate meeting location for all second floor departments on the first floor. This should include a dedicated space with customer service facilities (counter, table, etc...), computer, payment center, and any other regularly used features to aid staff and visitors. Signage should be posted directing how to contact departments at existing courtesy phone, and information posted on the web pages of all affected departments. This should be completed within 6 months.
- Entry doors should be modified to make them fully accessible, including fixing automatic door openers and developing a policy/procedure to regularly inspect and maintain.

Plans were discussed during audit that included installing a lift to access the second floor. Prior to pursuing this, the Town should consult an architect with experience in accessibility issues as there are numerous challenges with single-occupant lifts, both from a maintenance and use standpoint as well as securing the necessary variance from the Massachusetts Architectural Access Board.

4.2.1.2 Assessor

The questionnaire provided by the Assessor can be viewed in Attachment 9.3. Staff states regular interaction with disabled individuals and assists in filling out paperwork in the office, providing curbside service when requested, and providing in-home services if needed. Given Town Hall barriers, these practices are good examples of accommodations made for program access. The following barriers to accessibility were noted:

- Staff is not trained to handle requests for documents in alternative format.
- Staff is not trained to use TTY/TDD.
- Some forms are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following forms:
 - Senior, Blind and Veteran Statutory Exemption form <https://www.hamiltonma.gov/wp-content/uploads/2016/12/FY2023-statutory-exemption-application.pdf>
 - The instructions for the Legally Blind Exemption was not readable with a screen reader. <https://www.hamiltonma.gov/wp-content/uploads/2017/06/Legally-Blind-Persons-Exemption-Guide.pdf>
 - Senior Tax Deferral form was not readable with a screen reader. <https://www.hamiltonma.gov/wp-content/uploads/2016/12/State-Tax-Form-97-Deferrals.pdf>
 - Motor Vehicle Excise Abatement Application <https://www.hamiltonma.gov/wp-content/uploads/2017/02/MVAbatementAppl.pdf>
- Minutes and agendas for the Board of Assessors were posted as scanned images and not accessible. <https://www.hamiltonma.gov/government/assessors/minutes-agendas/>

4.2.1.3 Department of Public Works (Admin Office)

The questionnaire provided by the DPW can be viewed in Attachment 9.3. The DPW Admin office is located on the second floor, which is not accessible, but staff will meet on the first floor to complete paperwork or collect payments. DPW project bid documents posted to the Town's website were found to be accessible.

The following barriers to accessibility were noted:

- Staff is not trained to handle requests for documents in alternative format.
- Staff is not trained to use TTY/TDD.
- Trash bags and bulky waste stickers are available at area merchants, but it would be beneficial for the department to post the names/locations of merchants with fully compliant accessible parking, routes and service counters to ensure access.
- Several program information pages include information only available from image-based brochures that are not readable by screen readers nor have alternative text:
 - <https://www.hamiltonma.gov/government/waste-reduction-committee/recycling-information/>
 - <https://www.hamiltonma.gov/wp-content/uploads/2017/01/Recycle-and-Compost-Guide.pdf>
 - <https://www.hamiltonma.gov/wp-content/uploads/2018/12/FAQ-MATTRESS-1.pdf>
- Forms included in the form library should be posted as fillable forms. All forms sampled were able to be read with a screen reader extension, although all abbreviations and acronyms be replaced with full text.
 - <https://www.hamiltonma.gov/wp-content/uploads/2021/09/Interment-Order.pdf>
 - <https://www.hamiltonma.gov/wp-content/uploads/2017/02/addresschange.pdf>
- Some important utility forms are posted as scanned images and inaccessible to screen readers:
 - <https://www.hamiltonma.gov/appforwaterservice/>
 - <https://www.hamiltonma.gov/wp-content/uploads/2016/12/requestfinalwaterbill.pdf.pdf>
 - https://www.hamiltonma.gov/wp-content/uploads/2022/09/2022-08-01_Abatment-Policy_Hamilton-2022_Approved.pdf

4.2.1.4 Finance Department

The questionnaire provided by the Finance Department can be viewed in Attachment 9.3. The Finance Department is largely an internal service department, providing accounting and financial management for all Town operations. They post financial information for public use, and almost all documents posted were posted in an accessible document format and usable by screen readers. While located on the second floor, they are available to meet with residents and staff if requested on the main floor. Generally, public interaction is not typical other than posted and published materials.

Most documents The following barriers to accessibility were noted:

- Staff is not trained to handle requests for documents in alternative format.
- Staff is not trained to use TTY/TDD.
- Only one document posted was inaccessible to screen readers as it was posted as an image:
 - <https://www.hamiltonma.gov/wp-content/uploads/2018/08/Capital-Improvement-Plan.pdf>

4.2.1.5 Human Resources Department

The questionnaire provided by the Human Resources Department can be viewed in Attachment 9.3. A primary role of the department is providing information about employment opportunities and facilitating application thereof, as well as providing information for current employees. All job postings were fully accessible in both PDF and in short form in HTML directly on the website.

While not for public-facing programs, some sampled materials for current employees were posted as scanned images of flyers and brochures (Flexible Spending Account information and Labor Union Agreements). While these are internal forms where an employee can easily receive assistance from HR, the Town should consider replacing these with accessible documents.

The following barriers to accessibility were noted:

- Staff is not trained to use TTY/TDD.
- The Town application form, while available online and readable with screen reader, should be provided as a fillable form.
- I-9 Form, for employment eligibility, is readable with screen reader, but not the fillable form version available through the Department of Homeland Security. This should be updated.
 - <https://www.hamiltonma.gov/wp-content/uploads/2017/05/i-9-paper-version.pdf>
- All information provided for retirees is in scanned image form and inaccessible to screen readers.

4.2.1.6 Planning/Inspectional Services

The questionnaire provided by the Inspectional Services Department can be viewed in Attachment 9.3. The office is located on the second floor, and staff can meet customers on the first floor, although this is not clearly posted on the website or in Town Hall (nor for other second floor offices, as noted). Permit applications can be submitted via mail, email or in person and inspections can be requested by phone, email, or in person.

The following barriers to accessibility were noted:

- Staff is not trained to handle requests for documents in alternative format.
- Staff is not trained to use TTY/TDD.
- Certain permit application forms are scanned images and not accessible to screen readers:

- <https://www.hamiltonma.gov/wp-content/uploads/2020/08/Building-Permit-Application-with-Important-Information-regarding-Water-Ban-08-2020.pdf>
- <https://www.hamiltonma.gov/wp-content/uploads/2017/01/Workers.pdf>
- Certain permit application forms, while accessible with a screen reader, do not contain fillable fields.
 - <https://www.hamiltonma.gov/wp-content/uploads/2017/01/2017.Electrical-Application.pdf>
 - <https://www.hamiltonma.gov/wp-content/uploads/2017/01/2017-gas-fitting.pdf>
- Issued building permits/job weather cards (submitted by customers) are scanned images. While it is impractical to make these forms accessible as they may be handwritten, a notice for interested persons to email or call for information if they cannot access the information should be provided.

4.2.1.7 Town Clerk

The questionnaire provided by the Town Clerk can be viewed in Attachment 9.3. The Town Clerk oversees elections, which is addressed separately in this section below. Services are available online, via email, in person or via mail. As with other departments, much of the information is posted to the website in HTML and accessible with screen readers. Meeting agendas, election results, Town bylaws, and other documents not noted below are also posted in accessible formats.

The following barriers to accessibility were noted:

- Staff is not trained to handle requests for documents in alternative format.
- Staff is not trained to use TTY/TDD.
- Town Meeting Minutes are posted as scanned images and not accessible using screen readers.
- Some forms were posted as scanned images and not accessible using screen readers:
 - https://www.hamiltonma.gov/wp-content/uploads/2021/09/RAFFLES-BAZAAR-PACKET_use.pdf
 - http://files.ocpf.us/pdf/forms/M102_edit.pdf (campaign finance form; outside agency)
- Several forms included in the form library should be posted as fillable forms. The following forms were able to be read with a screen reader extension, although all abbreviations and acronyms be replaced with full text, but are not fillable:
 - <https://www.hamiltonma.gov/wp-content/uploads/2023/01/Vote-by-Mail-Paper-Application-2023-print.pdf>
 - <https://www.hamiltonma.gov/wp-content/uploads/2023/01/DOG-LICENSE-APPLICATION-FORM-2023.pdf>
 - <https://www.hamiltonma.gov/wp-content/uploads/2021/01/APPLICATION-FOR-BUSINESS-CERTIFICATE-2021.pdf>

Evaluation and Recommendations on Elections:

Election Day voting is held at Hamilton/Wenham Recreation Center Gymnasium. The building has numerous accessibility issues as detailed in Attachment 9.1. Voters have access to mail-in absentee ballots and early voting. Staff has, in the past, mailed absentee ballot applications. Early voting patrons, if requested, can be provided a ballot curbside by staff. An AutoMark ballot marking machine is available for the visually impaired or others who have difficulty marking a ballot. Staff has a history of accommodating individuals with disabilities, but the practices are not formalized and there is no information on these accommodations, or how to request them, on the Town Clerk's website.

The following recommendations are offered:

- Town Clerk Elections website be updated to provide information on the accommodations already offered and how to request them.

- Procedures for providing accommodations should be formalized in departmental policies to ensure they are consistently followed.

4.2.1.8 Treasurer/Tax Collector

The questionnaire provided by the Treasurer/Tax Collector can be viewed in Attachment 9.3. Payment services are offered online through a third-party vendor which meets WCAG 2.0 standards. Except as noted below, all online resources were accessible

The following barriers to accessibility were noted:

- Staff is not trained to handle requests for documents in alternative format.
- Staff is not trained to use TTY/TDD.
- One form sampled is posted as an image and not accessible:
 - <https://www.hamiltonma.gov/wp-content/uploads/2016/12/20170601144234994.pdf> (municipal lien certificate).
- Some informational resources (provided by third parties) are not accessible:
 - <https://www.hamiltonma.gov/wp-content/uploads/2017/04/SP-Rating-2019.pdf>

4.2.2 Recreation Department

The Recreation Department provides services at several locations including its primary location at 16 Union Street, adjacent to the Library. It is a one story building with restrooms, activity rooms and a gymnasium. The subsections below outline those facilities where Recreation Department programming occurs, but in many instances maintenance and capital planning is the responsibility of the Town's DPW.

4.2.2.1 Recreation Facilities Summary & Recommendations

The full facility audit in Attachment 9.1 contains the full scope of barriers to accessibility. Due to the high traffic and user population, all deficiencies noted in the report should be addressed. Of primary concern are the following high priority issues:

- Exterior parking and accessible routes to right of way and to entrances; excessive slopes on ramps, walkways.
- Toilet rooms should be designated as unisex and one should be modified to be fully accessible, including adding directional signage at the inaccessible toilet room. Available space precludes making both accessible.

4.2.2.2 Athletic Fields/Facilities Summary & Recommendations

The full facility audit in Attachment 9.1 contains the full scope of barriers to accessibility. The study team did not observe any fully accessible athletic facilities in the Town of Hamilton. Facilities reviewed include the softball and soccer fields at Donovan Field, the hockey field at Fairhaven Field, and the basketball court, tennis courts, softball field, baseball field, and volleyball court at Patton Park. Athletic facilities lacked accessible routes, accessible parking, and accessible seating.

The following recommendations apply to Athletic Facilities:

- Due to the high traffic of the Hamilton athletic facilities, provide accessible athletic facilities within the next 5 years. At least one of each type of athletic facility (e.g. baseball field, softball field, basketball court, etc.) should be made accessible, with priority going to those with the highest use. Associated

press boxes and/ or concession stands, should also be modified either through physical architectural barrier removal or by implementing a policy change.

- Prior to the next season opening, the study team recommends reviewing the Town's portable toilet plans. Provide an accessible portable toilet at each location where they are provided. Ensure the accessible portable toilet is located on an accessible route.

4.2.2.3 Playgrounds/Recreation Areas Summary & Recommendations

The study team did not observe any fully accessible play areas in the Town of Hamilton. The study team reviewed the playground at Fairhaven Field, the playground and walkways at Cutler Park, the pavilion, walkways, and playground at Patton Park, and the playground and walkways at School Street Park. The area lacked an accessible route, an accessible play surface, accessible play features, and accessible parking spaces (where off-street parking is provided).

The following recommendations apply to Playgrounds/Recreation Areas:

- See Section 4.2.2.2 regarding public/portable toilets.
- Provide 1 fully accessible playground within the next 3 years. Ensure any modifications to an existing play area is done in compliance with the 2010 ADA Standards, as well as 521 CMR. KMA recommends modifying the playground with the highest use. Information regarding the accessible playgrounds should be disseminated to residents and available on the Town website.
- Provide at least 1 fully accessible pavilion within the next 5 years. Ensure any modifications to the existing structures are completed in compliance with the 2010 ADA Standards and 521 CMR.

4.2.2.4 Recreation Programs & Services

The questionnaire provided by the Recreation Department can be viewed in Attachment 9.3. The department maintains two website, one for the Town and one for Hamilton-Wenham. Registration, permits for facility use, and other forms were accessible using screen readers and fillable forms. Online payment systems were fully accessible. Mail-in, email and over the phone registrations and assistance are offered. Staff is currently evaluating expansion of inclusive and therapeutic program offerings.

The following barriers to accessibility were noted:

- Staff is not trained to handle requests for documents in alternative format.
- Staff is not trained to use TTY/TDD.
- Webpage contains images that do not contain alt text:
 - <https://www.hamiltonma.gov/government/recreation-department/summer-employment/>
- Department Brochure is posted to flippingbook.com, which does allow a full PDF download that is accessible, but is difficult for many screen readers to process. The brochure itself provides many of the schedules and programmatic offerings as images that are not accessible. Alt text is not present.
 - <https://online.flippingbook.com/view/809569822/2/#zoom=true>
 - <https://www.hamiltonma.gov/government/recreation-department/>
- Department's Twitter feed and Facebook pages posts a number of brochures notifying of programs and schedules as images that are not accessible. Some posts do contain text summarizing the brochures, but they do not cover the full scope of information (examples).
 - <https://twitter.com/HWRrecreation/status/1626322472889905156?cxt=HHwWiMCz7YTr7ZEtAA> (summer programs)
 - <https://twitter.com/HWRrecreation/status/1625533837479493632/photo/1> (seasonal employment for summer)

- <https://www.facebook.com/photo/?fbid=238451044983914&set=ecnf.100064570607479>
(Pumpkinfest)
- <https://www.facebook.com/photo/?fbid=562509785911370&set=ecnf.100064570607479>
(mental health information)

4.2.3 Library

4.2.3.1 Hamilton-Wenham Public Library Building

The full facility audit for the Library building can be found in Attachment 9.1. The primary barriers at the library were observed in the parking and accessible routes to the building and right-of-way, as well as with the restrooms. Due to the high traffic in the building, and importance of the library as a community resource, it is recommended that all barriers found be mitigated within three years.

The following are recommended as high priority:

- Exterior parking and accessible routes should be addressed within 6 months.
- Within one year, the toilet rooms should be designated as unisex and one be made fully accessible. Directional signage should be provided to direct users to the accessible toilet room.

4.2.3.2 Library Department

The questionnaire provided by the Library can be viewed in Attachment 9.3. Staff is very knowledgeable about alternative format documents, offering large print in house and Braille and talking books upon request through Perkins School, which is noted on the website. An extensive interlibrary loan program ensures material in alternative format is available. An elevator is available to access both floors. Curbside service is offered. Other than the facility issues noted in the audit, no programming issues were noted as barriers to library services other than the response that staff is not trained to use TTY/TDD.

4.2.4 Hamilton Public Safety Building

The full audit of the Public Safety Building can be found in Attachment 9.1. The facility houses the Fire Department, Police Department and Emergency Communications Center (under Police). The building is largely staff only, but visitors, including school and public tours, occasionally will use the space. There are some public areas, such as the 2nd floor conference room, that are inaccessible to visitors, and as such, departments should identify, by policy, which alternative spaces should be used when accommodations are requested.

The study team recommends that all barriers be addressed, but as this facility is primarily closed to the public, most should be considered low priority and addressed as budget allows and in concert with other required maintenance or repairs. The exceptions to this recommendation are considered high priority and should be addressed within one year:

- Accessible parking and accessible routes to the building.
- The public toilet rooms should be designated unisex and one made fully accessible. Directional signage should be included in this mitigation.

4.2.4.1 Police Department

The questionnaire provided by the Police Department can be viewed in Attachment 9.3. Police oversees the dispatch center, where most public communications are handled. All dispatchers are trained in the use of TTY/TDD and silent call procedures, and text-to-911 is available. Numerous forms and services are available online and the department is actively converting all PDF forms to fillable forms. Access to, and delivery and completion of such forms is offered by the department through email, phone, mail, in-person or home delivery upon request.

Officers are trained to communicate with individuals with hearing, vision and cognitive disabilities, and has developed a confidential, voluntary form opt-in program to assist in providing care and support for individuals with disabilities.

More information can be found here: <https://www.hamiltonma.gov/government/police-department/autism-disability-outreach-program/>. The profile form is accessible and is a fillable form.

HPD has initiated a Silver Alert program to aid in serving those with memory impairments. More information can be found here: <https://www.hamiltonma.gov/government/police-department/silver-alert-program/>. The form is accessible and fillable.

Walk-in requests for service are common, and these can be provided in the building or curbside upon request. As noted, in-home services are routinely provided if an individual is unable to access the facility due to a disability or other condition.

The following barriers to accessibility were noted:

- Some forms and informational resources were scanned images and not accessible to screen readers:
 - <https://www.hamiltonma.gov/wp-content/uploads/2020/02/Solicitors-Permit-Application.pdf> (solicitor permit application)
 - <https://www.hamiltonma.gov/wp-content/uploads/2017/03/Complaint-Against-Member-of-the-Department.pdf> (complaint form)
- Some forms were accessible with screen readers, but should be converted to fillable forms:
 - <https://www.hamiltonma.gov/wp-content/uploads/2021/07/CPA-2022-Application.pdf> (citizens' academy application)
- Pictures are posted to the department page without alt text:
 - <https://www.hamiltonma.gov/government/police-department/police-memorial-day/>
- Most pictures posted to Department's Facebook page and Twitter feed were missing alt text:
 - <https://www.facebook.com/HamiltonMAPD/>
 - <https://twitter.com/HamiltonMAPD/status/1625921032929280010/photo/2>

4.2.4.2 Fire Department

The questionnaire provided by the Fire Department can be viewed in Attachment 9.3. Most calls for service are placed through Dispatch, which is fully trained in TTY/TDD, as well as text/email and other methods of communication. Most front-line services are performed onsite and directly with the requestor, and staff are trained in communicating with individuals of all abilities. Some staff are trained in American Sign Language (ASL), and the department has specialized equipment to assist individuals with injuries and disabilities during emergencies. Most informational links redirected to third party websites, usually national fire and life safety organizations, where most material was found to be accessible.

The following barriers to accessibility were noted:

- Pictures posted to the department photo gallery without alt text:
 - <https://www.hamiltonma.gov/government/fire-department/fire-apparatus/>

4.2.5 Senior Center/Council on Aging

4.2.5.1 Senior Center Facility Summary & Recommendations

The full facilities audit results can be found in Attachment 9.4. Due to the high traffic at the Senior Center, as well as the fact that it serves an elderly population, the study team recommends mitigating all barriers identified in the report.

The following areas are recommended as high priority and should be addressed within one year:

- Exterior parking and drop off areas due to their high visibility.
- Designating the toilet rooms as unisex and modifying one to be fully accessible. Provide directional signage at the inaccessible locations.

4.2.5.2 Council on Aging Department

The questionnaire provided by the Council on Aging can be viewed in Attachment 9.3. Staff is knowledgeable on providing documents in alternative format, and in the use of TTY/TDD. The COA has an outreach worker that proactively reaches out to residents that may require services, and staff routinely provides services and programming in the homes of residents.

The following barriers to accessibility were noted:

- All photos presented in photo gallery lack alternative text.
 - <https://www.hamiltonma.gov/government/council-on-aging/coa-photo-gallery/>
- Newsletter, which is a primary outlet of programs and scheduling, is posted as a scanned, low-resolution image and fully inaccessible to screen readers:
 - <https://www.hamiltonma.gov/wp-content/uploads/2023/01/February-2023-Newsletter.pdf>
- Senior property tax workoff information, a program utilized by many disabled and elderly residents, links were not active:
 - <https://www.hamiltonma.gov/government/council-on-aging/senior-citizen-property-tax-work-off-abatement/>
- Several forms included in the form library should be posted as fillable forms. The following forms were able to be read with a screen reader extension, although all abbreviations and acronyms be replaced with full text, but are not fillable:
 - <https://www.hamiltonma.gov/wp-content/uploads/2016/12/Application-for-Appointment.pdf>
 - <https://www.hamiltonma.gov/wp-content/uploads/2017/10/Town-Template-CORI.pdf>

4.2.6 Water Plant

The Water Plant is operated and maintained by the DPW, and administrative and public-facing services are provided at Town Hall (See Section 4.2.1.3). The full facilities audit is provided in Attachment 9.1. While there are deficiencies and barriers to accessibility, due to the relatively low traffic of this building and limited public access, the study team recommends mitigating barriers identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as Town budget permits.

4.2.7 General Patton Homestead

The Patton Homestead is a former historic private residence converted to public use and managed by the Town. Uses are primarily cultural, community and educational events, and the space is available for lease. The primary interior of the home is leased to Hamilton Historical Society, Inc.; Ubate Co-Working, and the Wenham Museum's Patton Family Archive. These are private entities, and it is recommended that the Town consult with Counsel to establish clear responsibility for each space and its normal use and re-evaluate those spaces.

The scope of the review performed under this study focused on the public Town uses, which were primarily in the exterior spaces. Because of the intensity of use during community events, the study team recommends mitigating all barriers identified in the report within three years.

Priority barriers that should be addressed sooner were:

- Exterior parking and accessible routes to building and event areas within 1 year.

- Modifying the toilet room to be fully accessible and on an accessible route.
- Develop plans for larger public events, including portable toilets, accessible routes and parking. Note that certain exceptions are provided for temporary events so long as best practices are observed. A good guide for temporary event accessibility planning can be found here: <https://adata.org/guide/planning-guide-making-temporary-events-accessible-people-disabilities>

4.2.8 Outdoor Facilities

See Outdoor Facilities Audit in Attachment 9.2 for complete results of the audits and deficiencies identified. The following subsections address specific areas covered under the scope of the study.

4.2.8.1 Chebacco Woods Trailhead & Boat Ramp Summary & Recommendations

The study team did not observe any fully accessible conservation areas in the Town of Hamilton. KMA reviewed the Chebacco Woods Trailhead. The conservation area lacked accessible parking spaces and an accessible route to the trailhead. Also not observed were any fully accessible boat ramps in the Town of Hamilton including the Chebacco boat ramp. The boat ramp area lacked accessible parking and an accessible route to the boat ramp.

The following recommendations apply to outdoor recreation, trailheads and boat ramps:

- Provide accessible parking and a route to the trailhead within the next 5 years at Chebacco Woods.
- Provide accessible parking and a route to the boat ramp within the next 5 years.

4.2.8.2 Hamilton Cemetery

Generally, the cemetery was accessible as the only access is for vehicular travel. However, the parking area lacked accessible spaces and the benches are not located on an accessible route. The study team recommends:

- Provide signage at the parking area specifying it's intended use within the next 2 years. If it is intended to be used by the public, ensure a van accessible space will be provided.
- Relocate or add benches on an accessible route within the next 2 years.

4.2.9 Pedestrian Facilities – Sidewalks, Crosswalks and Curb Ramps

Pedestrian facilities present a unique challenge. At present, there are no official standards promulgated under the ADA for pedestrian facilities such as sidewalks and crosswalks outside of those contained within a site, or a property boundary. This means that local and state regulations are the primary guidance for these types of facilities. Various court interpretations and DOJ issued guidance generally state that in the absence of official standards, a jurisdiction shall use the best available guidance, which is generally considered the Public Rights of Way Accessibility Guidelines (PROWAG), more fully described in Section 2.4.2.3. The U.S. Access Board released proposed guidelines in 2011, and they have yet to be adopted as official guidance. In 2022, The DOJ announced it's intention to make PROWAG official after many years of public comment.

Many municipalities have either adopted PROWAG as their standard, or largely incorporated the construction details and standards in their own Design and Construction Manuals, effectively making PROWAG to applicable required standard. This has not happened in Massachusetts, nor in most municipalities. With an aging road network, and extremely challenging right of way widths on most streets, following the PROWAG standards is very difficult.

The Town adopted a Complete Streets Policy in 2019, which references the Architectural Access Board's 521 CMR Rules and Regulations as a guiding document. The policy can be viewed here:

https://www.hamiltonma.gov/wp-content/uploads/2019/02/012219_Complete_Streets_Policy.pdf

The standards provided in 521 CMR do provide standards for walkways, curb ramps and other construction elements, but its authority does not extend to the right-of-way. Pedestrian concerns were very apparent in the public input process. The Town should consider amending the Complete Streets Policy to include the 2011 Public Rights of Way Accessibility Guidelines as a guiding document.

5 Providing Equally Effective Communications

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

5.1 Communications with Hearing and Speech Impaired Individuals

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

5.1.1 Findings

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

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

5.1.2 Recommendations

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

Sample of Effective Communication Statement and Request for Accommodation:

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

Other recommendations include:

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

Section 8.2.3 contains links to services to aid in communication with hearing and speech impaired individuals. Again, Police and Fire Departments are typically excellent resources for improving the effectiveness of communications.

5.2 Website Accessibility

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

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

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

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

To assess the Town's progress in meeting these website standards, a manual accessibility audit of the Town of Hamilton website was performed to evaluate content against current WCAG requirements. Manual accessibility audits have the major advantage of being the most thorough type of auditing. After completion of the audit, a report was created containing an assessment of a municipality's assets along with issues that need to be addressed. For every unique issue listed, instructions or examples were provided to show precisely how to make the website accessible. It is important to note that accessibility is an ongoing process.

5.2.1 Findings

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

- Text-heavy webpages, with most information provided on webpage in narrative form, minimal pictures and graphics. This provides good foundation for use of screen readers.
- Contrast between background logos, images, and fonts helps visually-impaired users.
- The majority of important information is contained in HTML format as site content, rather than links to documents.

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

- Accompanying all images with alternative text
- Certain documents posted to the website are images and do not contain searchable text, and inaccessible to screen readers or other accessibility tools. Examples are cited in the audit report and within each departmental section.
- Converting printable forms into online fillable forms whenever possible; Examples are cited in the audit report and within each departmental section.
-

5.2.2 Recommendations

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

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

The full website accessibility audit is available in Attachment 9.4

5.3 Public Meeting Access

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

Sampling of the Town's YouTube channel public meetings, including Town Meeting, Select Board and Planning board meetings, were posted with closed captioning.

