

**City of Worcester**

**REPORT**

**ADA Self-Evaluation  
(as basis for Transition Plan)**

**Prepared by  
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## Executive Summary

The Institute for Human Centered Design (IHCD) has prepared this ADA Self-Evaluation report on behalf of the City of Worcester as part of the City's on-going effort to assess the current level of accessibility in Worcester's programs, services, and activities. This Self-Evaluation report is intended to be used as the basis for the Transition Plan, a living document used to monitor corrective actions.

This ADA Self-Evaluation report includes model policies and procedures for adoption by the City, and a summary of architectural barriers and proposed barrier removal solutions for the City's 11 municipal buildings, three libraries, one police station, 10 fire stations, and over 20 open spaces. All are designed to help move the City towards full compliance with its obligations under Title II of the Americans with Disabilities Act (ADA) and/or the Massachusetts Architectural Access Board (MAAB). Under the guidance of the City of Worcester's ADA coordinator, directors from several City departments are very committed to this update of the Self-Evaluation and Transition Plan. The previous Self-Evaluation and Transition Plan, which was published in 2004, no longer adequately reflects the current state of city property. Nevertheless, after careful review of the City's 2004 Self-Evaluation and Transition Plan, IHCD can attest to the progress made in Worcester to ensure compliance with the Title II of the ADA in the last decade. IHCD found that many of the barriers described in the 2004 document had been effectively remediated prior to starting the new evaluation. The existing ADA Transition Plan was just 10 years old, which is a measure of consistent attention to accessibility as a priority.

To assist in prioritizing accessibility improvements to ensure compliance with Title II, IHCD has included two databases that supplement this ADA Self-Evaluation report:

- A Geographic Information System (GIS) database that provides the precise locations of each assessed facility and the accessibility issues identified in its site. This document was created in Google Earth and is compatible with Esri's ArcGIS v10, as requested by the City. A sample of this document is included in Appendix D.
- A database in Microsoft Excel format that organizes information from the report by facility, element, issue/physical barrier, location within facility, priority and action for barrier removal as well as other information that must be completed by the City. A sample of this document is included in Appendix E.

When the City's ADA coordinator presents findings and recommendations to the community and receives feedback, some recommendations may need adjustment. Together, the ADA Self-Evaluation and Transition plan will enable the City to engage in capital budgeting preparation for capital work to be completed within the next seven to ten years to address the operational needs and obligations of city departments.

For the sake of clarity, this ADA Self-Evaluation report is organized into two parts: Evaluation of Non-discriminatory Policies and Practices in Programs, Services, and Activities and Evaluation of Facilities. A list of facilities surveyed is included in Appendix A.

## Legal Overview

The City of Worcester is obligated by both Federal and State laws and codes concerning the rights of people with disabilities in the daily provision of programs, services, and activities. At the end of this report, Appendix B provides a comprehensive list of relevant laws and executive orders.

### **Federal Obligation: American with Disabilities Act**

Based on the 1964 Civil Rights Act and expanding upon the obligations of the 1973 Rehabilitation Act, the ADA prohibits discrimination against people with disabilities. The ADA provides civil rights protections to individuals with disabilities similar to those afforded to individuals on the basis of race, color, sex, national origin, age, and religion. The cornerstone of Title II of the ADA, which applies to state and local governments, is clear: no qualified person with a disability may be excluded from participating in, or denied the benefits of, the programs, services, and activities provided by state and local governments because of a disability.

The 2008 Amendments to the ADA, signed into law on September 25, 2008, describes in more detail who is covered by the civil rights protections of the ADA. The amendments expands the definition of “disability” to include impairments that substantially limit a major life activity and states that when determining whether someone qualifies as disabled, one cannot take into account assistive devices, auxiliary aids, accommodations, medical therapies and supplies. The amendments also address episodic or disabilities that may go into remission but still can significantly limit a major life activity when active, like epilepsy and post-traumatic stress disorder. The ADA defines a disability as<sup>1</sup>:

- A physical or mental impairment that substantially limits one or more major life activities (i.e. working, talking, hearing, seeing, caring for one's self);
- Having a record of a physical or mental impairment that substantially limits one or more major life activities;
- Being regarded by others as having an impairment such as individuals with severe facial scarring.

It is important to stress that the primary obligation to public entities such as the City of Worcester, under Title II of the Americans with Disabilities Act, is to ensure that, when ‘viewed in its entirety’ the programs, services, and activities offered are equally available to people with disabilities. Cities are required to follow the DOJ’s 2010 ADA Standards for Accessible Design in new construction and major alterations. They also must relocate programs or otherwise provide access in inaccessible older facilities (i.e. facilities built before the ADA went into effect January 26, 1992). Cities must communicate effectively with people who have hearing, vision, or speech disabilities. And they are required to make reasonable

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<sup>1</sup> To learn more qualified individuals with disabilities or to read the full text of the ADA, please visit <http://www.ada.gov/> or <http://www.disability.gov/>.

modifications to policies, practices, and procedures where necessary to ensure the equal participation of people with disabilities.

Following the passage of the ADA, the Department of Justice issued the 1991 ADA Standards for Accessible Design (ADA Accessibility Guidelines – ADAAG) to address physical access to facilities and transportation. These standards were based almost exclusively on the US Access Board’s guidelines. In 1994, slight technical amendments were made. Then in 2004, after years of public comment, the US Access Board issued new guidelines that were promptly adopted by US Department of Transportation and other federal agencies. But only in 2010 did the Department of Justice issue a revised and updated ADA Standard called the 2010 ADA Standards for Accessible Design (2010 ADA Standards) that would apply to all Title II and Title III entities. These standards revised requirements for policies such as ticketing and service animals, and for physical elements such as assembly seating, established construction tolerances for certain elements and formalized long-standing guidelines for docks, fields, pools, and other recreational facilities.

New construction and alterations that occurred between January 23, 1992 and September 15, 2010 should comply with the 1991 ADA Standards. From September 15, 2010 to March 15, 2012 either the 1991 ADA Standards or the 2010 ADA Standards could be used. However, after March 15, 2012, only the 2010 ADA Standard may be used. Facilities that meet or exceed ADAAG requirements are not required to make changes to the new standards except in the case of significant renovation. Though IHCD used the 2010 ADA Standards in surveying facilities, it is not expected that the buildings will meet or be brought up to all of these standards absent significant or total renovation. State and local governments must ensure that individuals with disabilities are not excluded from services, programs, and activities because buildings are inaccessible. This means Title II entities need not remove physical barriers, such as stairs, in all existing buildings, as long as they make their programs accessible to individuals who are unable to use an inaccessible existing facility.

#### Alterations to historic properties under the ADA

Alterations to historic properties must comply with the specific provisions governing historic properties in the 2010 ADA Standards, to the maximum extent feasible. Under those provisions, alterations should be done in full compliance with the alterations standards for other types of buildings. However, if following the usual standards would threaten or destroy the historic significance of a feature of the building, alternative standards may be used. The decision to use alternative standards for that feature must be made in consultation with the appropriate historic advisory board designated in the 2010 ADA Standards, and interested persons should be invited to participate in the decision-making process.

Historic properties are properties listed or eligible for listing in the National Register of Historic Places, or properties designated as historic under State or local law. In Worcester, the following city-owned facilities are designated as historic properties:

- City Hall – Nat’l Register District (3/29/1978); Preservation Restriction
- Frances Perkins Branch Library – Nat’l Register Individual Property (3/5/1980); Nat’l Register MRA (3/5/1980)

- Union Station – Nat'l Register District (8/15/1995); Nat'l Register Individual Property (3/5/1980); Nat'l Register MRA (3/5/1980); Preservation Restriction (9/30/1998)
- Webster Square Fire Station – Nat'l Register Individual Property (3/5/1980); Nat'l Register MRA (3/5/1980)
- Worcester Senior Center – Massachusetts Cultural Resource Information System (MACRIS);
- DPW Administrative Building: Water Operations – MACRIS;
- DPW Administrative Building: Headquarters – MACRIS.

The alternative requirements for historic buildings or facilities provide a minimal level of access. For example:

- 1) An accessible route is only required from one site access point (such as the parking lot);
- 2) A ramp may be steeper than is ordinarily permitted;
- 3) The accessible entrance does not need to be the one used by the general public;
- 4) Only one accessible toilet is required and it may be unisex;
- 5) Accessible routes are only required on the level of the accessible entrance.

But what if complying with even these minimal alternative requirements will threaten or destroy the historic significance? In such a case, which is rare, the public entity need not make the structural changes required by the 2010 ADA Standards. But, if structural modifications that comply with the 2010 ADA Standards cannot be undertaken, the Department's regulation requires that "program accessibility" be provided. The Department of Justice offers the following illustration:

A town owns a one-story historic house and decides to make certain alterations in it so that the house can be used as a museum. The town architect concludes that most of the normal standards for alterations can be applied during the renovation process without threatening or destroying historic features. There appears, however, to be a problem if one of the interior doors is widened, because historic decorative features on the door might be destroyed. The town architect consults the standards and determines that the appropriate historic body with jurisdiction over the particular historic home is the State Historic Preservation Officer. The architect then sets up a meeting with that officer, to which the local disability group and the designated title II coordinator are invited. At the meeting the participants agree with the town architect's conclusion that the normal alterations standards cannot be applied to the interior door. They then review the special alternative requirements, which require an accessible route throughout the level of the accessible entrance. The meeting participants determine that application of the alternative minimal requirements is likewise not possible. In this situation, the town is not required to widen the interior door. Instead, the town provides access to the program offered in that room by making available a video presentation of the items within the inaccessible room. The video can be viewed in a nearby accessible room in the museum.

## **Other Federal Obligations**

While the ADA is perhaps best known of disability civil rights laws, the City of Worcester has other ongoing Federal obligations concerning accessibility including, but not limited to, the following:

### **Rehabilitation Act\***

The Rehabilitation Act prohibits discrimination on the basis of disability in programs conducted by Federal agencies, in programs receiving Federal financial assistance, in Federal employment, and in the employment practices of Federal contractors. The standards for determining employment discrimination under the Rehabilitation Act are the same as those used in title I of the Americans with Disabilities Act.

### **Fair Housing Act**

The Fair Housing Act, as amended in 1988, prohibits housing discrimination on the basis of race, color, religion, sex, disability, familial status, and national origin. Its coverage includes private housing, housing that receives Federal financial assistance, and State and local government housing. It is unlawful to discriminate in any aspect of selling or renting housing or to deny a dwelling to a buyer or renter because of the disability of that individual, an individual associated with the buyer or renter, or an individual who intends to live in the residence. Other covered activities include, for example, financing, zoning practices, new construction design, and advertising.

The Fair Housing Act requires owners of housing facilities to make reasonable exceptions in their policies and operations to afford people with disabilities equal housing opportunities. For example, a landlord with a “no pets” policy may be required to grant an exception to this rule and allow an individual who is blind to keep a guide dog in the residence. The Fair Housing Act also requires landlords to allow tenants with disabilities to make reasonable access-related modifications to their private living space, as well as to common use spaces. (The landlord is not required to pay for the changes.) The Act further requires that new multifamily housing with four or more units be designed and built to allow access for persons with disabilities. This includes accessible common use areas, doors that are wide enough for wheelchairs, kitchens and bathrooms that allow a person using a wheelchair to maneuver, and other adaptable features within the units.

### **Air Carrier Access Act**

The Air Carrier Access Act prohibits discrimination in air transportation by domestic and foreign air carriers against qualified individuals with physical or mental impairments. It applies only to air carriers that provide regularly scheduled services for hire to the public. Requirements address a wide range of issues including boarding assistance and certain accessibility features in newly built aircraft and new or altered airport facilities. People may enforce rights under the Air Carrier Access Act by filing a complaint with the U.S. Department of Transportation, or by bringing a lawsuit in Federal court.

### **Voting Accessibility for the Elderly and Handicapped Act**

The Voting Accessibility for the Elderly and Handicapped Act of 1984 generally requires polling places across the United States to be physically accessible to people with disabilities for federal elections. Where no accessible location is available to serve as a polling place, a political subdivision must

provide an alternate means of casting a ballot on the day of the election. This law also requires states to make available registration and voting aids for disabled and elderly voters, including information by TTYs (also known as TDDs) or similar devices.

### **National Voter Registration Act**

The National Voter Registration Act of 1993, also known as the “Motor Voter Act,” makes it easier for all Americans to exercise their fundamental right to vote. One of the basic purposes of the Act is to increase the historically low registration rates of minorities and persons with disabilities that have resulted from discrimination. The Motor Voter Act requires all offices of State-funded programs that are primarily engaged in providing services to persons with disabilities to provide all program applicants with voter registration forms, to assist them in completing the forms, and to transmit completed forms to the appropriate State official.

### **Civil Rights of Institutionalized Persons Act**

The Civil Rights of Institutionalized Persons Act (CRIPA) authorizes the U.S. Attorney General to investigate conditions of confinement at State and local government institutions such as prisons, jails, pretrial detention centers, juvenile correctional facilities, publicly operated nursing homes, and institutions for people with psychiatric or developmental disabilities. Its purpose is to allow the Attorney General to uncover and correct widespread deficiencies that seriously jeopardize the health and safety of residents of institutions. The Attorney General does not have authority under CRIPA to investigate isolated incidents or to represent individual institutionalized persons.

The Attorney General may initiate civil law suits where there is reasonable cause to believe that conditions are “egregious or flagrant,” that they are subjecting residents to “grievous harm,” and that they are part of a “pattern or practice” of resistance to residents’ full enjoyment of constitutional or Federal rights, including title II of the ADA and section 504 of the Rehabilitation Act.

### **Individuals with Disabilities Education Act**

The Individuals with Disabilities Education Act (IDEA) (formerly called P.L. 94-142 or the Education for all Handicapped Children Act of 1975) requires public schools to make available to all eligible children with disabilities a free appropriate public education in the least restrictive environment appropriate to their individual needs.

IDEA requires public school systems to develop appropriate Individualized Education Programs (IEP’s) for each child. The specific special education and related services outlined in each IEP reflect the individualized needs of each student. IDEA also mandates that particular procedures be followed in the development of the IEP. Each student’s IEP must be developed by a team of knowledgeable persons and must be at least reviewed annually. The team includes the child’s teacher; the parents, subject to certain limited exceptions; the child, if determined appropriate; an agency representative who is qualified to provide or supervise the provision of special education; and other individuals at the parents’ or agency’s discretion.

