



City of Salem

ADA Self – Evaluation and Transition Plan

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Institute for Human Centered Design



A 40 year old international education and design non-profit dedicated to enhancing the experiences of people of all ages, abilities and cultures through excellence in design.



What IHCD does to meet that mission...in the US and globally

- ✓ Education & Training on Accessibility and Universal Design
- ✓ Technical Assistance
- ✓ Consulting on Accessibility and Inclusive Design (physical + digital)
- ✓ Design Services (physical + digital)
- ✓ Research – Contextual Inquiry with “User/Experts” (physical, digital, service, program design)



Design powerfully and profoundly influences each of us and our sense of confidence, comfort, and control.

2 core beliefs...

Design matters most at the edges of the spectrum; if it works there, **it works better for everyone**



IHCD's New England Technical Assistance Project

New England  Center

One of ten national centers
providing information,
guidance and training on the
Americans with Disabilities
Act.

800-949-4232 v/tty

A member of the  National Network



Agenda

- ✓ Brief Overview of the ADA
- ✓ Evaluation of Policies, Practices and Procedures
- ✓ Evaluation of Facilities
- ✓ Questions
- ✓ Next steps



Americans with Disabilities Act (ADA)

- ✓ Title I – Employment
- ✓ **Title II – State and Local Governments**
- ✓ Title III – Access to “Places of Public Accommodation” & Commercial Facilities
- ✓ Title IV – Telecommunications
- ✓ Title V - Miscellaneous



Americans with Disabilities Act (ADA)

Title II of the Americans with Disabilities Act requires that state and local government entities do not discriminate against people with disabilities in their **programs, services, and activities.**

State and local governments must take steps to examine their programs and establish a plan for compliance with the law.



Americans with Disabilities Act (ADA)

A primary goal of the ADA is the equal participation of individuals with disabilities in the "mainstream" of American society. The major principles of mainstreaming are –

- ✓ Individuals with disabilities must be integrated to the maximum extent appropriate.
- ✓ Separate programs are permitted where necessary to ensure equal opportunity. A separate program must be appropriate to the particular individual.
- ✓ Individuals with disabilities cannot be excluded from the regular program, or required to accept special services or benefits.



Applies to all State & Local Government Activities

- ✓ Town meeting
- ✓ Recreation Programs
- ✓ Employment
- ✓ Voting
- ✓ Senior Centers
- ✓ Police
- ✓ Fire
- ✓ Public Housing
- ✓ Homeless Shelters
- ✓ Public transportation
- ✓ Permits
- ✓ Camps
- ✓ Correctional Facilities
- ✓ Emergency Shelters



Five ADA Administrative Requirements

- ✓ Designate a **Responsible Employee** (to coordinate ADA obligations).
- ✓ Provide **Notice** of ADA requirements (to communicate the City's commitment to nondiscrimination).
- ✓ Establish a **Grievance Procedure** (to resolve complaints).
- ✓ Conduct a **Self-Evaluation** (to ensure participation of people with disabilities).
- ✓ Develop a **Transition Plan** (to ensure facility access).



Program Accessibility - *THE HEART OF YOUR RESPONSIBILITY*

- ✓ Ensure that each program, service and activity, when viewed in its entirety, is accessible to people with disabilities.
- ✓ Does not necessarily require a public entity to make each of its existing facilities accessible.
- ✓ Does not require a public entity to take any action that it can demonstrate would result in undue financial or administrative burden.



Effective Communication

- ✓ Ensure that communication with people who have disabilities is as effective as communication with people without disabilities.
- ✓ Covered entities must provide auxiliary aids and services when:
Needed to communicate effectively with people who have communication disabilities.



Effective Communication *Continued*

The key to communicating effectively is to consider:

- ✓ the nature, length, complexity, of the communication
- ✓ the context of the communication and
- ✓ the person's normal method(s) of communication



Effective Communication *Continued*

Auxiliary Aids and Services:

Services or devices that enable persons with impaired sensory, manual, or speaking skills to have an equal opportunity to participate in, and enjoy the benefits of programs or activities conducted by the City.



Web Accessibility

It is the Department of Justice position that when services are provided on a website, those services must be made accessible.

It means:

- Be able to use the website without a mouse;
- Provide a text description for pictures; and
- Use a text-based format, such as HTML.