5.3.1 Findings

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

- Warrants for Town Meeting and Special Town Meeting posted as image files and not accessible:
 - <https://www.hamiltonma.gov/wp-content/uploads/2022/03/2022-04-02-ATM-Warrant-Appendices-Final.pdf>
 - <https://www.hamiltonma.gov/wp-content/uploads/2022/09/22.10.01-STM-Warrant-Final-Copy.pdf>
- More at: <https://www.hamiltonma.gov/government/town-moderator/town-meeting-warrants/>
- Certain Meeting Notices, Agendas & Materials posted as low-quality scans:
 - https://www.hamiltonma.gov/2023_03_01_zba_hearingnotice_16blueberrylane/
 - https://www.hamiltonma.gov/2023_03_01_hamiltondevelopmentcorporation/
 - https://www.hamiltonma.gov/2023_02_21_selectboard-2/
- Agendas posted did not contain information on how to request an accommodation:
- With the changes during the pandemic, virtual access to meetings increased dramatically, providing alternative ways to attend other than in-person. While many meetings remain either virtual or hybrid, many have returned to fully in-person. Roughly half of meeting agendas sampled offered a hybrid option.
 - https://www.hamiltonma.gov/2023_02_16_fincom/ (Hybrid)
 - https://www.hamiltonma.gov/2023_02_16_housingauthority_revised/ (in person only)

It is important to consider that broadcasting a meeting with closed captioning is not a substitute for those meetings that allow public participation. In the case of Town Meeting, for example, the law does not allow for remote participation, so if meetings are held in locations with physical barriers, it is important that remote participation be facilitated.

5.3.2 Recommendations

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

- Develop a policy requiring all agendas, minutes, and materials to be posted in an accessible format. While most meetings are posted as scans, certain boards post the Clerk-received document in a fully accessible format. All agendas posted by the Planning Board and Human Rights Commission, for example, are good examples:
 - https://www.hamiltonma.gov/2023_02_23_planningboard/
 - https://www.hamiltonma.gov/2023_02_15_humanrightscommission/
- Offer hybrid meetings for all public meetings, or at the least, those that occur in facilities that have **any** identified barriers to access. This may require adoption of a remote policy by the Select Board if it has not already been done.
- All agendas should include a notice regarding the availability of reasonable accommodations, including contact information and procedures to request such assistance.
- Where the only venue for a large meeting is an inaccessible site, utilize temporary materials, such as mats, portable ramps, additional accessible parking signs/markings, and other purpose-built solutions to improve accessibility to the maximum extent feasible. Provide notice offering guidance on how best to access the site and request assistance. This was an issue reported during the COVID-19 pandemic when meetings were not able to be held indoors.

5.3.2.1 Town Meeting

Town Meeting, as the legislative body of the Town, presents unique challenges for ensuring accessibility. Massachusetts' Open Meeting Law (OML) allows for remote participation if so adopted by the Board of Selectman, but a quorum and the Moderator (as chair) must be physically present. The Executive Order exempting in-person attendance and relaxing other requirements of the OML allowed municipalities to experience remote and hybrid meetings and see the benefits of increased opportunities for participation, but this order expires in March 2023. Town Meetings, due largely to their size and infrequency, are a challenge to offer in a hybrid model.

Hamilton's Town Meeting is typically held at Hamilton-Wenham Regional High School. As a Regional District facility, it is not under the Town's jurisdiction and outside the scope of this study. However, it has been renovated to address ADA issues and does not appear to present significant barriers to accessibility for the purpose of Town Meeting. However, the issues noted with Town Meeting materials in the section above should be addressed before the Annual Town Meeting in the spring.

6 Public Engagement & Input

6.1 Overview

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

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

Accordingly, the public was provided opportunities to provide input toward the content and development of the Hamilton ADA Transition Plan as well as review and comment on the ADA Transition Plan itself. Specific efforts were made to inform residents and local or regional disability organizations regarding the opportunity to provide feedback including a Public Input Survey and an opportunity for Transition Plan public comment.

6.2 Public Input Survey

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

6.2.1 Methodology

The Town distributed surveys from July through August 2022 to various stakeholders online via Survey Monkey. Paper copies were also available at Town facilities and upon request. The Survey, which was targeted towards community members, organizations representing individuals with disabilities, and Town staff, was made available to enhance public input efforts to identify physical and programmatic barriers that may impact accessibility of Town facilities, programs, and services.

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

For a complete list of survey questions, and responses, please see Attachment 9.5.

It is important to remember that while all efforts were made to encourage feedback, the results are not necessarily inclusive of all individuals in the community who may have a disability. Readers should not equate the respondent pool as representative of the number of residents who have a disability.

6.2.2 Results

Survey responses were received by respondents ages 18 to 65; and response rates increased with age. This response trend illustrates that older residents are potentially more impacted by and aware of accessibility issues. Most respondents fell into the following age ranges: 21% identified themselves as ages 56 to 65 and 28% as over 65 followed by 23% in age categories 36 – 45 and 46 - 55.

Responses indicated the following respondent trends:

- 11% stated they have a disability.
- 13% stated they are a caregiver or family member for a someone with a disability.
- 51% reported they, or people who they serve as caregivers, have not used a mobility aid, auxiliary aid for hearing or visual impairment, or service animal.
- 32% stated they use a crutch or cane.
- 17% reported they use a walker or mobility scooter.

6.2.2.1 Facilities, Program and Services Access

Responses included the following:

- 13% reported an issue accessing a Town facility due to a disability and all identified the Town Hall as an issue.
- 13% reported an issue accessing a Town Program or Service due to a disability and the following program and/or service barriers were noted as occurring at the Building Department, Department of Public Works, Library, Recreation Department, and Town Hall
- 11% of respondents reported difficulty accessing or participating in the local government activities including Town Meeting, Select Board Meeting, Other Board, Commission, Committee or Task Force Meeting, Local, State or National Elections or Other
- 5%, who reported difficulty, cited issues with the Town and Select Board Meetings

Opened-ended programs and services comments/concerns from respondents included:

- Lack of Town Meeting access when it was held under a tent
- Desire to make Hamilton easier to get around for all
- Lack of access to conduct business upstairs in Town Hall
- Difficulty hearing speakers

6.2.2.2 Pedestrian Ease of Use

There was a wide variety of answers regarding accessibility of pedestrian facilities. Pedestrian facilities were specified as sidewalks, crosswalks, push buttons at crosswalks (where present), curb ramps, and pedestrian crossings at driveways.

- 28% of respondents said all sidewalks are usable but some with minor difficulty.
- 7% of respondents stated that most sidewalks are inaccessible and too difficult to use.
- 37% of respondents stated that crosswalks are easily accessible.
- 48% of respondents stated that push buttons at crosswalks are easily accessible.
- 30% of respondents stated all curb ramps are usable but some with minor difficulty.
- 31% listed pedestrian crossing at driveways are usable but some with minor difficulty.

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

- Patio area at library not handicapped accessible.
- Desire to make all public buildings accessible with several handicapped parking spaces and wide walkways along with elevator to all the offices.
- Need for more and accessible sidewalks. Currently many sidewalks are in poor condition, difficult to use, and not level.
- A need for more handicapped parking near public facility entrances

6.2.2.3 Effective Communication

- 93% of respondents stated they have not made an accommodation request of the Town and stated general satisfaction with the Town's effective communication tools
- 50% of respondents, who did make an accessibility inquiry, stated that the staff they spoke with was responsive and resolved their issue
- 87% of respondents stated they knew who a member of the public can contact to make a request for an accommodation. They also stated that they had no difficulty accessing any of the Town communication due to a disability. Of those who had difficulty, the website was listed as the most difficult.
- 90% of respondents stated that they had no difficulty accessing or participating in local government activities due to a disability. Of those who had difficulty, the Town meeting, selectboard meeting and other meetings were listed as the most difficult.

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

- Difficulty navigating Town website, accessing current and readily available accurate meeting and zoom login info for remote meetings.
- Too many meetings do not seem to be easily found on the Town website, sometimes there are old meeting dates still up. There's been confusion when getting online that the particular account being used for a meeting cannot accommodate the public looking to get on.
- It would be great to have accessibility to information about updates in Hamilton.
- Improving the Town website and communication for people with disabilities would be helpful, including improving the Town website.

6.3 Transition Plan Public Comment

<TO BE ADDED AFTER FINAL DRAFT RELEASE>

7 Transition Plan

7.1 Overview of Transition Plan

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

7.1.1 Administrative Action Items

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

Action Item	Ref.	Timeline	Status/Notes
Appoint an ADA Coordinator	3.2.2	30 days	
Update and post public notice	3.1.2	60 days	
Revision to ADA Coordinator Job Description	3.2.2	6 months	
Revise, adopt and post new grievance procedure	3.3.2	90 days	
Complete Self-Evaluation	3.4.1	N/A	In process
Adopt Transition Plan (including public comment)	3.4.2	3-4 months	

7.1.2 Town-wide Action Items

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

Action Item	Ref.	Timeline	Status/Notes
Develop employee training program and standards on ADA and accessibility awareness.	4.1.1.1	1 year	
Integration of public notice into all Town and Departmental web pages, print materials, social media feeds.	3.1.2	6 months	
Create standard internal policies and procedures for addressing requests for accommodation.	4.1.1.1	1 year	
Create an accessibility web page with links on all subpages/sites.	3.1.2	6-9 months	
Develop program for routine inspections of facilities and testing of any specialized assistance devices.	4.1.2.1	6 months	
Conduct an initial training event or requirement on maintenance of accessible features and set schedule for periodic training; integrate into onboarding materials for new employees.	4.1.2.1	6-9 months	
Ensure maintenance of accessible features is specifically addressed in all contracts for services and construction projects as appropriate.	4.1.2.1	3 years	Allows for expiration of any multi-year contracts.

7.1.3 Departmental Programs & Services Action Items

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

Action Item	Ref.	Timeline	Status/Notes
Town Hall			
Post notices on departmental webpages and within building for all Town Hall 2 nd Floor departments regarding availability of alternative meeting and customer services space on 1 st floor.	4.2.1.1	30 days	
Designate and equip space on 1 st floor to provide for 2 nd floor departments a substantially equivalent meeting and service area.	4.2.1.1	3 months	
DPW – post notice on webpage of 100% accessible locations at which residents can procure trash bags and bulky waste sticker.	4.2.1.3	2 months	
Inspection – Ensure building inspector is included on all future Town projects to fully inspect all aspects of public buildings for ADA compliance, including use of digital level to check all slopes.	4.2.1.6	Immediate	
Clerk – update elections webpage and policy documents to include notices on accommodations and other recommendations	4.2.1.7	At least 30 days before next election	
Recreation/DPW – Develop Portable Toilet guidance for placement and type for parks and special events, including events at Patton Homestead.	4.2.2.2 4.2.2.3 4.2.7	2 months	
DPW/Planning – Evaluate adding PROWAG guidelines to Complete Streets Policy and adopting PROWAG standards in Design and Construction Manual or Standard Details	4.2.9	1 year	

7.1.4 Communications, Website/Social Media & Public Meetings

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

Action Item	Ref.	Timeline	Status
The ADA Coordinator should develop an Effective Communications Notice/Policy and distribute to Departments and website for posting.	5.1.2	6 months	
Develop a roster of ASL translators, alternative format vendors (braille) and ensure it is kept up to date if needed.	5.1.2	6 months	
Develop a standard policy/procedure and training on use of TTY/TDD and communication with hearing and speech impaired individuals.	5.1.2	6 months	
Develop a schedule and procedure for testing any assistive or auxiliary listening devices.	5.1.2	6 months	
Create separate landing page for accessibility, to include public notice, grievance procedure, contact	5.2.2	6 months	

information/links for ADA Coordinator, and Disability Commission (contact and agendas).			
Schedule and provide routine training for staff responsible for website and social media posting.	5.2.2	6-9 months	
Review and address specific formatting and contrast recommendations and findings from the website accessibility audit.	5.2.2	1 year	
Develop a procedure and schedule for routine audits of forms and postings provided by departments.	5.2.2	6 months	
Convert all scanned and PDF forms to fillable forms	4.1	1 year	
Select Board policy statement on posting of minutes, agendas, and materials in an accessible format.	5.3.2	3 months	
Evaluate the feasibility of offering all meetings in a hybrid format to allow full participation (pending expiration of OML Executive Order)	5.3.2	6 months	
Require all agendas for all public meetings contain statement on requesting accommodations.	5.3.2	30 days	
Update or develop social media policies on posting images to include alt text and posting text only information to accompany any graphics-based flyers or brochures	Multiple		

7.1.5 Facility Improvements and Capital Projects

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

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

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

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

Offered in the following table are those items that were identified as high priority and as having the most beneficial impact on accessibility. The full facility audits and the deficiencies identified therein should be addressed, and the Town should work with stakeholders to develop a long-term improvement plan that aligns with other strategic plans and the Town’s Capital Improvement Plan. The Town should also recognize that any of the improvements below may trigger the need for further mitigation under 521CMR, or be best performed as part of a larger scope. Prior to beginning any project in the list below, staff should consult the overall report and make a determination on scope and scale.

Action Item	Ref.	Timeline	Status
Town Hall	4.2.1.1		
Alternative meeting/service space for 2 nd floor departments – construct and/or equip		6 months	
Unisex toilet rooms, 1 accessible and directional signage		1 year	
Address main doors to make fully compliant		1 year	
Exterior parking and accessible routes to entrances		18 months	
Install elevator for second floor access		3 years	
Recreation Center/Gymnasium	4.2.2.1		
Unisex toilet rooms, 1 accessible and directional signage		1 year	
Exterior parking and accessible routes to entrances		18 months	
Athletic Fields			
Construct fully accessible athletic facilities – at least one of each type		5 years	
Playgrounds/Recreation Areas	4.2.2.3		
Construct one fully accessible playground		3 years	
Construct 1 fully accessible pavilion		5 years	
Library	4.2.3.1		
Exterior parking and accessible routes to entrances		6 months	
Unisex toilet rooms, 1 accessible and directional signage		1 year	
Public Safety Building	4.2.4		
Exterior parking and accessible routes to entrances		1 year	
Unisex toilet rooms, 1 accessible and directional signage		1 year	
Senior Center	4.2.5.1		
Exterior parking and drop-off areas		1 year	
Unisex toilet rooms, 1 accessible and directional signage		1 year	
Patton Homestead	4.2.7		
Parking and accessible routes to event areas		1 year	
Modify toilet rooms and accessible route		1 year	
Chebacco Woods Recreation Area	4.2.8.1		
Parking and accessible route to trailhead		1 year	
Accessible parking and rout to boat ramp		1 year	
Hamilton Cemetery	4.2.8.2		
Signage and parking improvements		2 years	
Relocate or add benches on accessible route		2 years	

8 Appendices

8.1 Recommended Policy and Procedure Documents

8.1.1 Public Notice (Proposed)

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

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

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

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

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

Complaints: A grievance procedure is available to resolve complaints. <LINK TO GRIEVANCE PROCEDURE>

For complaints, comments, or concerns, please contact:

<NAME>, ADA Coordinator
577 Bay Road
Hamilton, MA 01936
<phone>
<EMAIL (with LINK)>

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

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

8.1.2 Grievance Procedure (Proposed)

Americans with Disabilities Act Grievance Procedure (Full Version)

This grievance procedure is established to meet the requirements of the ADA. It 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 (Name of Public Entity).

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number, email address 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 as soon as possible, preferably within 60 calendar days of the alleged violation to:

<NAME>, ADA Coordinator
577 Bay Road
Hamilton, MA 01936
<phone>
<EMAIL (with LINK)>

Within 15 calendar days after receipt of the complaint, (name of ADA Coordinator) will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, (name of ADA Coordinator) will respond in writing, and where appropriate, in format that is accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the (Name of Public Entity) and offer options for substantive resolution of the complaint.

If the response by (name of ADA Coordinator) does not satisfactorily resolve the issue, the complainant may appeal the decision within 15 calendar days after receipt of the response to the (Head of Public Entity) or designee.

Within 15 calendar days after receipt of the appeal, the (Head of the Public Entity) or designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the (Head of the Public Entity) or designee will respond in writing, and, where appropriate, in a format that is accessible to the complainant, with a final resolution of the complaint.

Americans with Disabilities Act Grievance Procedure (Short Version)

Complaints concerning discrimination on the basis of disability by the Town of Hamilton may be sent to (ADA Coordinator name and contact information), who will contact the complaint within 15 calendar days after receipt of the complaint to discuss the complaint and will respond in writing within 15 days of the discussion.

8.1.3 Service Animal Policy (Proposed)

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

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

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

Below are the policy guidelines for the Town:

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

8.2 Resources

8.2.1 General Resources & Guides

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

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

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

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

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

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

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

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

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

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

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

8.2.2 Grant Funding for Accessibility Projects

Massachusetts Community Development Block Grant Program (CDBG)

CDBG is a federally funded, competitive grant program designed to help small cities and towns meet a broad range of community development needs. Eligible projects include but are not limited to housing rehabilitation or development, micro-enterprise or other business assistance, infrastructure, community/public facilities, public social services, planning, removal of architectural barriers to allow access by persons with disabilities, and downtown or area revitalization. More information about the program can be found here:

<https://www.mass.gov/service-details/community-development-block-grant-cdbg>

Massachusetts Municipal ADA Improvement Grant Program

The Massachusetts Office on Disability (MOD) administers the Municipal ADA Improvement Grant program. This funding is aimed at supporting capital improvements to improve programmatic access and/or removing barriers encountered by people with disabilities. Project grants of up to \$250,000 are available. There are also planning grants to assist

communities in creating or updating a Self-Evaluation and/or Transition Plan. More information about the program can be found here:

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

Massachusetts Cultural Facilities Fund

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

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

Complete Streets Funding Program

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

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

Community Transit Grant Program

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

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

8.2.3 Services to Aid Communication with Hearing/Speech Impaired Individuals

MassRelay Service

The Massachusetts Department of Mental Health operates the MassRelay service. This service is provided 24 hours, seven days a week, 365 days a year and enables people who are deaf, hard of hearing, late deafening, or speech disabled to communicate with hearing people over regular phone lines. A Relay Operator will complete your call, dialing

the party you wish to contact and then stay on the line to relay messages electronically via a TTY or verbally to people who can hear. Dial 711 in Massachusetts or 1-800-439-0183 from anywhere else.

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

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

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

8.2.4 Training and Technical Assistance

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

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

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

Massachusetts Commission Against Discrimination (MCAD)

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

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

Massachusetts Office on Disability (MOD)

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

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

ADA Coordinator Certification Program

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

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

National ADA Symposium

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

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

New England ADA Center

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

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

9 Attachments

The following Attachments are presented as separate documents and are summarized in this section. These documents are used to inform the overall self-evaluation and transition plan and are provided as informational only.

9.1 Building Audits

Facility audit reports provide a photo-captioned report on each facility owned and operated by the Town. Additionally, the information from the facility audits is included in Section 4.2 as it relates to the building or facility in which a particular service or program is delivered by a Town department. The photo-captioned reports are intended to be used by Town staff in identifying and rectifying specific accessibility code non-compliance.

Summary findings/recommendations from the facility audits are also included in Section 7.1.5, Facility Improvements and Capital Projects, as part of the Town's Transition Plan.

9.2 Outdoor Facility Audits

The outdoor facility audits include parks, playgrounds, trailheads, and other outdoor elements. Summary findings/recommendations from the facility audits are also included in Section 7.1.5, Facility Improvements and Capital Projects, as part of the Town's Transition Plan.

9.3 Departmental Questionnaires

The Town's departmental core programs and services, as determined by questionnaire responses, communication with staff, and website research, are used to inform the facilities audits by establishing the context under which the various services or programs are provided in a particular facility. In other words, if the facility a in which a department provides a service in is not accessible, but the services are performed off site or can easily be offered in an alternative way that is accessible, remedial work to such a facility would be given a lower priority.

9.4 Website Audit

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

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

9.5 Public Input Survey Results

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

Attachment 9.1 Building Audits

DRAFT HAMILTON BUILDING AUDITS

KMA audited the following buildings:

GENERAL PATTONS HOMESTEAD	2
PUBLIC LIBRARY	8
PUBLIC SAFETY BUILDING	18
RECREATION CENTER.....	27
SENIOR CENTER.....	33
TOWN HALL	39
WATER PLANT.....	53


GENERAL PATTONS HOMESTEAD



AUDITED ON: FEBRUARY 8, 2022







General Patton's Homestead is located at 650 Asbury Street. The site consists of a three-story building that contains private businesses and employee meeting rooms, offices, and toilet rooms. Public events are hosted outdoors. There are two parking lots at this facility, including one designated accessible parking space.


GENERAL PATTON'S HOMESTEAD

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
1.	<p>Private Business Spaces</p> <p>KMA did not have access to the private business spaces during the audit. KMA requires more information on whether the Town leases these spaces in order to determine accessibility requirements.</p>	N/A	N/A	N/A	N/A
2.	<p>Parking Lot near Main Entrance</p> <p>The accessible parking space and its associated access aisle have slopes >2%.</p> <p>The designated accessible parking space and its associated aisle lack the required marking.</p>	<p>2010 ADAS 502.4</p> <p>2010 ADAS 502.2</p>		<p>Regrade and restripe the existing accessible parking space and its associated access aisle.</p> <p>Unit Cost: \$1,500 per space or aisle</p> <p>Quantity: 2 (1 spaces, 1 aisle)</p>	\$3,000

<p>3.</p>	<p>Blue Stone Path to Entry</p> <p>There are gaps between the stones > 1/2" in the direction of travel, @ up to 1 1/4".</p> <p>There are changes in level > 1/4" between the stones, @ up to 3/4".</p> <p>A portion near the front door has running slopes >5% and is not treated as a ramp, @ 6%.</p> <p>There are steps leading to the public sidewalk and lower parking lot.</p>	<p>2010 ADAS 302.3 2010 ADAS 303.2 2010 ADAS 403.3 2010 ADAS 206.2.2</p>		<p>Regrade and resurface the bluestone path.</p> <p>Unit Cost: \$25/ SF Est . Quantity: 500 SF</p>	<p>\$12,500</p>
<p>4.</p>	<p>Lower Parking Lot</p> <p>The lower parking lot gravel surface is not stable, firm, and slip resistant.</p> <p>There is an insufficient number of accessible parking spaces. There are no standard or van accessible parking spaces provided.</p>	<p>2010 ADAS 502.4 2010 ADAS 208.2</p>		<p>Resurface and stripe the existing parking spaces to provide accessible parking spaces per ADA-208.2 as well as their associated signs and access aisles.</p> <p>Unit Cost: \$1,500 per space or aisle Est. Quantity: 3 (2 spaces + 1 aisle)</p>	<p>\$4,500</p>

<p>5.</p>	<p>Municipal Sidewalk</p> <p>The sidewalks are not firm and slip resistant, due to the gravel surface.</p> <p>The sidewalks are obstructed due to the snow.</p> <p><i>Note: KMA audited the municipal sidewalks that served as the only accessible route between site elements.</i></p>	<p>2010 ADAS 206.2.2</p>		<p>Regrade the walking paths to provide at least one accessible route to each unique amenity within the site. Further study required</p> <p>Unit Cost: \$50,000 Quantity: 1</p> <p>Remove the snow and establish a policy to ensure snow removal becomes part of routine maintenance of the sidewalks.</p> <p>Unit Cost: \$50 Quantity: 1</p>	<p>\$50,000</p>
<p>6.</p>	<p>Field</p> <p>The field is obstructed due to the snow.</p> <p>There is no accessible route to the event area due to the grass surface.</p>	<p>2010 ADAS 206.2.2</p>		<p>Remove the snow and establish a policy to ensure snow removal becomes part of routine maintenance of the field.</p> <p>Unit Cost: \$50 Quantity: 1</p> <p>Provide an accessible route to the event area.</p> <p>Unit Cost: \$25/SF Est. Quantity: 750 SF</p>	<p>\$18,800</p>

<p>7.</p>	<p>Main Entrance to Public Area</p> <p>The main entry door provides <32" clear width, @ 29".</p> <p>The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p> <p>The door maneuvering clearance is <18" on the latch pull-side for a forward approach.</p> <p>The threshold is >1/2" and not beveled at maximum 1:2, @ 1 3/4" AFF.</p>	<p>2010 ADAS 404.2.3 2010 ADAS 404.2.7 2010 ADAS 404.2.4.1 2010 ADAS 404.2.5</p>		<p>Enlarge the door opening and install a new door. Unit Cost: \$5,000 ea. Quantity: 1</p> <p>Replace the door hardware with lever type. Unit Cost: \$300 ea. Quantity: 1</p> <p>Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 1</p> <p>Replace the threshold. Unit Cost: \$250 ea. Quantity: 1</p>	<p>\$8,050</p>
<p>8.</p>	<p>Corridor near Accessible Toilet Room</p> <p>Some of the corridors provide <36" wide for a depth >24", @ as little as 27" wide.</p> <p><i>Observed in corridor near the Accessible Toilet Room, and in corridor leading to Employee's Space.</i></p>	<p>2010 ADAS 403.5.1</p>		<p>Enlarge the route. Additional study required. Unit Cost: \$1,000 ea. Quantity: 1</p>	<p>\$1,000</p>

<p>9.</p>	<p>Public Single-User Toilet Room</p> <p>The door lacks tactile/ braille signage mounted on the latch side of the door.</p> <p>The door maneuvering clearance is <18" on the latch pull-side for a forward approach, due to the water closet.</p> <p>The side grab is <42" long, @ 26".</p> <p>The wall mounted cabinet protrudes >4" into the circulation area, @ 8 3/4".</p> <p>The toilet paper dispenser is not located 7"-9" from the front of the toilet.</p>	<p>2010 ADAS 703.4.2</p> <p>2010 ADAS 404.2.4.1</p> <p>2010 ADAS 604.5.1</p> <p>2010 ADAS 307.2</p> <p>2010 ADAS 604.4</p>		<p>Install tactile/ Braille signage on the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 per sign Quantity: 1</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 1</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the cabinet. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the toilet paper dispensers. Unit Cost: \$50 ea. Quantity: 1</p>	<p>\$1,700</p>
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<p>TOTAL FOR GENERAL PATTON'S HOMESTEAD:</p>	<p>\$99,550</p>
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PUBLIC LIBRARY



AUDITED ON: MARCH 3, 2022







The Hamilton Public Library is located at 14 Union Street. It is a two-story building constructed in 2001. The library contains stacks, toilet rooms, study areas, meeting rooms, and employee areas. The parking lot is shared with the Recreation Center and Fairhaven Field. There are four accessible parking spaces.