*\* Requires a Transition Plan.*

## **State Obligations:**

### **Massachusetts Constitutional Amendment - Article 114**

The Massachusetts Constitution states:

*“No otherwise qualified handicapped individual shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity within the Commonwealth.”*

Article 114 is written broadly. It prohibits discrimination based on disability on any level within the state, not just for recipients of state or federal funds. For example, town meetings must be held in an accessible place with sign language interpreters provided if needed, and a small grocery store or a privately owned dinner theater cannot refuse to do business with an individual based on the person’s disability.

### **Massachusetts Architectural Access Board – M.G.L. c. 22, § 13A**

The Architectural Access Board (AAB) is a regulatory agency whose mandate is to develop and enforce regulations designed to make public buildings accessible to, functional for and safe for use by persons with disabilities. See 521 C.M.R. In addition to writing regulations, the Board decides on variance requests, provides training on its regulations, issues advisory opinions and makes decisions on complaints. Local building inspectors are responsible for enforcing the regulations which are a specialized section of the Massachusetts Building Code. See 780 C.M.R.

The construction, reconstruction, remodeling, alteration, or change of use of a building or facility that is open to the public triggers the authority of the AAB. New construction must fully comply.

For renovation, remodeling, or alteration:

- The work being done must comply with the regulations.
- If the work done in any 36-month period is greater than \$100,000, the “work being performed” is required to comply. In addition, an accessible entrance and an accessible toilet room, telephone and drinking fountain (if toilets, telephones and drinking fountains are provided) shall also be provided.
- If the work done in a 36-month period is more than 30% of the “full and fair cash value” of the building,<sup>2</sup> the entire building must come into compliance.

Enforcement: Anyone can file a complaint with the Board. The Board has the authority to issue variances and/or impose fines of up to \$1000 per violation per day of noncompliance with its order.

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<sup>2</sup> This is usually the assessed value established by the city or town. See [521 C.M.R. § 5.38](#) for details about establishing value where no assessment exists.

## Evaluation of Non-discriminatory Policies and Practices in Programs, Services, and Activities

### Introduction

In an effort to provide and maintain compliance with the ADA, the City of Worcester contracted with the Institute for Human Centered Design (IHCD) to undertake a comprehensive assessment of its policies, practices and procedures as well as its facilities to determine compliance with the requirements of the Americans with Disabilities Act and the Massachusetts Architectural Access Board. The review and recommendations provided in this assessment also go beyond strict compliance assessment to recommend enhancements to current conditions that would result in a more usable, inclusive and welcoming environment for members of the Worcester community.

Information about corrective action will include citations of title II of the ADA as well as recommended 'best practices' for each aspect that requires action.

The assessment included policies, practices and procedures relative to employment and non-discrimination in policies, practices and procedures for all of the City's programs, services and activities including those related to effective communication.

As with most municipalities, certain corrective actions are needed in policies, practices and procedures to ensure the City of Worcester's compliance with applicable laws. In addition, the City may wish to consider making a commitment to a more accessible website; the City's commitment to communicate with members of the public via its website is demonstrated in the amount of information provided through its *E-services*. Choosing to make the website more accessible would make it available to site visitors who use assistive technology such as screen readers and would be in keeping with the ADA's intent for equal access. The website is also a valuable asset in communicating the City's commitment to equal opportunity for people with disabilities through a clear statement and contact information for the ADA Coordinator. It can also provide a helpful opportunity to share information about accessible routes to reaching the City's programs and activities including meetings.

This report summarizes IHCD's findings of title II of the ADA compliance. The information pertinent to this assessment was obtained by materials submitted by the City and information from the website; it constitutes the basis for this compliance assessment report. It is clear that the City understands its obligations under Title II of the ADA. However, additional steps are necessary to ensure that people with disabilities enjoy the same opportunities to participate in its programs, services and activities as Worcester's residents without disabilities.

## Analysis

Title II of the ADA prohibits discrimination on the basis of disability. Specifically, title II requires that:

*No qualified individual with a disability shall, on the basis of 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 (35 CFR Part 35.130 (a)).*

This report is divided into sections where these requirements apply. Each section includes the applicable citation from title II of the ADA, IHCD's summary of findings - after reviewing the material provided by the City and the information from the website - and IHCD's recommendations for the City of Worcester to implement.

### I - Designation of Responsible Employee

Title II of the ADA makes clear that a public entity must designate a responsible employee and adopt grievance processes.

*Designation of Responsible Employee: 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. (35 CFR Part 35.107 (a)).*

Title II provides little specific guidance for implementing this requirement but the primary role of the designated employee, also called the ADA Coordinator, is making sure that the City is in compliance with the requirements.

#### Finding:

The City of Worcester has met its obligation to designate a responsible employee by appointing Ms. Jayna Turchek, Esq. to the position of ADA Coordinator. The choice of a person with appropriate experience and training and the authority to solve problems is a good choice in keeping with a pattern of expectation of compliance as discerned through the Department of Justice's Project Civic Access ADA Settlement Agreements. However, the name and complete contact information of the ADA Coordinator is not in all the materials distributed by the City or posted in many buildings.

#### Recommendations:

- The City should consider adding the name, complete contact information – including title and email – and scope of responsibilities of the ADA Coordinator to all the materials distributed by the City and to its website. Doing so will improve compliance and make more efficient operations with respect to the needs of members of the public with disabilities.

Furthermore, notification of the ADA Coordinator will:

- Make it easier for the City to be proactive in meeting the needs of members of the public with disabilities;
- Help the City develop and articulate a clear vision and mission with regard to members of the public with disabilities;
- Reduce confusion and improve the City's day-to-day operations with respect to members of the public with disabilities;
- Permit employees to respond more quickly to needs as they arise because they have a primary contact for addressing these needs;
- Build in-house expertise and capacity;
- Prevent confusion and help ensure that candidates for employment, employees and the public have a clear understanding of their responsibilities and rights under the ADA.

## **II - Complaint Procedures**

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

*Complaint Procedure: 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. (35 CFR Part 35.107 (b)).*

### Finding:

From the material provided and the information on the website, it appears that the City of Worcester is in compliance with its obligations regarding grievances procedures – detailed description of the procedure, the two-steps review process and the record-keeping for all complaints.

What is not clear is if all the City departments are aware of the steps necessary for submitting a grievance and if staff knows to whom the complaint should be addressed.

The grievance procedure form is not on the City's home page website making it difficult for the general public to find that information.

It is not clear if the grievance procedure form available in a PDF format on the City's website is also available in an alternate format.

It is not clear if the City uses the same grievance procedure form for employees and members of the public.

### Recommendations:

- Consider adding the email of the ADA Coordinator to the Grievance Procedure form.
- Ensure that the City's employees are aware of the grievance procedure and can provide information about the process when appropriate.
- Provide the grievance procedure form on the City's home page of the website and state the commitment to provide copies in alternate formats upon request.

### III – 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. (35 CFR Part 35.106)*

#### Findings:

The City has a uniform policy regarding the posting of ADA notices in its facilities. IHCD found documents with statements alerting Department and Division Heads about the obligation to post notification of non-discrimination policies relative to people with disabilities in materials disseminated to members of the public as well as in noticeable locations in the City's public buildings. Public notices with reasonable accommodations are provided in both English and Spanish and include the ADA Coordinator's name, address, telephone number and email address.

#### Recommendations:

The City should inspect buildings on a regular basis to confirm that ADA public notices are prominently posted in public areas. The City should continue to publish the Notice in all the materials distributed by the City and post the Notice on the City's website home page.

### IV - Reasonable Modification of Policies Practices and Procedures

Title II of the ADA requires state and local governments to modify its policies 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 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. (35 CFR Part 32.130 (b)(7)).*

#### Finding:

The City needs to develop policies to address the current 'no animals allowed' policy in the City's Department of Public Works and Parks.

#### Recommendation:

- The City should adopt policies, practices and procedures for responding to request for modifications by members of the public with disabilities.

## V - Employment and Reasonable Accommodation

Title II of the ADA prohibits discrimination on employment on the basis of disability:

*No qualified individual with a disability shall, on the basis of disability, be subjected to discrimination in employment under any service, program, or activity conducted by a public entity. (35 CFR Part 35.140 (a)).*

This requires that title II entities make reasonable accommodation to qualified employees with disabilities. Reasonable accommodation may include modifying work schedules, job restructuring, and making facilities used by employees readily accessible to employees with a disability.

Note that the requirements of title I of the ADA, as established by the regulations of the Equal Employment Opportunity Commission in 29 CFR Part 1630, apply to employment in any service, program, or activity conducted by a public entity if that public entity is also subject to the jurisdiction of title I. (35 CFR Part 35.140 (b)(1)).

### Finding:

From the policies listed on the City's *Affirmative Action Policy on Employment*, there is no evidence that the City has failed to provide reasonable accommodation to its employees.

There is not a clear statement on the City's obligation to provide reasonable accommodation under Title I of the ADA in all aspects of employment in the personnel policies.

### Recommendations:

- We recommend complying with the requirement of reasonable accommodation by including appropriate inserts in materials and publications that contain general information disseminated to City's staff.
- Having a section in the City's *Affirmative Action Policy on Employment* for employees with disabilities regarding reasonable accommodation under the ADA. That could be done by having a paragraph that states:

*The City of Worcester is committed to the fair and equal employment of people with disabilities. Reasonable accommodation is the key to this non-discrimination policy. While many individuals with disabilities can work without accommodation, other qualified applicants and employees face barriers to employment without the accommodation process. It is the policy of the City to reasonably accommodate qualified individuals with disabilities unless the accommodation would impose an undue hardship. In accordance with the Americans with Disabilities Act, reasonable accommodations will be provided to qualified individuals with disabilities when such accommodations are directly related to performing the essential functions of a job, competing for a job, or to enjoy equal benefits and privileges of employment.*

- Ensure that all the PDF's forms in the Human Resources page on the City's website are accessible to people who are blind or have difficulty seeing.
- Consider having a policy regarding reasonable accommodation under title I of the ADA.
- Ensure that the complete contact information – including name, title and email - of the person responsible of handling employment grievance procedures is included in all materials distributed to employees.
- Under *Standard and Pre-employment Inquiries* (page 29 of the *Affirmative Action Policy on Employment*) add the term disability to the list of unlawful employment practices.
- Title I of the ADA also prohibit an employer from refusing to hire solely on the basis of disability. Under *Screening Disabled Persons* (page 34 of the *Affirmative Action Policy on Employment*) consider adding an excerpt from title I of the ADA regarding non-discrimination on the basis of disability.
- Under *Compliance Agency Filings* (page 58 of the *Affirmative Action Policy on Employment*) clarify that the time to file a complaint with MCAD is 300 days not 180 (180 is if the complainant file a complaint directly with the EEOC).
- Review the City's *Affirmative Action Policy on Employment* and replace the term 'disabled' with 'person with disability'

Suggestion: The national Job Accommodation Network is the most comprehensive, practical resource for understanding the job accommodation process: <http://www.askjan.org>

## **VI - Auxiliary Aids and Services**

Title II entities are required to provide appropriate auxiliary aids and services 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 City'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. (35 CFR Part 35.160 (a)).*

Auxiliary aids and services are devices or services that enable effective communication for people with disabilities. The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the length and complexity of the communication involved (e.g., a query at an information desk in City Hall, a meeting, a job description).

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.

Furthermore, this requirement may include providing sign language interpreters, telephone handset amplifiers, telecommunication devices for Deaf persons (TDD's), note takers, written materials for

persons who are Deaf or hard of hearing or transcripts, Braille, digital or audio information for persons who are blind or have difficulty seeing.

The decision about what auxiliary aid is appropriate should evolve from a consultation between the title II entity (City of Worcester) and individuals with disabilities wherever possible to ensure effective communication. In many cases, more than one type of auxiliary aid or service may make effective communication possible. While consultation is strongly encouraged, the public entity shall give primary consideration to the requests of individuals with disabilities. The Effective Communication obligation does not require a public entity to take any action that would result in a fundamental alteration in the nature of its services, programs or activities or impose an undue financial and administrative burden.

Finding:

The City has a uniform policy for employees to provide auxiliary aids and services. IHCD found documents with statements alerting Department and Division Heads about the obligation to post notification of non-discrimination policies relative to people with disabilities in materials disseminated to members of the public as well as in noticeable locations in the City's public buildings. Public notices with reasonable accommodations are provided in both English and Spanish and include the ADA Coordinator's name, address, telephone number and email address. In addition, City staff has been advised that all public meeting notices and printed and electronic publications for distribution to the public should include the following "short-form" notice:

*"The City of Worcester does not discriminate on the basis of disability. The [insert office, program or division name here] will provide auxiliary aids and services, written materials in alternative formats, and reasonable modifications in policies and procedures to persons with disabilities upon advance request. Please contact [enter staff name and email and phone] or the ADA Coordinator at disabilities@worcesterma.gov."*

It is not clear if the forms available on the City's website on a PDF format are available on an accessible format or are accessible to people who use screen readers.

It is not clear if the 'Important Numbers' in the Emergency Communication page on the City's website are accessible to people with disabilities.

Finally, it is not clear if the services currently provided in the E-services page are currently accessible for people who are blind or have difficulty seeing.

Recommendations:

The City should continue to develop and publicize clear processes for members of the public and employees to request auxiliary aids and services:

- The City should ensure that staff interacting with the public is fully trained on how to respond to TTY and relay calls for telephone communications with people who are deaf, have difficulty hearing or have speech disabilities.
- Ideally, the City will develop a system for training staff to meet these responsibilities especially knowing the processes for securing Braille, making large print, other types of alternate formats,

understanding how to request interpreters or CART and the length of time needed and how to use the assistive listening systems and other special devices to assist people with disabilities to enjoy effective communication.

- Ensure that the City's website and other web-based services such as the *E-services* and the *Employee Portal* are accessible to people with disabilities.
- Ensure that the following PDF forms on the City's website are accessible to people with disabilities:
  - *Feedback Form*
  - *Sidewalk Snow Removal Policies*
  - *Voluntary Emergency Preparedness Registry*
  - *Worcester Government Channel – Programming Schedule*
  - *Animal Control Complaint and Permit Form*
  - *Disability Indicator Form*
  - *All the Forms on the Communication Documents Page*
  - *Library Tour Request Visit*
- Ensure that City's residents who are deaf or hard of hearing have access to the City's *Alert Notifications* such as *Winter Parking Ban*.
- Ensure that the '*Important Numbers*' in the Emergency Communication page of the City's website are accessible to people who are deaf or have difficulty hearing.
- Review the City's material and replace the terms 'handicap/disable with 'disability'.
- Ensure that all videos provided in the City's website are captioned for people who are deaf or have difficulty hearing and/or provide audio description for people who are blind or have difficulty seeing.
- Ensure that all the services provided by the *Cable Services Division* are accessible to members of the public with disability.
- Ensure that the '*Captcha*' button is accessible to people with disabilities.
- Review the City's material and replace the terms 'handicap/disabled with 'disability'.