IHCD Scope of Work

- ✓ Evaluation of Programs, Services and Activities – infrastructure of policies & procedures that support program access;
- ✓ Evaluation of Facilities; and
- ✓ ADA Self-Evaluation – comprehensive data about the current state of compliance that identifies both issues that need corrective action and gaps in policies and procedures.



Evaluation of Programs, Services and Activities



Basis for Policies Report

The report summarizes IHCD's findings of ADA Title II compliance.

The information pertinent to the assessment was obtained:

- ✓ Online ADA questionnaire developed by the Institute for Human Centered Design (IHCD) and submitted by twenty four(24) Departments;
- ✓ Information from the City's website.



Key Recommendations

Designate a Responsible Employee :

- ✓ The City of Salem has met its obligation to designate a responsible employee by designating Lisa Cammarata as the City's ADA Coordinator.

Grievance Procedure:

- ✓ Clarify the Grievance Procedure by distributing to all department heads,
- ✓ Post copies of it in noticeable locations in each of the City's public buildings, and
- ✓ Ensure the City's employees are aware of the Grievance Procedure process and can provide information to members of the public about the process when appropriate.



Key Recommendations *Continued*

Notice of ADA requirements:

- ✓ The City has an ADA Notice on its website. However, multiple City departments reported that Notices were not posted.
- IHCD recommends distributing the Notice to all department heads, publishing the Notice in all the materials distributed by the City, posting the Notice prominently on the City's website home page and posting copies in public locations in the City's buildings.



Key Recommendations *Continued*

Reasonable Modification of Policies Practices and Procedures:

- ✓ IHCD recommends the City take additional steps to provide information to members of the public about the process of requesting reasonable modification of policies when appropriate.
- ✓ The City should provide a form for requesting reasonable modifications of policies on the City's website, and state the commitment to provide copies in accessible formats upon request.



Key Recommendations *Continued*

Employment and Reasonable Accommodation:

- ✓ IHCD found no evidence that the City of Salem failed to provide a reasonable accommodation when requested.

Effective Communications – Auxiliary Aids and Services:

- ✓ Clarify procedures of providing Effective Communication.
- ✓ Ensure that the City's website and other web-based services are accessible to people with disabilities. It is the Department of Justice's position that when services are provided on a website, those services too must be made accessible. The website should be considered a "program" of the City. (See web accessibility report).



Evaluation of Facilities

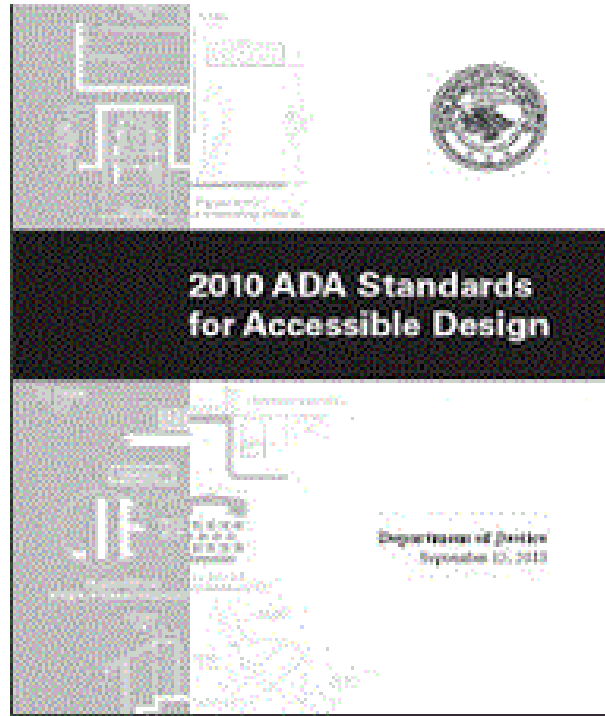


Facilities Surveyed

- ✓ 25 Municipal Buildings
(including 2 Fire Stations and 8 Public Schools and their playgrounds)
- ✓ 12 Outdoor Areas
- ✓ 2 parking garages and 1 parking lot (near City hall Annex)



Basis for Self - Evaluation



2010 Standards for Accessible Design
Effective March 15 2012



**Massachusetts Architectural
Access Board (MAAB)**
Effective January 27 2006



Deliverables



Building Report Standard Format

To assist in prioritizing accessibility improvements to ensure compliance with Title II of the ADA, IHCD provided a building report for each of the buildings.