PUBLIC LIBRARY





#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
10.	<p>Accessible Parking Spaces serving the Library Main Entrance</p> <p>There is an insufficient number of van accessible parking spaces. For a parking lot with four accessible spaces, one must be van accessible.</p> <p>The accessible parking spaces and their associated access aisles have slopes >2%, @ up to 3.5%.</p> <p>The accessible parking spaces and their associates access aisles have deteriorated surface.</p> <p>The access aisles are <60" wide, measured centerline to centerline, @ 57".</p> <p>The accessible parking signs are mounted <60" AFF, measured to the bottom of the sign, @ 54" AFF.</p>	<p>2010 ADAS 208.2.4</p> <p>2010 ADAS 502.4</p> <p>2010 ADAS 502.3.1</p> <p>2010 ADAS 502.6</p>		<p>Restripe a portion of the parking lot to add 1 van accessible space, as well as its associated sign and access aisle.</p> <p>Unit Cost: \$300 per space or aisle Quantity: 2 (1 space + 1 aisle)</p> <p>Regrade and restripe the existing accessible parking spaces and their associated access aisle.</p> <p>Unit Cost: \$1,500 per space or aisle Quantity: 4 (2 spaces + 2 aisles)</p> <p>Install a sign with the International Symbol of Accessibility at 60" AFF minimum, measured to the bottom of the sign. Include a van accessible sign where applicable.</p> <p>Unit Cost: \$100 ea. Quantity: 2</p>	\$6,800
11.	<p>Accessible Parking Spaces serving the Recreation Center</p> <p>The accessible parking signs are mounted <60" AFF, measured to the bottom of the sign, @ 50" AFF.</p> <p>The slope of the curb ramp is >8.3%, @ 9.5%.</p>	<p>2010 ADAS 502.3.1</p> <p>2010 ADAS 405.2</p>		<p>Install a sign with the International Symbol of Accessibility at 60" AFF minimum, measured to the bottom of the sign. Include a van accessible sign where applicable.</p> <p>Unit Cost: \$100 ea. Quantity: 2</p> <p>Rebuild the curb ramp.</p> <p>Unit Cost: \$1,250 ea. Quantity: 1</p>	\$1,450

<p>12.</p>	<p>Walkways around the Library</p> <p>Walkways have cross slopes >2%, up to 2.8%.</p> <p>Some areas of the walkway have changes in level > 1/2" and not beveled due to areas of deterioration/material settlement.</p>	<p>2010 ADAS 403.3 2010 ADAS 403.4</p>		<p>Regrade the walkway. Unit Cost: \$25/SF Est. Quantity: 600 SF</p>	<p>\$15,000</p>
<p>13.</p>	<p>Main Entrance</p> <p>The door lacks a level landing, @ 2.2%.</p> <p>The drop boxes are mounted >48" AFF, @ 56" AFF.</p>	<p>2010 ADAS 404.2.4.4 2010 ADAS 308.2 & 308.3</p>		<p>Regrade the door landing. Unit Cost: \$1,000 ea. Quantity: 1</p> <p>Lower the drop boxes. Unit Cost: \$250 ea. Quantity: 1</p>	<p>\$1,250</p>

<p>14.</p>	<p>Interior Doors</p> <p>In some doors, the bottom of the glazed panels is >43" AFF, @ up to 56" AFF.</p> <p><i>Observed in Main Entrance, Children's Library, Program Room, Phoenix Room, and Staircase's doors.</i></p>	<p>2010 ADAS 404.2.11</p>		<p>Install a new door. Unit Cost: \$1,000 ea. Est. Quantity: 12</p>	<p>\$12,000</p>
<p>15.</p>	<p>Bookshelves</p> <p>Some of the bookshelves protrude >4" into the circulation space, @ 9".</p>	<p>2010 ADAS 307.2</p>		<p>Install a cane detectable object below the bookshelf. Unit Cost: \$250 ea. Est. Quantity: 20</p>	<p>\$5,000</p>
<p>16.</p>	<p>Desks and Tables</p> <p>There is no accessible computer desk provided on the lower level, @ 42" AFF measured to the top of the desk.</p>	<p>2010 ADAS 226.1</p>		<p>Provide an accessible computer desk. Unit Cost: \$250 ea. Quantity: 1</p>	<p>\$250</p>
<p>17.</p>	<p>Main Stair</p> <p>The clear space between the handrail and the wall is <1 1/2", @ 1 1/3" at some points.</p> <p>The stairs handrails lack the required extensions at the bottom.</p>	<p>2010 ADAS 505.5 2010 ADAS 505.10.3</p>		<p>Install compliant handrails on both sides of the stair. Unit Cost: \$50/LF Est. Quantity: 15 LF</p>	<p>\$750</p>





18.	<p>Program Room (Lower Level)</p> <p>The paper towel dispenser is mounted >46" AFF over the counter, @ 47" AF.</p>	2010 ADAS 308.3.2		<p>Lower the paper towel dispenser. Unit Cost: \$50 ea. Quantity: 1</p>	\$50
19.	<p>Drinking Fountain (Lower Level)</p> <p>The drinking fountain protrudes >4" into the circulation space, @ 18".</p> <p>The women's toilet room tactile/ Braille signage lacks the required 18"x18" clear floor space due to the drinking fountain.</p> <p>The floor lacks a 'hi' drinking fountain.</p>	2010 ADAS 307.2 2010 ADAS 703.4.2 2010 ADAS 211.2 & 211.3		<p>Relocate the drinking fountain to a location where it is not a protruding object and does not obstruct the sign clear floor space. Unit Cost: \$1,500 ea. Quantity: 1</p> <p>Add a 'hi' drinking fountain per ADA-602. Unit Cost: \$1,500 Quantity: 1</p>	\$3,000
20.	<p>Drinking Fountain (First Level)</p> <p>The knee clearance at the drinking fountain is <27" AFF, @ 26 1/2".</p>	2010 ADAS 602.2		<p>Relocate the drinking fountain so it provides the required knee clearance. Unit Cost: \$1,500 ea. Quantity: 1</p>	\$1,500


<p>21.</p>	<p>Conference Room (First Level)</p> <p>The door maneuvering clearance is <18" on the latch pull-side for a forward approach, @ 7" due to the sink.</p> <p>The sink pipes lack insulation.</p>	<p>2010 ADAS 404.2.4.1 2010 ADAS 606.5</p>		<p>Relocate the sink or provide a smaller sink to provide the required door maneuvering clearance. Unit Cost: \$750 ea. Est. Quantity: 1</p> <p>Insulate the pipes underneath the sink. Unit Cost: \$50 ea. Est. Quantity: 1</p>	<p>\$800</p>
<p>22.</p>	<p>Staff Room (First Level)</p> <p>The paper towel dispenser is mounted >46" AFF over the counter, @ 49" AF.</p> <p>The range controls require reaching across burners.</p> <p>The kitchenette does not provide 50% of the storage within an accessible reach range.</p>	<p>2010 ADAS 308.3.2 2010 ADAS 804.6.4 2010 ADAS 804.5</p>		<p>Lower the paper towel dispenser. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the range controls. Unit Cost: \$500 ea. Quantity: 1</p> <p>Provide additional storage within an accessible reach range. Unit Cost: \$250 Quantity: 1</p>	<p>\$800</p>
<p>23.</p>	<p>Thresholds in Toilet Rooms</p> <p>Thresholds in all toilet rooms are > 1/4" AFF and not beveled at maximum 1:2.</p>	<p>2010 ADAS 404.2.5</p>		<p>Replace the threshold. Unit Cost: \$250 ea. Quantity: 6</p>	<p>\$1,500</p>

<p>24.</p>	<p>Men's & Women's Multi-user Toilet Rooms (Lower Floor)</p> <p>The door does not open a full 90 degrees due to the paper towel dispenser and trash receptacle.</p> <p>The pull-side door maneuvering clearance is < 60" perpendicular to the doorway, @ 32" due to the paper towel dispenser and trash receptacle.</p> <p>The door maneuvering clearance is <18" on the latch pull-side for a forward approach, @ 15" due to the lavatory.</p> <p>The lavatory is >34" AFF, @ 34 1/4" AFF.</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 19".</p> <p><i>Observed in Women's Toilet Room.</i></p> <p>The mirror is >40" AFF, @ 40 1/2", measured to the bottom of the reflective surface.</p> <p>The toilet stall door lacks a pull device on both sides of the door.</p> <p>The side grab bar extends <54" from the rear wall, @ 49".</p> <p>The rear grab bar extends <12" from the centerline of the water closet, @ 6".</p> <p>The coat hook is mounted >48" AFF, @ 54" AFF.</p>	<p>2010 ADAS 404.2.3 2010 ADAS 404.2.4.1 2010 ADAS 606.3 2010 ADAS 604.2 2010 ADAS 603.3 2010 ADAS 604.8.2.2 2010 ADAS 604.5.1 2010 ADAS 604.5.2 2010 ADAS 308.2 & 308.3</p>	   	<p>Relocate the paper towel dispenser and trash receptacle to a location where it does not obstruct the door opening and maneuvering clearance. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 2</p> <p>Lower the lavatory to max. 34" AFF. Unit Cost: \$3,000 ea. Quantity: 1</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Est. Quantity: 1</p> <p>Lower the mirror. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a door pull on both sides of the stall door. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the rear grab bar. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea.</p>	<p>\$8,050</p>
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	<i>Observed in Women's and Men's Toilet Rooms.</i>			Quantity: 2	
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<p>25.</p>	<p>Men's & Women's Multi-user Toilet Rooms (First Floor)</p> <p>The pull-side door maneuvering clearance is < 48" perpendicular to the doorway, @ 26" due to the paper towel dispenser and trash receptacle.</p> <p><i>Observed in Men's Toilet Room.</i></p> <p>The mirror is >40" AFF, @ 40 1/2", measured to the bottom of the reflective surface.</p> <p>The toilet stall door lacks a pull device on both sides of the door.</p> <p>The stall door is not self-closing.</p> <p>The toilet centerline is not 16"-18" from the side wall, @ up to 19 1/2".</p> <p>The side grab bar extends <54" from the rear wall, @ 49".</p> <p>The rear grab bar extends <12" from the centerline of the water closet, @ 7 1/2".</p> <p>The coat hook is mounted >48" AFF, @ 54" AFF.</p> <p><i>Observed in Women's and Men's Toilet Rooms.</i></p>	<p>2010 ADAS 404.2.4.1</p> <p>2010 ADAS 604.2</p> <p>2010 ADAS 604.8.2.2</p> <p>2010 ADAS 604.2</p> <p>2010 ADAS 604.5.1</p> <p>2010 ADAS 604.5.2</p> <p>2010 ADAS 308.2 & 308.3</p>	   	<p>Relocate the paper towel dispenser and trash receptacle to a location where it does not obstruct the door opening and maneuvering clearance.</p> <p>Unit Cost: \$50 ea. Quantity: 1</p> <p>Lower the mirror.</p> <p>Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a door pull on both sides of the stall door.</p> <p>Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a self-closing hinge.</p> <p>Unit Cost: \$50 ea. Quantity: 2</p> <p>Reposition the toilet.</p> <p>Unit Cost: \$1,500 ea. Est. Quantity: 2</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall.</p> <p>Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the rear grab bar.</p> <p>Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a coat hook mounted no higher than 48" AFF.</p> <p>Unit Cost: \$50 ea. Quantity: 2</p>	<p>\$3,650</p>
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<p>26.</p>	<p>Children’s Single-user Toilet Rooms (Lower Floor)</p> <p>The door maneuvering clearance is <18” on the latch pull-side for a forward approach, @ 15” due to the lavatory.</p> <p>The knee clearance at the sink is <24” AFF, @ 23” AFF.</p> <p>The side grab bar extends <54” from the rear wall, @ 49”.</p> <p>The rear grab bar extends <12” from the centerline of the water closet, @ as little as 8”.</p> <p>The toilet paper dispenser and infant changing table are mounted <12” above the side grab bar, @ 6”.</p> <p>The top of the infant changing table is >34” AFF, @ 36” AFF.</p> <p>The paper towel dispenser protrudes >4” into the circulation area, @ 9”.</p>	<p>2010 ADAS 404.2.4.1</p> <p>2010 ADAS 606.2</p> <p>2010 ADAS 604.5.1</p> <p>2010 ADAS 604.5.2</p> <p>2010 ADAS 609.3</p> <p>2010 ADAS 902.1</p> <p>2010 ADAS 307.2</p>		<p>Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 2</p> <p>Raise the lavatory to provide the required knee/toe clearances. Unit Cost: \$750 ea. Quantity: 2</p> <p>Install a 42” min. side grab bar, located 12” from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the rear grab bar. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the toilet paper dispenser and infant changing table. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate and lower the changing table to 34” AFF maximum when in the open position. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the paper towel dispenser and infant changing table. Unit Cost: \$50 ea. Quantity: 2</p>	<p>\$7,000</p>
<p>TOTAL FOR PUBLIC LIBRARY:</p>					<p>\$68,850</p>

PUBLIC SAFETY BUILDING



AUDITED ON: MARCH 3, 2022









The Hamilton Public Safety building is located at 265 Bay Road. It is a two-story building with a reception area, administrative offices, employee locker rooms, employee dorms, holding cells, toilet rooms, and typical police function areas. The parking lot is shared with the Senior Center, and it provides four accessible parking spaces.




Note: Refer to the Hamilton Senior Center report for parking details.

PUBLIC SAFETY BUILDING





#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
27.	<p>Walkways around the Building</p> <p>The curb ramp in front of the main entrance lacks a level landing at the top.</p> <p>The curb ramp in the accessible route connecting the main entrance with the accessible parking spaces has a counter slope 5%, @ 6.4%.</p>	<p>2010 ADAS 406.4</p> <p>2010 ADAS 406.2</p>		<p>Rebuild the curb ramp.</p> <p>Unit Cost: \$1,250 ea.</p> <p>Quantity: 2</p>	\$2,500
28.	<p>Main Entrance</p> <p>The threshold is > ½” high and not beveled with a maximum 1:2 slope.</p> <p>The accessible route to the main entrance has running slopes >5%, @ 5.3%, and is not treated as a ramp.</p>	<p>2010 ADAS 404.2.5</p> <p>2010 ADAS 403.3</p>		<p>Replace the threshold.</p> <p>Unit Cost: \$250 ea.</p> <p>Quantity: 1</p> <p>Install compliant handrails on both sides.</p> <p>Unit Cost: \$50/LF</p> <p>Est. Quantity: 90 SF</p>	\$4,750

<p>29.</p>	<p>Lobby Area</p> <p>Reception counters protrude >4" into the circulation area.</p> <p>The AED box is mounted >48" AFF to the highest operable part, @ 52" AFF, and it protrudes >4" into the circulation area, @ 7".</p> <p>Mailboxes are mounted >48" AFF to the highest operable part, @ 58" AFF, and protrude >4" into the circulation area, @ 7".</p> <p>The phone is mounted >48" AFF to the highest operable control, @ 56" AFF.</p>	<p>2010 ADAS 307.2 2010 ADAS 308.2 & 308.3</p>		<p>Install a cane detectable object below the counters. Unit Cost: \$250 ea. Quantity: 3</p> <p>Lower the AED, mailboxes, and phone no higher than 48" AFF. Unit Cost: \$250 ea. Quantity: 3</p>	<p>\$1,500</p>
<p>30.</p>	<p>Public Single-user Toilet Room serving Lobby</p> <p>The threshold is > ¼" high and not beveled with a maximum 1:2 slope.</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 18 ½".</p> <p>The side grab bar extends <54" from the rear wall, @ 49".</p> <p>The paper towel dispenser is mounted >48" AFF to the highest operable part, @ 57" AFF, and protrudes >4" into the circulation area, @ 9".</p>	<p>2010 ADAS 404.2.5 2010 ADAS 604.2 2010 ADAS 604.5.1 2010 ADAS 308.2 & 308.3 2010 ADAS 307.2</p>		<p>Replace the threshold. Unit Cost: \$250 ea. Quantity: 1</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 1</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the paper towel dispenser. Unit Cost: \$50 ea. Quantity: 1</p>	<p>\$1,850</p>

31.	<p>Conference Room (Police Department)</p> <p>The bottom of the door glazed panel is >43" AFF, @ 45" AFF.</p> <p>The TV protrudes >4" into the circulation space.</p>	<p>2010 ADAS 404.2.11 2010 ADAS 307.2</p>		<p>Install a new door. Unit Cost: \$1,000 ea. Est. Quantity: 1</p> <p>Install a cane detectable object below the TV. Unit Cost: \$250 ea. Quantity: 1</p>	\$1,250
32.	<p>Break Room (Police Department)</p> <p>The knee clearance at the sink is <8" deep, @ 3".</p> <p>The microwave is mounted >46" AFF over the counter, @ 62" AFF to the highest operable control.</p> <p>The paper towel dispenser protrudes >4" into the circulation area, @ 9".</p> <p>The phone is mounted >48" AFF to the highest operable control, @ 62" AFF.</p>	<p>2010 ADAS 606.2 2010 ADAS 308.3 2010 ADAS 307.2 2010 ADAS 308.2 & 308.3</p>	 	<p>Modify the apron at the sink to provide the required knee clearance. Unit Cost: \$250 ea. Quantity: 1</p> <p>Lower the microwave and phone. Unit Cost: \$250 ea. Quantity: 2</p> <p>Install a cane detectable object below the paper towel dispenser. Unit Cost: \$250 ea. Quantity: 1</p>	\$1,000
33.	<p>Booking Area (Police Department)</p> <p>The counter is >36" AFF, @ 40" AFF.</p> <p>The sink is >34" AFF, @ 36" AFF.</p> <p>The sink does not provide knee/toe clearance for a forward approach due to the cabinet.</p>	<p>2010 ADAS 904.4 2010 ADAS 606.3 2010 ADAS 606.2</p>		<p>Lower a 36" wide portion of the counter to 36" max. AFF. Unit Cost: \$750 Quantity: 1</p> <p>Provide an accessible sink. Unit Cost: \$750 ea. Quantity: 1</p>	\$1,500

<p>34.</p>	<p>Detainee Interview Room (Police Department)</p> <p>The door tactile/ braille signage is not mounted on the latch side of the door.</p> <p>The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p>	<p>2010 ADAS 703.4.2 2010 ADAS 404.2.7</p>		<p>Install compliant tactile/ Braille signage on the nearest adjacent wall to the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 ea. Est. Quantity: 1</p> <p>Replace the door hardware with lever type. Unit Cost: \$300 ea. Quantity: 1</p>	<p>\$400</p>
<p>35.</p>	<p>Detainee Access Route (Police Department)</p> <p>The detainee entrance is not accessible due to the step.</p>	<p>2010 ADAS 206.2.4</p>		<p>Provide an accessible route. Additional study required. Unit Cost: \$1,000 Quantity: 1</p>	<p>\$1,000</p>
<p>36.</p>	<p>Detainee Pre-Holding Room (Police Department)</p> <p>The counter is >36" AFF, @ 50" AFF.</p>	<p>2010 ADAS 904.4</p>		<p>Lower a 36" wide portion of the counter to 36" max. AFF. Unit Cost: \$750 Quantity: 1</p>	<p>\$750</p>

<p>37.</p>	<p>Holding Cells (Police Department)</p> <p>The gate provides < 32" clear width, @ 31".</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 18 1/2".</p> <p><i>Note: At least one accessible cell per holding classification must be provided (typically men's, women's and juvenile).</i></p>	<p>2010 ADAS 404.2.3</p> <p>2010 ADAS 604.2</p>		<p>Enlarge the gate opening and install a new gate. Unit Cost: \$5,000 ea. Quantity: 1</p> <p>Provide a compliant sink/toilet combo unit. Unit Cost: \$3,000 ea. Quantity: 1</p> <p>Develop a policy to utilize the accessible cell with the required turning space when needed. Ensure information about this policy is properly disseminated. Unit Cost: \$0 Quantity: N/A</p>	<p>\$8,000</p>
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<p>38.</p>	<p>Men's & Women's Locker Rooms (Police Department)</p> <p>The floor surface has an abrupt change in level near the lavatory.</p> <p>The lavatory pipes are not insulated.</p> <p>The locker shelves and hooks are not 15"-48" AFF, @ up to 76" AFF.</p> <p>There is no accessible toilet stall provided.</p> <p>There is no accessible shower provided.</p> <p><i>Observed in Men's and Women's Locker Rooms.</i></p> <p>The paper towel dispenser is mounted >48" AFF to the highest operable part, @ 57" AFF, and protrudes >4" into the circulation area, @ 9".</p> <p>The coat hook is mounted >48" AFF, @ 66" AFF.</p> <p><i>Observed in Women's Locker Room.</i></p> <p>The mirror is >40" AFF, @ up to 41", measured to the bottom of the reflective surface.</p> <p><i>Observed in Men's Locker Room.</i></p>	<p>2010 ADAS 206.2.4</p> <p>2010 ADAS 606.5</p> <p>2010 ADAS 222.2</p> <p>2010 ADAS 213.3.1</p> <p>2010 ADAS 213.3.6</p> <p>2010 ADAS 308.2 & 308.3</p> <p>2010 ADAS 307.2</p> <p>2010 ADAS 603.3</p>	   	<p>Regrade the floor near the grate. Unit Cost: \$1,000 ea. Quantity: 2</p> <p>Insulate the pipes underneath the sink. Unit Cost: \$50 ea. Est. Quantity: 2</p> <p>Provide at least one locker, and no less than 5% of the total number of lockers in a cluster, that provide the shelves at 48" max. AFF. Unit Cost: \$250 ea. Est. Quantity: 2</p> <p>Provide an accessible roll-in or transfer shower. Unit Cost: \$2,200 ea. Est. Quantity: 2</p> <p>Provide an accessible toilet room. Unit Cost: \$5,000 ea. Quantity: 2</p> <p>Relocate the paper towel dispenser. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 1</p> <p>Lower the mirror. Unit Cost: \$50 ea. Quantity: 1</p>	<p>\$17,250</p>
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<p>39.</p>	<p>Men's & Women's Locker Rooms (Fire Department)</p> <p>The lavatory pipes are not insulated.</p> <p>The locker shelves and hooks are not 15"-48" AFF, @ up to 69" AFF.</p> <p>The paper towel dispenser is mounted >48" AFF to the highest operable part, @ 55" AFF, and protrudes >4" into the circulation area, @ 9".</p> <p>There is no accessible shower provided.</p> <p><i>Observed in Men's and Women's Locker Rooms.</i></p> <p>The toilet stall door provides <32" clear width, @ 24".</p> <p>The clearance around the water closet is <60" measured perpendicular from the side wall to the lavatory.</p> <p>The toilet lacks the required grab bars.</p> <p>The mirror is >40" AFF, @ up to 40 1/2", measured to the bottom of the reflective surface.</p> <p>The coat hook is mounted >48" AFF, @ 66" AFF.</p> <p><i>Observed in Women's Locker Room.</i></p> <p>The floor surface has slopes >2% towards the drain.</p>	<p>2010 ADAS 606.5</p> <p>2010 ADAS 222.2</p> <p>2010 ADAS 308.2 & 308.3</p> <p>2010 ADAS 307.2</p> <p>2010 ADAS 213.3.6</p> <p>2010 ADAS 404.2.3</p> <p>2010 ADAS 604.3.1</p> <p>2010 ADAS 604.5</p> <p>2010 ADAS 603.3</p> <p>2010 ADAS 606.2</p> <p>2010 ADAS 206.2.4</p> <p>2010 ADAS 213.3.1</p>		<p>Insulate the pipes underneath the sink. Unit Cost: \$50 ea. Est. Quantity: 2</p> <p>Provide at least one locker, and no less than 5% of the total number of lockers in a cluster, that provide the shelves at 48" max. AFF. Unit Cost: \$250 ea. Est. Quantity: 2</p> <p>Relocate the paper towel dispenser. Unit Cost: \$50 ea. Quantity: 2</p> <p>Provide an accessible roll-in or transfer shower. Unit Cost: \$2,200 ea. Est. Quantity: 2</p> <p>Provide an accessible toilet room. Unit Cost: \$5,000 ea. Quantity: 2</p> <p>Lower the mirror. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 1</p> <p>Regrade the floor near the lavatory and drain. Unit Cost: \$1,000 ea. Quantity: 1</p>	<p>\$16,200</p>
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	<p>The floor surface has an abrupt change in level near the lavatory.</p> <p>There is no accessible toilet stall provided.</p> <p><i>Observed in Men's Locker Room.</i></p>				
40.	<p>Accessible Routes within Fire Department Levels</p> <p>An accessible route is not provided between the levels and there are unique programs located on non-accessible levels.</p> <p><i>For example: staff kitchenette, staff break room, training room, and dorms.</i></p>	2010 ADAS 206.2.3	No photo	<p>Provide an elevator or develop a policy to ensure all programs can be provided on an accessible level.</p> <p>Additional study required.</p> <p>Unit Cost: \$50,000 ea.</p> <p>Quantity: 1</p>	\$50,000
TOTAL FOR PUBLIC SAFETY BUILDING:					\$107,950

RECREATION CENTER




AUDITED ON: MARCH 3, 2022





The Hamilton Recreation Center is adjacent to the Public Library, located at 14 Union Street. It is a one-story building containing toilet rooms and gymnasium. The parking lot is shared with the Public Library and Fairhaven Field, and it provides four accessible parking spaces.


Note: Refer to the Hamilton Public Library report for parking details.