Additionally, under Title II of the ADA, emergency programs, services and activities must be accessible to people with disabilities.

- Ensure that the City takes the necessary steps to effectively communicate with people with disabilities (*ADA Tool kit: Emergency Management from Department of Justice - <http://www.ada.gov/pccatoolkit/chap7emergencygmt.pdf>*) and *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](http://www.fema.gov/pdf/about/odc/fnss_guidance.pdf))*.
- Make the emergency plan available on the City's website and update the emergency procedure as often as is necessary.

## **VII – Emergency Preparedness, Evacuation Plans, and Emergency Shelters**

As evidenced by recent Project Civic Access settlement agreements, the Department of Justice views emergency preparedness plans as critical components of a municipality's responsibilities related to accessibility. In Worcester, the *Department of Emergency Communications* is responsible for all of the emergency and non-emergency calls in the City and emergency services are the shared responsibility of Police and Fire. While a full review of Worcester's emergency preparedness, evacuation plans and emergency shelters was not part of this RFP, based on prior emergency shelter evaluation work and surveys of typical municipal physical facilities, the following general findings are worth noting.

### Finding

- Multi-story buildings did not regularly post up to date floor plans;
- Information about evacuating people unable to navigate stairs was notably absent;
- Schools and other facilities built after 1991 lack designated Areas of Rescue Assistance (ADAAG 4.3.11) and accessible means of two way communication;

Elements not yet required by code:

- Schools and other large buildings do not have evacuation chairs;
- Designated MEMA and FEMA shelters such as schools may lack backup power for elevators and refrigeration;
- Designated MEMA and FEMA shelters such as most schools lack showers and locker rooms.

### Recommendations

1. Conspicuously post up to date floor plans;
2. Post information about evacuating people unable to navigate stairs;
3. Develop evacuation plans for each facility;
4. In facilities built or altered after 1991, provide designated Areas of Rescue Assistance (ADAAG 4.3.11) and accessible means of two way communication; in facilities built or alter after 3/15//2012, provide Areas of Refuge in accordance with IBC 2003 or newer;
5. As MEMA/FEMA F.N.S.S. plans are developed or revised, adopt policies to ensure that community evacuation plans enable people with disabilities, including those who have mobility, vision, hearing, or cognitive disabilities, mental illness, or other disabilities, to safely self-evacuate or to be evacuated by others. Until all emergency shelters have accessible parking, exterior routes, entrances, interior routes to the shelter area, and accessible toilet rooms serving the shelter area; identify and widely publicize to the public, including persons with disabilities and the organizations that serve them, the locations of the most accessible emergency shelters. For more information see US DOJ's *Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities* - <http://www.ada.gov/emergencyprepguide.htm>, ADA Tool kit: *Emergency Management from Department of Justice* - <http://www.ada.gov/pcatoolkit/chap7emergencymgmt.pdf> and 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](http://www.fema.gov/pdf/about/odc/fnss_guidance.pdf)

Additionally, we recommend considering, in partnership with MEMA and FEMA:

1. Engaging the National Fire Protect Association (NFPA) for evacuation training, guidance on evacuation chairs and their location in each facility;
2. Acquiring evacuation chairs and locating in stairwells;
3. Providing and load verifying backup power source for elevator to address F.N.S.S. emergency shelter needs;
4. Installing one or more accessible showers to meet emergency shelter needs;
5. Providing backup power for refrigeration to meet emergency shelter needs.

### **Telephone Emergency Services (28 CFR 35.162)**

Requirement: Telephone emergency services, including 911 services, shall provide direct access to individuals who use TDD's and computer modems.

Compliance: 911 operators have access to a TTY system and provide access to 911 services for individuals using TTY devices and telephone relay service. The City has adopted a policy and procedures for TTY calls or relay service calls for the hearing impaired. The policy states that 911 operators should enable their TTY device to verify there is not a hearing impaired caller on the line anytime they have an open line call or there is silence on the line. It is unclear whether all 911 operators are trained in the use of Telephone Relay Services (TRS), Video Relay Service (VRS) and the various innovations (e.g., captioned telephones, <http://www.captel.com/911psaps.php>) to improve communications access for people who are deaf and hard-of-hearing.

Recommendations: The Department of Justice recommends the following measures to facilitate compliance with the ADA requirement for equally effective emergency communications:

- Ensure that a working TTY or TTY-compatible equipment is provided at every emergency communications position.
- Develop procedures for maintaining TTYs and TTY-compatible equipment that are as effective as the maintenance procedures for voice telephone equipment.
- If the City has a plan for back-up equipment in case of equipment malfunctions, telephone line malfunctions, or power failure, ensure that the plan covers TTY calls and equipment.
- Ensure that 911 and enhance 911 services provided for TTY users are equal in response time to services provided to the general public.
- Ensure that 911 and enhanced 911 services provided for TTY users are equal in response quality to services provided to the general public.
- Provide 911 services to TTY users during the same hours of operation as services provided to the general public.
- Ensure that 911 services provided for TTY users are equal in all other features offered (including automatic number identification, automatic location identification, automatic call distribution, etc.).
- Ensure that 911 operators respond to each silent, open line call by querying the line with a TTY.
- Ensure that all 911 operators can easily switch back and forth between TTY mode and voice mode during a call.

- Make TTY training mandatory, as well as training on TVR at least, for all personnel who may have contact with individuals from the public who have hearing or speech disabilities.
- Ensure that 911 services require or offer refresher training for TTYs as well as training on TVR at minimum, at least as often as they require or offer training for voice calls, and at least every six months.
- Conduct periodic unannounced tests to 911 operators using both silent, open line calls and calls transmitting TTY tones as well as Telephone Voice Relay.
- Keep records of the results of all test calls. Include the date and time of each call, identification of the call-taking position, whether the call was silent or transmitted tones, whether the caller received a TTY response and the content of the response, the time elapsed and the number of rings from the initiation of the TTY call until the call taker responded by TTY, and whether the call was processed according to your standard operating procedures.

### **Emergency Management (28 CFR 35.149)**

Requirement: A public entity may not deny the benefits of its programs, services and activities to individuals with disabilities because its facilities are not accessible. When viewed in their entirety, each of a public entity's programs, services and activities must be readily accessible to and useable by individuals with disabilities (see the requirements for program accessibility, above).

Compliance: No emergency planning and preparedness documents, policies or procedures have been provided for this assessment as of the preparation of this report. Methods to communicate information about emergencies the public include a reverse 911-type system called DCC, social media (for citizens who sign up for notification), and radio and TV by activation of the Emergency Alerting system. Fire and police department employees can go door-to-door to provide information for smaller events.

#### Recommendations:

Integrate advance planning to meet the needs of individuals with disabilities into the City's emergency planning and preparedness, policies and procedures. The advance planning should include:

- Identification of the disability-related needs of the people who are likely to be housed in a shelter.
- Advance arrangements to meet those disability-related needs in the event of an emergency.
- Include individuals with disabilities and disability advocacy organizations in the advance planning process.
- Ensure that sheltering facilities are physically accessible to individuals with disabilities.
- Ensure that eligibility criteria are not used to unnecessarily segregate individuals into "special needs" or "medical" shelters.
- Train emergency managers, shelter operators, and shelter employees and volunteers on the requirement to reasonably modify policies, practices, and procedures for qualified individuals with disabilities. For instance:
- a "no pets" policy should be modified to allow an individual with a disability to be accompanied

- by a service animal in a shelter;
- modify kitchen access policies for individuals who may need access to food for medical reasons (such as individuals with diabetes);
- Modify sleeping arrangements as necessary to accommodate disability-related needs, such as the needs of individuals who use wheelchairs or other mobility devices.
- Include preparations to provide effective communication to individuals with disabilities as part of the City's advance planning.
- Train Emergency Management personnel on the current best practices for Title II entities recommended by the US Department of Justice:  
<http://www.ada.gov/pcatoolkit/chap7emergencymgmt.htm> and;
- Federal Emergency Management Agency's Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters: <http://www.fema.gov/news-release/fema-issues-new-guidance-support-people-disabilities-during-disasters>

#### **VIII – Maintenance of Accessible Features** (ADA Title II – 28 CFR Part 35.133(a))

Title II requires accessible facilities and equipment to be maintained such that they are readily accessible to and usable by persons with disabilities. Examples of facilities and equipment include electronic and physical accessibility features accessible parking, sidewalks (including snow removal and temporary routes during construction), APS, curb ramps, ramps, elevators, lifts, power door openers, locks, dispensers, drinking fountains, assistive listening equipment, TTD/TTYs, etc.

#### **Finding:**

Based on reports from Worcester staff and reviews of facilities, maintenance of some accessible features is needed however it is unclear how the City evaluates or prioritizes maintenance requests related to accessibility.

#### **Recommendations:**

- We recommend developing and or modifying building, department, and city-wide policies to ensure accessible features are maintained and prioritized appropriately.
- We recommend adopting a snow removal and temporary pedestrian routes policy and suggest that the City of Cambridge and MassDOT have good models to work from.

## Polling Places

While IHCD was not contracted to evaluate polling place accessibility, policies or practices, it is worth noting, that under both the ADA as well as the Voting Accessibility for the Elderly and Handicapped Act of 1984, polling places across the United States are generally required to be physically accessible to people with disabilities for federal elections. Additionally, Massachusetts' laws also prohibit voter discrimination.

In cases of inaccessible polling places, a political subdivision must provide an alternate means of casting a ballot on the day of the election. These laws also require states to make available registration and voting aids for disabled and elderly voters, including information by alternative accessible means. As such, the U.S. Department of Justice (DOJ) as well as the Massachusetts Attorney General's Office have consistently prioritized voting accessibility. See Appendix C of this report for the language that DOJ utilizes in settlement agreements with municipalities and counties as part of its Project Civic Access work.<sup>3</sup>

## Resource List

- Americans with Disabilities Act Title II Regulations:  
[http://www.ada.gov/regs2010/titleII\\_2010/titleII\\_2010\\_regulations.htm](http://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm)
- ADA Tool kit: Emergency Management from Department of Justice:  
<http://www.ada.gov/pcatoolkit/chap7emergencymgmt.pdf>
- US DOJ's *Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities*:  
<http://www.ada.gov/emergencyprepguide.htm>
- ADA Tool kit: *Emergency Management from Department of Justice*  
<http://www.ada.gov/pcatoolkit/chap7emergencymgmt.pdf>
- *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](http://www.fema.gov/pdf/about/odc/fnss_guidance.pdf)
- Job Accommodation Network:  
<http://www.askjan.org>

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<sup>3</sup> <http://www.justice.gov/iso/opa/resources/767201359163246439025.PDF>

## Evaluation of Facilities

### Introduction

In preparation for the writing of the report, IHCD surveyed a set of the City's portfolio of facilities and properties as listed in Appendix A. As stipulated by the City of Worcester, IHCD's scope of work covers 'Vertical Aspects', including City-owned and leased buildings – building interior, exterior, and accessible routes from public way. Worcester's portfolio includes 11 municipal buildings, three libraries, one police station, 10 fire stations, and 20 open spaces. As requested by the City, the following facilities were not included in IHCD's scope of work:

- Public Schools;
- Housing Authority;
- Conservation Land;
- 'Horizontal Aspects', including public rights-of way such as public and private streets, crosswalks, sidewalks, curb ramps, etc.

Overall, the City of Worcester faces a city-wide challenge in ensuring access to all of its programs, services, and activities. Like many cities in the Commonwealth of Massachusetts, Worcester has a large number of aging buildings and other facilities that pose barriers to residents and City employees with disabilities, and the sheer amount of work that would be required to bring these older facilities into compliance is daunting. Nevertheless, Worcester completed a number of accessibility-related renovations in recent years, and many of these renovations are, fortunately, compliant with current accessibility standards.

While the City of Worcester did not provide IHCD with information about the dates of alterations, it is clear that the City has undertaken renovations to facilities after the passage and enforcement of the Americans with Disabilities Act in 1991. Newly constructed or altered facilities or elements that were constructed or altered before March 15, 2012 and that do not comply with the 1991 Standards or with UFAS shall on or after March 15, 2012, be made accessible in accordance with the 2010 Standards.<sup>4</sup> Likewise, the work shall also meet the current requirements of Massachusetts Building Code including 521 CMR Architectural Access Board Regulations. Further, it is important to note that those elements in existing City facilities that are subject to supplemental requirements of the 2010 ADA Standards (i.e., elements for which there are neither technical nor scoping specifications in the 1991 Standards) such as (C) Recreational boating facilities; (D) Exercise machines and equipment; (E) Fishing piers and platforms; (H) Play areas; (J) Swimming pools, wading pools, and spas; and (L) Miscellaneous - (1) Team or player seating and (3) Accessible route in court sports facilities, need to be brought into compliance with 2010 ADA Standards.<sup>5</sup> Finally, many existing elements in the City such as sidewalks, ramps, parking lots, or restrooms have suffered from deferred maintenance that has failed to preserve

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<sup>4</sup> As described in **28 CFR 35.151(c) – Accessibility Standards and Compliance Date**

<sup>5</sup> As described in **28 CFR 35.150(b)(2)(i)**

or maintain accessibility features.<sup>6</sup> As these are worked on, the 2010 ADA Standards must be met.

The vast majority of buildings and facilities are “functionally accessible” meaning that they are generally usable by people with disabilities but are not in full compliance with current accessibility requirements, though they may have been compliant when they were built or last renovated – before 1991. Broadly speaking, key facilities throughout the City such as the DPW Administrative Building: Water Operations, Administration Building at Hope Cemetery, Great Brook Valley Branch Library, and most fire stations are completely inaccessible. City Hall is an example of a “functionally accessible” facility: the building features accessible parking, one accessible entrance facing the plaza, one accessible entrance facing Main Street, accessible single-user toilet rooms on level 3, and has accessible routes through most of the building. Yet the few drinking fountains provided are inaccessible, many offices cannot be reached via an accessible route (including the Mayor’s Office) because of doorway issues, and virtually none of the service counters are accessible.