The reports include:

- Building Report
- Building Catalog



Building Report

- ✓ Basic information about the building including the location of entrances and exits, vertical circulation, and interior layout and functions.
- ✓ Key accessibility issues.
- ✓ Order of Magnitude Cost Estimates (Material only – no labor, no design, unforeseen conditions or overhead in costs)

City Hall Annex



City of Salem

July 2019



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City Hall Annex

Background

Year built: Year renovated: 2018
The City Hall Annex is located at 98 Washington Street. The building has four stories including a basement with the main accessible entrance on the east side at 98 Washington Street and a second accessible entrance on the west side by an adjacent parking lot. The building floors are connected by an elevator and two (2) staircases including a central staircase.

Level I has small, medium and large conference rooms, and men's and women's single-user toilet rooms. Level II has offices for the Planning, Engineering, Building and Traffic and Parking Departments, a small meeting room, and an Engineering Department conference room. Level III has offices for the Human Resources, Health and Treasurer's Departments, a Health Department conference room, a second conference room, and a Wellness Room. Level III also has single-user men's, women's and all-gender toilet rooms.

Key Accessibility Issues

Parking

Accessibility issues include lack of a van accessible parking space in the lot adjacent to the Annex and in the lot bordered by Sewell Street, and lack of an access aisle at two designated car-accessible parking spaces in the Sewell Street parking lot.

Toilet Rooms

Accessibility issues include paper towel dispensers mounted higher than the maximum height allowed in the first floor men's and women's toilet rooms.

Signage

Accessibility issues include lack of complaint designation, egress and directional signage at multiple locations throughout the building.

Stairways

Accessibility issues include lack of continuous handrails and handrail extensions at the central staircase in the lobby.

Drinking Fountains

Accessibility issues include lack of a drinking fountain for a standing user on Levels I and III.

Order of Magnitude Cost Estimates

- Provide compliant accessible parking spaces: \$1,650
- Provide compliant paper towel dispensers in first floor toilet rooms: \$1,060
- Provide complaint accessible signage: \$3,654
- Provide complaint railings at lobby central staircase: \$1,074
- Provide two (2) drinking fountains for a standing user: \$6,042
- Miscellaneous corrective actions (accessible service counter, cane detectable barriers): \$1,110

Total: \$14,590

Note: Costs for assistive listening systems are not included. If audible communication is integral to the use of spaces in the Annex, especially the meeting rooms, provide an assistive listening system. One system with a central person responsible for signing it out and keeping it charged should work.

Best Practice and Inclusive Design

Best practice and inclusive design recommendations include elements that are not required in the standards but may create enhanced experiences for all users.

- IHCD team noticed that a Level II conference room had a sliding door. This is an excellent design because it provides maneuvering clearance at the door and maximizes usable space because of the lack of a door swing.







Building Catalog

The Building Catalog is a database of records of each building element that is noncompliant with regard to one or more applicable accessibility Standard. Each record in the Catalog contains the following information:

- ✓ Photograph
- ✓ Floor and location information
- ✓ Element and Element Type
- ✓ List of issues, with measurements (if applicable)
- ✓ Possible remedies
- ✓ Cost estimate (if applicable)

City of Salem
Salem City Hall Annex

ID	Location	Floor	Room	Element	Type	Photo	Issues	Current Measure	Recommendations	Quantity	Price	Cost Estimation
Approach and Entrance												
Off-Street Parking Lot or Garage												
1	Parking By Annex	Ext		Off-Street Parking Lot or Garage	N/A		Total # of parking Total # of designated accessible parking spaces Total # of designated van accessible spaces Vehicle space < 132" wide at van space Sign does not have the designation "Van Accessible"	20 1 - - -	Provide a van accessible space that is 96" wide min. with an access aisle that is 96" wide min. Add the designation "Van Accessible" to the sign located at the van accessible space. Mount the sign 60" min. and 96" max. aff. (Cost for re-striping and a "Van Accessible" sign.)	1	600	\$600
2	Parking Sewell Street Lot	Ext		Off-Street Parking Lot or Garage	N/A		Total # of parking Total # of designated accessible parking spaces Total # of designated van accessible spaces	60 4 -	Provide a van accessible space that is 96" wide min. with an access aisle that is 96" wide min. Add the designation "Van Accessible" to the sign located at the van accessible space. Mount the sign 60" min. and 96" max. aff. (Cost for re-striping and a "Van Accessible" sign.)	1	600	\$600
3	Parking Sewell Street	Ext		Off-Street Parking Lot or Garage	N/A		Access aisle not provided	-	Provide a marked access aisle that is 60" wide min. (At both the photographed space and second identical space behind the photographed location.) (Cost for re-striping to provide access aisles.)	2	225	\$450
Access to Goods and Services												
Means of Egress												
4	Large Meeting Room	1	108	Means of Egress	N/A		Tactile exit sign not provided	-	Ensure tactile exit signs with raised characters and braille are provided at exit doors. Mount signs between 48"-60" above finish floor located on the latch side of the door.	1	174	\$174