RECREATION CENTER

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
41.	<p>Walkways around the Building</p> <p>Walkways have running slopes >5%, @ up to 6.3%, and are not treated as ramp.</p>	2010 ADAS 403.3		Regrade the walkway. Unit Cost: \$25/SF Est. Quantity: 390 SF	\$9,750
42.	<p>Egress Route from Gymnasium</p> <p>The ramp has running slopes >8.3%, @ 10%.</p> <p>The ramp lacks the required edge protection.</p>	2010 ADAS 405.2 2010 ADAS 405.9		Rebuild the ramp. Unit Cost: \$15,000 ea. Quantity: 1	\$15,000
43.	<p>Main Entrance</p> <p>The mail drop-box is mounted >48" AFF, @ 50" AFF and it lacks an adjacent level clear floor space, @ 6.3%.</p> <p>The door landing has an abrupt change in level.</p>	2010 ADAS 308.2 & 308.3 2010 ADAS 305.2 2010 ADAS 404.2.4.4		Lower and relocate the drop-box. Unit Cost: \$250 ea. Quantity: 1 Regrade the door landing. Unit Cost: \$1,000 Quantity: 1	\$1,250

44.	<p>Hooks in Corridor</p> <p>Hooks and shelves are mounted >48" AFF, @ up to 71" AFF, and they protrude >4" into the circulation area, @ 9".</p>	<p>2010 ADAS 308.2 & 308.3</p> <p>2010 ADAS 307.2</p>		<p>Provide at least one hook and shelf mounted at 48" max. AFF. Unit Cost: \$250 ea. Quantity: 1</p> <p>Install a cane detectable object below the shelves. Unit Cost: \$250 ea. Quantity: 2</p>	\$750
45.	<p>Door to Gymnasium</p> <p>The bottom of the glazed panel is >43" AFF, @ up to 56" AFF.</p> <p>The door lacks a level landing, @ 6.9%.</p>	<p>2010 ADAS 404.2.11</p> <p>2010 ADAS 404.2.4.4</p>		<p>Install a new door. Unit Cost: \$1,000 ea. Est. Quantity: 1</p> <p>Regrade the door landing. Unit Cost: \$1,000 Quantity: 1</p>	\$2,000
46.	<p>Gymnasium</p> <p>The AED and fire pull protrude >4" into the circulation space, @ up to 9".</p>	<p>2010 ADAS 307.2</p>		<p>Install a cane detectable object below the AED and fire pull alarm. Unit Cost: \$250 ea. Est. Quantity: 1</p>	\$250

47.	<p>Egress Door from Gymnasium</p> <p>The door lacks a level landing, @ 15.1%.</p>	2010 ADAS 404.2.4.4		<p>Regrade the door landing.</p> <p>Unit Cost: \$1,000</p> <p>Quantity: 1</p>	\$1,000
48.	<p>Drinking Fountain</p> <p>The drinking fountain protrudes >4" into the circulation space, @ 18".</p>	2010 ADAS 307.2		<p>Relocate the drinking fountain to a location where it is not a protruding object.</p> <p>Unit Cost: \$1,500 ea.</p> <p>Quantity: 1</p>	\$1,500

<p>49.</p>	<p>Men's & Women's Multi-user Toilet Rooms</p> <p>The threshold is > ¼" AFF and not beveled at maximum 1:2.</p> <p>The mirror is >40" AFF, @ up to 41", measured to the bottom of the reflective surface.</p> <p>The toilet stall door lacks a pull device on both sides of the door.</p> <p>The stall door is not self-closing.</p> <p>The side grab bar extends <54" from the rear wall, @ 50".</p> <p>The rear grab bar extends <12" from the centerline of the water closet, @ as little as 5".</p> <p>The coat hook is mounted >48" AFF, @ 54" AFF.</p> <p><i>Observed in Women's and Men's Toilet Rooms.</i></p> <p>The sanitary napkin dispenser is mounted >48" AFF, @ 53" AFF, and it protrudes >4" into the circulation area, @ 7".</p> <p>The top of the infant changing table is >34" AFF, @ 37" AFF.</p> <p>The knee clearance under the changing table is obstructed by the bench.</p> <p><i>Observed in Women's Toilet Room.</i></p> <p>The lavatory is >34" AFF, @ 34 ½" AFF.</p>	<p>2010 ADAS 404.2.5</p> <p>2010 ADAS 603.3</p> <p>2010 ADAS 604.8.1.2</p> <p>2010 ADAS 604.5.1</p> <p>2010 ADAS 604.5.2</p> <p>2010 ADAS 604.8.3</p> <p>2010 ADAS 308.2 & 308.3</p> <p>2010 ADAS 307.2</p> <p>2010 ADAS 902.1</p> <p>2010 ADAS 606.3</p> <p>2010 ADAS 308.2</p> <p>2010 ADAS 604.2</p>		<p>Replace the threshold. Unit Cost: \$250 ea. Quantity: 2</p> <p>Lower the mirror. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a door pull on both sides of the stall door. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a self-closing hinge. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the rear grab bar. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the sanitary napkin dispenser. Unit Cost: \$50 ea. Quantity: 1</p> <p>Lower the changing table to 34" AFF maximum when in the open position. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the bench.</p>	<p>\$5,750</p>
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	<p>The soap dispenser is mounted >48" AFF, @ 49" AFF to the highest operable control.</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 18 1/2".</p> <p><i>Observed in Men's Toilet Room.</i></p>			<p>Unit Cost: N/A Quantity: 1</p> <p>Lower the lavatory to max. 34" AFF. Unit Cost: \$3,000 ea. Quantity: 1</p> <p>Relocate the soap dispenser. Unit Cost: \$50 ea. Quantity: 1</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Est. Quantity: 1</p>	
TOTAL FOR RECREATION CENTER:				\$37,250	



SENIOR CENTER

AUDITED ON: MARCH 3, 2022






The Hamilton Senior Center is located at 299 Bay Road. It is a two-story building containing public and employee toilet rooms, reception area, meeting area, and staff offices. The parking lot is shared with the Public Safety Building, and it provides four accessible parking spaces.

SENIOR CENTER

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
50.	<p>Parking Lot</p> <p>The accessible parking spaces and their associated access aisles have slopes >2%, @ up to 3%.</p> <p>Some of the accessible parking spaces lack the required signage.</p> <p>One of the designated accessible parking spaces lacks an adjacent access aisle.</p>	<p>2010 ADAS 502.4</p> <p>2010 ADAS 502.6</p> <p>2010 ADAS 502.2</p>		<p>Regrade and restripe the existing accessible parking spaces and their associated access aisle.</p> <p>Unit Cost: \$1,500 per space or aisle</p> <p>Quantity: 6 (4 spaces + 2 aisles)</p> <p>Install a sign with the International Symbol of Accessibility at 60" AFF minimum, measured to the bottom of the sign. Include a van accessible sign where applicable.</p> <p>Unit Cost: \$100 ea.</p> <p>Quantity: 2</p>	\$9,000
51.	<p>Outdoor Area</p> <p>There is no accessible route provided neither to the seating area, nor to the raised planters, due to the grass surface.</p>	<p>2010 ADAS 206.2.2</p>		<p>Provide an accessible to the seating area and raised planters.</p> <p>Unit Cost: \$25/SF</p> <p>Est. Quantity: 36 SF</p>	\$900

<p>52.</p>	<p>Main Entrance</p> <p>The mail drop-box is mounted >48" AFF and it lacks an adjacent level clear floor space, @ 6.3%.</p>	<p>2010 ADAS 308.2 & 308.3</p> <p>2010 ADAS 305.2</p>		<p>Lower and relocate the drop-box.</p> <p>Unit Cost: \$250 ea.</p> <p>Quantity: 1</p>	<p>\$250</p>
<p>53.</p>	<p>Accessible Entrance</p> <p>The threshold is > 1/4" high and not beveled with a maximum 1:2 slope.</p> <p>The route to the accessible entrance has cross slopes >2%, @ 2.2%.</p> <p>The route to the accessible entrance has running slopes >5%, @ 8.3% and is not treated as ramp.</p> <p>The door opener button lacks an adjacent level clear floor space, @ 2.9%.</p>	<p>2010 ADAS 404.2.5</p> <p>2010 ADAS 403.3</p> <p>2010 ADAS 403.3</p> <p>2010 ADAS 305.2</p>		<p>Replace the threshold.</p> <p>Unit Cost: \$250 ea.</p> <p>Quantity: 1</p> <p>Regrade the walkway.</p> <p>Unit Cost: \$25/SF</p> <p>Est. Quantity: 24 SF</p> <p>Install compliant handrails on both sides.</p> <p>Unit Cost: \$50/LF</p> <p>Est. Quantity: 20 LF</p> <p>Relocate the door opener button.</p> <p>Unit Cost: \$250 ea.</p> <p>Quantity: 1</p>	<p>\$2,100</p>
<p>54.</p>	<p>Reception Counter</p> <p>The reception counter is >36" AFF, @ 40" AFF.</p>	<p>2010 ADAS 904.4</p>		<p>Lower a 36" wide portion of the counter to 36" max. AFF.</p> <p>Unit Cost: \$750</p> <p>Quantity: 1</p>	<p>\$750</p>

<p>55.</p>	<p>Meeting Area</p> <p>The AED and TVs protrude >4" into the circulation space, @ up to 9".</p> <p>The fire pull alarm is mounted >48" AFF, @ 54" AFF.</p>	<p>2010 ADAS 307.2 2010 ADAS 308.2 & 308.3</p>		<p>Install a cane detectable object below the AED and TV. Unit Cost: \$250 ea. Quantity: 3</p> <p>Lower the fire pull alarm. Unit Cost: \$250 ea. Quantity: 1</p>	<p>\$1,000</p>
<p>56.</p>	<p>Staff Offices Corridor</p> <p>The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p> <p>The door lacks a level landing, @ 9.5%.</p> <p>The threshold is > 1/2" high and not beveled with a maximum 1:2 slope.</p> <p>The corridor has running slopes >5% and is not treated as ramp, @ 9.5%.</p>	<p>2010 ADAS 404.2.7 2010 ADAS 404.2.4.4 2010 ADAS 404.2.5 2010 ADAS 403.3</p>		<p>Replace the door hardware with lever type. Unit Cost: \$300 ea. Quantity: 1</p> <p>Regrade the door landing. Unit Cost: \$1,000 Quantity: 1</p> <p>Replace the threshold. Unit Cost: \$250 ea. Quantity: 1</p> <p>Regrade the corridor. Unit Cost: \$25/SF Est. Quantity: 45 SF</p>	<p>\$2,675</p>

<p>57.</p>	<p>Accessible Single-user Toilet Room (Women's)</p> <p>The door lacks tactile/ braille signage mounted on the latch side of the door.</p> <p>The pull-side door maneuvering clearance is < 48" perpendicular to the doorway, @ 40" measured from the door to the lavatory.</p> <p>The knee clearance at the sink is <27" AFF, @ 25" AFF.</p> <p>The mirror is >40" AFF, @ up to 50", measured to the bottom of the reflective surface.</p> <p>The side grab bar extends <54" from the rear wall, @ 45".</p> <p>The rear and side grab bars are not mounted 33"-36" AFF, @ up to 38" AFF.</p> <p>The flush valve is not located on the open side of the toilet.</p> <p>The paper towel dispenser protrudes >4" into the circulation area, @ 9".</p>	<p>2010 ADAS 703.4.2</p> <p>2010 ADAS 404.2.4.1</p> <p>2010 ADAS 606.2</p> <p>2010 ADAS 603.3</p> <p>2010 ADAS 604.5.1</p> <p>2010 ADAS 609.4</p> <p>2010 ADAS 604.6</p> <p>2010 ADAS 307.2</p>		<p>Install compliant tactile/ Braille signage on the nearest adjacent wall to the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 ea. Est. Quantity: 1</p> <p>Relocate the lavatory or provide a smaller lavatory to provide the required clearance around the water closet. Unit Cost: \$750 ea. Est. Quantity: 1</p> <p>Raise the sink to provide the required knee/toe clearances. Unit Cost: \$750 ea. Quantity: 1</p> <p>Lower the mirror. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall and mounted between 33"-36". Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the rear grab bar. Unit Cost: \$50 ea. Quantity: 1</p> <p>Reposition the flush valve or install an automatic flush control. Unit Cost: \$1,000 ea. Quantity: 1</p> <p>Relocate the paper towel dispenser. Unit Cost: \$50 ea. Quantity: 1</p>	<p>\$2,800</p>
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58.	<p>Men's Single User Toilet Room</p> <p>The toilet room lacks the required footprint, layout, and fixtures to meet the requirements of an accessible bathroom.</p>	2010 ADAS 213.2	No Image	<p>Designate the toilet rooms as unisex with required signage and mitigate the other single user toilet room to be the accessible toilet room.</p> <p>Unit Cost: \$100 ea. Quantity: 2</p>	\$200
TOTAL FOR SENIOR CENTER:					\$19,675




TOWN HALL


AUDITED ON: FEBRUARY 8, 2022








Hamilton Town Hall is located at 577 Bay Road. The site consists of a three-story building with various town departments, conference and meeting rooms, and public and employee toilet rooms. There are two designated accessible parking spaces provided at this facility.

TOWN HALL





#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
59.	<p>Parking Lot near Main Entrance</p> <p>The designated accessible parking spaces lack an adjacent access aisle.</p>	2010 ADAS 502.2		Restripe the pavement markings in the parking spaces to add the required associated access aisles. Unit Cost: \$150 per space or aisle Quantity: 4 (2 spaces, 2 aisles)	\$600
60.	<p>Exterior Ramp to the Rear Entrance</p> <p>The ramp has running slopes >8.3%, @ 8.4%-9.7%.</p> <p>The ramp ground surface is broken/ uneven due to material deterioration.</p> <p>The ramp lacks the required edge protection.</p> <p>The ramp lacks the required handrail extensions at the top and at the bottom.</p>	2010 ADAS 405.2 2010 ADAS 405.4 2010 ADAS 405.9 2010 ADAS 505.10	 	Rebuild the ramp. Unit Cost: \$15,000 ea. Quantity: 1	\$15,000



61.	<p>Exterior Stair to the Rear Entrance</p> <p>The stair lacks the required handrail extensions at the top and at the bottom.</p> <p>The stair handrails are not rounded.</p>	<p>2010 ADAS 505.10 2010 ADAS 505.7</p>		<p>Install compliant handrails on both sides. Unit Cost: \$50/LF Est. Quantity: 16 LF</p>	\$800
62.	<p>Main Entrance</p> <p>The stair lacks the required handrails on both sides.</p> <p>The main entry double door lacks at least one leaf that provides the required 32" minimum clear width, @ 29".</p> <p>There is <48" between door swings in a series at the main entrance's vestibule, @ 32".</p> <p>The fire alarm pull is mounted >48" AFF, @ 55" AFF.</p>	<p>2010 ADAS 210.1 2010 ADAS 404.2.3 2010 ADAS 404.2.6 2010 ADAS 308.2 & 308.3</p>	 	<p>Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 2</p> <p>Lower the fire alarm pull. Unit Cost: \$250 ea. Quantity: 1</p>	\$5,250



<p>63.</p>	<p>Accessible Entrance</p> <p>The automatic door openers were not operational at the time of KMA's audit.</p> <p>The entry double door lacks at least one leaf that provides the required 32" minimum clear width, @ 27".</p> <p>The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p> <p>The threshold is >1/2" high and not beveled at maximum 1:2, @ 1" vertical.</p>	<p>2010 ADAS 404.3 2010 ADAS 404.2.3 2010 ADAS 404.2.7 2010 ADAS 404.2.5</p>		<p>Ensure the automatic door opener is in working condition. Unit Cost: \$50 ea. Quantity: 2</p> <p>Replace the door hardware with lever type. Unit Cost: \$300 ea. Quantity: 1</p> <p>Replace the threshold. Unit Cost: \$250 ea. Quantity: 2</p>	<p>\$650</p>
<p>64.</p>	<p>Accessible Route between Levels</p> <p>An accessible route is not provided between the levels.</p> <p><i>Note: The Basement, Second, and Third Floor are only accessed via stairs.</i></p>	<p>2010 ADAS 206.2.3</p>	<p>No Photo</p>	<p>Provide an elevator or develop a policy to ensure all programs can be provided on an accessible level. Additional study required. Unit Cost: \$50,000 ea. Quantity: 1</p>	<p>\$50,000</p>
<p>65.</p>	<p>AED Boxes</p> <p>Some of the AED are mounted >48" AFF, @ up to 61" AFF to the highest operable part, and/or they protrude >4" into the circulation area, @ 9".</p> <p><i>Observed in Assessor's Office and Second Floor Corridor.</i></p>	<p>2010 ADAS 307.2 2010 ADAS 308.2 & 308.3</p>		<p>Relocate the AED. Unit Cost: \$250 ea. Est. Quantity: 2</p>	<p>\$500</p>


66.	<p>Coat Hanger Rods</p> <p>Coat hanger rods are mounted >48" AFF, @ up to 57" AFF.</p> <p><i>Observed in Assessor Office, Accountant Office, and Second Floor Corridor.</i></p>	2010 ADAS 308.2 & 308.3		<p>Provide an accessible coat hanger rod.</p> <p>Unit Cost: \$300 Est. Quantity: 3</p>	\$900
67.	<p>Door Hardware</p> <p>Most of the door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p>	2010 ADAS 404.2.7		<p>Replace the door hardware with lever type.</p> <p>Unit Cost: \$300 ea. Est. Quantity: 20</p>	\$6,000
68.	<p>Signage</p> <p>Most doors lack tactile/ braille signage mounted on the latch side of the door.</p> <p>The headroom under the signage flags provides <80" of vertical clearance, @ as little as 62" AFF.</p>	2010 ADAS 703.4.2 2010 ADAS 307.4		<p>Install tactile/ Braille signage on the latch side of the door. Coordinate with location and height requirements.</p> <p>Unit Cost: \$100 ea. Est. Quantity: 20</p> <p>Relocate the signage flags.</p> <p>Unit Cost: \$50 ea. Est. Quantity: 5</p>	\$2,250



69.	<p>Electrical Outlets</p> <p>Some of the electrical outlets throughout the building are mounted <15" AFF.</p>	2010 ADAS 308.2 & 308.3		<p>Relocate the electrical outlets within an accessible reach range.</p> <p>Unit Cost: \$250 Est. Quantity: 10</p>	\$2,500
70.	<p>Light Switches</p> <p>Some of the light switches throughout the building are mounted >48", @ up to 53" AFF.</p> <p><i>Observed in First Floor Corridor, Clerk's Office, and Meeting Room.</i></p>	2010 ADAS 308.2 & 308.3		<p>Relocate the light switches within an accessible reach range.</p> <p>Unit Cost: \$250 Est. Quantity: 4</p>	\$1,000
71.	<p>Counters throughout the Building</p> <p>Most of the counters are >36" AFF, @ up to 43 1/2" AFF.</p> <p><i>Observed in Assessor, Treasurer, Clerk, and Building's Department Office.</i></p>	2010 ADAS 904.4		<p>Lower a 36" wide portion of the counter to 36" max. AFF.</p> <p>Unit Cost: \$750 Est. Quantity: 4</p>	\$3,000
72.	<p>Main Stair</p> <p>The stair threads are <11" deep, @ 10 1/2".</p> <p>The stair does not have the required handrails on both sides.</p>	2010 ADAS 504.2 2010 ADAS 505.2		<p>Rebuild the stair.</p> <p>Unit Cost: \$50,000 Quantity: 2</p> <p>Install compliant handrails on both sides.</p> <p>Unit Cost: \$50/LF Est. Quantity: 136 LF</p>	\$106,800



<p>73.</p>	<p>Employee's Kitchen (Basement)</p> <p>The door provides <32" clear width, @ 30".</p> <p>The sink counter is >34" AFF, @ 37" AFF.</p> <p>The table lacks the required 27" AFF minimum knee clearance, @ 25" AFF.</p> <p>The first aid box and the eyes wash are mounted >48" AFF, and they protrude >4" into the circulation path.</p> <p>The clearance between the base cabinets and the wall is <60", @ 36".</p>	<p>2010 ADAS 404.2.3</p> <p>2010 ADAS 606.3</p> <p>2010 ADAS 306.3</p> <p>2010 ADAS 307.2</p> <p>2010 ADAS 308.2 & 308.3</p> <p>2010 ADAS 804.2.2</p>	  	<p>Enlarge the door opening and install a new door. Unit Cost: \$5,000 ea. Quantity: 1</p> <p>Lower the counter to 34" AFF maximum. Unit Cost: \$3,000 ea. Quantity: 1</p> <p>Provide an accessible table. Unit Cost: \$250 ea. Quantity: 1</p> <p>Relocate the first aid box. Unit Cost: \$250 ea. Quantity: 1</p> <p>Relocate the eyes wash. Unit Cost: \$250 ea. Quantity: 1</p> <p>Enlarge the kitchen. Additional study required. Unit Cost: \$10,000 Quantity: 1</p>	<p>\$18,750</p>
<p>74.</p>	<p>Door in Corridor (1st Floor)</p> <p>The pull-side door maneuvering clearance is <48" perpendicular to the doorway, due to the bench.</p>	<p>2010 ADAS 404.2.4.1</p>		<p>Relocate the bench. Unit Cost: \$0 ea. Quantity: 1</p>	<p>\$0</p>





<p>75.</p>	<p>Corridor near Meeting Room (1st Floor)</p> <p>The headroom under the flag provides <80" of vertical clearance, @ 79" AFF.</p> <p>The hand sanitizer is mounted >48" AFF, 50" AFF to the highest operable part.</p>	<p>2010 ADAS 307.4 2010 ADAS 308.2 & 308.3</p>		<p>Relocate the flag. Unit Cost: \$50 ea. Quantity: 1</p> <p>Lower the hand sanitizer Unit Cost: \$50 ea. Quantity: 1</p>	<p>\$100</p>
<p>76.</p>	<p>Assessor's Office (1st Floor)</p> <p>The computer desk is >34" AFF and lacks the required knee/ toe clearance for a forward approach, @ 42" AFF.</p> <p>The thermostat is mounted >48" AFF, @ 58" AFF measured to the highest operable part.</p>	<p>2010 ADAS 902 2010 ADAS 308.2 & 308.3</p>		<p>Provide an accessible computer desk. Unit Cost: \$250 ea. Quantity: 1</p> <p>Lower the thermostat. Unit Cost: \$250 Quantity: 1</p>	<p>\$500</p>

<p>77.</p>	<p>Meeting Room (1st Floor)</p> <p>The calendar is mounted >48" AFF, @ 63" AFF to the highest operable part.</p> <p>The flag protrudes >4" into the circulation area.</p> <p>The HDMI plug is mounted <15" AFF, @ 10" AFF.</p> <p>The wall-mounted bookshelf protrudes >4" into the circulation area, @ 8".</p> <p>The mailboxes are mounted >48" AFF, @ 58" AFF.</p>	<p>2010 ADAS 308.2 & 308.3</p> <p>2010 ADAS 307.2</p>		<p>Lower the calendar. Unit Cost: \$50 Quantity: 1</p> <p>Install a cane detectable object below the flag. Unit Cost: \$500 ea. Quantity: 1</p> <p>Provide an HDMI plug within an accessible reach range. Unit Cost: \$250 Quantity: 1</p> <p>Install a cane detectable object below the bookshelf. Unit Cost: \$500 ea. Quantity: 1</p> <p>Relocate the mailbox shelves. Unit Cost: \$50 ea. Est. Quantity: 1</p>	<p>\$1,350</p>
<p>78.</p>	<p>Second Floor Corridor</p> <p>The fire alarm pull is mounted >48" AFF, @ 54" AFF.</p>	<p>2010 ADAS 308.2 & 308.3</p>		<p>Lower the fire alarm pull. Unit Cost: \$250 ea. Quantity: 1</p>	<p>\$250</p>

79.	<p>Offices at Second Floor</p> <p>Most of the office doors at the second floor have thresholds that are $>1/2''$ AFF, @ $3/4''$.</p>	2010 ADAS 404.2.5		<p>Replace the threshold. Unit Cost: \$250 ea. Est. Quantity: 5</p>	\$1,250
80.	<p>Finance's Office (2nd Floor)</p> <p>The pull-side door maneuvering clearance is $< 54''$ perpendicular to the doorway, due to the pedestal table.</p>	2010 ADAS 404.2.4.1		<p>Relocate the table. Unit Cost: \$0 ea. Quantity: 1</p>	\$0
81.	<p>Planning & Inspection's Office (2nd Floor)</p> <p>The door provides $< 32''$ clear width, @ $29''$.</p> <p>The room lacks accessible seating.</p>	2010 ADAS 404.2.3 2010 ADAS 226.1		<p>Enlarge the door opening and install a new door. Unit Cost: \$5,000 ea. Quantity: 1</p> <p>Provide an accessible table. Unit Cost: \$250 ea. Quantity: 1</p>	\$5,250
82.	<p>Conference Room (2nd Floor)</p> <p>The room lacks accessible seating.</p>	2010 ADAS 226.1	No Photo	<p>Provide an accessible table. Unit Cost: \$250 ea. Quantity: 1</p>	\$250

83.	<p>Board of Health Office (2nd Floor)</p> <p>The pull side door maneuvering clearance is <18" on the latch side @ 11".</p>	2010 ADAS 404.2.4.1	No Photo	<p>Install an automatic door opener.</p> <p>Unit Cost: \$2,500 ea.</p> <p>Quantity: 1</p>	\$2,500
84.	<p>Stair leading to DPW's Office (2nd Floor)</p> <p>The stair lacks the required top and bottom handrail extensions.</p>	2010 ADAS 505.10		<p>Install compliant handrail extensions on both sides of the ramp/stair.</p> <p>Unit Cost: \$50/LF</p> <p>Est. Quantity: 6 LF</p>	\$300
85.	<p>DPW's Office (2nd Floor)</p> <p>Doors provide <32" clear width, @ 28".</p> <p>Some of the thresholds are >1/2" AFF, @ up to 2".</p> <p>One of the pull-side door maneuvering clearances is <18" on the latch side @ 9".</p>	<p>2010 ADAS 404.2.3</p> <p>2010 ADAS 404.2.5</p> <p>2010 ADAS 404.2.4.1</p>		<p>Enlarge the door opening and install a new door.</p> <p>Unit Cost: \$5,000 ea.</p> <p>Quantity: 3</p> <p>Replace the threshold.</p> <p>Unit Cost: \$250 ea.</p> <p>Quantity: 2</p> <p>Install an automatic door opener.</p> <p>Unit Cost: \$2,500 ea.</p> <p>Quantity: 1</p>	\$18,000

86.	<p>Single-User Toilet Room (Basement)</p> <p>The room lacks the required footprint and accessible elements for an accessible toilet room.</p>	2010 ADAS 213.2		<p>Provide an accessible toilet room. Additional study required. Unit Cost: \$5,000 ea. Quantity: 1</p>	\$5,000
87.	<p>Public Women's Multi-User Toilet Room (1st Floor)</p> <p>The toilet room lacks the required footprint, layout, and fixtures to meet the requirements of an accessible bathroom.</p>	2010 ADAS 213.2		<p>Designate the toilet rooms as unisex with required signage and mitigate the other single user toilet room to be the accessible toilet room. In addition, make the women's room a single user toilet room Unit Cost: \$100 ea. Quantity: 2</p>	\$200

<p>88.</p>	<p>Public Men's Multi-User Toilet Room (1st Floor)</p> <p>The door lacks the required minimum 12" of maneuvering clearance on the latch push side of the door, @ 11".</p> <p>The threshold is >1/2", @ 3/4".</p> <p>The side grab bar extends <54" from the rear wall, @ 45".</p> <p>The rear grab bar is not mounted 33"-36" AFF, @ 31" AFF.</p> <p>The flush valve is not located on the open side of the toilet.</p> <p>The toilet paper dispenser protrudes >4" into the circulation area and is mounted <12" above the side grab bar, @ 6".</p> <p>The lavatory pipes lack insulation.</p> <p>The mirror is >40" AFF, measured to the bottom of the reflective surface, @ 48" AFF.</p> <p>The paper towel dispenser is mounted >48" AFF, @ 49" AFF to the highest operable part.</p> <p>The hand dryer protrudes >4" into the circulation area, @ 7".</p> <p>The coat hook is mounted >48" AFF, @ 64" AFF.</p> <p>There is no visual or audible alarm.</p>	<p>2010 ADAS 404.2.4.1</p> <p>2010 ADAS 404.2.5</p> <p>2010 ADAS 604.5.1</p> <p>2010 ADAS 609.4</p> <p>2010 ADAS 604.6</p> <p>2010 ADAS 307.2</p> <p>2010 ADAS 609.3</p> <p>2010 ADAS 606.5</p> <p>2010 ADAS 603.3</p> <p>2010 ADAS 308.2 & 308.3</p> <p>2010 ADAS 215</p>	   	<p>Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 1</p> <p>Replace the threshold. Unit Cost: \$250 ea. Quantity: 1</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the rear grab bar. Unit Cost: \$50 ea. Quantity: 1</p> <p>Reposition the flush valve or install an automatic flush control. Unit Cost: \$1,000 ea. Quantity: 1</p> <p>Relocate the toilet paper dispenser. Unit Cost: \$50 ea. Quantity: 1</p> <p>Insulate the pipes underneath the lavatory. Unit Cost: \$50 ea. Quantity: 1</p> <p>Lower the mirror. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the tampon dispenser. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install a cane detectable object below the hand dryer. Unit Cost: \$500 ea. Quantity: 1</p>	<p>\$5,350</p>
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				<p>Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install a visual/audible alarm in the toilet room. Unit Cost: \$750 ea. Quantity: 1</p>	
TOTAL FOR TOWN HALL:					\$254,300






WATER PLANT


AUDITED ON: MARCH 4, 2022



The Hamilton Water Plant building is located at 79 Pine Street. It is a two-story building containing staff rooms, a staff toilet room, and typical water treatment spaces. There are no accessible parking spaces provided at this facility. KMA was informed on site that staff does occasionally offer tours to visitors.