When looked at in their entirety, the number of mostly or entirely inaccessible facilities throughout the City makes it difficult to ensure access to all of Worcester’s programs, services, and activities. As a way of understanding the breadth and depth of the challenge the City faces, it is useful to consider the following partial list of everyday municipal activities in which people with disabilities may be unable to participate due to the nature of the facilities in which these activities occur:

- Apply for a marriage certificate at the City Clerk’s office at City Hall;
- Obtain a residential parking permit or pay a parking ticket at City Hall;
- Summon and enter most fire stations;
- Attend City-related events at the Parks Building;
- Use the lavatories inside the toilet rooms at Frances Perkins Branch Library;
- Visit the Green Hill Zoo;
- Attend free community events at Beaver Brook Park;
- Visit the Mayor’s office at City Hall;
- In some cases, vote in local, state, or federal elections at precinct polling locations;
- Pick up a new recycling bin at DPW Administration Building: Customer Service;
- Lend a book at Great Brook Valley Branch Library.

On a positive note, most City-owned facilities built or renovated after the year 2000 – including the Public Library, Franklyn Street Fire Station, Webster Street Fire Station, and portions of DCU Center – are substantially more accessible and meet most architectural requirements. A component of the Engineering Division in Worcester, the Architectural Services department is responsible for

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<sup>6</sup> It is important to bear in mind that **28 CFR 35.133 - Maintenance of Accessible Features** says: (a) A public entity shall maintain in operable working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities by the Act or this part. (b) This section does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs. (c) If the 2010 Standards reduce the technical requirements or the number of required accessible elements below the number required by the 1991 Standards, the technical requirements or the number of accessible elements in a facility subject to this part may be reduced in accordance with the requirements of the 2010 Standards. [56 FR 35716, July 26, 1991, as amended by Order No. 1694-93, 58 FR 17521, Apr. 5, 1993; AG Order No. 3180-2010, 75 FR 56178, Sept. 15, 2010]

architectural design and renovations throughout city-owned facilities. IHCD has assessed facilities that have been recently renovated and can attest to the careful implementation of accessibility improvements by the City's architectural team. Continued facility replacements or renovations will substantially reduce barriers and realize Worcester's commitment to inclusion and equal rights.<sup>7</sup> In the meantime, the greatest problems posed by existing barriers can be ameliorated by establishing policies and procedures to accommodate the public. It is worth noting that in the past years, the City of Worcester has taken several significant steps in this direction:

- Worcester has hired a part-time ADA Coordinator, Jayna Turchek;
- Worcester has hired a consultant to undertake this ADA self-evaluation (as basis for the City's transition plan);
- Worcester has solicited bids to evaluate Public Rights-of-Way throughout the City;
- Worcester's Parks, Recreation & Cemetery Division has hire a consultant to evaluate open spaces throughout the City;
- Worcester has established a Commission on Disabilities.

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<sup>7</sup> Note that the ADA 2010 Standards Advisory 202.3 Alterations states: Although covered entities are permitted to limit the scope of an alteration to individual elements, the alteration of multiple elements within a room or space may provide a cost-effective opportunity to make the entire room or space accessible. Any elements or spaces of the building or facility that are required to comply with these requirements must be made accessible within the scope of the alteration, to the maximum extent feasible. If providing accessibility in compliance with these requirements for people with one type of disability (e.g., people who use wheelchairs) is not feasible, accessibility must still be provided in compliance with the requirements for people with other types of disabilities (e.g., people who have hearing impairments or who have vision impairments) to the extent that such accessibility is feasible.

## Accessibility Survey Methodology

The analysis of existing conditions that comprises the body of the report is based on observations and documentation completed by IHCD during site visits in the fall and winter of 2013/2014. This accessibility survey included the following facilities:<sup>8</sup>

### Municipal Buildings:

- City Hall
- DPW Administrative Building - Water Operations
- DPW Administrative Building - Headquarters
- DPW Administrative Building - Customer Service
- Inspectional Services \*
- Parks Building
- Senior Center \*
- Union Station
- Administration Building at Hope Cemetery
- Green Hill Golf
- DCU Center and Major Taylor Garage

### Libraries:

- Public Library
- Frances Perkins Branch Library
- Great Brook Valley Branch Library

### Police Station:

- Police Headquarters

### Fire Stations:

- Fire Department Headquarters
- Burncoat Street Fire Station
- Franklin Street Fire Station
- Greendale Fire Station
- McKeon Road Fire Station
- Park Avenue Fire Station
- South Division Fire Station
- Southeast Fire Station
- Tatnuck Square Fire Station
- Webster Square Fire Station

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<sup>8</sup> The City of Worcester has provided IHCD with the list of City-owned and leased facilities. IHCD is not aware nor was contractually responsible for any additional facilities that are not included in this list (see Appendix A).

Open Spaces:

- Green Hill Golf
- Green Hill Zoo
- Beaver Brook Park \*
- Lake Park

\* Facility used as polling place, according to the City of Worcester.

The City of Worcester did not originally identify the following facilities for evaluation under the original request for proposal and contract; however, at the request of the Director of the Department of Parks, Recreation and Cemetery, IHCD also evaluated the parking and buildings (toilet rooms, community buildings, little league buildings, etc.) of the following open spaces:

- Bell Hill Beach
- Coes Pond Beach
- Crompton Park
- Elm Park
- Farber Field
- Greenwood Park
- Hadwen Park
- Harrington Field
- Harry Sherry Field
- Indian Lake Beach
- Kendrick Field
- Logan Field
- Mulchay Field
- Rockwood Field
- Shore Park Beach
- Ty Cobb Field
- Vernon Hill Park

Given the nature of the continual need for upkeep and renovation in older cities like Worcester, it can be difficult to determine when a building or facility may have been renovated or altered. Therefore, IHCD's review of the City-owned facilities was based on compliance with the 2010 ADA Standards for Accessible Design and rules and regulations of the 2006 Massachusetts Architectural Access Board for new construction for each element assumed to have undergone renovation or alteration. Any altered facilities or elements that were constructed or altered before March 15, 2012, and that do not comply with the 1991 ADA Standards shall on or after March 15, 2012, be made accessible in accordance with the 2010 ADA Standards for Accessible Design. Likewise, the work shall also meet the requirements of the 2006 Massachusetts Architectural Access Board.

## **Program Accessibility**

In Worcester, City-owned buildings range in levels of accessibility: they may be mostly accessible, such as the Public Library, or completely inaccessible, such as the DPW Administrative Building - Water Operations. Throughout the City, many programs, services, and activities that are offered to the public are located in inaccessible facilities or in facilities with certain inaccessible features. For instance, two of the 10 municipal buildings are inaccessible, one of the three libraries is inaccessible, and seven of the 10 fire stations are inaccessible. Additionally, at least two facilities, Police Headquarters and McKeon Road Fire Station, were designed and constructed for vehicular access only and do not provide any direct pedestrian route between the sidewalks, public transit, and building entrances.

It's important to stress that the primary obligation to public entities such as the City of Worcester, under Title II of the Americans with Disabilities Act, is to ensure that, when 'viewed in its entirety' the programs, services, and activities offered are equally available to people with disabilities. Worcester may achieve program accessibility by a number of methods. In many situations, providing access to facilities through structural methods, such as alteration of existing facilities and acquisition or construction of additional facilities, may be the most efficient method of providing program accessibility (refer to Structural Accessibility below). Worcester may, however, provide services, programs, and activities to individuals with disabilities through alternative methods, if physical barriers in an inaccessible facility are not removed. Non-structural methods that achieve program accessibility include:

- Relocating a service to an accessible facility, e.g., moving a public information office from the third floor to the first floor of a building;
- Providing an aide or personal assistant to enable an individual with a disability to obtain the service;
- Providing benefits or services at an individual's home, or at an alternative accessible site.

Unlike private entities under Title III, public entities are not required to remove barriers from each facility, even if removal is readily achievable. A public entity must make its "programs" accessible. Physical changes to a building are required only when there is no other feasible way to make the program accessible. Although, in theory, programs, services, and activities can be relocated to an accessible space upon request in certain facilities, it is much more difficult to entirely relocate programs, services, and activities such as those provided in completely inaccessible building such as DPW Administrative Building - Water Operations, Administration Building at Hope Cemetery, Great Brook Valley Branch Library as well as older fire stations. With that said, providing duplicated services at other locations or the temporary relocation of services based upon individual requests is the best solution for the foreseeable future until such time when these buildings are completely renovated or replaced.

Given this situation, IHCD has made several recommendations in order to increase accessibility of programs, services, and activities provided by the City of Worcester. These recommendations are organized into three distinct categories:

- 1) Relocation of programs, services and activities within current facility;
- 2) Relocation of programs, services and activities to another facility;
- 3) Short-term renovations to ensure access to programs, services and activities.

### **1) Relocation of programs, services and activities within current facility**

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

- DPW Administrative Building - Headquarters: All offices located on level 1 are completely inaccessible to residents because they cannot be reached via an accessible route. An elevator provides access to all other floor levels, except access to level 1. Programs, services, and activities offered on level 1 should be relocated to other offices on levels 2 or 3. The City website as well as permanent signage at the entrance of this facility should indicate this accommodation.

### **2) Relocation of programs, services and activities to another facility**

When not possible to relocate them within the current facility, program, services, and activities should be relocated to an accessible facility. The following program, services, and activities are offered in inaccessible buildings. IHCD strongly recommends that the City identify accessible facilities where these programs, services and activities could be relocated:

- DPW Administrative Building - Water Operations: All programs, services, and activities provided at this facility are inaccessible because the building lacks an accessible entrance. Despite the building that has an elevator, no other accessible amenity is provided on any floor of the building.<sup>9</sup>
- Great Brook Valley Branch Library: This library branch is located on a steep hillside within the Great Brook Valley housing project. The library was opened in 1981 by the Worcester Housing Authority and occupies a converted townhouse. This 1-story facility is intended to serve residents of the housing project as well as the general public.<sup>10</sup> Although this library branch may be a convenient location to the residents located uphill, it presents serious difficulties to those arriving by public transit or car on Tacoma Street. Therefore, all programs, services, and activities provided at this facility are inaccessible because the building lacks an accessible route from the street and parking lot. While the City may offer to relocate programs, services, and activities to another more accessible library, it should ensure that all library amenities when looked at in entirety are generally accessible.

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<sup>9</sup> Elevator lacks a current certificate of inspection.

<sup>10</sup> Information provided on the Worcester Public Library website at <http://www.worcpubliclib.org/about/visitwpl.htm>.

### 3) Renovations to ensure access to programs, services and activities

When program accessibility cannot be achieved through non-structural methods, physical changes to a facility may be the only feasible option to ensure access to services, programs, and activities to individuals with disabilities. Sometimes small projects can greatly improve the level of accessibility at facilities. IHCD identified the following recurring accessibility issues within public areas throughout the facilities in Worcester:

#### Priority 1 - Approach and Entrance:

- Curb ramps with excessive slopes, broken surfaces, missing detectable warnings, and no level landings;<sup>11</sup>
- Accessible parking spaces with excessive slopes, broken surfaces, and missing or inadequate access aisles;
- Exterior route between sidewalk, public transit stop, parking, and building entrance with tripping hazards and potential barriers;
- Exterior ramps with excessive slopes, broken surfaces, non-compliant railings, and no level landings at top or bottom;
- Entrance doors without level landings and inadequate maneuvering clearances;
- Locked entrances with inaccessible intercoms or doorbells;
- Accessible entrances that are not properly identified;
- Inaccessible entrances without signage directing to accessible entrance.

#### Priority 2 - Access to Goods and Services:

- Unsecured weather mats and carpets along circulation paths;
- Doors that require excessive opening force and with non-compliant hardware;
- Service counters that are above 36" high and lack required clear space;
- Stairways with missing or non-compliant handrails;
- Many rooms and spaces lack the required designation signage;
- Signs are incorrectly mounted on walls, doors, and door frames or lack raised characters, Braille, and compliant typography;
- Egress routes and fire exits that are not properly identified.

#### Priority 3 - Toilet Rooms:

- Toilet rooms with improperly mounted grab bars, dispensers, mirrors, and/or coat hooks;
- Toilet rooms lack accessible plumbing fixtures, maneuvering clearances, and/or alarms;
- Signs at inaccessible toilet rooms do not direct users to accessible amenities.

#### Priority 4 - Additional Access:

- Inaccessible drinking fountains;
- Wall-mounted hand sanitizers that are above 48" high;
- Payphones without TTY capability.

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<sup>11</sup> Review of 'Horizontal Aspects', including public rights-of way such as public and private streets, crosswalks, sidewalks, curb ramps, etc., were not included in IHCD's scope of work.

As part of renovations to ensure access to programs, services and activities, IHCD strongly recommends the remediation of the following recurring accessibility issues that were identified throughout the facilities in Worcester:

Priority 1 - Approach and Entrance:

- Repair or replace curb ramps;
- Re-grade, resurface, and re-stripe accessible parking spaces;
- Repair exterior route between sidewalk, public transit stop, parking, and building entrance;
- Repair or replace exterior ramps and handrails;
- Install automatic door openers as an option in lieu of re-grading or doing structural work at entrances;
- Provide accessible intercoms and doorbells at entrances;
- Provide accessible signage at entrances and identify each accessible entrance with International Symbol of Accessibility;
- Ensure that accessible entrances and routes to accessible entrances are labeled.

Priority 2 - Access to Goods and Services:

- Secure loose weather mats or carpets;
- Replace door knobs with lever-type hardware;
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep doors open during regular hours or add automatic openers;
- Ensure that a portion of each counter is at least 36" wide and no more than 36" above the floor. Alternatively, provide an auxiliary counter with a maximum height of 36" in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.
- Replace older handrails along stairways;
- Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed in all facilities:
  - Ensure all permanent rooms and spaces have designation signage alongside the doors;
  - Ensure room designation signage has raised characters and Braille;
  - Ensure room designation signage is not covered by artwork or other objects;
  - Ensure that egress routes and fire exits are signed appropriately.

Priority 3 - Toilet Rooms:

- Make minor (non-structural) modifications to toilet rooms including relocating grab bars, dispensers, mirrors, and coat hooks;
- Make alterations inaccessible toilet rooms that meet all ADA/MAAB requirements;
- Ensure signage at inaccessible toilet rooms direct users to accessible amenities.