Municipal Buildings and Outdoor Areas

The program accessibility obligation does not typically require that every facility or outdoor area be made accessible.

To determine which facility/outdoor areas must be made accessible, the City should consider:

- ✓ How to provide the program in the most integrated setting appropriate;
- ✓ Locations where the activities are offered;
- ✓ Which facility/outdoor areas are accessible and to what extent;
- ✓ Dispersion of the accessible outdoor areas and convenience to reach them (playgrounds, baseball fields, soccer fields, accessible parking, etc., accessible by public transportation or pedestrian routes).



Accessibility Issues in Municipal Buildings



Municipal Building – *City Hall* – *City Hall Annex*



Sidewalk



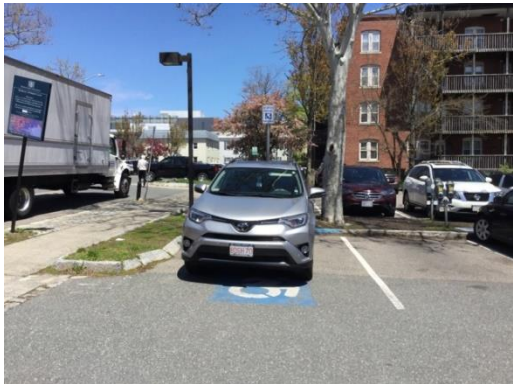
Designation Signage



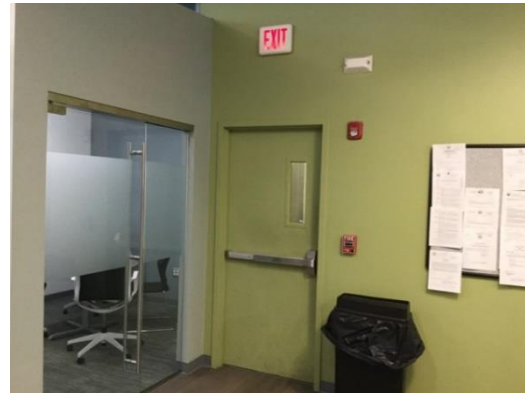
Service Counter



Toilet Room



Parking



Egress Signage



Interior Access Route



Drinking Fountain



Municipal Building – *City Hall* – *City Hall Annex Continued*



Toilet Room



Assembly Area



Interior Access route



Municipal Building – *Police Headquarters*



Assembly Area



Assembly Area



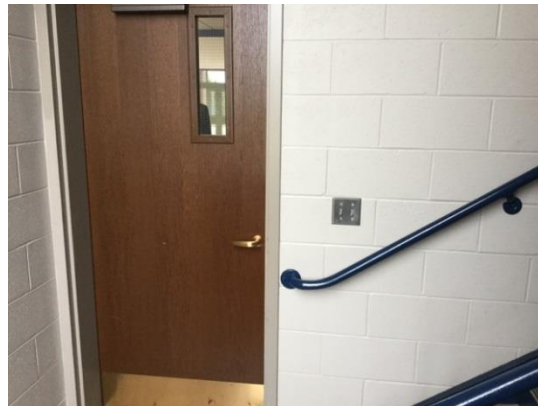
Toilet lavatory combo



Interior Access Route



Parking



Egress Signage



Elevator



Municipal Building – *Police Headquarters*



Toilet Room



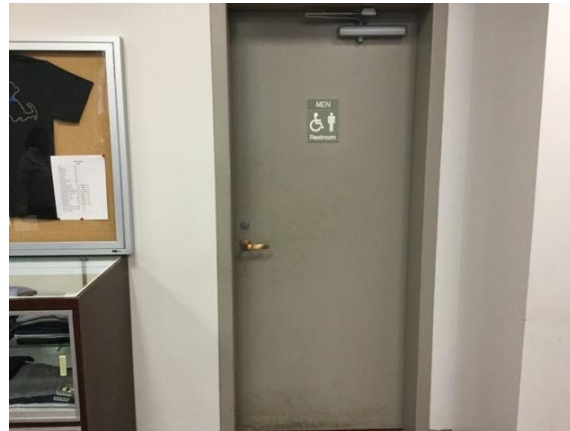
Doors



Entrance Doors



Toilet Room



Toilet Signage



Toilet Room



Municipal Building - *Fire Departments*



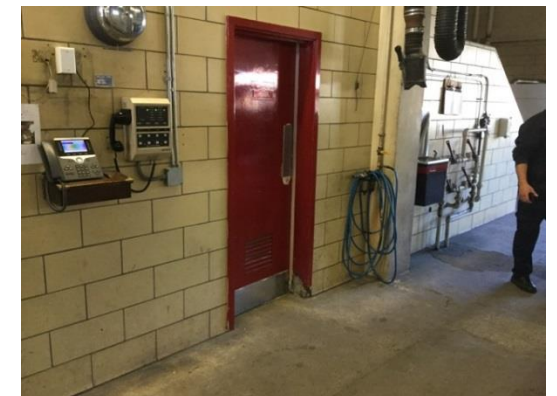
Entrance



Emergency Exit



Service Counter



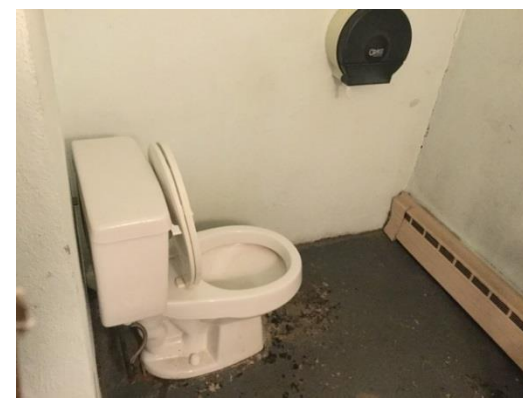