WATER PLANT

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
89.	<p>Parking Lot</p> <p>There are no standard accessible spaces and no van spaces are provided.</p>	2010 ADAS 208.2		<p>Stripe a portion of the parking lot to add 1 van accessible space, as well as its associated sign and access aisle.</p> <p>Unit Cost: \$300 per space or aisle Quantity: 2 (1 space, 1 aisle)</p>	\$600
90.	<p>Accessible Route to the Building</p> <p>There is no accessible route provided to the building, due to gravel surfaces and abrupt change in level.</p>	2010 ADAS 206.2.2		<p>Provide an accessible route. Additional study required.</p> <p>Unit Cost: \$5,000 Quantity: 1</p>	\$5,000
91.	<p>Accessible Route within Levels</p> <p>An accessible route is not provided between the levels. KMA was informed that visitors can access the underground room, where the rainwater system is located.</p>	2010 ADAS 206.2.3		<p>Provide an elevator or develop a policy to ensure all programs can be provided on an accessible level. Additional study required.</p> <p>Unit Cost: \$50,000 ea. Quantity: 1</p>	\$50,000

<p>92.</p>	<p>Single-user Toilet Room</p> <p>The mirror is >40" AFF, @ up to 42", measured to the bottom of the reflective surface.</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 20".</p> <p>The side grab bar extends <54" from the rear wall, @ 52".</p> <p>The rear grab bar extends <12" from the centerline of the water closet, @ as little as 11".</p> <p>The coat hook is mounted >48" AFF, @ 64" AFF.</p> <p>The soap dispenser is mounted >48" AFF, @ 53" AFF to the highest operable control.</p> <p>The wall mounted shelf and hooks protrude >4" into the circulation area, @ up to 6".</p>	<p>2010 ADAS 603.3</p> <p>2010 ADAS 604.2</p> <p>2010 ADAS 604.5.1</p> <p>2010 ADAS 604.5.2</p> <p>2010 ADAS 604.8.3</p> <p>2010 ADAS 308.2</p> <p>2010 ADAS 307.2</p>	 <p>The top photograph shows a sink with a mirror above it and a soap dispenser on the wall. The middle photograph shows a toilet with grab bars on either side. The bottom photograph shows a coat rack with a towel hanging on it and a soap dispenser on the wall.</p>	<p>Lower the mirror. Unit Cost: \$50 ea. Quantity: 1</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Est. Quantity: 1</p> <p>Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the rear grab bar. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 1</p> <p>Lower the soap dispenser no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the shelf and hooks so that they do not protrude. Unit Cost: \$50 ea. Quantity: 3</p>	<p>\$1,900</p>
<p>TOTAL FOR WATER PLANT: \$57,500</p>					

DRAFT HAMILTON OUTDOOR FACILITY AUDITS

KMA audited the following outdoor facilities:

DONOVAN FIELD 2
FAIRHAVEN FIELD 5
CUTLER PARK..... 8
PATTON PARK..... 10
SCHOOL STREET PARK 16
HAMILTON CEMETERY 18
CHEBACCO WOODS TRAIL 20
CHEBACCO BOAT RAMP 22





DONOVAN FIELD


AUDITED ON: MARCH 4, 2022



The Donovan Field is located at 239 Sagamore Street. The site consists of one softball field and a soccer field. A parking lot with no accessible parking spaces is provided at this facility.

DONOVAN FIELD

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
1.	<p>Parking Lot</p> <p>There is an insufficient number of accessible parking spaces. For a parking lot with 1-25 total spaces, one van accessible space is required. Currently, no standard accessible spaces and no van spaces are provided.</p>	2010 ADAS 208.2		<p>Stripe a portion of the parking lot to add one van accessible space, as well as its associated sign and access aisle.</p> <p>Unit Cost: \$300 per space or aisle Quantity: 2 (1 space, 1 aisle)</p>	\$600
2.	<p>Walkways and Accessible Routes to and within the Facility</p> <p>Walkways and field entrances are obstructed due to the snow.</p>	2010 ADAS 206.2.2	No Image	<p>Remove the snow and establish a policy to ensure snow removal becomes part of routine maintenance of the field.</p> <p>Unit Cost: \$50 Quantity: 1</p>	\$50
3.	<p>Softball and Soccer Field</p> <p>There is no accessible route to the fields due to the grass.</p> <p>The spectator/ team benches are not located on an accessible route due to grass.</p>	2010 ADAS 206.2.2		<p>Provide an accessible route to the softball field, benches, and soccer field.</p> <p>Unit Cost: \$25/SF Est. Quantity: 750 SF</p>	\$18,750

4.	<p>Picnic Table</p> <p>The picnic table lacks the required knee and toe clearance for a forward approach.</p> <p>The picnic table is not located on an accessible route due to grass and dirt surfaces.</p>	<p>2010 ADAS 226.1 & 902.2</p> <p>2010 ADAS 206.2.2</p>		<p>Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance along an accessible route.</p> <p>Unit Cost: \$250 ea. Est. Quantity: 1</p>	\$250
TOTAL FOR DONOVAN FIELD:					\$19,650

FAIRHAVEN FIELD



AUDITED ON: MARCH 3, 2022




The Fairhaven Field is adjacent to the Hamilton Recreation Center and Public Library and is bordered by Linden Street and Lois Street. The site consists of a hockey field and playground area. The parking lot is shared with the Recreation Center and Public Library, and it provides four accessible parking spaces.

Note: Refer to the Hamilton Public Library report for parking details.

FAIRHAVEN FIELD

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
5.	<p>Walkways and Accessible Routes to and within the Facility</p> <p>Walkways, field, and playground entrances are obstructed due to the snow.</p>	2010 ADAS 206.2.2		<p>Remove the snow and establish a policy to ensure snow removal becomes part of routine maintenance of the field.</p> <p>Unit Cost: \$50 Quantity: 1</p>	\$50
6.	<p>Hockey Field</p> <p>There is no accessible route to the hockey field due to grass.</p>	2010 ADAS 206.2.2		<p>Provide an accessible route to the hockey field.</p> <p>Unit Cost: \$25/SF Est. Quantity: 1,500 SF</p>	\$37,500

7.	<p>Playground</p> <p>There is no accessible route to and within the playground area due to dirt surface.</p> <p>The playground lacks ground-level play components and an accessible route between elements.</p> <p>Benches are not located along an accessible route due to dirt surface.</p>	<p>2010 ADAS 206.2.2</p> <p>2010 ADAS 240.2.1.2</p>		<p>Provide an accessible route to and within the play area. Unit Cost: \$25/SF Est. Quantity: 6,500 SF</p> <p>Provide ground-level play components at the playground and an accessible route between/ to the elements. Unit Cost: \$50,000 Quantity: 1</p> <p>Provide at least one bench, and no less than 5% of the total number of benches, that provides compliant adjacent clear floor space along an accessible route. Unit Cost: \$250 ea. Est. Quantity: 1</p>	\$212,750
TOTAL FOR FAIRHAVEN FIELD:					\$250,300




CUTLER PARK

AUDITED ON: MARCH 4, 2022



Cutler Park is accessible through Cuttler Road and Bay Road. The site consists of a playground area and walkways. There are no public toilet facilities or off-street parking provided

CUTLER PARK

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
1.	<p>Walkways and Accessible Routes to and within the Park</p> <p>Walkways, and playground areas are obstructed due to the snow.</p>	2010 ADAS 206.2.2		<p>Remove the snow and establish a policy to ensure snow removal becomes part of routine maintenance of the park.</p> <p>Unit Cost: \$50 Quantity: 1</p>	\$50
2.	<p>Playground Area</p> <p>There is no accessible route to and within the playground area due to grass and dirt surface.</p> <p>The playground lacks the required minimum number of ground-level & elevated play components.</p> <p>Benches are not located along an accessible route due to grass and dirt surface.</p>	2010 ADAS 206.2.2 2010 ADAS 240.2.1.2 & 240.2.2	 	<p>Provide an accessible route to and within the play area.</p> <p>Unit Cost: \$25/SF Est. Quantity: 2,000 SF</p> <p>Provide ground-level and elevated play components at the playground and an accessible route between/ to the elements.</p> <p>Unit Cost: \$50,000 Quantity: 1</p> <p>Provide at least one bench, and no less than 5% of the total number of benches, that provides compliant adjacent clear floor space along an accessible route.</p> <p>Unit Cost: \$250 ea. Est. Quantity: 1</p>	\$100,250
TOTAL FOR CUTLER PARK:					\$100,300




PATTON PARK




AUDITED ON: MARCH 3, 2022








Patton Park is bordered by Asbury Street and Bay Road. The site consists of a basketball court, three tennis courts, a pavilion, a softball field, a baseball field, a volleyball court, a playground area, and walkways. There are no public toilet facilities provided. There are two surface parking lots at this facility, providing two accessible parking spaces each.



PATTON PARK

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
1.	<p>Parking Lot at Asbury Street</p> <p>The accessible parking spaces lack the required signage.</p> <p>The designated accessible parking spaces lack an adjacent access aisle.</p>	<p>2010 ADAS 502.6</p> <p>2010 ADAS 502.2</p>		<p>Install a sign with the International Symbol of Accessibility at 60" AFF minimum, measured to the bottom of the sign. Include a van accessible sign where applicable.</p> <p>Unit Cost: \$100 ea.</p> <p>Quantity: 2</p> <p>Restripe the pavement markings in the parking spaces and associated access aisle.</p> <p>Unit Cost: \$150 per space or aisle</p> <p>Quantity: 3 (2 spaces, 1 aisle)</p>	\$650
2.	<p>Parking Lot at Bay Road</p> <p>The accessible parking spaces and their associated access aisle have slopes >2%, @ up to 3.7%.</p> <p>The standard access aisle is <60" wide, measured centerline to centerline, @ 55".</p> <p>The van access aisle is <96" wide, measured centerline to centerline.</p>	<p>2010 ADAS 502.4</p> <p>2010 ADAS 502.3.1</p> <p>2010 ADAS 502.2</p>		<p>Regrade and restripe the existing accessible parking space and its associated access aisle.</p> <p>Unit Cost: \$1,500 per space or aisle</p> <p>Quantity: 4 (2 spaces, 2 aisles)</p>	\$6,000
3.	<p>Walkways and Accessible Routes to and within the Park</p> <p>Walkways, fields, courts, and playground entrances are obstructed due to the snow.</p>	<p>2010 ADAS 206.2.2</p>		<p>Remove the snow and establish a policy to ensure snow removal becomes part of routine maintenance of the park.</p> <p>Unit Cost: \$50</p> <p>Quantity: 1</p>	\$50

<p>4.</p>	<p>Benches</p> <p>Benches are not located along an accessible route due to dirt surface and grass.</p>	<p>2010 ADAS 206.2.2</p>		<p>Provide at least one bench, and no less than 5% of the total number of benches, that provides compliant adjacent clear floor space along an accessible route.</p> <p>Unit Cost: \$250 ea. Est. Quantity: 2</p>	<p>\$500</p>
<p>5.</p>	<p>Picnic Tables</p> <p>Picnic tables lack the required knee and toe clearance for a forward approach.</p> <p>Picnic tables are not located on an accessible route due to grass and dirt surfaces.</p>	<p>2010 ADAS 206.2.2 2010 ADAS 226.1 & 902.2</p>		<p>Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance along an accessible route.</p> <p>Unit Cost: \$250 ea. Est. Quantity: 2</p>	<p>\$500</p>
<p>6.</p>	<p>Tennis Courts</p> <p>The gate lacks the required minimum 10" of smooth surface along the bottom of the push side.</p> <p>One of the gates lacks the required level landing.</p> <p>At one of the gates, the threshold is > 1/4" high and not beveled with a maximum 1:2 slope.</p>	<p>2010 ADAS 404.2.10 2010 ADAS 404.2.4.4 2010 ADAS 404.2.5</p>		<p>Install a kick plate that is minimum 10" tall on the bottom of the push side of the gate.</p> <p>Unit Cost: \$250 ea. Quantity: 2</p> <p>Regrade the gate landing.</p> <p>Unit Cost: \$1,000 Quantity: 2</p>	<p>\$2,500</p>

7.	<p>Basketball Court</p> <p>There is no accessible route to the basketball court due to the dirt.</p>	2010 ADAS 206.2.2		<p>Provide an accessible route to the basketball court.</p> <p>Unit Cost: \$25/SF Est. Quantity: 240 SF</p>	\$6,000
8.	<p>Playground Area</p> <p>There is no accessible route to and within the playground area due to dirt surface, grass, and woodchips.</p> <p>The swing set is not located on an accessible route due to the grass and dirt surface.</p> <p>The playground lacks the required minimum number of ground-level & elevated play components.</p>	2010 ADAS 206.2.2 2010 ADAS 240.2.1.2 & 240	 	<p>Provide an accessible route to and within the play area.</p> <p>Unit Cost: \$25/SF Est. Quantity: 15,000 SF</p> <p>Provide ground-level and elevated play components at the playground and an accessible route between/ to the elements.</p> <p>Unit Cost: \$50,000 Quantity: 1</p>	\$425,000

<p>9.</p>	<p>Pavilion</p> <p>There is no accessible route to the pavilion due to the grass and dirt surface.</p> <p>The ramp has cross slopes >2%, @ 4.8%.</p> <p>The ramp lacks the required edge protection.</p> <p>The transition from the ramp to the walkway at the bottom level is not flush and has an abrupt change in level > ¼”.</p>	<p>2010 ADAS 206.2.2 2010 ADAS 405.3 2010 ADAS 405.9 2010 ADAS 303</p>		<p>Provide an accessible route to the pavilion. Unit Cost: \$25/SF Est. Quantity: 240 SF</p> <p>Rebuild the ramp. Unit Cost: \$15,000 ea. Quantity: 1</p>	<p>\$21,000</p>
<p>10.</p>	<p>Softball Field</p> <p>There is no accessible route to the softball field due to the grass and dirt surface.</p> <p>The dugout benches and spectator bleachers are not located on an accessible route due to grass, dirt surface, and abrupt changes in level.</p> <p>There is no level 30” x 48” clear floor space adjacent to the bleachers.</p>	<p>2010 ADAS 206.2.2 2010 ADAS 303 2010 ADAS 221</p>		<p>Provide an accessible route to the softball field, bleachers, and dugout benches. Unit Cost: \$25/SF Est. Quantity: 780 SF</p> <p>Provide an adjacent clear floor space at the bleachers. Unit Cost: \$1,000 Quantity: 1</p>	<p>\$3,000</p>

<p>11.</p>	<p>Baseball Field</p> <p>There is no accessible route to the baseball field due to the grass and dirt surface.</p> <p>The dugout benches and spectator bleachers are not located on an accessible route due to grass, dirt surface, and abrupt changes in level.</p> <p>There is no level 30" x 48" clear floor space adjacent to the bleachers.</p> <p>The gates lack the required minimum 10" of smooth surface along the bottom of the push side.</p>	<p>2010 ADAS 206.2.2 2010 ADAS 303 2010 ADAS 221 2010 ADAS 404.2.10</p>		<p>Provide an accessible route to the baseball field, bleachers, and dugout benches. Unit Cost: \$25/SF Est. Quantity: 780 SF</p> <p>Provide an adjacent clear floor space at the bleachers. Unit Cost: \$1,000 Quantity: 1</p> <p>Install a kick plate that is minimum 10" tall on the bottom of the push side of the gate. Unit Cost: \$250 ea. Quantity: 2</p>	<p>\$21,000</p>
<p>12.</p>	<p>Volleyball Field</p> <p>There is no accessible route to the volleyball field due to the grass.</p>	<p>2010 ADAS 206.2.2</p>		<p>Provide an accessible route to the volleyball field and the dugout benches. Unit Cost: \$25/SF Est. Quantity: 3,960 SF</p>	<p>\$99,000</p>
<p>TOTAL FOR PATTON PARK:</p>					<p>\$585,200</p>



SCHOOL STREET PARK

AUDITED ON: MARCH 4, 2022



The School Street Park is bordered by School Street. The site consists of a playground area and walkways. There are no public toilet facilities or off-street parking provided.

SCHOOL STREET PARK

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
13.	<p>Walkways and Accessible Routes to and within the Park</p> <p>Walkways, and playground areas are obstructed due to the snow.</p>	2010 ADAS 206.2.2		<p>Remove the snow and establish a policy to ensure snow removal becomes part of routine maintenance of the park.</p> <p>Unit Cost: \$50 Quantity: 1</p>	\$50
14.	<p>Playground Area</p> <p>There is no accessible route to and within the playground area due to grass and dirt surface.</p> <p>The swing set is not located on an accessible route due to the grass and dirt surface.</p> <p>Benches are not located along an accessible route due to grass and dirt surface.</p>	<p>2010 ADAS 206.2.2</p> <p>2010 ADAS 240</p>		<p>Provide an accessible route to and within the play area.</p> <p>Unit Cost: \$25/SF Est. Quantity: 1,920 SF</p> <p>Provide at least one bench, and no less than 5% of the total number of benches, that provides compliant adjacent clear floor space along an accessible route.</p> <p>Unit Cost: \$250 ea. Est. Quantity: 1</p>	\$48,250
TOTAL FOR SCHOOL STREET PARK:					\$48,300



HAMILTON CEMETERY

AUDITED ON: MARCH 4, 2022



The Hamilton Cemetery is located at 623 Bay Road Sagamore Street. The site consists of vehicular routes and graves. There are no pedestrian walkways. A parking lot with no accessible parking spaces is provided at this facility.

HAMILTON CEMETERY

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
1.	<p>Parking Lot</p> <p>There is an insufficient number of accessible parking spaces. For a parking lot with 1-25 total spaces, one van accessible space is required. Currently, no standard accessible spaces and no van spaces are provided.</p>	2010 ADAS 208.2		<p>Stripe a portion of the parking lot to add one van accessible space, as well as its associated sign and access aisle.</p> <p>Unit Cost: \$300 per space or aisle Quantity: 2 (1 space, 1 aisle)</p>	\$600
2.	<p>Benches</p> <p>Benches are not located along an accessible route due to grass and dirt surface.</p>	2010 ADAS 206.2.2		<p>Provide at least one bench, and no less than 5% of the total number of benches, that provides compliant adjacent clear floor space along an accessible route.</p> <p>Unit Cost: \$250 ea. Est. Quantity: 5</p>	\$1,250
TOTAL FOR HAMILTON CEMETERY:					\$1,850



CHEBACCO WOODS TRAIL

AUDITED ON: MARCH 4, 2022



The Chebacco Woods Trailhead is located at Chebacco Road. The site provides a parking lot with no designated accessible parking space.

CHEBACCO WOODS TRAIL

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
1.	<p>Parking Lot</p> <p>There is an insufficient number of accessible parking spaces. For a parking lot with 1-25 total spaces, one accessible space is required, one of which must be van accessible. Currently, no standard accessible spaces and no van spaces are provided.</p>	2010 ADAS 208.2		<p>Pave and stripe a portion of the parking lot to add one van accessible space, as well as its associated sign and access aisle.</p> <p>Unit Cost: \$1,500 per space or aisle</p> <p>Quantity: 2 (1 space, 1 aisle)</p>	\$3,000
2.	<p>Route to Trailhead</p> <p>There is no accessible route to the trailhead entrance due to cracked and deteriorated surfaces and dirt surfaces.</p>	2010 ADAS 206.2.2		<p>Provide an accessible route to the trailhead entrance.</p> <p>Unit Cost: \$25/SF</p> <p>Est. Quantity: 60 SF</p>	\$1,500
TOTAL FOR CHEBACCO WOODS TRAIL:					\$4,500



CHEBACCO BOAT RAMP

AUDITED ON: MARCH 4, 2022



The Chebacco Boat Ramp is located at Chebacco Road. The site provides a parking lot with one designated accessible parking space.

CHEBACCO BOAT RAMP

#	Barrier Statement	Code References	Photo	Proposed Mitigation	Cost
1.	<p>Parking Lot</p> <p>There is an insufficient number of van accessible parking spaces. For a lot with 1 accessible space, 1 must be van accessible.</p> <p>The accessible parking space and its associated access aisle have slopes >2%, @ up to 4.5%.</p> <p>The accessible parking space lacks the required signage.</p>	<p>2010 ADAS 208.2</p> <p>2010 ADAS 502.4</p> <p>2010 ADAS 502.6</p>		<p>Regrade and restripe the existing accessible parking space and its associated access aisle to add one van accessible space, as well as its associated sign and access aisle.</p> <p>Unit Cost: \$1,500 per space or aisle</p> <p>Quantity: 2 (1 space, 1 aisle)</p>	\$3,000
2.	<p>Walkways</p> <p>The accessible route from the accessible parking to the boat ramp has running slopes >5%, up to 7.5%, and is not treated as ramp.</p>	<p>2010 ADAS 403.3</p>		<p>Install compliant handrails on both sides of the accessible route.</p> <p>Unit Cost: \$50/LF</p> <p>Est. Quantity: 120 LF</p>	\$6,000
TOTAL FOR CHEBACCO BOAT RAMP:					\$9,000



EDWARD J. COLLINS, JR. CENTER FOR PUBLIC MANAGEMENT
JOHN W. McCORMACK GRADUATE SCHOOL OF POLICY AND GLOBAL STUDIES
UNIVERSITY OF MASSACHUSETTS BOSTON

100 Morrissey Boulevard
Boston, MA 02125-3393
P: 617.287.4824
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mccormack.umb.edu/centers/cpm
collins.center@umb.edu

ADA Self-Evaluation Program Accessibility Data Collection Form

Department

Assessors

Contact Name

Jane Dooley

Contact Number

978-468-5574

Contact Email

jdooley@hamiltonma.gov

Primary Facility Address

577 Bay Road, Hamilton, MA

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

Yes. Board of Assessors meeting agendas and minutes. Assessors maps, statutory exemption information and applications, forms for abatements, change of addresses, abutters list requests. Documents are pdfs and can be accessed and downloaded by users. General information (i.e., motor vehicle excise tax) is added directly in HTML and is available to research by users.

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

No. Would be happy to learn.

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

No. Would be happy to learn.

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

We assist a blind resident who applies for statutory exemptions by completing applications and using his signature stamp when we meet with him in the office. Also, we will meet residents at their car outside of the building to enable them to more easily submit paperwork. We work with elderly residents who come into the office by completing their paperwork.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

If needed a staff member will go to a resident's house to assist with any paperwork related to the Assessors office (i.e., filing for a veteran's statutory exemption).

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No.

Are all or a portion of these services generally available online? Please describe.

Residents can access the information described above under Core Services. Many call the office and are provided with the information they need especially via email.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Yes as previously mentioned in first response under Core Services.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Same as above.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

The Council on Aging Director at the Senior Center on Bay Road notifies us of residents that are interested in learning more about what programs are available to them through the Assessors office. The Director visits resident homes to notarize documents for the Assessors office.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

We don't specifically provide notices but do provide information on how to apply for programs on the website. Also a notice is put in the Senior Center newsletter about an exemption.

Are all or a portion of these services generally available online? Please describe.

As described above.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Yes as described above.

Please add any information on this program or service you feel is helpful to understanding how it is provided.



ADA Self-Evaluation Program Accessibility Data Collection Form

Department

COA

Contact Name

Theresa Woodbury

Contact Number

978-468-55951

Contact Email

twoodbury@hamiltonma.gov

Primary Facility Address

299 Bay Road Hamilton, Ma. 01982

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

Yes, we regularly post updates on activities, newsletters, menus, etc to the town webpage. Documents are posted in pdf format via internet access available desktop and smartphone.

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

Yes-large print

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

Yes-minimal

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Core services provided are to elderly residents. We offer a variety of activities such as exercise classes, arts and crafts, socialization, meals on wheels, and information/referral services.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

In residents residences.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

Yes-we let residents know that if they are unable to come in for services we are able to bring it to them to some extent.

Are all or a portion of these services generally available online? Please describe.

Yes, we offer a description of our services and how to acquire them online.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Yes, our outreach worker reaches out to residents that might not have the ability to look for services online.

Please add any information on this program or service you feel is helpful to understanding how it is provided.



ADA Self-Evaluation Program Accessibility Data Collection Form

Department

Department of Public Works

Contact Name

Tim Olson

Contact Number

978-626-5227

Contact Email

tolson@hamiltonma.gov

Primary Facility Address

Hamilton Town Hall, 577 Bay Road, Hamilton, MA 01982

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

Yes, trash and water information and updates, procurement and bid opportunities

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

No

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

Just through the Code Red Emergency Messaging Software

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

DPW and Water Administration at Hamilton Town Hall, Water billing questions, Water connection applications, Cemetery lot purchases, Trash bulky waste stickers, trash, recycling, and compost bin distribution, general administration questions, street and trench permits, use of computers, office equipment

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

Hamilton Cemetery

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

There is a phone on the accessible first floor to call 2nd floor departments, but I do not believe the direction to use this phone is on the town website

Are all or a portion of these services generally available online? Please describe.

Some are available, trench and street permits and water connection application. No ability to pay for bulky stickers etc. on the website, but stickers and trash bag purchases can be made a local merchants

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Yes, if there is a patron with a disability we will meet the patron on the first floor with necessary paperwork or to collect payment etc.

Please add any information on this program or service you feel is helpful to understanding how it is provided.



ADA Self-Evaluation Program Accessibility Data Collection Form

Department

Finance

Contact Name

Alex Magee

Contact Number

978-626-5215

Contact Email

amagee@hamiltonma.gov

Primary Facility Address

577 Bay Rd. Hamilton, MA 01936

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

Not routinely but a few times a year. The kinds of documents we post are typically financial reports and/or budget related, almost always as PDFs.