Priority 4 - Additional Access:

- Replace older drinking fountains with accessible fixtures. Provide a water cooler with cups on an interim basis until fixtures are upgraded;
- Lower hand sanitizers to 48" above the floor;
- Install a TTY device on each payphone.

Although not included in the scope of work of this project, IHCD identified the following recurring accessibility issues within staff areas throughout the facilities in Worcester:

Kitchens and/or Staff Lounges: In older facilities, these staff-only amenities are often completely inaccessible. Non-compliant kitchens and/or staff lounges can be found in the following facilities: City Hall, DPW Administrative Building – Water Operations, DPW Administrative Building – Headquarters, DPW Administrative Building – Customer Service Center, Inspectional Services, Senior Center, Frances Perkins Branch Library, and all fire stations.

Toilet rooms: The staff-only amenities often lack accessible plumbing fixtures and maneuvering clearances. Non-compliant toilet rooms can be found in most fire stations.

Locker rooms: In addition to toilet rooms, these staff-only amenities often lack accessible lockers and shower rooms. Non-compliant locker rooms can be found in the following facilities: Parks Building, Public Library, and all fire stations.

Offices without public interface: The staff-only amenities often lack accessible signage, door hardware, maneuvering clearances, and alarms. Non-compliant offices without public interface can be found in most facilities.

Training Center at Fire Department Headquarters: This one-story, staff-only building has been recently renovated and is mostly accessible; however, the following accessibility barriers were identified:

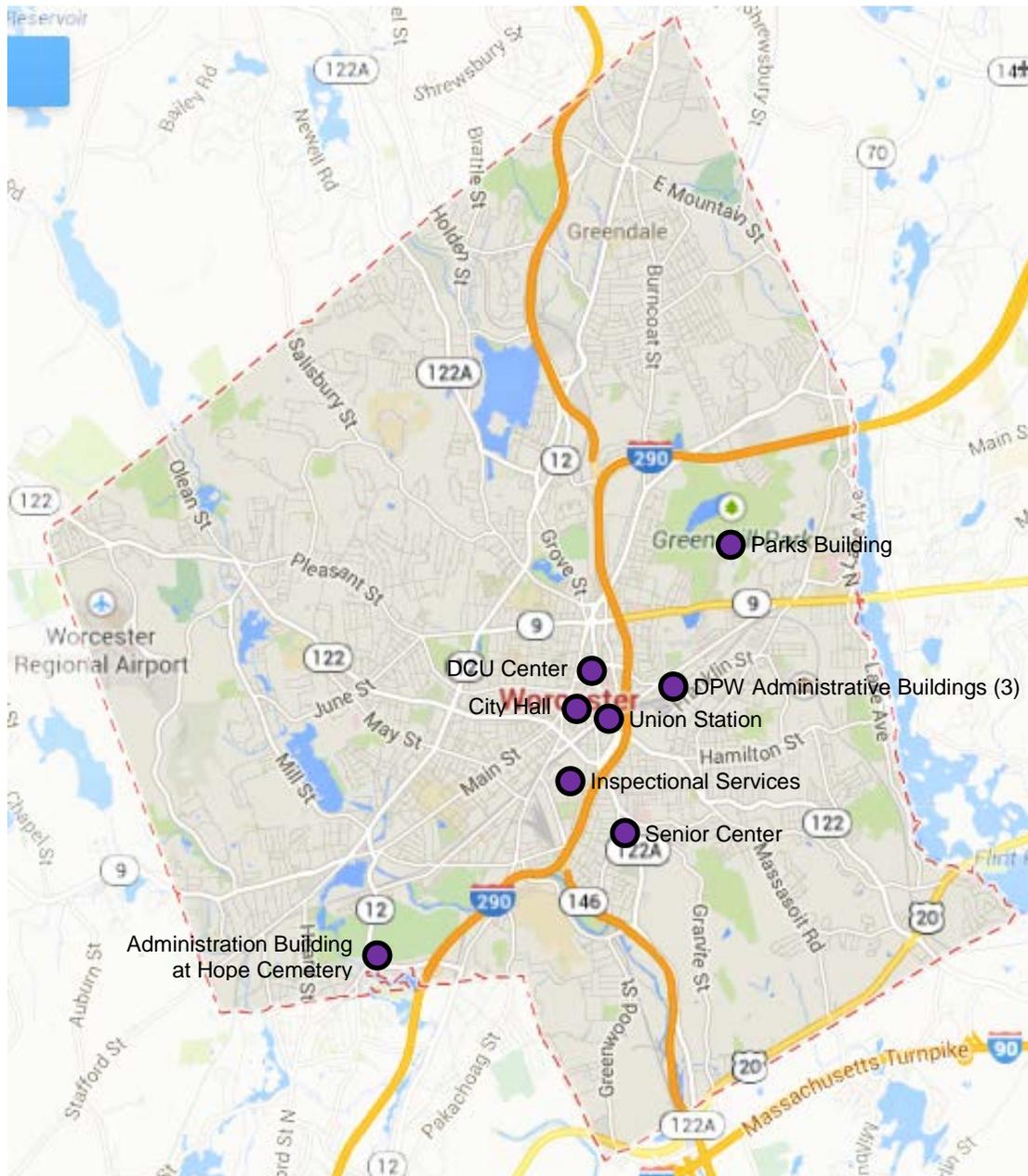
- in the vestibule and lobby, weather mats are not secured and can become tripping hazards;
- in the lobby, the drinking fountain creates a protruding object that is not-cane detectable and that increases the possibility of injury to staff;
- no accessible lockers are provided in the locker rooms;
- inside the Women's locker room, the shower stall designated as accessible is used for storage. Further, this shower stall lacks the required size and clearance.

IHCD strongly recommends a comprehensive renovation plan to remediate the recurring accessibility issues within the staff areas mentioned above. When kitchens, staff lounges, toilet rooms, locker rooms, and offices without public interface are altered as part of a major renovation in the building, they may need to be brought into compliance with the current accessibility laws and regulations. Before these staff-only amenities are ready to be renovated, the City should be prepared to alter any of them as part of a reasonable accommodation request by a staff member with disabilities.

### Municipal Buildings:

While many city offices are located at City Hall, a city with a population over 180,000 cannot hold all public services in one single building. The City of Worcester owns and operates 11 municipal buildings:

- City Hall
- DPW Admin. Buildings (3)
- Inspectional Services
- Parks Building
- Senior Center
- Union Station
- Administration Building at Hope Cemetery
- Green Hill Golf
- DCU Center



## City Hall 455 Main Street



View of City Hall from street<sup>12</sup>

Over a dozen departments and divisions occupy this five-story, 1890's building. They include the Office of the City Manager, Administration & Finance, Economic Development, Human Resources, and Law. Although this facility features accessible off-street parking in the underground garage, one accessible entrance facing the plaza, accessible single-user toilet rooms on level 3, two elevators, and has accessible routes through most of the building, IHCD recommends the following immediate upgrades to improve programs, services, and activities at City Hall:

- Raise the signs identifying the accessible parking spaces in the garage;
- Replace all knobs with levers on doors to offices that are open to public;
- Replace or remove all thresholds on doors to offices that open to public;
- Remove or secure all weather mats;
- Ensure that counters for transactions with the public are accessible;
- Install handrails on both sides of the ramp on the basement level;
- Make improvements to both assembly areas on levels 3 and 4;
- Implement a comprehensive signage plan to ensure that ADA-compliant signs are provided within all public areas;
- Make minor improvements to multi-user toilet rooms on the basement level;
- Install an ADA-compliant sign at each inaccessible toilet to indicate the location of the accessible toilet rooms on level 3;
- Protect the drinking fountain on level 1 and replace the drinking fountain on level 3 with an ADA-compliant fixture;
- Lower hand sanitizer on level 2;
- Install a TTY device on telephone on level 1.

<sup>12</sup> During the assessment of City Hall, the plaza along Main Street was being renovated and access to it was restricted to the construction crew. Therefore, IHCD was not able to verify the accessibility conditions of the plaza.



Photo 1

## Issues

### Priority 1 – Approach and Entrance

#### **Parking**

Off-street staff and public parking with over 25 spaces was identified on the basement level of the building. Although four spaces designated as accessible are provided in this underground parking facility off of Front Street, their identification signs do not meet the minimum allowable height. (Photos 1 & 2)

#### **Exterior Route**

An exterior ramp off of Front Street connects the sidewalk to the accessible entrance facing the plaza. Not only does its bottom landing exceed the maximum allowable slope but also a few vertical displacements along the ramp surface create hazardous tripping hazards. (Photo 3)

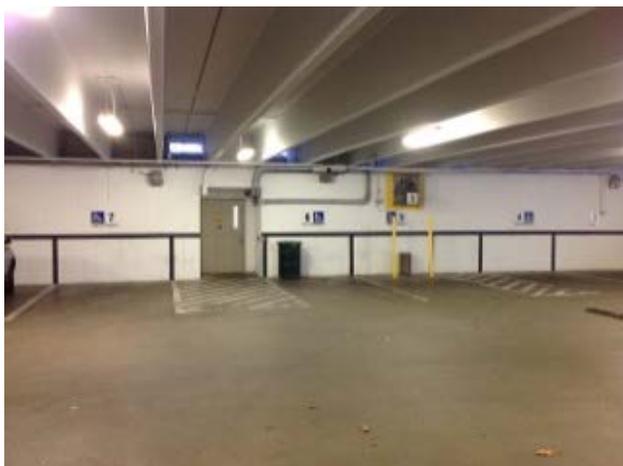


Photo 2



Photo 3



Photo 4

## Priority 2 – Access to Goods and Services

### **Doors**

On all floor levels, doors to offices have non-compliant thresholds that exceed the maximum allowable height (1”) and do not meet the required beveled edge. (Photo 4)

### **Floor Surfaces**

At all entrances as well as elevator lobbies, entry doors to offices, and circulation areas within the building, weather mats are not secure and can become tripping hazards to visitors and staff. (Photo 5)

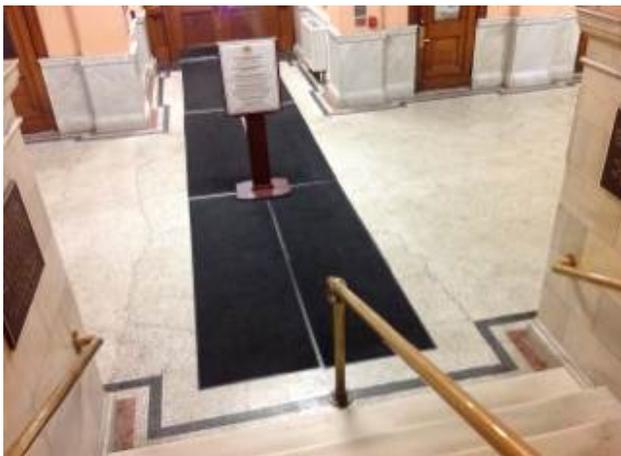


Photo 5

### **Sale and Service Counters**

Counters for transactions with the public can be found on level 2. Most of them are inaccessible because they exceed the maximum allowable height for visitors using wheeled mobility devices or who are of short stature (42-48” AFF):

- Treasure & Collector of Taxes (room 203);
- Payroll Parking (room 204);
- City Clerk (room 206); (Photo 6)
- Election Commission (room 208);
- Division of Assessing (room 209).



Photo 6

Although it is currently closed to the public, the counter at the Information Center on level 1 also exceeds the maximum allowable height (44” AFF).

On level 4, the counter at Customer Services meets the height requirement; however, it is obstructed by brochures.



Photo 7

### **Ramp**

On the basement level, a ramp connects both elevator lobbies. This ramp does not provide the required railings on both sides. (Photo 7)

### **Assembly Areas**

No reserved wheelchair spaces are identified within the tiered seating inside Esther Howland Chamber and Levi Lincoln Jr. Room on levels 3 and 4. Additionally, there does not appear to be any assistive listening or captioning equipment in any of these assembly areas and there is no signage notifying users of its availability.



Photo 8

### **Signage**

Except for the signs identifying the toilet rooms on level 1, very little signage is provided at this facility and not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photos 8 & 9)



Photo 9



Photo 10



Photo 11



Photo 12

### Priority 3 – Toilet Rooms

#### **Toilet Rooms**

For staff use, one multi-user, Women's toilet room is located on level 1 and one set of multi-user toilet rooms (one for each gender) are located on the basement and levels 2 and 4. Neither of these staff-only amenities is accessible.

For public use, one set of multi-user toilet rooms (one for each gender) are located on levels 1 and 3. While the multi-user toilet rooms on level 3 are completely inaccessible, the toilet rooms on level 1 are partially accessible. Also for public use, one set of accessible single-user toilet rooms (one for each gender) is located on level 3. These amenities on levels 1 and 3 are the only accessible toilet rooms in this facility; however, people with disabilities on other floor levels may not know these accessible facilities are provided (see Signage below).

#### **Signage**

Except for the toilet rooms on level 1, all other toilet rooms are not identified with accessible signage. In addition to the designation signs, directional signs indicating the location of the accessible toilet rooms are also not provided at inaccessible toilet rooms. (Photo 12)



Photo 13

#### Priority 4 – Additional Access

##### ***Drinking Fountains***

Two wall-mounted drinking fountains are provided at City Hall: an ADA-compliant fixture near the toilet rooms on level 1 and an older, inaccessible fixture near room 301 in the lobby on level 3. Although the fixture on level 1 is ADA-compliant, it creates a hazardous protruding object that increase the likelihood of injuries among people with low or no vision or others who may be unobservant.



