City of Salem
ADA Self – Evaluation and Transition Plan

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Valerie Fletcher, Executive Director

Ana Julian, Senior Project Manager

David West, ADA Information Specialist and Accessibility Surveyor

Institute for Human Centered Design

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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 its 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)

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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**

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IHCD's
New England Technical Assistance Project

New England ADA 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 ADA National Network

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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.

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Integrated Setting

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 <u>must be integrated</u> to the maximum extent appropriate.

✓ Separate programs are permitted where necessary to ensure <u>equal opportunity</u>. A separate program must be appropriate to the particular individual.

✓ Individuals with disabilities <u>cannot be excluded</u> from the regular program, or required to accept special services or benefits.

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Program Accessibility - *THE HEART OF YOUR RESPONSIBILITY*

✓ Ensure that each program, service and activity, <u>when viewed in its entirety</u>, 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 an <u>undue financial</u> or <u>administrative burden</u>.

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Strategies for Facilities

3 strategies to ensure access to **programs, services and activities**:

- Relocation of programs, services and activities **within the current facility**;

- Relocation of programs, services and activities **to another facility**;

- **Renovation of the facility** to ensure access to programs, services and activities.

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IHCD Scope of Work

✓ Evaluation of Programs, Services and Activities – infrastructure of policies & procedures that support program access;

✓ Evaluation of the City's Website;

✓ 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.

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Evaluation of Programs, Services & Activities

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Basis for the 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.

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Key Recommendations

Designate a Responsible Employee :

- ✓ The City of Salem has met its obligation to designate a responsible employee by selecting 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.

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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.

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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 for requesting a 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.

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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 (See web accessibility report).

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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)

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Basis for Self - Evaluation
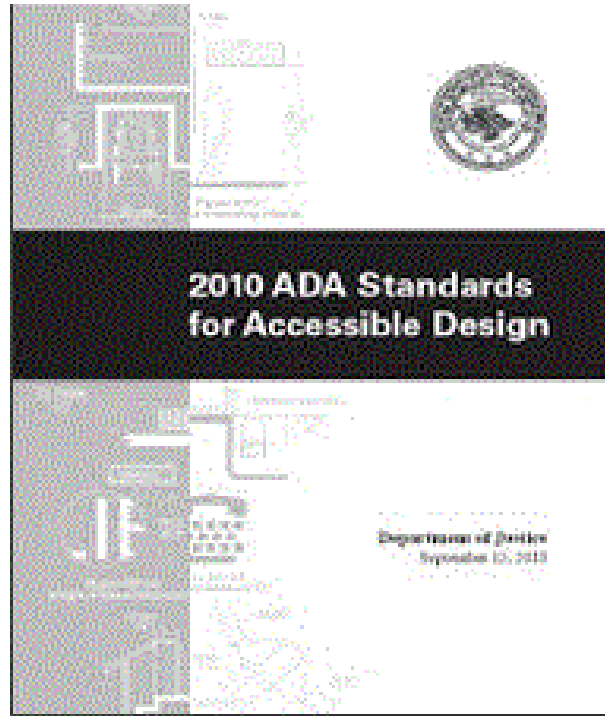
2010 Standards for Accessible Design
Effective March 15 2012

521 CMR (MAAB)
Effective January 27 2006

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Deliverables

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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)

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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 standards. 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)

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Accessibility Issues in Municipal Buildings

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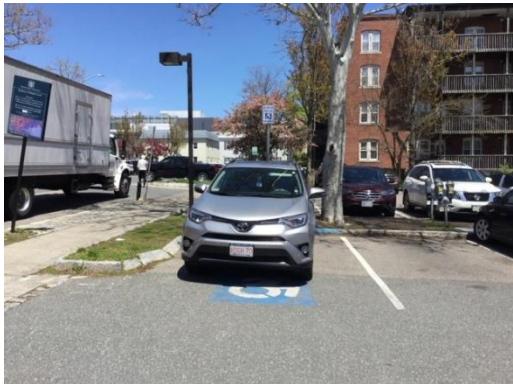
Municipal Building – *City Hall – City Hall Annex*

Sidewalk

Designation Signage

Service Counter

Toilet Room

Parking

Egress Signage

Interior Access Route

Drinking Fountain

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

Toilet Room

Assembly Area

Interior Access route

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Municipal Building – *Police Headquarters*