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

No

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

Not that I am aware of

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

The mission of the Finance Department is to provide effective financial services while managing the town's financial resources in a sustainable and responsible manner. The Finance Department acts as a conduit between the financial and other offices of the town. The Finance Department implements operational best practices to minimize the cost of government while maximizing constituent services and the public policy goals of the Town Manager and various Boards and Committees of the Town of Hamilton. The Finance Department will provide quality support and services to other town departments to ensure they can perform their missions more effectively. The Finance Department is led by the Town's Finance Director who oversees all of the financial divisions of the Town, including General Finance, Accounting, Treasurer/Collector, Assessor, and IT. The Finance Department prepares and implements the annual operating and capital budgets. The Finance Department provides daily support to other

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

We typically only operate out of town hall; with rare instances of remote work once in a while as a situation requires (snow day, sick children, etc.)

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No

Are all or a portion of these services generally available online? Please describe.

n/a

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Yes. As we are located on a second floor that does not have an elevator, if a resident (or if an employee) asks to speak with us and are unable to navigate the stairs, we will set an alternative meeting space to use. As noted earlier, we are mostly an internally facing department, so public interaction is relatively rare.

Please add any information on this program or service you feel is helpful to understanding how it is provided.



ADA Self-Evaluation Program Accessibility Data Collection Form

Department

Hamilton Fire Department

Contact Name

Chief Raymond Brunet

Contact Number

(978)-468-5559

Contact Email

Rbrunet@hamiltonma.gov

Primary Facility Address

265 Bay Road Hamilton

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

We do not regularly post to our web page. We do so on an as needed basis. We do, however, use our Face Book page to post events, updates and news the department feel relevant to our residents.

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

No

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

Dispatch has these services

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

1. We provide an array of services to the community as listed below
2. Fire Suppression
3. Emergency Medical Services
4. Fire safety Permitting and Inspection
5. Fire Safety Education to all ages
6. Child Safety Seat Installations

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

- Throughout our community
1. Schools
 2. Council on Aging Complex
 - 3 Commercial & Residential Properties

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

As stated, we mostly use our Facebook page and share it to other local pages.

Are all or a portion of these services generally available online? Please describe.

No, the majority of our services are face to face interactions. The only online service we offer is an burning permit payment process with a daily activation of their permit.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Yes, if they call us we will manually put their permit in the system if they are unable.
Some of my staff have taken sign language classes to be prepared If the need presents itself.
We have equipment to extricate patients from most emergencies with a variety of disabilities and/or injuries.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

NA

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

NA

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

NA

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

Yes, we post news bulletins on the towns web page and sign board.

Are all or a portion of these services generally available online? Please describe.

No

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

No

Please add any information on this program or service you feel is helpful to understanding how it is provided.

NA

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

NA

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

NA

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

NA

Are all or a portion of these services generally available online? Please describe.

NA

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

NA

Please add any information on this program or service you feel is helpful to understanding how it is provided.

NA

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

NA

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

NA

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

NA

Are all or a portion of these services generally available online? Please describe.

NA

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

NA

Please add any information on this program or service you feel is helpful to understanding how it is provided.

NA



ADA Self-Evaluation Program Accessibility Data Collection Form

Department

Human Resources

Contact Name

Michellelee Maloney

Contact Number

Contact Email

MMaloney@hamiltonma.gov

Primary Facility Address

299 Bay Road, Hamilton, MA 01982

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

Yes - Employment Opportunities - PDF Internet access via desktop and Smart phone.

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

Large print - Yes

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

No

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Core Service is job opportunities, counseling and policy interpretation - On-line, in-person or on the phone.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

CORI and SORI - Mass.gov

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

Yes, we offer the ability to apply for a job on-line, in-person or by mail.

Are all or a portion of these services generally available online? Please describe.

Yes, the Town's Policy and Procedure guidebook is available on-line as well the job application.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

It is a one person department.

Please add any information on this program or service you feel is helpful to understanding how it is provided.



ADA Self-Evaluation Program Accessibility Data Collection Form

Department

INSPECTIONAL SERVICES

Contact Name

RICH MALONEY

Contact Number

978-626-5246

Contact Email

RMALONEY@HAMILTONMA.GOV

Primary Facility Address

577 BAY ROAD

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

YES. WE POST NOTICES, BUILDING CODE UPDATES, RELEVANT CODES, HOW TO APPLY FOR A PERMIT, NECESSARY PAPERWORK FOR SUCH.

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

NO

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

NO

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

WE ISSUE PERMITS AND PERFORM INSPECTIONS FOR BUILDING, ELECTRICAL, PLUMBING, GAS, AND SHEETMETAL PERMITS. PERMIT APPLICATIONS ARE SUBMITTED AS HARD COPIES IN PERSON OR BY MAIL OR EMAIL, WE REVIEW AND ISSUE. INSPECTIONS ARE DONE BY REQUEST BY PHONE, EMAIL, OR IN PERSON.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

FIELD INSPECTIONS ARE PERFORMED AT PROPERTY ADDRESSES WHERE PERMITS ARE ISSUED TO.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

NO

Are all or a portion of these services generally available online? Please describe.

PERMITS AND INSPECTIONS CAN COME IN VIA EMAIL.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

WE CAN MEET ANY CUSTOMER ON THE 1ST FLOOR OF TOWN HALL AS NECESSARY.

Please add any information on this program or service you feel is helpful to understanding how it is provided.



ADA Self-Evaluation Program Accessibility Data Collection Form

Department

Library

Contact Name

Kim Butler

Contact Number

978-468-5577

Contact Email

kbutler@hwlibrary.org

Primary Facility Address

14 Union Street, South Hamilton, MA

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

The library posts to it's website (www.hwlibrary.org). The website is formatted for mobile use. Users also have the capacity to increase or decrease the font size. The library website is also text heavy in places to accomodate text to speech needs and where there are images we try to accompany it with text as well.

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

We circulate large print materials in fiction and non-fiction. We also have a relationship with the Perkins School to receive talking books and braille materials when requested by patrons.

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

No

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Circulation of materials in all formats. The library provides books, audiobooks, DVD's, blu-rays, music CD's and other items for circulation to patrons. Items are made available on both levels of the library on bookcases of varying height and size. Checkout of materials is done at the main circulation desk that has a two level desk that accomdates patrons living with a disability.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

We have a page on our website that describes our paternership with the Perkins School and how patrons can access auido materials and braille materials from Perkins at our reference desk.

Are all or a portion of these services generally available online? Please describe.

Ebooks and eaudios are available online through Overdrive and the Libby app.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Both floors of the library are accessable via elevator. If a patrons has mobility issues staff are trained to offer assistance or to retrieve materials for patrons. We also offer curbside pick up.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Reference help for patrons of all ages. The library provides research help for members of the community; we help with topics ranging from school projects, geneology, social services referrals, and readers advisory. These services are provided in the library, over the phone, and by email.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No.

Are all or a portion of these services generally available online? Please describe.

Patrons may access research assistance through the online library databases. They may also email reference questions or fill out an online form to get book recommendations.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Library staff routinely retrieve information for patrons that they can come in to pick up. We also request articles that can be emailed to a patron and printed from home.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Computer, copy and fax services. The library makes available sixteen public computers for patrons (13 on the second floor, 3 in the children's room). All computers have internet access and Microsoft Office. The library also has printing services in black & white and color, two photocopy machines, and one fax machine for patron use.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No.

Are all or a portion of these services generally available online? Please describe.

No.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Staff are available to assist patrons with computer and technology help. We also frequently assist patrons in using the copier and fax machine.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Programs for all ages. The library provides programming opportunities for children, teens, and adults throughout the year. Children's programs are primarily story times during the year with a robust summer reading program through the months of June, July and August. Teen programs are geared to appeal to the age group and are driven by current trends. Adult programming is varied through the year and also includes three book clubs. Programs are offered both in person and virtual.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No

Are all or a portion of these services generally available online? Please describe.

Some of our programs have been virtual over Zoom and some have been hybrid programs (in person with a virtual option).

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Staff are able to work with families to accommodate disabilities in story time. All spaces used for programming are handicapped accessible.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Study and meeting rooms. The library has one large meeting room, one conference room, and three study rooms that are available for patrons. The large meeting room is on the first floor and is accessible from multiple entrances and exits. It also has a projector, screen, sound system, and hearing assistance equipment installed. The conference room is on the second floor as are the three study rooms. They are all handicapped accessible.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No.

Are all or a portion of these services generally available online? Please describe.

The large meeting room and the conference room are bookable online.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

All spaces are handicapped accessible and we recently added the hearing assist devices to the large meeting room for programs.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Digital Resources. The library provides access to digital resources to our patrons. These services include ebooks and eaudios, and streaming video service. It also includes research databases such as Consumer Reports, Ancestry, MorningStar, The New York Times online, and others. In order to access these services patrons need to login using their library card.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No.

Are all or a portion of these services generally available online? Please describe.

All of these services are located online. All of the links to each service are on our website and each database is described in full including how to access each one.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Staff are available to help patrons both in person and over the phone with access to electronic resources. We help with everything from logging in to how to search for materials.

Please add any information on this program or service you feel is helpful to understanding how it is provided.



ADA Self-Evaluation Program Accessibility Data Collection Form

Department

Hamilton Police Department

Contact Name

Chief Russell Stevens

Contact Number

(978)468-1212

Contact Email

rstevens@hamiltonma.gov

Primary Facility Address

265 Bay Rd. Hamilton, MA 01982

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

Yes and no. There are various forms available on line and are added as needed. Most forms are in PDF format and are or are being converted to fillable documents.

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

No.

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

All Dispatchers are familiar on how to use and access TTY/TDD and/or relay services.

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Most communications with the public originate by telephone through the dispatch center. Dispatchers have the ability to communicate on 9-1-1 through TTY/TDD or using a silent call procedure. Text-to-911 is also available.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

The Hamilton Communications Center is located within the Hamilton Public Safety building.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

On the Communications website, there are several links to forms which can be downloaded and completed. These include: Burning Permits, Business Emergency Contact list, Home owner contact list, 9-1-1 Disability report, and 9-1-1 contact forms to keep at home with emergency contact information.

Are all or a portion of these services generally available online? Please describe.

All forms are available online

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Dispatchers make every reasonable effort to assist the public in accessing forms, whether it be by phone, e-mail or having an officer drop off paperwork at a residence. Dispatchers can also talk the public through on how to complete a form over the phone or provide directions at the front window.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Officers on patrol frequently encounter people with varying disabilities. For those who are hard of hearing, officers have pamphlets with various pictures to assist in determining the best way to communicate. HPD has also created a form which is kept private and secure, except when needed, to assist in providing care and support for those with Autism or any other types of disabilities. Officers are also familiar with identifying home mobility assistant devices and making sure residents can access them when responding to calls for service such as a lift assist. HPD also has started a Silver Alert program for those with serious memory impairments.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

All services are provided throughout the town as needed.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

All forms for the Autism-Disability Outreach Program and the Silver Alert Program are available on the Police Department webpage. They have also been announced on social media platforms, as well as have been discussed in public forums with the Selectboard, School Committee, Special Education Parent Advisory Committee, and the

Are all or a portion of these services generally available online? Please describe.

Access to the forms are available online.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Yes, officers are more than willing to assist in printing out forms and delivering them, helping to explain any forms and to assist in making sure the forms are completed appropriately.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Processing of LTC/FID permits is conducted in person at the police station on the 1st Saturday morning and the 3rd Monday evening of every month. The Firearms Licensing Officers can also schedule individual appointments on an as-needed basis. All paperwork needs to be completed prior to the appointment and applicants have their fingerprints taken. The appointments are conducted in the front reception room just off the lobby of the police station where there is a computer for the officer to process the paperwork and an ink pad mounted to the top of a counter. Every effort is made to make the application processing appointment as easy as possible.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

LTC/FID permits can only be processed at the police station

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

On the department website is a link to the Commonwealth of Massachusetts Firearms Record Bureau. There anyone can locate forms, complete various tasks and contains informational services.

Are all or a portion of these services generally available online? Please describe.

Access to forms and tasks is available online.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

All officers have the ability to print out forms and deliver them to residents as needed

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

The Hamilton Police provide members of the public to come in to have their fingerprints taken for various reasons (employment, citizenship, etc.). This service is conducted in the front reception room just off of the lobby of the police station where there is a ink pad mounted affixed to a countertop.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

This service can only be provided at the police station.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No

Are all or a portion of these services generally available online? Please describe.

No

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Officers will assist an individual in providing fingerprint cards if needed and do as much as possible to ensure the task is completed.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

As a small community, the Hamilton Police receive a good number of walk-in requests for service. These requests can be for a wide variety of reasons to include: filing/making reports, dropping off unwanted/expired medications, asking questions, directions, use of the restroom, meet with an officer, request to check a car seat or to pick-up reports/paperwork.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

If the request for service can not be completed in the lobby or reception room, some walk-in requests can be conducted in the parking lot or can even be done at a residence.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

Are all or a portion of these services generally available online? Please describe.

Some forms can be found online such as public record requests, filing a complaint/commendation of an employee, and blank crash reports.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Being a small community, officers make an effort to assist members of the public in completing any request for service. Officers can also take reports by telephone for many types of calls.

Please add any information on this program or service you feel is helpful to understanding how it is provided.



ADA Self-Evaluation Program Accessibility Data Collection Form

Department

Recreation

Contact Name

Sean Timmons

Contact Number

978-468-2178

Contact Email

stimmons@hamiltonma.gov

Primary Facility Address

16 Union Street, Hamilton, MA 01982

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

Yes. Our Department post materials to two main web pages; the Town's Website as well as our own webpage www.hwrecreation.com. This second webpage not only contains information but is also used as our main registration tool for residents to sign-up for all of our programming and memberships.

These websites are available through internet access as well as smart phones. We also offer in-person, mail-in, and over the phone registration for all of our programs and memberships.

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

We can provide large print upon request. We also use flippingbook.com for all of our brochure promotions. This software does provide a "magnifying glass" feature for those who are more computer savvy.

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

No

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

We provide over 200 seasonal programs, activities, trainings, etc.. for community members of all ages. These programs run at various indoor/outdoor locations throughout Hamilton and Wenham.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

These services are provided in our Recreation Center Gym, Town Buildings, as well as all of the Town's outdoor athletic facilities (tennis courts, playing fields, basketball courts, etc..)

We do our best to provide everyone with equal access to these facilities

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

We do not.

Are all or a portion of these services generally available online? Please describe.

Registration or information for all of these services are available online. We also can mail or email any information that residents ask request.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Yes, our staff will do everything we can to make sure anyone can attend any class, program, or activity. We are also looking into providing more inclusive and therapeutic recreation in the coming seasons.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Veterans Memorial Pool

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

Patton Park. The pool is completely ADA accessible.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

N/A

Are all or a portion of these services generally available online? Please describe.

Information and registration ability are available on-line.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Yes, the pool is 100% ADA accessible.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Patton Park Camp

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

Patton Park

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

We do not, though portions of the park are ADA accessible.

Are all or a portion of these services generally available online? Please describe.

Information and Registration

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

We do, we make every effort to make sure any community member who would like to attend the program is able to.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

We are will be working on a Patton Park Master Plan which will have an emphasis on making the park more accessible to all in the community.



ADA Self-Evaluation Program Accessibility Data Collection Form

Department

Office of the Town Clerk

Contact Name

Carin Kale

Contact Number

978-468-5570 x 3

Contact Email

ckale@hamiltonma.gov

Primary Facility Address

577 Bay Road, Hamilton

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

Yes, the Town Clerk has a web page. Much content is typed directly into the web site. Documents are often uploaded and always as PDFs. Links to external information such as the Secretary of State's Office are often provided.

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

No.

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

Not really. I worked with the Deaf community in the past so I have familiarity.

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

State Elections and Local Elections which can include Vote by Mail, in-person early voting, Election Day voting.

How the service is provided: Residents register to vote on line at www.registertovotema.com, through automatic voter registration at the RMV or certain state agencies, or in person at Town Hall. Registered voters request a mailed ballot, arrive to vote early in-person, or arrive to vote on Election Day.

Materials: ballots

Equipment: computers for on-line registration, ballot and marker for in-person voting or Election Day voting, voting machine to cast a ballot. NOTE: we do have an Automark ballot marking machine set up on Election Day for voters who are blind or have difficulty marking a ballot

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

Election Day voting takes place at the Hamilton Wenham Recreation Center Gymnasium which is physically accessible.

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No we do not.

Are all or a portion of these services generally available online? Please describe.

Voter registration is online. A signed request for an absentee ballot or an early ballot can be emailed. Voting is not available online.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Yes, see the comment above about the Automark ballot marking machine for the visually impaired. During early in-person voting we can bring a ballot out to an individual in a car who finds it difficult to come into the building. We once had a voter ask for an Absentee ballot application to be mailed because she elderly and could not drive. We mailed it to her.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Elections are based on state law and direction from the Secretary of State's Office.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Administration of the Annual Street List/Census.

At the end of December every household (approx 3000) in town is mailed a Street List/Census form that they are required to complete, sign and return. The form is to list every member that resides in the household. No equipment is used.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

N/A

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No we do not. US mail is the delivery vehicle.

Are all or a portion of these services generally available online? Please describe.

No.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

We will if asked.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

All requirements are in law and direction is provided by the Secretary of State's Office.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Issuance of certified copies of birth certificates, death certificates, marriage certificates.
Individuals can request copies. Payment can be online via a link on the Town website or they can come into the office and pay by cash or check.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

N/A

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No we do not.

Are all or a portion of these services generally available online? Please describe.

Payment is available online.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

Copies can be mailed. If asked, we will do whatever is necessary to help.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Post meeting agendas of all Town boards and committees in compliance with the Open Meeting Law.

Meetings must be posted 48 hours in advance. The legal/official posting is on the Town website (the agenda is a PDF). Paper copies hang in a locked cabinet in Town Hall.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

N/A

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

We do not.

Are all or a portion of these services generally available online? Please describe.

Yes, the meeting agenda is on the Town website calendar.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

We have never been asked. We will if asked.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

Core Service or Programs Inventory (continued)

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

Issue Marriage Intentions and Marriage Certificates, Raffle/bazaar permits, Dog Licenses, Business Certificates.

Forms are available on the Town website.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

N/A

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

We do not.

Are all or a portion of these services generally available online? Please describe.

Forms are online. Payment can be made online.

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

We will if ever asked.

Please add any information on this program or service you feel is helpful to understanding how it is provided.



ADA Self-Evaluation Program Accessibility Data Collection Form

Department

Treasurer/Collector

Contact Name

Peggy Mcloughlin

Contact Number

978-626-5217

Contact Email

pmcloughlin@hamiltonma.gov

Primary Facility Address

577 Bay Road Hamilton, MA 01982

General Guidance:

1. Complete one for each core group of services and programs.
2. Programs and services that are generally similar in how they are provided or in the resources they use should be grouped together.
3. Provide information on public-facing services only.
4. If you have any questions or need help completing this form, please contact Mike Edwards via email at michael.edwards@umb.edu

Communications:

Does your department regularly post materials to a departmental web page? If yes, please describe, including information about document format and accessibility.

We do have all general information regarding our office on-line. Pdf documents for employees as well as our taxpayers are offered on-line.
Contact information including e-mail phone numbers are also available on-line
Bill payment information and how to pay on-line as well as other agencies that may be able to help them

Is your staff trained on how to respond for requests for document or materials in alternative format, such as braille or large print?

We are not trained or have knowledge at this time

Is your staff knowledgeable on the use of TTY/TDD or relay services for the hearing impaired, and/or interpreter services?

Not at this time

Core Service or Programs Inventory

Please describe the service or program provided, including details on how the service is provided and what materials or equipment are used:

We provide services internally as well as to the public.
All revenue comes through our office via tax payer coming to our office or using our on-line bill pay system. We also provide a drop off box located outside our building next to the handicap ramp which you could walk to or drive up to.
All misc money collected by other departments is turn over and signed off by us.
We also process payroll and all benefits through our office. Employees can input enter their time on-line and PDF's forms are available on-line for our employees as well as in our office.

If other than the primary address listed, where are these services provided? If yes, please state the location and describe any measures that are taken to ensure accessibility.

Not at this time

Do you provide notices (on website, bulletin board, or through other means) to patrons on how to access this service if they are unable to do so due to a disability? Please describe.

No

Are all or a portion of these services generally available online? Please describe.

I am unaware of any at this time

Does your staff currently make any reasonable accommodations to provide this service or services to patrons with disabilities? If so, please describe.

We try to accommodate tax payers any way we can. One example is one of our residents is blind and we do fill out his quarterly tax checks for him and stamp his signature on the check for him. If someone needs any help with a service in our office we try to help anyway we can.

Please add any information on this program or service you feel is helpful to understanding how it is provided.

We are available by phone and e-mail.

Attachment 9.4 Website Audit

Website Auditing Process and Methodology

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

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

City/Town: Hamilton, Massachusetts

Website: <https://www.hamiltonma.gov/>

Audit Date: June 2022

Accessibility Area: Website



The following pictures are missing alternative text:

Page: [History](#)



Alt text example: A photo of the outside of the Hamilton-Wenham Public Library; a photo of the outside front of Hamilton Town Hall

Alternative Text
[WCAG 2.2 – 1.1](#)

Text alternatives for any non-text content provides context for users who use braille, screen readers, assistive technologies, or need simpler language.

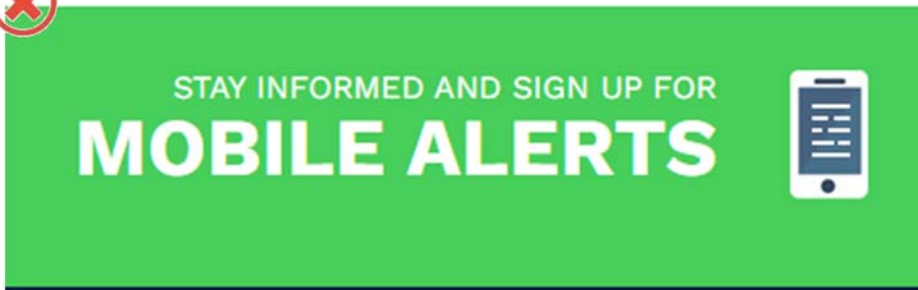
Media Captions
[WCAG 2.2 – 1.2.2](#)

N/A: No video media is available on the website

- Captions or transcriptions for all prerecorded audio or video media helps users who are deaf or hard of hearing understand content.
- A full transcript (of captions and audio description) is useful for people who have both hearing and visual impairments including those who are deaf-blind.



Color Contrast
[WCAG 2.2 – 1.4.3](#)



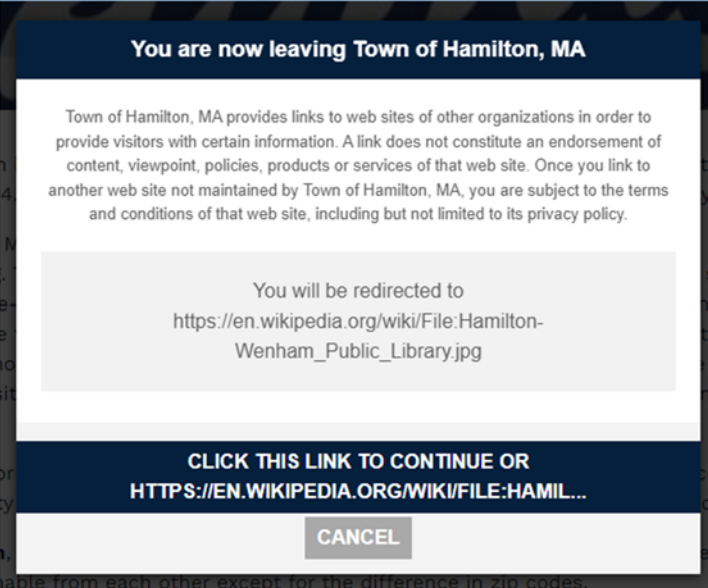







Color contrast ratio for the above banner is 2.04:1, not high enough to meet WCAG standards.

All other headers pass with a contrast of at least **4.5:1 or higher**




- A color contrast ratio of at least 4.5:1 helps increase clarity
- [Contrast checker](#)

<p>Flashing WCAG 2.2 – 2.3.1</p>	<p>✓</p> <p>Website does not contain any flashing images or text</p>	<p>Web pages should not contain anything that flashes more than three times in a second. A pair of opposing changes in relative luminance can cause seizures in some people if it is large enough and in the right frequency range.</p>
<p>Plain Language WCAG 2.2 – 3.1</p>	<p>✓</p> <p>Appropriate-level language is used throughout the site. Paragraphs do not contain more than 50 words.</p>	<ul style="list-style-type: none"> • Use easy to understand words, short sentences, and a simple tense. Content that is readable and understandable ensures accessibility for people of all cognitive abilities. • Reading level should not be more advanced than lower secondary education level. • A paragraph of more than 50 words should be broken up into two. • Avoid double negatives. • Do not use idioms because they cannot be directly translated without losing their cultural or dependent-language meaning.
<p>Clear Organization W3C – 4.3.2</p>	<p>✓</p> <p>Toolbars are consistently formatted throughout the site; links are organized in a logical layout. A “quick links” section makes the most common needs easily accessible to users. An “A-Z Directory” is also available for easy navigation.</p> <div data-bbox="435 1371 987 1833" style="border: 1px solid black; padding: 10px; background-color: #1a2b3d; color: white; text-align: center;"> <p>WHERE DO I GO FOR...</p> <p>Unsure of where to find the information you are looking for? Check our A-Z directory of all departments, applications and other general information.</p> <p>A-Z DIRECTORY ➔</p> </div>	<p>Users often become confused and lost when they do not understand the visual hierarchy of the site, menus, and structure. Clear sub-menus and a well-defined structure will help the user know what is on the site and how to find it.</p>


<p>Sitemap WCAG 2.0 – G63</p>	 <p>A sitemap is not available on the website</p>	<p>Providing a site map allows users to understand what the site contains and how the content is organized.</p>
<p>External Link Alert</p>	 	<p>Alerting users when they will be leaving the Town website systems helps those using assistive devices keep track of webpage navigation.</p>
<p>Manual Accessibility Test</p>	 <p>Website passes the review of keyboard-only navigation:</p> <ul style="list-style-type: none"> • Tabbing between sections of a webpage to make sure they can be found without a mouse • Testing all menus with the keyboard to ensure none are skipped over • Checking for skip links at the top of the page that allow users to jump directly to each page's vital content • Verifying that links and form fields are highlighted when using keyboard commands 	<p>As advanced as software is, there are still plenty of situations where an algorithm can't recognize the nuances of website accessibility or usability. Because of this, manual testing is mandatory; it will provide the most detailed feedback about a website's accessibility.</p> <p>To ensure consideration is given to as many devices and browser types as possible, manual accessibility tests were conducted in a variety of browsers, including the latest versions of Internet Explorer, Edge, Chrome, and Firefox.</p>
<p>Accessibility Area: Documents</p>		
<p>File Type Section508 - Documents</p>	 <p>All uploaded documents are in PDF format and lack accessibility features (see PDF Accessibility Area for more information)</p>	<ul style="list-style-type: none"> • Save documents as .docx format to preserve accessibility features. Other formats that can be produced by Microsoft Word (RTF, DOC, TXT, and ODF) may not be accessible.