Toilet Room



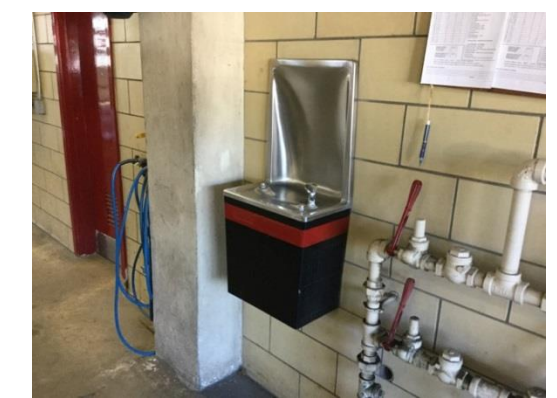
Parking



Route



Toilet Room



Drinking Fountain



Key Recommendations for Building Facilities

- ✓ Ensure there is an accessible route from all arrival points to those areas in the building where programs, services and activities are provided.
- ✓ If parking is provided, ensure fully accessible parking spaces are provided.
- ✓ Ensure that fully accessible toilet rooms are provided in each building. Where it is technically infeasible to provide accessible multi-user toilet rooms, provide an accessible single-user toilet room in the same area as the existing multi-user toilet rooms.
- ✓ Ensure that where services or activities are offered there is a sufficient number of accessible features (accessible wheelchair seating areas, accessible counters, accessible work surfaces, etc.).
- ✓ Particular attention should be given to buildings where key services are being offered to the community.
- ✓ Ensure compliant signage is provided. (designation, directional, egress)



Key Recommendations for Building Facilities - Continued

- ✓ If audible communication is integral to the use of a space, provide a compliant assistive listening system.
- ✓ Ensure that those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities are maintained in operable working condition (e.g., elevators or automatic door openers).
- ✓ Police Station: the holding cells at this location are not fully accessible, making them compliant may be technically infeasible. The City should ensure that Program Accessibility is provided as needed by transferring detainees to an accessible location (e.g., Essex County Correctional Facility).