Assembly Area

Assembly Area

Toilet Lavatory Unit

Interior Access Route

Parking

Egress Signage

Elevator

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Toilet Room

Doors

Entrance Doors

Toilet Room
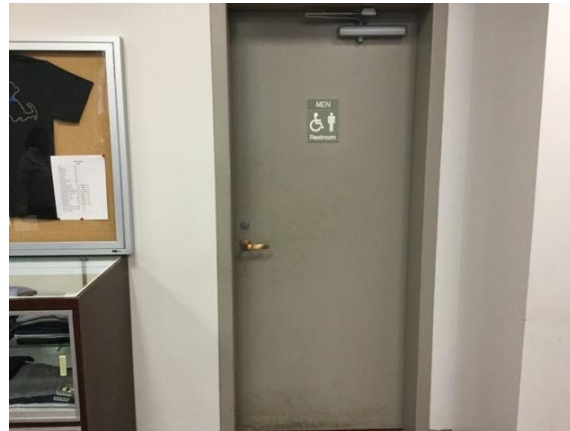
Toilet Signage

Toilet Room

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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.).

✓ Ensure compliant signage is provided. (designation, directional, egress)

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Municipal Buildings – *Schools*

Egress Sign

Garden

Work Surface

Interior Access Route

Assembly Area

Service Counter

Classroom Sink

Play Areas

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Municipal Building – *Schools continued*

Directional signage

Lavatory (sink)

Urinal

Toilet

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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.

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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.

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Municipal Building – *Parking*

Illuminated ISA Sign

Accessible Parking Spaces

Doors
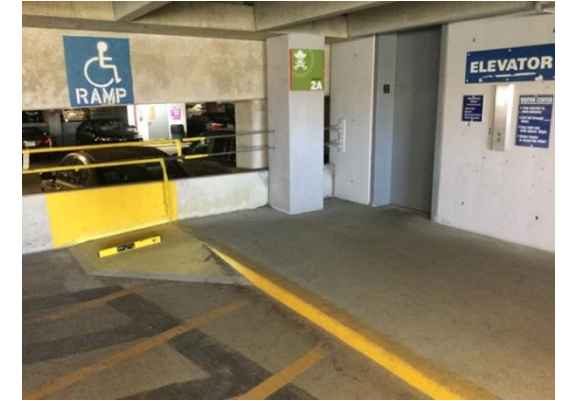
Accessible Route

Identification Signage
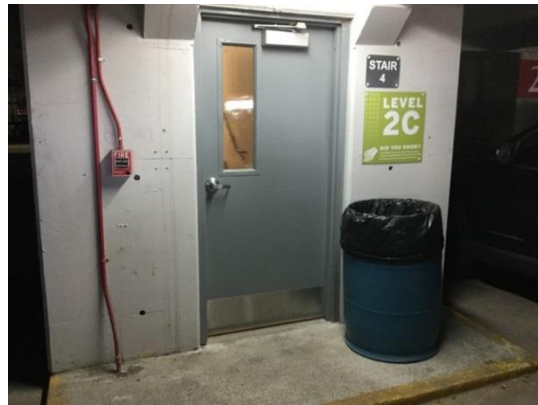
Egress Sign

Elevators
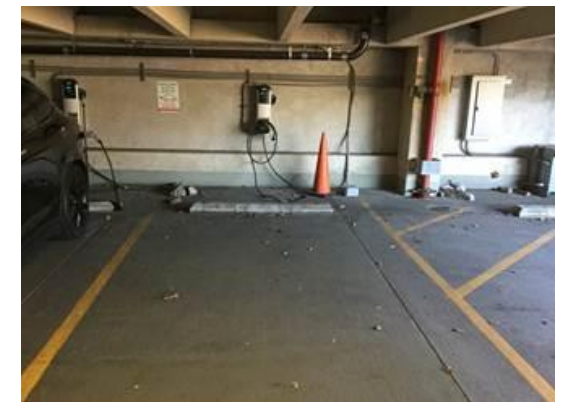
Vehicle Charging Station

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Accessibility Issues in Outdoor Areas

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Outdoor Areas – Amenities

Parking

Picnic Tables

Toilet Rooms

Service Counters

Signage

Bleachers

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Accessible Routes to all elements

Basketball Court

Drinking Fountain

Picnic Table

Trash Can

Beach

Gazebo

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Playgrounds

Playground

Playground

Playground

Playground

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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.

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Key Recommendations for Outdoor Facilities - *Continued*

✓ 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.

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Good Examples ...

Sink

Entrance

Picnic Table

Accessible Route

Single-User Toilet

Counter

Counter

Hockey

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Self – Evaluation & Transition Plan

Self-Evaluation Report

Transition Plan Database

Possible Trainings

✓IHCD can provide a training on the requirements of Title II ADA;

✓IHCD can provide a training on Effective Communication;

✓IHCD can provide training to the Commission on Disability on plan reading.

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Thank you!

Questions?

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