		<ul style="list-style-type: none"> Develop reusable accessible design templates 																
File Name Section508	 <p>File names are not descriptive and unique enough to distinguish between documents. For example:</p> <table border="1" data-bbox="324 361 1096 447"> <tr> <td>2022_07_06_ZBA</td> <td>July 6, 2022</td> <td>June 14, 2022</td> <td>Meeting Agendas</td> </tr> </table>	2022_07_06_ZBA	July 6, 2022	June 14, 2022	Meeting Agendas	<p>A descriptive file name that identifies the document or its purpose helps everyone locate, open, and switch between documents.</p>												
2022_07_06_ZBA	July 6, 2022	June 14, 2022	Meeting Agendas															
Titles / Labels	 <p>Documents are titled and labeled, but should specify language</p>	<p>All documents should be titled, tables should include headers, and the language of all contents should be noted.</p>																
Date Format	 <table border="1" data-bbox="435 674 998 1144"> <tr> <td>JUNE</td> <td>JUNE 1, 2022 @ 8:00 AM</td> <td>1</td> <td>Hamilton Development Corporation Meeting</td> </tr> <tr> <td>JUNE</td> <td>JUNE 1, 2022 @ 7:00 PM</td> <td>1</td> <td>Zoning Board of Appeals Meeting</td> </tr> <tr> <td>JUNE</td> <td>JUNE 2, 2022 @ 5:30 PM</td> <td>2</td> <td>"Barnicle Bros" at Patton Homestead Sunset Music Series</td> </tr> <tr> <td>JUNE</td> <td>JUNE 6, 2022 @ 7:00 PM</td> <td>6</td> <td>Select Board Meeting</td> </tr> </table> <p>The Town of Hamilton formats their dates appropriately.</p>	JUNE	JUNE 1, 2022 @ 8:00 AM	1	Hamilton Development Corporation Meeting	JUNE	JUNE 1, 2022 @ 7:00 PM	1	Zoning Board of Appeals Meeting	JUNE	JUNE 2, 2022 @ 5:30 PM	2	"Barnicle Bros" at Patton Homestead Sunset Music Series	JUNE	JUNE 6, 2022 @ 7:00 PM	6	Select Board Meeting	<p>Writing out the month and date in words can avoid confusion.</p>
JUNE	JUNE 1, 2022 @ 8:00 AM	1	Hamilton Development Corporation Meeting															
JUNE	JUNE 1, 2022 @ 7:00 PM	1	Zoning Board of Appeals Meeting															
JUNE	JUNE 2, 2022 @ 5:30 PM	2	"Barnicle Bros" at Patton Homestead Sunset Music Series															
JUNE	JUNE 6, 2022 @ 7:00 PM	6	Select Board Meeting															

Accessibility Area: PDFs

Searchable text PDF508	 <p>Not all PDFs are searchable, such as documents found in the Public Meeting Document Archive.</p>	<p>An ADA compliant PDF has searchable text. PDFs created by scanning pages are pictures of the original. Screen readers cannot infer meaning from just a picture.</p>
Bookmarks PDF508	 <p>Bookmarks are not present for documents greater than 9 pages. Examples of violations include, Town of Hamilton Zoning Bylaw</p>	<p>If the PDF document contains 9 or more pages, bookmarks should be added. Bookmarks allow the reader to quickly navigate to points of interest</p>
Alternative Text PDF508	 <p>PDF documents do not contain images that require alternative text</p>	<p>Type text that describes the image in the Alternative Text field (click Options > Properties)</p>

Accessibility Area: Social Media

Alternative Text	 <p>Tweets are missing alternative text</p>	<p>Provide media with alternative text that describes the image</p>
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Alt text: A photo of a red firework bursting in the evening sky, with an army tank and American flag in the foreground.



Media Captions

All videos on [Hamilton's Town YouTube](#) page allow for embedded YouTube caption capabilities.

- Ensure video content includes synchronized captions.
- Ensure audio descriptions for people with visual disabilities are included in the default sound track, or as a separate selectable sound track.
- Add captions to photos to ensure individuals understand what is going on in the picture.

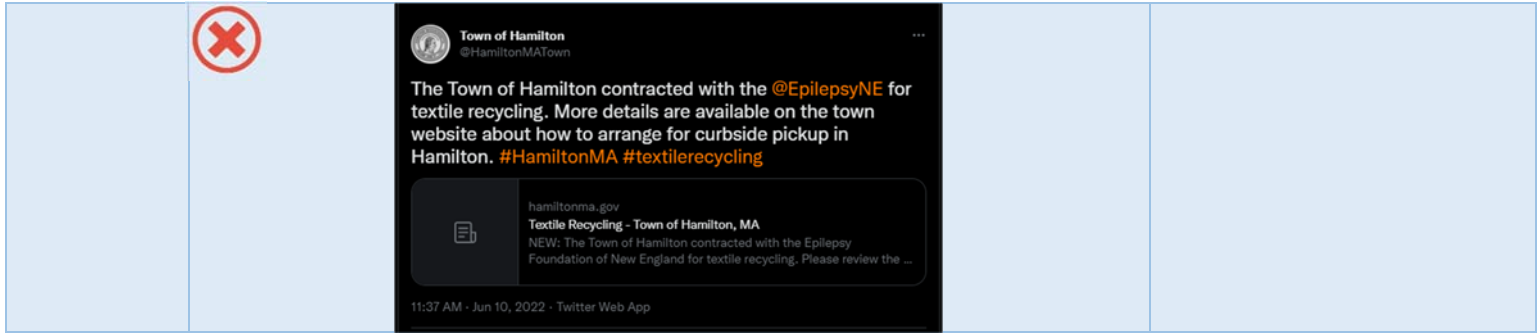


Plain Language

Hashtags that contain more than one word should use camel case. Hamilton employs this most of the time, but not always.



- Write in plain language, use camel case when appropriate (i.e., capitalize the first letters of compound words. This is helpful as it makes multi-word hashtags easier to read, including for those using a screen reader.
- Limit use of hashtags, abbreviations and acronyms.



Acronyms

Hamilton's twitter account does not use any acronyms

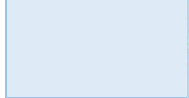
Always spell out the first instance of the acronym and add the acronym, in parentheses after. This is especially helpful for those using screen readers, because after the name is heard and the acronym is spelled out, the user will be better able to associate the sound of the acronym with the full name.

Outside content

When the town retweets others' content, they should note any ADA accessibility barriers, such as lack of video captioning

For content the municipality has not created and thus may not be accessible, make audience aware of these limitations. Provide a note briefly explaining the limitation, such as that: the photo is untagged; the video will auto start; the video does not include captioning; or the audio file is not accompanied by a written transcript.

Accessibility Area: Newsletter











Website allows users to subscribe to weekly newsletters and/or receive enhanced public safety alerts on their mobile device.

Accessibility Area: E-permitting

Site contains downloadable permitting application. Various license applications also direct users to downloadable PDF form

Site contains downloadable permitting application. Various license applications also direct users to downloadable PDF form

Accessibility Area: Downloadable Forms

Form Accessibility	 <p>Some PDF forms allow users to directly type content into the blank spaces, such as the State Tax Form 2. Others require the user to print the form or upload to a third-party PDF reader, such as the Abutter's Request Form. The latter is much more difficult for low- or-vision- impaired citizens and those with less technical competence.</p>	
Accessibility Area: Public Notice and Grievance Procedure		
Title II	 <p>ADA policy is listed and explained on the website, however a contact telephone number is not provided.</p>	The ADA Coordinator is responsible for coordinating the efforts of the government entity to comply with Title II and investigating any complaints that the entity has violated Title II. The name, office address, and telephone number of the ADA Coordinator must be provided to interested persons.
Accessibility Area: Secure Electronic Transfers (E-payments)		
Clear confidentiality language	 <p>Municipal e-pay system is “digicert Trusted secure” and also provides a link to the privacy policy where information about security and encryption is provided</p>  <p>Copyright © 2022 - City Hall Systems, Inc. - All Rights Reserved For questions or comments, please email: ePay@CityHallSystems.com For help, Monday-Friday 8:30AM-5PM ET, please call 508-381-5455</p> <p>Terms & Conditions of Use Security & Privacy</p>	To facilitate and encourage electronic commerce using payment card products, it will be necessary to assure cardholders that their payment information is safe and can only be accessed by the intended recipient.
Functioning Services	At the time of the audit all electronic services were functioning	
Contact Information	 <p>Online Payment Centers, UniPay and City Hall Systems, provides a contact phone number, email address, hours of operations, and a live support multilingual chat feature (City Hall Systems) in the event residents need assistance</p>	
Accessibility Area: Other / Integrated Apps		
GIS	 <p>Simple and explanatory language is provided for GIS users</p>	Text alternatives for any non-text content provides context for users who use braille, screen readers, assistive technologies, or need simpler language.
Trash / Recycling	 <p>Trash and recycling information is written clearly and organized by headings. Linked PDFs are searchable</p>	
Accessibility Area: Mobile Version		
Layout	 <p>Site layout is compatible with mobile device</p>	

Summary and Recommendations

The Town of Hamilton's municipal website has both strengths and areas for improvement. A big asset is the intuitive layout of the site. The toolbar navigations are uniform, uncomplicated, and easy to understand. All links are accessible by both keyboard, mouse, or a tap of the finger. First time visitors are able to find important documents and forms with ease via their "QuickLinks" feature and the "A-Z Directory." However, providing a site map will help users understand exactly what the site contains and how the content is organized.

The language used throughout the site is succinct and written at an appropriate comprehension level. The website is mobile friendly and formats correctly on a smartphone. The pop-up message that appears when the user is about to be redirected to a third-party site is a sophisticated feature compare to peer municipalities.

The site could improve upon many of its accessibility features, specifically in compliance with American Disability Act regulations. To enhance the experience for users who are reliant on-screen readers or assistive technologies, all images should be accompanied by alternative text. Alternative text should be present not only on the website, but all documents and social media channels, where applicable.

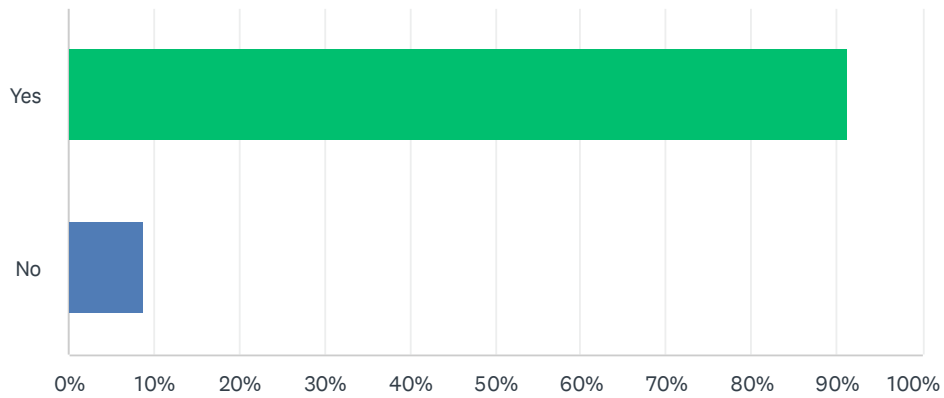
Many PDFs provided on the website are scanned images and thus prevent text from being searched using a search tool. This prevents individuals who rely on screen readers from accessing the content. Additionally, file names should be more distinct than just a date and an acronym. For files large enough, bookmarks should be added to allow for easy navigation to points of interest.

As often as possible, convert print forms into online fillable forms. When users can submit information through a website, rather than printing off and mailing in a form, it not only saves paper and postages costs, but increase involvement by eliminating the "hassle factor." Online payment will simplify the process for fee payment, which will lead to increased revenues and time saved chasing down late payments.

Hamilton's social media pages are a strength of the Town's online presence. While few improvements could be made such as adding alternative text to images and being transparent about media limitations when sharing outside content, the platforms post information daily in clear and concise language. Overall, the underlining structure of the municipal website is efficient and effective, however can be enhanced by adding additional ADA recommended features.

Q1 Are you a resident of the Town of Hamilton?

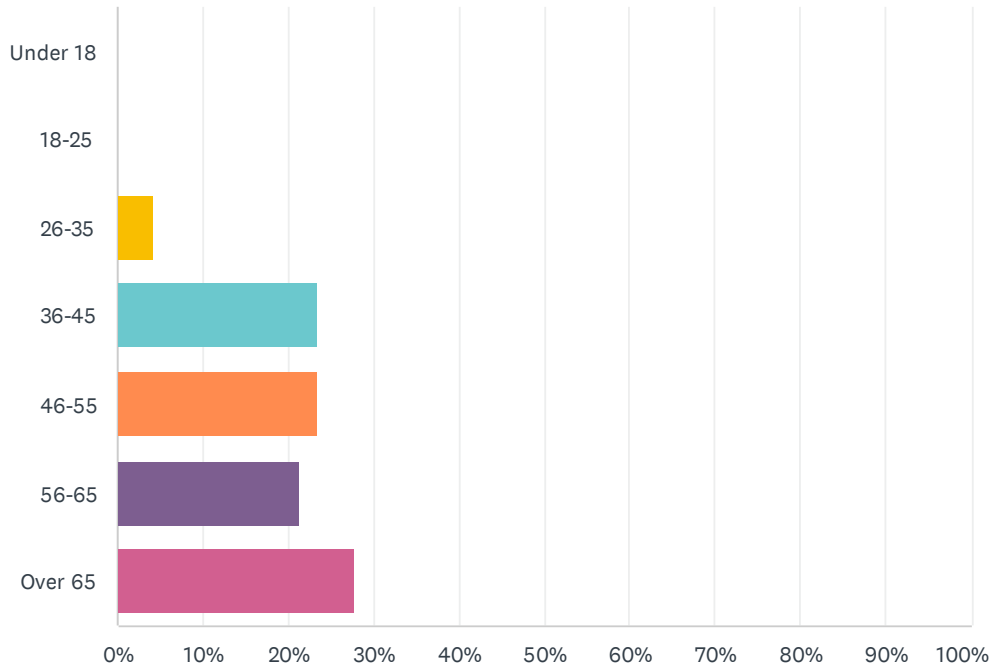
Answered: 46 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	91.30%	42
No	8.70%	4
TOTAL		46

Q2 What is your current age?

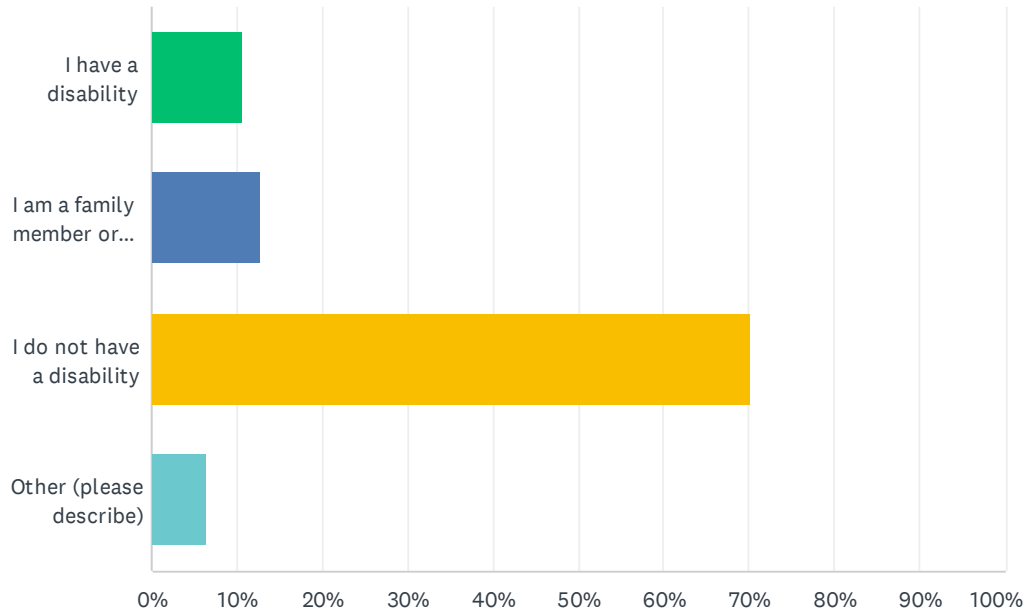
Answered: 47 Skipped: 0



ANSWER CHOICES	RESPONSES	
Under 18	0.00%	0
18-25	0.00%	0
26-35	4.26%	2
36-45	23.40%	11
46-55	23.40%	11
56-65	21.28%	10
Over 65	27.66%	13
TOTAL		47

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

Answered: 47 Skipped: 0

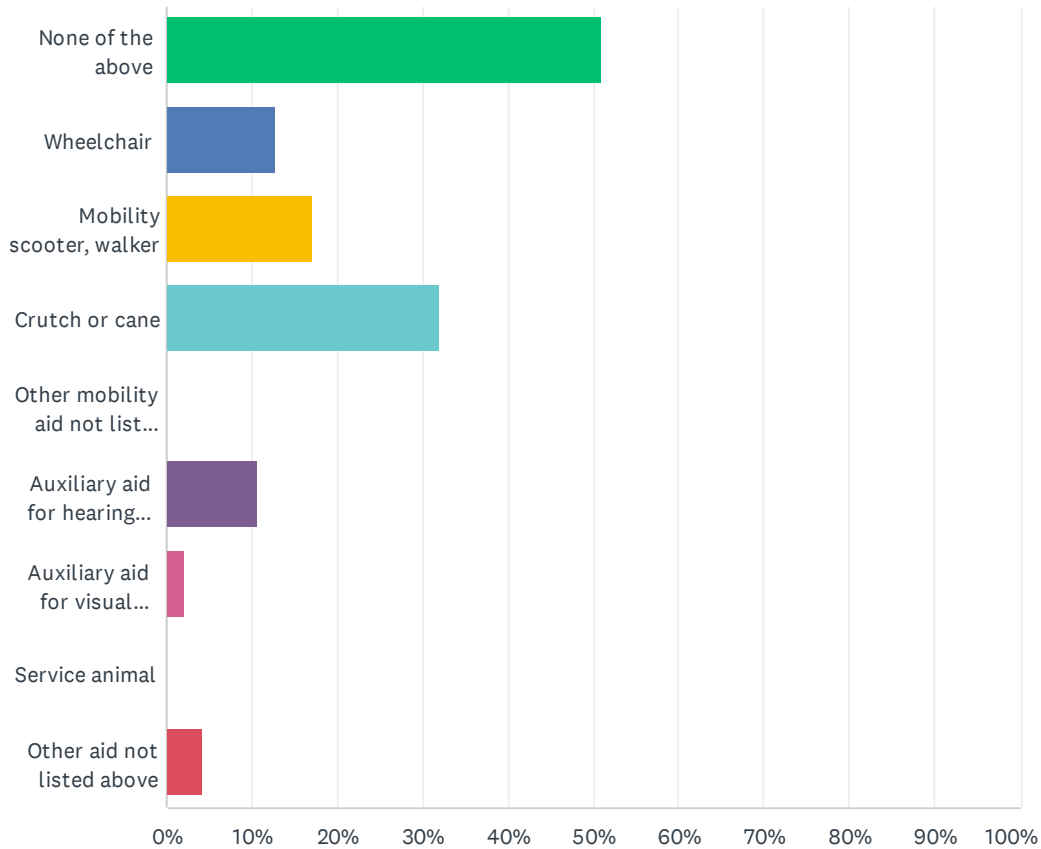


ANSWER CHOICES	RESPONSES	
I have a disability	10.64%	5
I am a family member or caregiver for a person with a disability	12.77%	6
I do not have a disability	70.21%	33
Other (please describe)	6.38%	3
TOTAL		47

#	OTHER (PLEASE DESCRIBE)	DATE
1	My deceased husband of three years had a physical disability.	7/7/2022 6:27 PM
2	I wish to make Hamilton easier to get around for all	7/6/2022 6:55 PM
3	Just old!	7/6/2022 5:36 PM

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

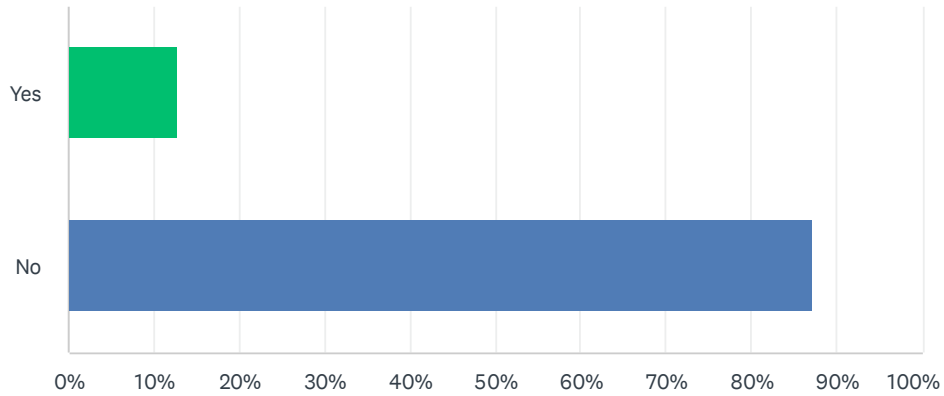
Answered: 47 Skipped: 0



ANSWER CHOICES	RESPONSES	
None of the above	51.06%	24
Wheelchair	12.77%	6
Mobility scooter, walker	17.02%	8
Crutch or cane	31.91%	15
Other mobility aid not listed above	0.00%	0
Auxiliary aid for hearing impairment	10.64%	5
Auxiliary aid for visual impairment	2.13%	1
Service animal	0.00%	0
Other aid not listed above	4.26%	2
Total Respondents: 47		

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

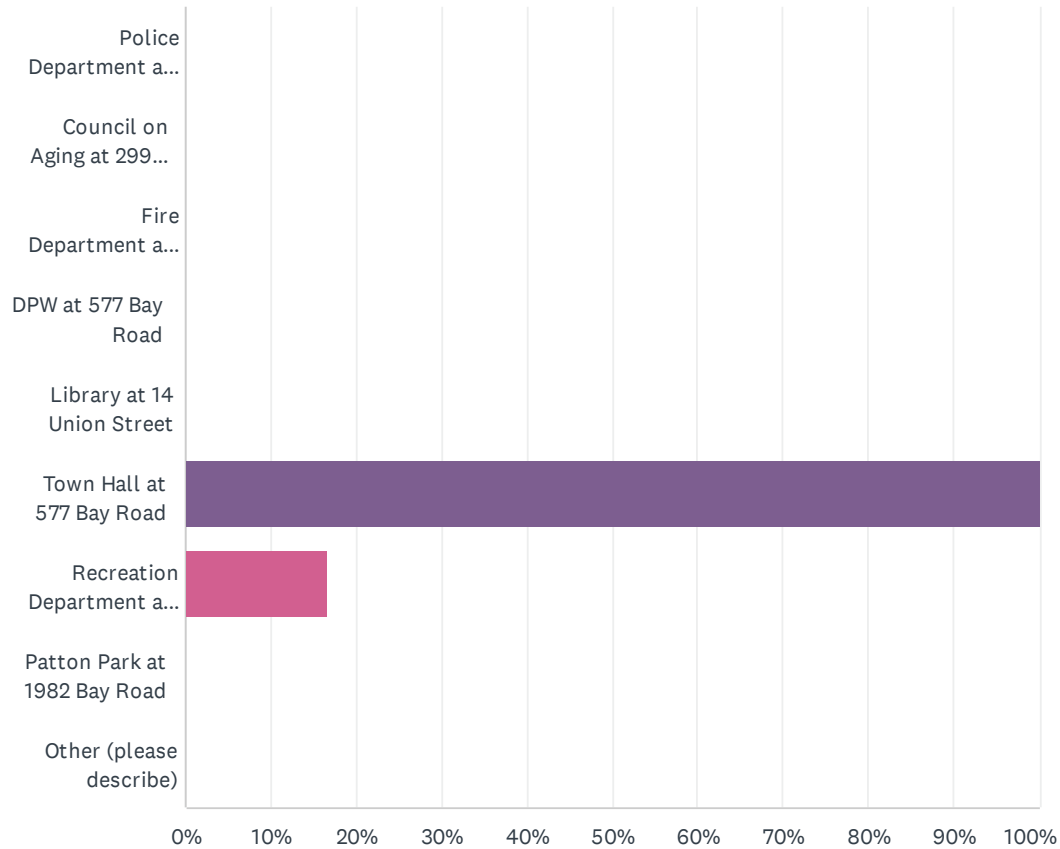
Answered: 47 Skipped: 0



ANSWER CHOICES	RESPONSES	
Yes	12.77%	6
No	87.23%	41
TOTAL		47

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

Answered: 6 Skipped: 41



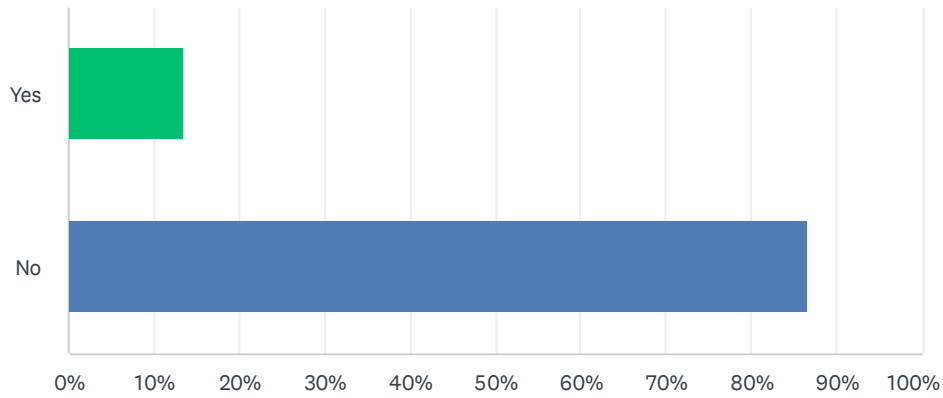
ANSWER CHOICES	RESPONSES
Police Department at 265 Bay Road	0.00% 0
Council on Aging at 299 Bay Road	0.00% 0
Fire Department at 265 Bay Road	0.00% 0
DPW at 577 Bay Road	0.00% 0
Library at 14 Union Street	0.00% 0
Town Hall at 577 Bay Road	100.00% 6
Recreation Department at 16 Union Street	16.67% 1
Patton Park at 1982 Bay Road	0.00% 0
Other (please describe)	0.00% 0
Total Respondents: 6	