Municipal Building – *Schools*



Egress Sign



Garden



Work Surface



Interior Access Route



Assembly Area



Service Counter



Classroom Sink



Play Areas



Municipal Building – *Schools continued*



Directional signage



Lavatory (sink)



urinal



Toilet



Key Recommendations for Schools

- ✓ Ensure that fully accessible toilet rooms are provided in each building. Where it is technically infeasible to provide accessible multi-user toilet rooms provide an accessible single-user toilet room in the same area as the existing multi-user toilet rooms.
- ✓ In unique rooms such as a nurse's room, ensure that a fully accessible toilet room is provided. This includes maintaining the clear floor space at all fixtures free of any storage.
- ✓ Ensure that accessible sinks (with knee and toe clearance) are provided in at least one classroom per grade. If accessible sinks are already provided, ensure they have insulated pipes.



Key Recommendations for Schools - Continued

- ✓ Ensure accessible work surfaces are provided in at least one classroom per grade. Furthermore, ensure that specialized classrooms (e.g., labs, mechanical drawing rooms etc.) all have accessible work surfaces.
- ✓ Ensure that all elements in the classrooms are within reach range (e.g., emergency showers and dispensers in toilet rooms).
- ✓ If audible communication is integral to the use of a space, provide a compliant assistive listening system.



Municipal Building – *Parking*



Illuminated ISA Sign



Accessible Parking Spaces



Doors



Accessible Route



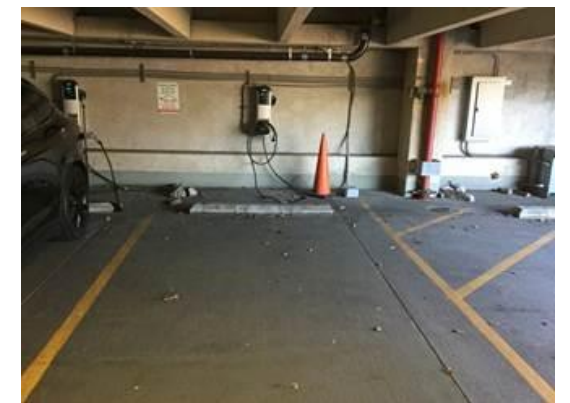
Identification Signage



Egress Sign



Elevators



Vehicle Charging Station



Accessibility Issues in Outdoor Areas



Outdoor Areas – Amenities



Parking



Picnic Tables



Toilet Rooms



Service Counters



Signage



Bleachers



Accessible Routes to all elements



Basketball Court



Drinking Fountain



Picnic Table



Trash Can



Beach



Gazebo



Playgrounds



Playground



Playground



Playground



Playground



Key Recommendations for Outdoor Facilities

- ✓ Ensure there is an accessible route to all elements in the park/outdoor space (baseball fields, basketball courts, playgrounds, picnic areas, toilet facilities, etc.).
- ✓ Ensure there is a clear floor space adjacent to the bench at team seating areas and spectator seating areas at the baseball fields, basket courts, etc.
- ✓ Ensure that accessible routes are provided to and around playgrounds; in addition, ensure that an accessible route is provided in the play area to all play components.
- ✓ How to provide the program in the most integrated setting appropriate;
- ✓ Locations where the activities are offered;
- ✓ Which outdoor areas are accessible and to what extent;



Key Recommendations for Outdoor Facilities *Continued*

- ✓ Level of dispersion of the accessible outdoor areas (playgrounds, baseball fields, soccer fields, beaches, etc.,) and convenience to reach them (accessible by car or pedestrian routes).
- ✓ Ensure that a certain number of amenities (at least 5%) in the parks/outdoor spaces are accessible (e.g., picnic tables, service counters at concession stands, etc.).
- ✓ At parks with beach access, ensure that accessible routes are provided to the normal recreation water level (lakes, ponds and reservoirs) or the high tide level (tidal beaches).
- ✓ Where portable toilets are provided, ensure an accessible portable toilet is provided in the same area. Ensure the accessible portable toilet is on an accessible route.



Good Examples ...



Sink



Entrance



Picnic Table



Accessible Route



Single User Toilet



Counter



Counter



Hockey



Self–Evaluation & Transition Plan Goals

- ✓ All the City's programs, services and activities, when viewed in their entirety, are readily accessible to and usable by people with disabilities.
- ✓ Priority of ensuring 'Program Access' with a goal of equal participation of people with disabilities.
- ✓ Implementation strategy integrated into City's planning and budgeting.
- ✓ All residents, regardless of ability feel that they know about and can participate in all that the City of Salem has to offer.



Next steps

- ✓ Comments received
 - Finalize the plan
 - Implementation



Thank you!
Questions?