Photo 14

##### ***Hand Sanitizer***

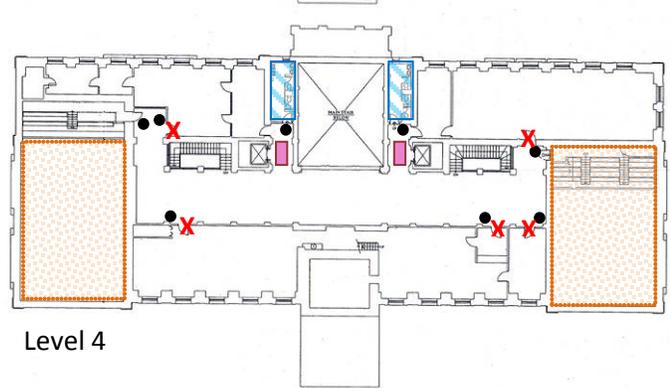
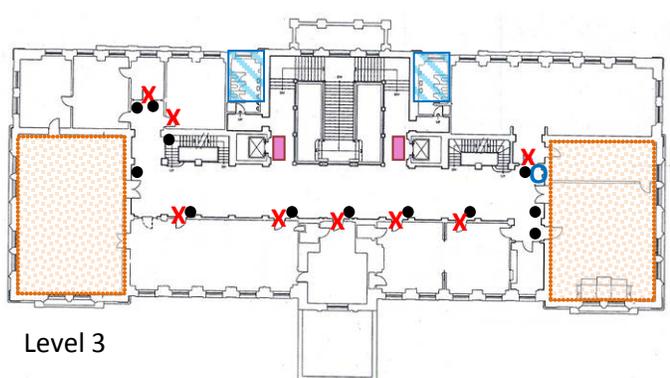
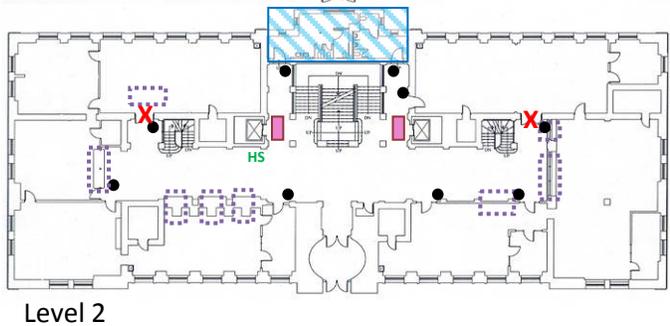
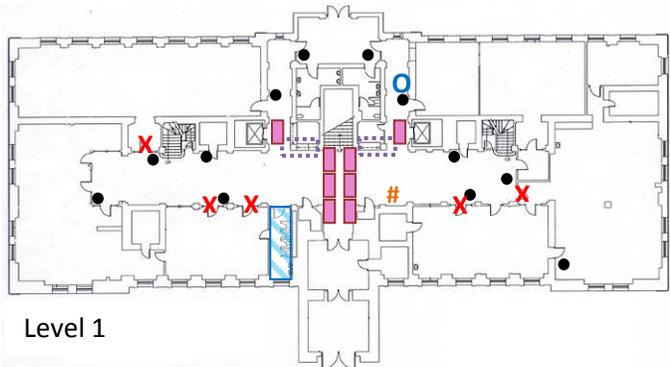
At City Hall, at least one hand sanitizer dispenser was found in the lobby on level 2. This dispenser provided for public use exceeds the maximum allowable height (50" AFF). (Photo 14)

##### ***Telephone***

In the lobby on level 1, the public telephone offers no TTY capability. (Photo 15)



Photo 15



**Legend**

- X** Doors
- Floor Surfaces
- Sale and Service Counters
- Assembly Areas
- Signage
- Toilet Rooms
- Drinking Fountain
- HS** Hand Sanitizer
- #** Telephone

## Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

In the underground garage off of Front Street, raise all four signs identifying the accessible parking spaces so that their bottom is at least five feet above the floor.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### **Exterior Route**

Repair or replace all degraded walking surfaces along the ramp.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Accessible Routes for Ramps.*

### Priority 2 – Access to Goods and Services

#### **Doors**

Replace or remove the thresholds from doors to all offices with public interface.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Doors, Doorways, and Gates.*

#### **Floor Surfaces**

Secure all weather mats with industrial-strength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates at all entrances.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Sales and Service Counters**

Modify counters on each office with public interface so that they are accessible. In the meantime, provide an auxiliary counter no higher than 36" above the floor in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.

On level 4, ensure that the counter at Customer Services is unobstructed at all times.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-in Elements for Sales and Service Counters.*

### **Ramp**

Install compliant railings on both sides of the ramp on the basement level.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Accessible Routes for Ramps.*

### **Assembly Areas**

Inside Esther Howland Chamber and Levi Lincoln Jr. Room, re-configure tiered seating and install integrated accessible seating. Because only the front and rear rows can be reached through an accessible route, integrate and disperse new accessible seating along these rows, especially near the sides and center.

Provide assistive listening devices (ALSs) in both assembly areas. ALSs are required where audible communication is integral to the use of the space, but are not required where audio amplification is not provided. In each assembly area, at least two accessible receivers must be provided. These receivers must be hearing-aid compatible, which means that the ALS receiver must be usable with an induction neckloop that interfaces with the telecoil in an individual's personal hearing aid or cochlear implant. In each assembly area, install an ADA-compliant sign with the International Symbol of access for hearing loss to alert occupants that ALSs are available.

### **Signage**

Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

## **Priority 3 – Toilet Rooms**

### **Toilet Rooms**

As multi-user toilet rooms on all floor levels are altered during a building renovation, ensure that alterations meet all ADA/MAAB requirements. In the meantime, improve signage at these inaccessible amenities by directing residents to the closest accessible toilet room in the facility (see Signage below).

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

### **Signage**

Except for the toilet rooms on level 1, install an ADA-compliant sign alongside the door to all toilet rooms. Install an ADA-compliant sign at each inaccessible toilet room to indicate the location of the accessible single-user toilet rooms on level 3.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

## **Priority 4 – Additional Access**

### ***Drinking Fountains***

Replace the existing fixture on level 3 with an accessible drinking fountain. In the meantime, provide an adjacent water cooler with cups for equivalent access at the inaccessible drinking fountain.

Install cane-detectable barriers on both sides of the drinking fountain near the toilet rooms on level 1.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Drinking Fountains.*

### ***Hand Sanitizer***

Lower the hand sanitizer dispenser on level 2 so that its control is no higher than 48" above the floor.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Building Blocks for Operable Parts.*

### ***Telephone***

Install a TTY device on telephone on level 1. Install an ADA-compliant sign that directs to the TTY device. Such device must be accessible and available whenever the payphone is operable.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Communication Elements and Features for Telephones.*

## DPW Administrative Building – Water Operations 16-18 East Worcester Street



*View of DPW Administrative Building – Water Operations from street*

This facility is one of three DPW Administrative Buildings on East Worcester Street. This four-story building houses the Water Operations Division, which consists of an information center on level 1, a billing office on level 2, and engineering department on levels 3 and 4. All programs, services, and activities provided at this facility are completely inaccessible to residents with disabilities because:

- no accessible parking spaces are provided on the parking lot adjacent to the building;
- the only public entrance has one step up from the sidewalk and a short stairway to level 1;
- the elevator located at the rear of the building has failed its last inspection by the State’s Department of Public Safety;
- toilet rooms are provided on all floors but none is accessible;
- all egress stairways lack the required handrails;
- all doors have non-compliant hardware;
- ADA-compliant signs are not provided.

## Recommendations

In terms of accessibility, DPW Administrative Building – Water Operations represents the worst City-owned facility in Worcester. Although relocating all programs, services, and activities to a fully accessible facility is not at all optimal from a user standpoint (refer to Program Accessibility above), it offers a short-term option until this entire facility can undergo a major renovation.

## DPW Administrative Building – Headquarters 20 East Worcester Street



View of DPW Administrative Building –  
Headquarters from street <sup>13</sup>

The second DPW Administrative Building, Headquarters is a three-story that houses the Engineering Division. Although this facility features an *ad hoc* accessible parking space, an entrance and an elevator that may be generally used by residents with mobility disabilities, and accessible multi-user toilet rooms on level 2, IHCD recommends the following immediate upgrades to improve programs, services, and activities at Headquarters:

- Improve the off-street parking space designated as accessible and provide additional spaces as required;
- Improve the entrance on East Worcester Street;
- Replace all knobs with levers on doors to offices that are open to public;
- Remove or secure all weather mats;
- Remove, relocate, or install a barrier underneath the wall-mounted fire extinguisher on the level 2;
- Ensure that counters for transactions with the public are accessible, including counters within recently renovated areas;
- Install handrails along the stairway between lobby and level 1;
- Study to potential upgrade of the elevator cab size;
- Implement a comprehensive signage plan to ensure that ADA-compliant signage is provided at all spaces that are open to the public;
- Install an ADA-compliant sign at each inaccessible toilet room to indicate the location of the accessible amenity on level 2.
- Remove nearby storage and lower the drinking fountain on level 2;
- Lower hand sanitizer on level 3.

<sup>13</sup> During its assessment, DPW Administrative Building – Headquarters was undergoing a major renovation on all floor levels. It is worth mentioning that only certain areas of the building were being renovated while many other public areas, including the elevator, offices, and toilet rooms, were left untouched and remain inaccessible. Since the total value of work done in a 36-month period was not readily available to IHCD, it is unclear if the renovation in this facility has triggered the authority of the Massachusetts Architectural Access Board.



Photo 1

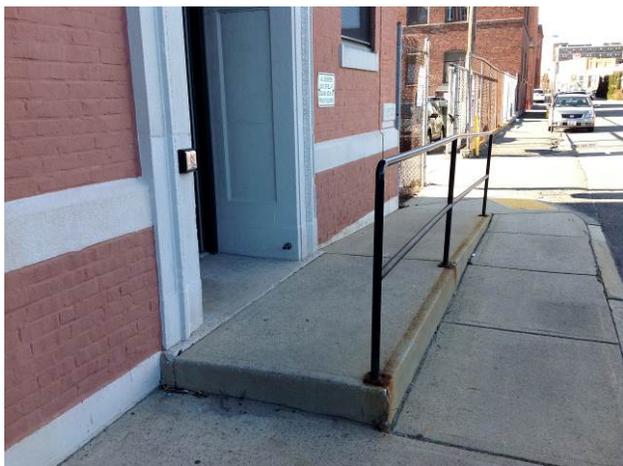


Photo 2

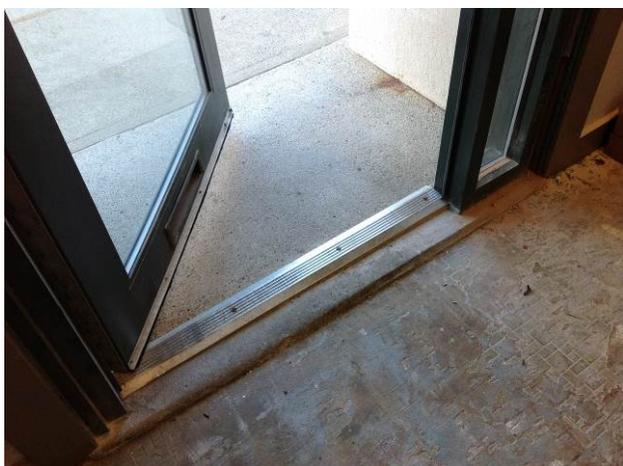


Photo 3

## Issues

### Priority 1 – Approach and Entrance

#### **Parking**

Off-street staff and public parking with over 100 spaces was identified in parking lot along the building. Although one ad hoc space designated as accessible is provided near the accessible entrance, it is not compliant because:

- the sign is too low, misplaced, and does not identify the parking space as van-designated; (Photo 1)
- the access aisle (striped area) is only 5 feet wide, not 8 feet wide as required for van-designated parking spaces; (Photo 1)
- additional accessible parking spaces are required in this parking facility, based on the total number of parking spaces.

#### **Entrance**

Although it may be generally used by those with mobility disabilities, the entrance designated as accessible presents the following barriers:

- at the ramp leading to the building entrance, no edge protection, bottom landing, or railings on both sides are provided. The only railing provided does not offer railing extensions. Further, the “open” landing at the top of the ramp offers a dangerous step to the building entrance; (Photo 2)
- the entry door has a threshold that excessively exceeds the maximum allowable height for accessible doors; (Photo 3)
- the entry door had malfunctioning door openers during the accessibility audit. This facility has been open to the public during a major renovation; therefore, door openers must be functioning properly. (Photo 2)



Photo 4

## Priority 2 – Access to Goods and Services

### **Doors**

Throughout the building, doors to most toilet rooms exceed the maximum allowable force required to open them. Additionally, doors to non-renovated toilet rooms and staff-only areas (offices, staff lounge, etc.) have non-compliant hardware. (Photo 4)

### **Floor Surfaces**

Within most flights of the egress stairways, several weather mats are not secure and can become tripping hazards to visitors and staff. (Photo 5)

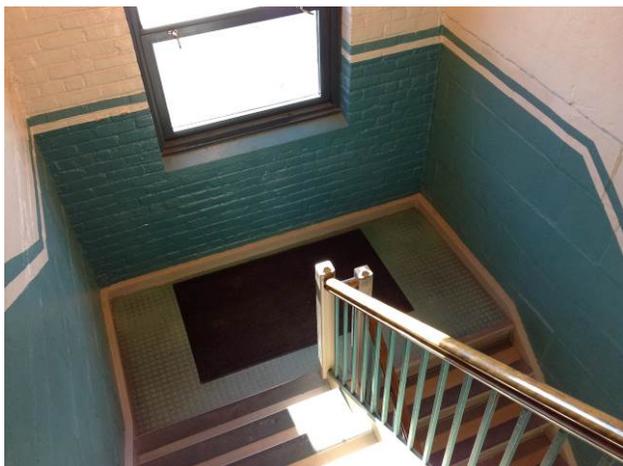


Photo 5

### **Protruding Object**

On the circulation path on the level 2, a wall-mounted fire extinguisher cabinet is a hazardous protruding object that increases the possibility of injury to visitors and staff.

### **Sale and Service Counters**

On level 1, at least one counter for transactions with the public inside the permit office exceeds the maximum allowable height for visitors using wheeled mobility devices or who are of short stature (41" AFF).