#	OTHER (PLEASE DESCRIBE)	DATE
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There are no responses.

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

Answered: 45 Skipped: 2



ANSWER CHOICES	RESPONSES	
Yes	13.33%	6
No	86.67%	39
TOTAL		45

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

Answered: 5 Skipped: 42



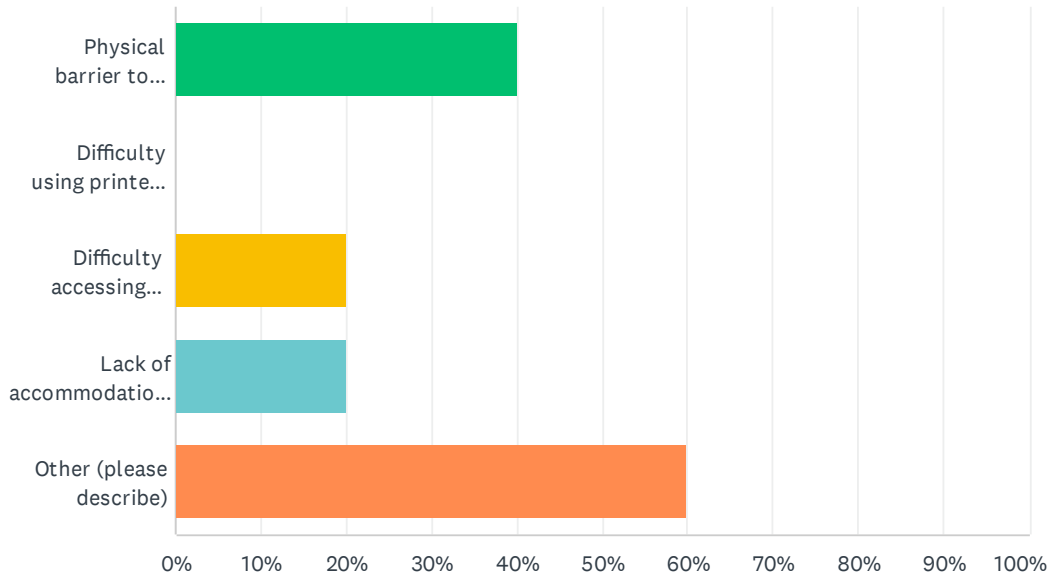
Town of Hamilton Accessibility Survey

ANSWER CHOICES	RESPONSES	
Assessor's Department	0.00%	0
Building Department	20.00%	1
Cemetery Department	0.00%	0
Council on Aging	0.00%	0
Department of Public Works	20.00%	1
Finance Department	0.00%	0
Fire Department	0.00%	0
Human Resources	0.00%	0
Library	20.00%	1
Police Department	0.00%	0
Recreation Department	40.00%	2
Town Manager or Board of Selectmen	0.00%	0
Town Clerk	0.00%	0
Treasurer/ Collector	0.00%	0
Water Department	0.00%	0
Town board, commission or other unit (please specify)	40.00%	2
Total Respondents: 5		

#	TOWN BOARD, COMMISSION OR OTHER UNIT (PLEASE SPECIFY)	DATE
1	Town meeting back when it was under a tent	7/21/2022 2:59 PM
2	The times I had business upstairs in the Town Hall	7/6/2022 9:57 PM

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

Answered: 5 Skipped: 42

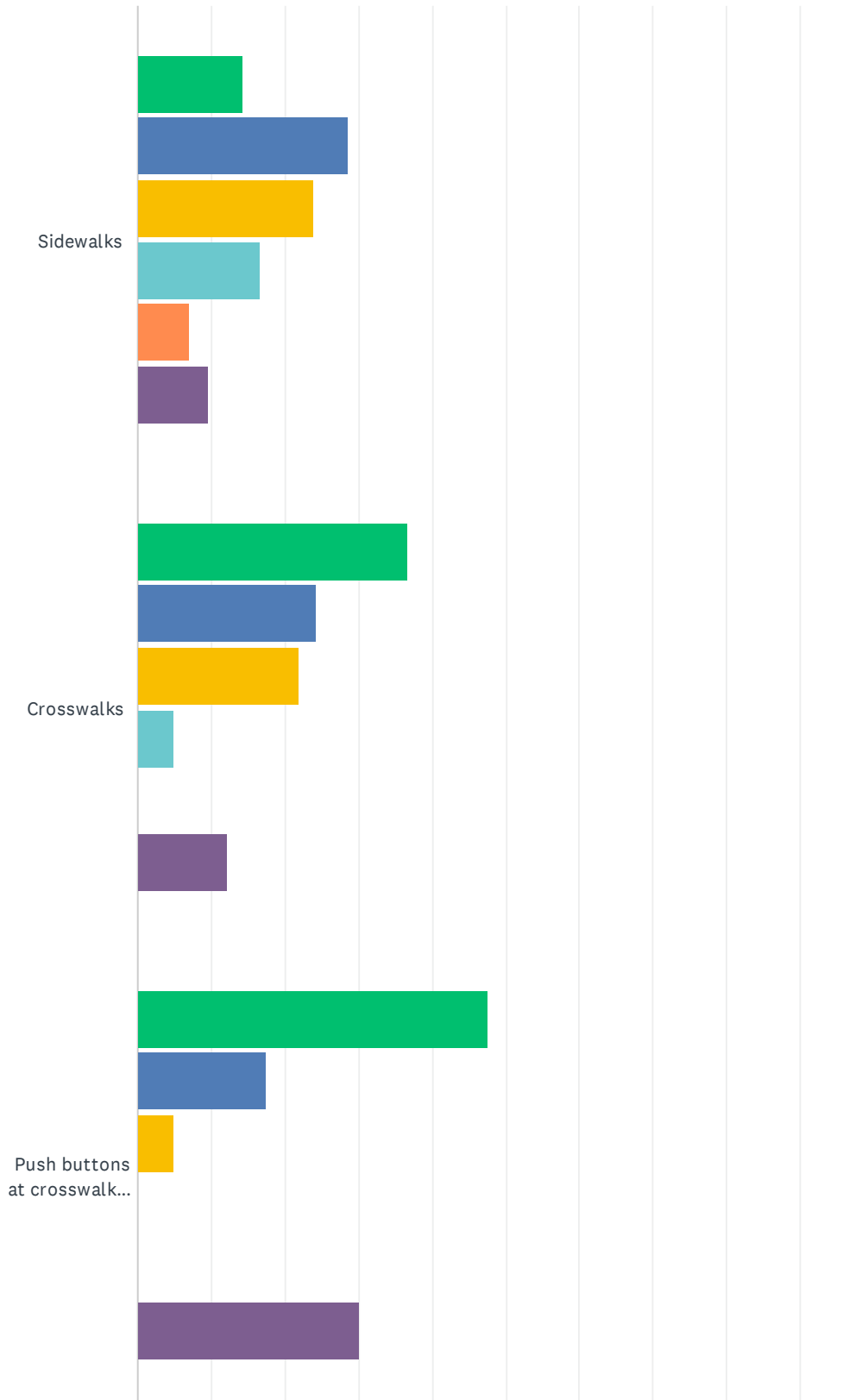


ANSWER CHOICES	RESPONSES	
Physical barrier to access, such as a lack of wheelchair access, counter height, or lack of accessible parking	40.00%	2
Difficulty using printed materials or forms	0.00%	0
Difficulty accessing online materials or services due to format, readability or other technical issue	20.00%	1
Lack of accommodations for the hearing impaired	20.00%	1
Other (please describe)	60.00%	3
Total Respondents: 5		

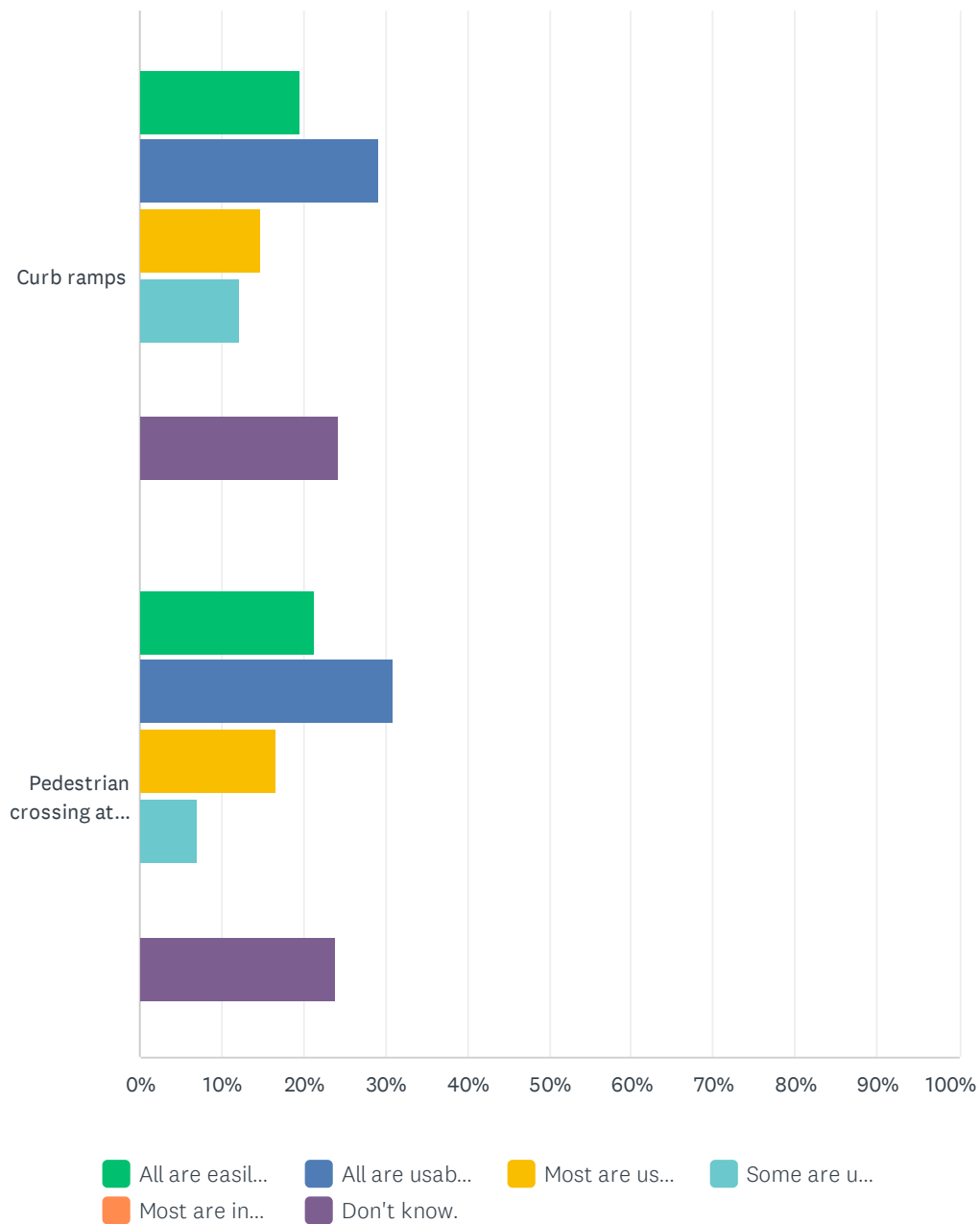
#	OTHER (PLEASE DESCRIBE)	DATE
1	Difficult to hear speakers sometime	7/21/2022 2:59 PM
2	Sidewalks missing and/or are not handicap accessible along 1A to get to public areas	7/8/2022 5:14 PM
3	Voting. Wish handicap parking was closer to the entrance	7/6/2022 9:33 PM

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

Answered: 42 Skipped: 5



Town of Hamilton Accessibility Survey

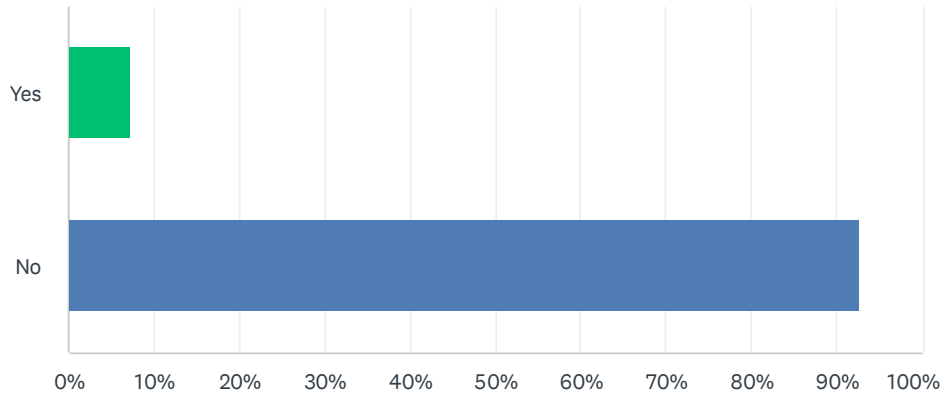


Town of Hamilton Accessibility Survey

	ALL ARE EASILY ACCESSIBLE.	ALL ARE USABLE BUT SOME WITH MINOR DIFFICULTY.	MOST ARE USABLE BUT SOME ARE TOO DIFFICULT.	SOME ARE USABLE BUT MANY ARE TOO DIFFICULT.	MOST ARE INACCESSIBLE/ TOO DIFFICULT TO USE.	DON'T KNOW.	TOTAL
Sidewalks	14.29% 6	28.57% 12	23.81% 10	16.67% 7	7.14% 3	9.52% 4	42
Crosswalks	36.59% 15	24.39% 10	21.95% 9	4.88% 2	0.00% 0	12.20% 5	41
Push buttons at crosswalks (where present)	47.50% 19	17.50% 7	5.00% 2	0.00% 0	0.00% 0	30.00% 12	40
Curb ramps	19.51% 8	29.27% 12	14.63% 6	12.20% 5	0.00% 0	24.39% 10	41
Pedestrian crossing at driveways	21.43% 9	30.95% 13	16.67% 7	7.14% 3	0.00% 0	23.81% 10	42

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

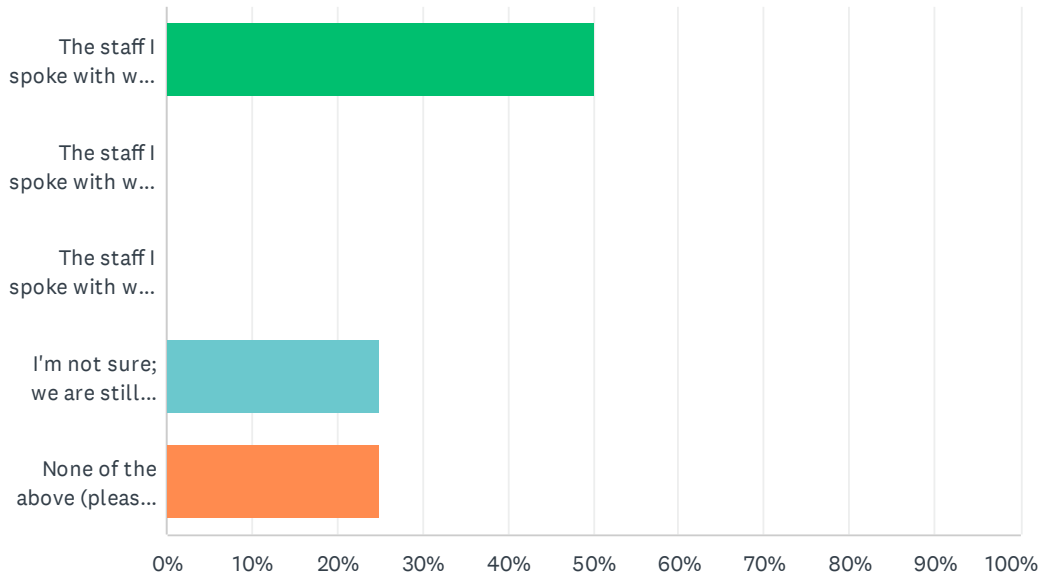
Answered: 41 Skipped: 6



ANSWER CHOICES	RESPONSES	
Yes	7.32%	3
No	92.68%	38
TOTAL		41

Q12 How would you describe your experience?

Answered: 4 Skipped: 43

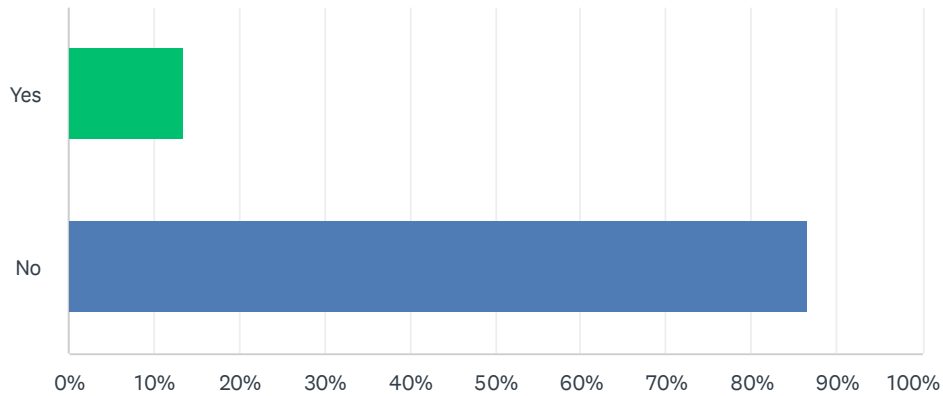


ANSWER CHOICES	RESPONSES	
The staff I spoke with was responsive and resolved my issue.	50.00%	2
The staff I spoke with was responsive, but unable to resolve my issue.	0.00%	0
The staff I spoke with was not responsive and my issue remained unresolved.	0.00%	0
I'm not sure; we are still working through it.	25.00%	1
None of the above (please describe):	25.00%	1
TOTAL		4

#	NONE OF THE ABOVE (PLEASE DESCRIBE):	DATE
1	Patio area of library not accessible to handicapped people. I sent an email. Waiting to here back.	7/18/2022 7:46 PM

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

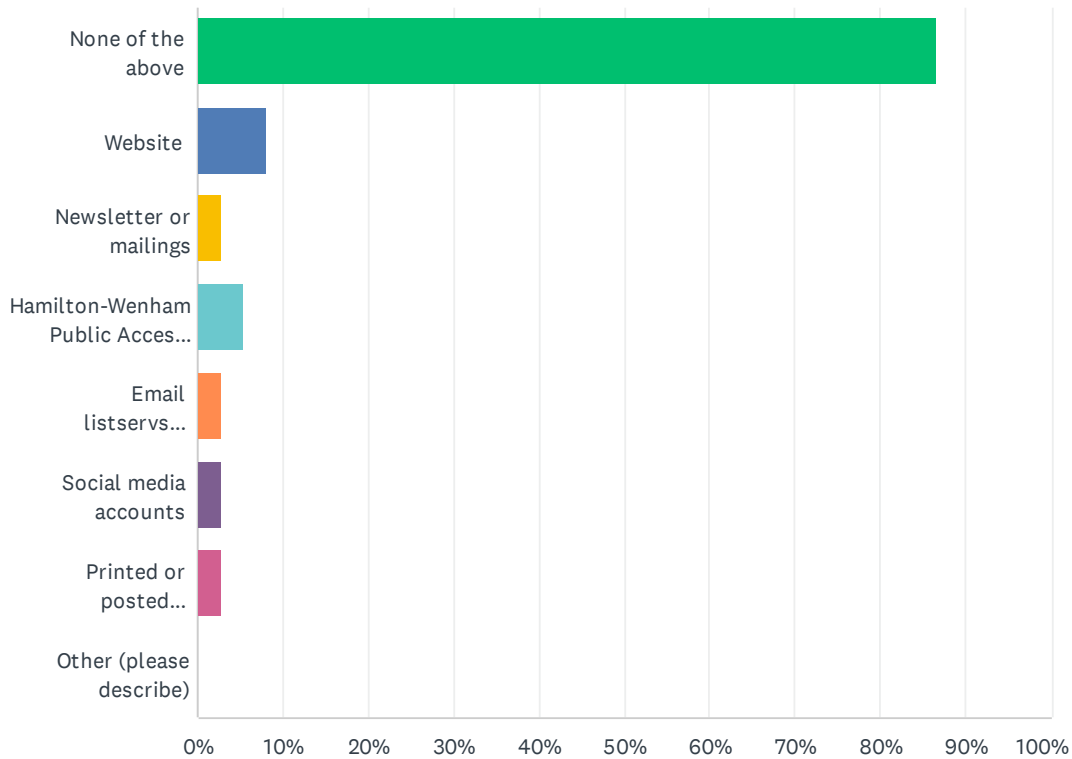
Answered: 37 Skipped: 10



ANSWER CHOICES	RESPONSES	
Yes	13.51%	5
No	86.49%	32
TOTAL		37

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

Answered: 37 Skipped: 10

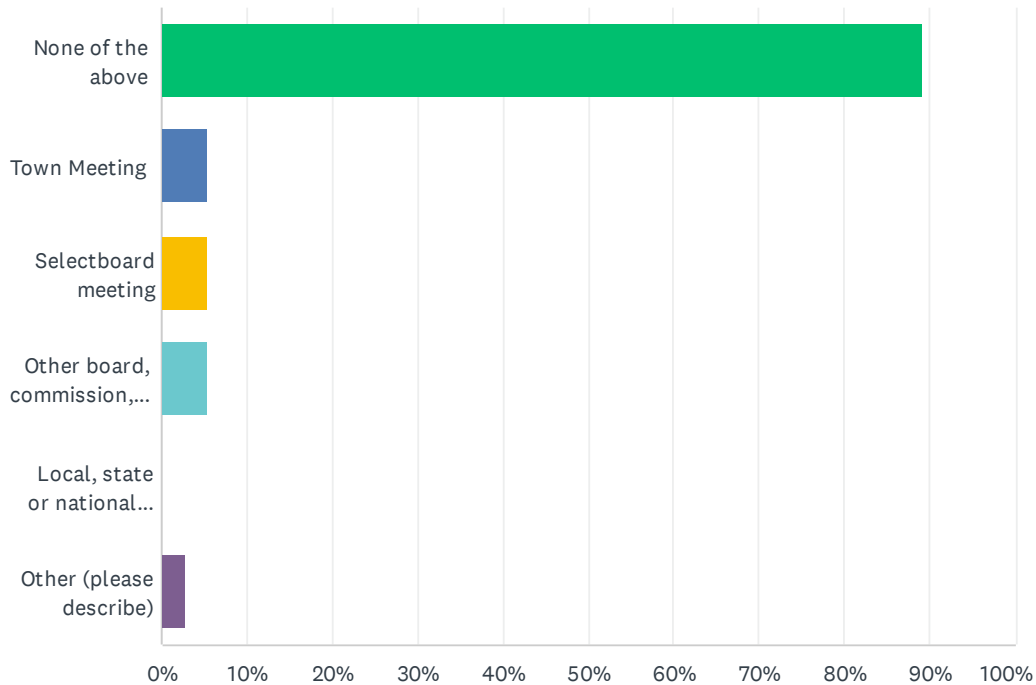


ANSWER CHOICES	RESPONSES	
None of the above	86.49%	32
Website	8.11%	3
Newsletter or mailings	2.70%	1
Hamilton-Wenham Public Access TV	5.41%	2
Email listservs (email blasts)	2.70%	1
Social media accounts	2.70%	1
Printed or posted materials at a Town office	2.70%	1
Other (please describe)	0.00%	0
Total Respondents: 37		

#	OTHER (PLEASE DESCRIBE)	DATE
	There are no responses.	

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

Answered: 37 Skipped: 10



ANSWER CHOICES	RESPONSES	
None of the above	89.19%	33
Town Meeting	5.41%	2
Selectboard meeting	5.41%	2
Other board, commission, committee or task force meetings	5.41%	2
Local, state or national elections	0.00%	0
Other (please describe)	2.70%	1
Total Respondents: 37		

#	OTHER (PLEASE DESCRIBE)	DATE
1	Not due to a disability which is my point. Since I've had trouble at times getting current and readily available accurate meeting and zoom login info off the town website, then surely there are people with disabilities who do have a problem navigating site and specific info,	7/8/2022 8:35 AM

Q16 Is there any other information you would like the Town to consider in evaluating accessibility to Town facilities, programs or services?

Answered: 19 Skipped: 28

#	RESPONSES	DATE
1	Patio area at library not handicapped accessible.	7/18/2022 7:48 PM
2	Cell phone service needs to happen here more reliably. You can not call for services walking in this town ,if something happens to you or another Hamiltonian .You would have to bang on a door !	7/9/2022 4:21 PM
3	Respect older citizens by making all public buildings accessible with several handicapped parking spaces and wide walkways along with elevator to all the offices	7/8/2022 6:42 PM
4	With regards to the sidewalks around town, too many have very low branches hanging over walking area causing person to have to duck significantly to pass...	7/8/2022 11:53 AM
5	Too many meetings do not seem to be easily found on town website, sometimes there are old meeting dates still up. Theres been confusion when getting online that the particular account being used for a meeting cannot accommodate the public looking to get on. This would create challenges to everyone, including people challenged by technology and with disabilities or even lack of focus. Ex. for town facility- I drove by the new pool yesterday and thought to myself, wouldn't it be nice to be able to use the pool for some lap swimming for adults only. To begin to find out if this is even possible and if the opportunity exists it would take me doing a lot of research to get that answer. My thought is too many layers of research to get that answer. Being able to know who to go to simply would be supportive even more so to people with disabilities. Communication made easier.	7/8/2022 8:35 AM
6	We need side walks installed or atleast one side of each street through out the town not just parcial.	7/7/2022 1:45 PM
7	More sidewalks. Unable to walk safely in my neighborhood due to no sidewalk. Moulton St.	7/7/2022 8:59 AM
8	no	7/6/2022 10:02 PM
9	A need for more handicapped parking near emtrances	7/6/2022 9:38 PM
10	As a caregiver for a person with Parkinson's, I have concerns he will be unable to access certain buildings in the future	7/6/2022 9:31 PM
11	Sidewalk all along Bay Road all the way to Town Hall is a travesty and in awful condition	7/6/2022 8:23 PM
12	No	7/6/2022 8:18 PM
13	Driveways and sidewalks and crosswalk lights are not part of town budget. We should focus our efforts on things the town can actually control. Instead of always asking developers for affordable housing money (which is important but less specific), ask for both new and repair of existing sidewalks that can be used by persons in wheelchairs, with canes, etc in addition to the able bodied.	7/6/2022 5:54 PM
14	It would be great to have accessibility to information about updates in Hamilton. Salem News doesn't have a Hamilton page anymore, and I do not know of a way to access info about plans for the town, etc.	7/6/2022 5:52 PM
15	N/a	7/6/2022 5:28 PM
16	Improving the town website	7/6/2022 5:00 PM
17	Hardly any of these questions pertained to people with intellectual disabilities. Not all disabilities are physical.	7/6/2022 4:39 PM
18	I wish there were more sidewalks.	7/6/2022 3:51 PM

19 Many of the side walks are very difficult and not level. Water and ice pool which is difficult to navigate. Particularly the crosswalk 1A near Winthrop

7/6/2022 3:43 PM