Photo 6



Photo 7

### **Stairways**

One short stairway connects the accessible entrance to level 1 while two egress stairways connecting all floors level can be found on the South side of the building. Neither stairway has the required railings on both sides. (Photo 7)

### **Elevator**

An elevator is located near the accessible entrance and connects the entry lobby on street level and levels 2 and 3. This elevator does not offer an accessible route to level 1, which can only be accessed via a stairway (see Stairways above). The elevator meets the minimum dimensional requirements for existing elevators under the MAAB (48" x 48", wall-to-wall and wall-to-floor); however, it does not meet the following requirements for accessible elevators:

- no intercom is provided inside the elevator cab;
- raised letters and Braille for buttons are not provided on the control panel;
- the top button of the control panel exceeds the maximum allowable height (58" AFF);
- on all floor levels, jamb signs are provided on only one side of the elevator hoistway entrances and exceed the maximum allowable height (63" AFF);
- on all floor levels, call buttons exceed the maximum allowable height (54-57" AFF). (Photo 8)



Photo 8



Photo 9

### **Signage**

While some signs have been updated in a few areas of the building, the remaining older signage is problematic because not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 9)

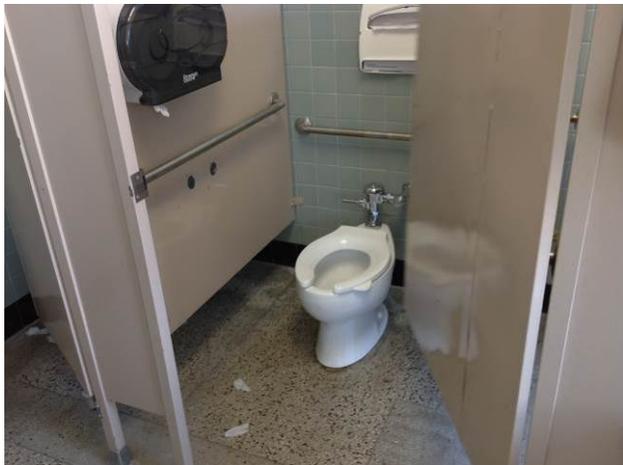


Photo 10

### Priority 3 – Toilet Rooms

#### ***Toilet Rooms***

One set of multi-user toilet rooms (one for each gender) for staff and public use are located on levels 1 and 3 while two sets of multi-user toilet rooms are located on level 2. Although one set of multi-user toilet rooms have been recently renovated on the West side of the building on level 2, all other toilet rooms inaccessible with insufficient maneuvering spaces, inaccessible toilet stalls, urinals and lavatories, and missing alarms. (Photos 10 & 11)



Photo 11

#### ***Signage***

Except for the toilet rooms on level 3, all other toilet rooms (including the recently renovated ones) are not identified with accessible signage. (Photo 12)



Photo 12



Photo 13

#### Priority 4 – Additional Access

##### ***Drinking Fountains***

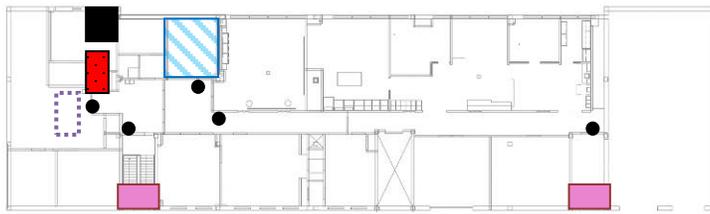
At least one drinking fountain is provided on each floor level. On level 2, the single, wall-mounted drinking fountain exceeds the maximum allowable height (38" AFF) and is obstructed by storage. (Photo 13)

##### ***Hand Sanitizer***

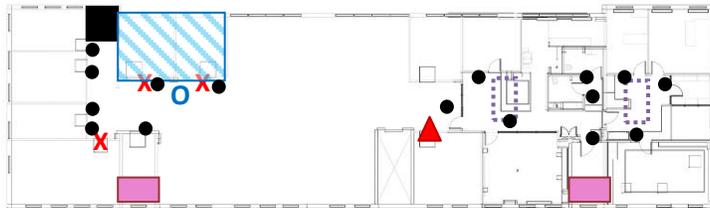
On level 3, a hand sanitizer dispenser mounted on the closet door near the egress stairway exceeds the maximum allowable height (54" AFF). (Photo 14)



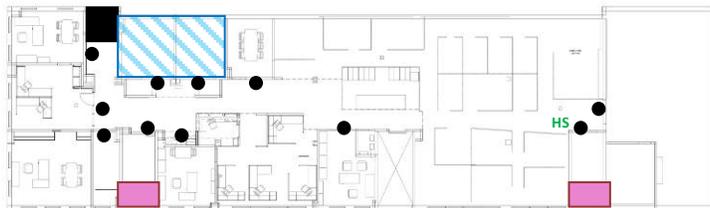
Photo 14



Level 1



Level 2



Level 3

**Legend**

- X** Doors
- Floor Surfaces
- ▲** Protruding Object
- ⋯** Sale and Service Counters
- Stairway
- Elevator
- Signage
- ▨** Toilet Rooms
- Drinking Fountain
- HS** Hand Sanitizer

## Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

Confirm the total number of parking spaces in this parking facility and provide the required number of accessible parking spaces. For parking facilities with 101 to 150 parking spaces, at least five accessible parking spaces are required. At least one parking space must be van-designated and must provide a sign that contain the designation “van accessible”.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### **Entrance**

Reconstruct the exterior ramp leading to the building entrance so that compliant railings are provided on both sides and edge protection is provided on the open side. Extend the top landing of the ramp and relocate the step at least five feet from the building entrance. Re-grade the concrete landing adjacent to the entry door so that the new ramp is flush with the door threshold. Ensure that the automatic door opener is operable at all times.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Accessible Routes for Doors, Doorways, and Gates and Ramps.*

### Priority 2 – Access to Goods and Services

#### **Doors**

Replace all door knobs with lever hardware.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Doors, Doorways, and Gates.*

#### **Floor Surfaces**

Secure all weather mats with industrial-strength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates at all entrances.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Protruding Object**

Relocate or recess the wall-mounted fire extinguisher cabinet on the circulation path on the level 2. Alternatively, install a cane-detectable barrier underneath it.

### **Sales and Service Counters**

Modify counters on each office with public interface so that they are accessible. In the meantime, provide an auxiliary counter no higher than 36" above the floor in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-in Elements for Sales and Service Counters.*

### **Stairways**

Install compliant handrails on both sides of all stairways and develop policies and procedures to evacuate individuals unable to navigate stairs.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping for Emergency Egress and General Site and Building Elements for Stairways.*

### **Elevator**

Undertake an engineering study to evaluate connecting the elevator to the currently inaccessible level 1.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Elevators.*

### **Signage**

Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### **Priority 3 – Toilet Rooms**

#### ***Toilet Rooms***

As toilet rooms on all floor levels are altered during a building renovation, ensure that alterations meet all ADA/MAAB requirements. In the meantime, improve signage at these inaccessible amenities by directing residents to the closest accessible toilet room in the facility (see Signage below).

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

#### ***Signage***

Except for the toilet rooms on level 3, install an ADA-compliant sign alongside the door to all toilet rooms. Install an ADA-compliant sign at each inaccessible toilet room to indicate the location of the accessible, multi-user toilet rooms on the basement level.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### **Priority 4 – Additional Access**

#### ***Drinking Fountains***

Lower the drinking fountain on level 2 so that the spout outlet is no higher than 36” above the floor. Ensure that the approach to the drinking fountain is clear of obstructions at all times.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Drinking Fountains.*

#### ***Hand Sanitizer***

Lower the hand sanitizer dispenser on level 3 so that its control is no higher than 48” above the floor.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Building Blocks for Operable Parts.*

## DPW Administrative Building – Customer Service Center 76 East Worcester Street



*View of DPW Administrative Building – Customer Service Center from street*

The third and last DPW Administrative Building, the Customer Service Center is housed in this small, one-story facility. In addition to customer service, the Trash & Recycling Division is also located at this facility. IHCD recommends the following immediate upgrades to improve programs, services, and activities at DPW Administrative Building – Customer Service Center:

- Improve the off-street parking designated as accessible by installing a sign that contain the designation “van accessible”, re-striping the parking space, and enlarging the access aisle to eight feet wide.
- Smooth the transition between asphalt driveway and wooden ramp;
- Add slip-resistant strips along the surface of the ramp;
- Remove, relocate, or install a barrier underneath the ceiling-mounted television screen near the main entrance;
- Implement a comprehensive signage plan to ensure that ADA-compliant signage is provided at all spaces that are open to the public;
- Relocate the flush valve of the accessible toilet stall in the Women’s toilet room.
- Relocate obstructions around drinking fountain.



Photo 1



Photo 2

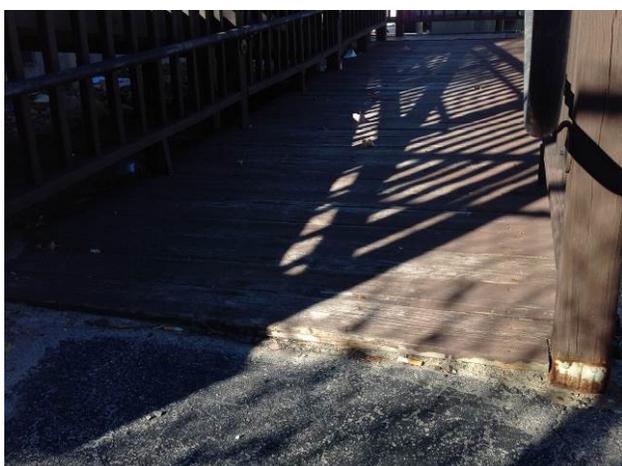


Photo 3

## Issues

### Priority 1 – Approach and Entrance

#### Parking

Off-street staff and public parking with 10 spaces was identified in parking lot adjacent to the building. Although one space designated as accessible is provided near the accessible entrance, the following issues were identified:

- the sign identifying the parking space is not provided;
- markings are not highly visible;
- the access aisle (stripped area), which was obstructed by a vehicle, is only 5 feet wide, not 8 feet wide as required for van-designated parking spaces. (Photo 1)

#### Entrance

At the end of parking lot, a ramp connects the accessible entrance at the East side of the building. This ramp presents the following barriers to those using wheeled mobility devices:

- the transition between asphalt driveway and wooden ramp is not properly maintained and a one-inch lip is found at the bottom landing of the ramp; (Photos 2 & 3)
- the surface of the ramp appears to be slippery during wet conditions;
- the top run of the ramp exceeds the maximum allowable slope (9.2%).



Photo 4

## Priority 2 – Access to Goods and Services

### ***Protruding Object***

Near the main entrance, a ceiling-mounted television screen is a hazardous protruding object that increases the possibility of injury to visitors and staff. (Photo 4)

### ***Signage***

Except for the signs identifying the toilet rooms, very little signage is provided at this facility and not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photos 5 & 6)



Photo 5



Photo 6



Photo 7

### Priority 3 – Toilet Rooms

#### ***Toilet Rooms***

One set of multi-user toilet rooms (one for each gender) for staff and public use are located at the rear of the building. Inside the accessible toilet stall in the Women's toilet room, the flush valve is located on the incorrect side of the toilet. (Photo 7)



Photo 8

### Priority 4 – Additional Access

#### ***Drinking Fountains***

Near the toilet rooms, the single, wall-mounted drinking fountain is obstructed by furniture and a fire extinguisher. (Photo 8)



Photo 9

## Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

Re-stripe the accessible parking space and enlarge the access aisle to eight feet wide. Install a sign that contain the designation “van accessible” within 10 feet of the head of the parking space.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### **Entrance**

Install a metal strip along the transition between the asphalt driveway and the wooden ramp so that changes in level are higher than ¼”. Add slip-resistant strips perpendicular to the path of travel along the entire surface of the ramp.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Ramps.*

### Priority 2 – Access to Goods and Services

#### **Protruding Objects**

Remove or relocate the ceiling-mounted television near the main entrance. Alternatively, install a cane-detectable barrier underneath it.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Building Blocks for Protruding Objects.*

#### **Signage**

Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### Priority 3 – Toilet Rooms

#### **Toilet Rooms**

In the Women’s toilet room, modify the plumbing of the accessible toilet stall so that the flush valve is on the left side of the toilet.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

### Priority 4 – Additional Access

#### **Drinking Fountains**

Ensure that the approach to the drinking fountain is clear of obstructions at all times and that a clear floor space of 30” by 48” is provided underneath the fixture.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Drinking Fountains.*

## Inspectional Services 25 Meade Street



*View of Inspectional Services from street*

As a result of the City's recent reorganization, the majority of Worcester's inspectional services are now located at this three-story, 1920's building. The Department of Inspectional Services includes the Building and Zoning Division, the Housing and Health Division, the Fire Prevention Division and the Division of Public Health. Although this facility features five accessible parking spaces, an accessible entrance, an elevator, and accessible multi-user toilet rooms on the basement level, IHCD recommends the following immediate upgrades to improve programs, services, and activities at Inspectional Services:

- Replace all door knobs with levers on doors to offices that open to public;
- Replace or remove all thresholds on doors to offices that open to public;
- Ensure that counters for transactions with the public are accessible;
- Ensure that at least one of each type of computer station is accessible and unobstructed by storage and furniture at all times;
- Implement a comprehensive signage plan to ensure that ADA-compliant signage is provided at all spaces that are open to the public;
- Install an ADA-compliant sign at each inaccessible toilet room on levels 1 and 2 to indicate the location of the accessible toilet rooms on the basement level.



Photo 1

## Issues

### Priority 2 – Access to Goods and Services

#### Doors

On levels 1 and 2, doors to the following offices have non-compliant hardware and thresholds that exceed the maximum allowable height (1”):

- Rooms 100, 101, 103, 104, 105, 109, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209. (Photo 1)

#### Floor Surfaces

At all entrances as well as stairways and other circulation areas within the building, several weather mats are not secure and can become tripping hazards to visitors and staff. (Photo 2)

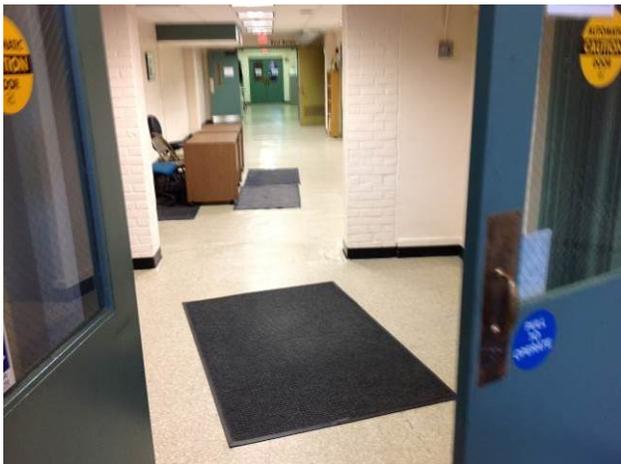


Photo 2

#### Sale and Service Counters

Counters for transactions with the public can be found on levels 1 and 2. Most of them are inaccessible because they exceed the maximum allowable height (42” AFF):

- Plumbing / Gas / Wiring (room 108); (Photo 3)
- Housing (room 106);
- Property Review Team (room 206).

Although at an accessible height, the lower counter inside Fire Prevention (room 100) is obstructed by trash cans and storage.



Photo 3



Photo 4

### Work Surfaces

In addition to the counters mentioned above, computer stations are offered to the public on level 1. However, the work surface of Building Permits (room 107) exceeds the maximum allowable height (42" AFF). Although at an accessible height, the lower counter of Plumbing / Gas / Wiring (room 108) is obstructed by the nearby furniture. (Photo 4)

### Stairways

On opposite sides of the building, egress stairways offers vertical circulation to all floor levels. Another stairway connects the main entrance off of the staff parking lot to level 1. Neither stairway has compliant handrails. (Photo 5)



Photo 5

### Signage

Except for the signs identifying the toilet rooms on the basement level, very little signage is provided at this facility and not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 6)



Photo 6



Photo 7

### Priority 3 – Toilet Rooms

#### ***Toilet Rooms***

One set of multi-user toilet rooms (one for each gender) for staff and public use are located on the basement level while one set of single-user toilet rooms are located on levels 2 and 3. Although the multi-user toilet rooms on the basement level have been recently renovated, all single-user toilet rooms are inaccessible with insufficient maneuvering spaces, inaccessible plumbing fixtures, and missing alarms. (Photos 7 & 8)

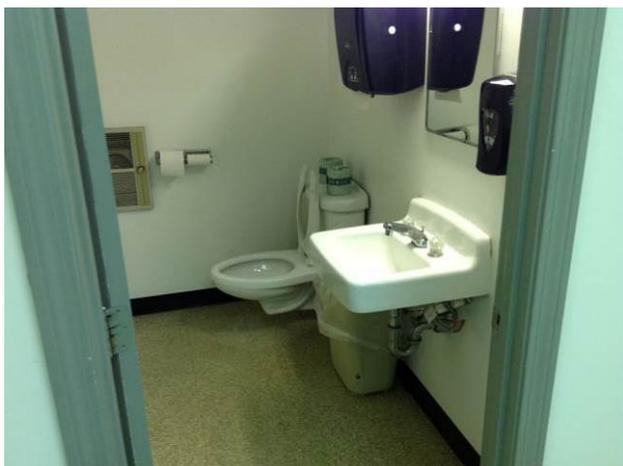


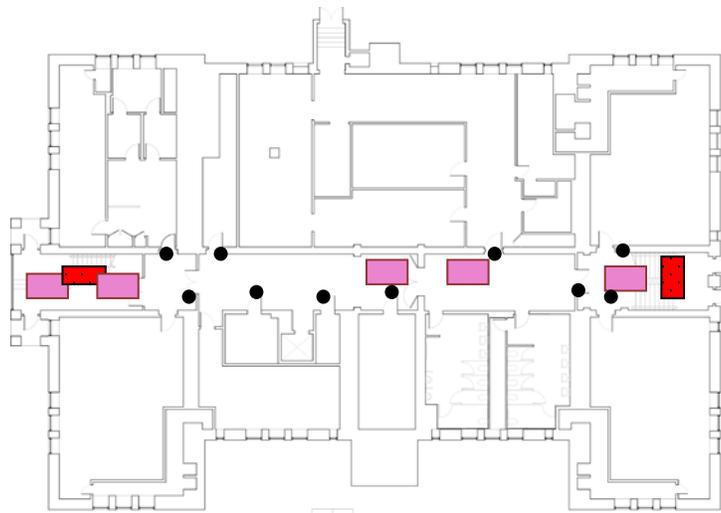
Photo 8

#### ***Signage***

Except for the recently renovated toilet rooms on the basement level, all other toilet rooms are not identified with accessible signage despite being located within public areas. In addition to the designation sign, a directional sign indicating the location of the accessible multi-user toilet rooms on the basement level is also not provided. (Photo 9)



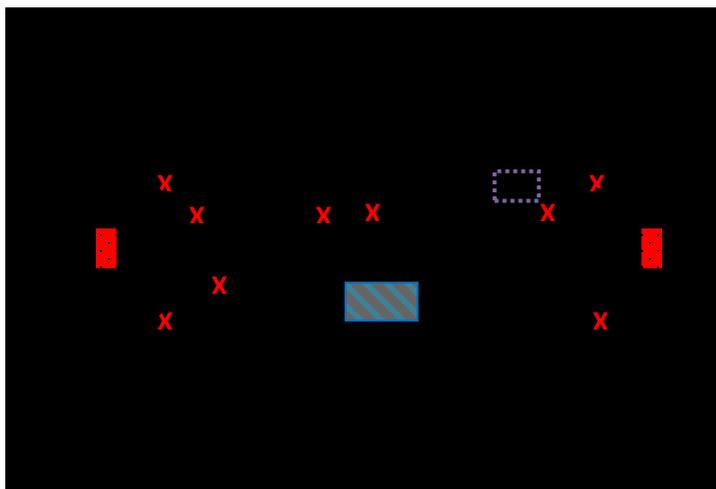
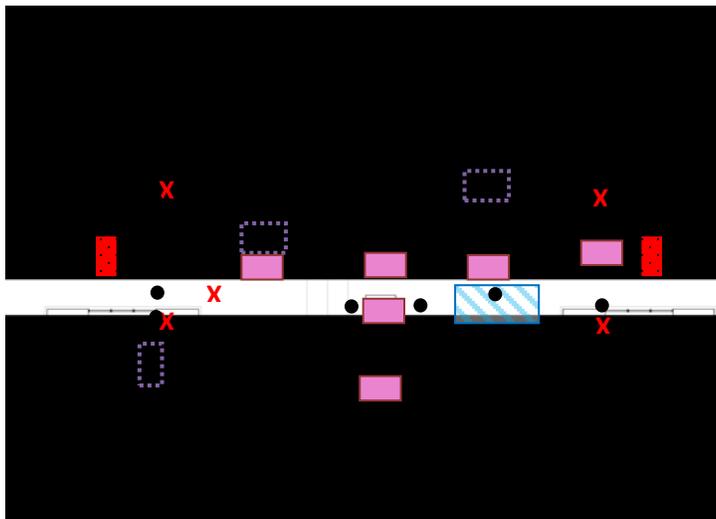
Photo 9



Basement

**Legend**

- X Doors
- Floor Surfaces
- Sale and Service Counters
- ▲ Work Surfaces
- Stairway
- Signage
- Toilet Rooms



Level 2

## Recommendations

### Priority 2 – Access to Goods and Services

#### **Doors**

Replace all door knobs with lever hardware.  
Replace or remove the thresholds from doors to rooms 100, 101, 103, 104, 105, 109, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Doors, Doorways, and Gates.*

#### **Floor Surfaces**

Secure all weather mats with industrial-strength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates at all entrances.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Sales and Service Counters**

Modify counters on each office with public interface so that they are accessible. In the meantime, provide an auxiliary counter no higher than 36" above the floor in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.

Additionally, ensure that the lower counter of Plumbing / Gas / Wiring (room 108) is clear of obstructions at all times.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-in Elements for Sales and Service Counters.*

#### **Work Surfaces**

If the computer station of Building Permits (room 107) does not offer the same function as the nearby accessible computer station, lower the workstation to 34" above the floor and provide the required clear floor space underneath it.

Ensure that the approach to the lower counter of Plumbing / Gas / Wiring (room 108) is clear of obstructions at all times

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-In Elements for Work and Dining Surfaces.*

### **Stairways**

Install compliant handrails on both sides of all stairways and develop policies and procedures to evacuate individuals unable to navigate stairs.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping for Emergency Egress and General Site and Building Elements for Stairways.*

### **Signage**

Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### **Priority 3 – Toilet Rooms**

#### **Toilet Rooms**

As single-user toilet rooms on levels 1 and 2 are altered during a building renovation, ensure that alterations meet all ADA/MAAB requirements. In the meantime, improve signage at these inaccessible amenities by directing residents to the closest accessible toilet room in the facility (see Signage below).

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

#### **Signage**

Install an ADA-compliant sign at each inaccessible single-user toilet room on levels 1 and 2 to indicate the location of the accessible multi-user toilet rooms on the basement level.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

## Parks Building (a.k.a Massachusetts Army National Guard, Parks, Recreation & Cemetery Department Administrative Headquarters) 50 Skyline Drive



*View of Parks Building from parking lot*

At the top of Green Hill Park, a State-owned, single-story building is shared by the City of Worcester and the Massachusetts Army National Guard. In addition to the Parks, Recreation & Cemetery Department, the Architectural Services Division is also housed in this facility. Although this facility features an accessible entrance, one accessible single-user toilet room, and has accessible routes through most of the building, IHCD recommends the following immediate upgrades to improve programs, services, and activities at Parks Building:

- Provide at least two accessible parking spaces, including one van-designated space;
- Improve the exterior route between sidewalk, parking lot and accessible entrance;
- Replace double-leaf doors with wider doors or keep them open during regular hours;
- Remove or secure all weather mats;
- In the Architectural Services Drafting Room, relocate or remove bookshelves and furniture from all circulation paths to ensure a 36-inch minimum clear width.
- Implement a comprehensive signage plan to ensure that ADA-compliant signage is provided at all spaces that are open to the public;
- Install an ADA-compliant sign at each inaccessible locker room to indicate the location of the accessible single-user toilet room near meeting room A.



Photo 1

## Issues

### Priority 1 – Approach and Entrance

#### **Parking**

Off-street staff and public parking with over 25 spaces was identified in parking lot in front of the building. Although two *ad hoc* spaces designated as accessible are provided near the accessible entrance, they do not meet any of the minimum requirements for accessibility. (Photo 1)

#### **Exterior Route**

The exterior route between the site entrance, the parking, and the building entrance presents the following barriers:

- the asphalt walkway between the parking lot and the building entrance has been poorly maintained, with heaving and cracking surfaces; (Photo 2)
- the exterior ramp leading to the building entrance exceeds the maximum allowable running slope on the top segment (9.4%);
- the exterior stairway leading to the building entrance has loose stone steps at top and bottom that create tripping hazards. (Photo 3)



Photo 2



Photo 3



Photo 4

## Priority 2 – Access to Goods and Services

### **Doors**

Throughout the building, several double-leaf doors do not meet the minimum allowable clear width for accessible doors. Non-compliant doors include doors to Meeting rooms A, B, C & D, C3 Architectural Services Drafting Room. (Photo 4)

### **Floor Surfaces**

At the entry lobby, a weather mat is not secure and can become a tripping hazard to visitors and staff. (Photo 5)

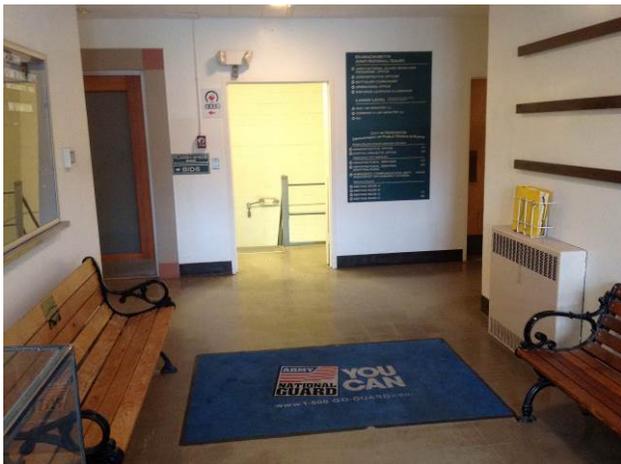


Photo 5

### **Interior Routes**

In the Architectural Services Drafting Room, bookshelves and furniture obstruct the accessible route and circulation paths to less than 36" of width. (Photo 6)

### **Signage**

While some signs have been updated in a few areas of the building, the remaining older signage is problematic because not all permanent rooms and spaces are properly identified with ADA-compliant signs.



Photo 6



Photo 7

### Priority 3 – Toilet Rooms

#### **Toilet Rooms**

One single-user toilet room for staff and public use is located near meeting room A while one set of locker rooms are located near the entrance and meeting room A. Although the single-user toilet has been recently renovated, all locker rooms are inaccessible with inaccessible plumbing fixtures, inaccessible shower rooms, and missing alarms. (Photos 7 & 8)



Photo 8

#### **Signage**

The accessible single-user toilet room near meeting room A is identified with an ADA-compliant sign. However, the sign is incorrectly mounted on the door instead of on the wall alongside the door. (Photo 9)

Both Men's and Women's locker rooms are not identified with accessible signage.

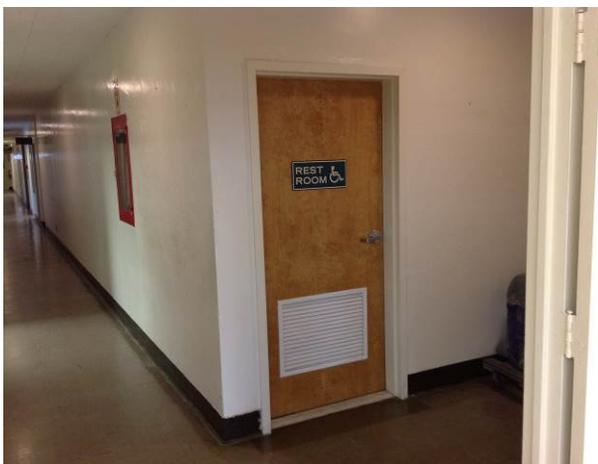
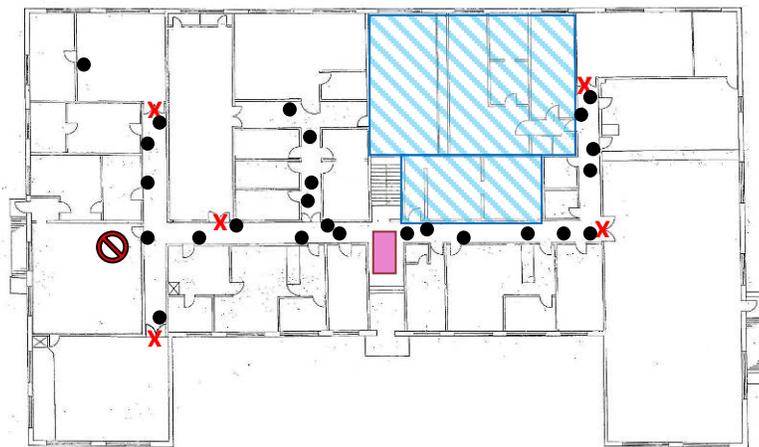


Photo 9



**Legend**

- X** Doors
- Floor Surfaces
- ⊘** Interior Route
- Signage
- ▨** Toilet Rooms

## Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

Install two accessible parking spaces that share a common accessible aisle of 8 feet of width. Spaces must be correctly striped and slopes must not exceed 2% in any direction. Install a sign within 10 feet of the head of each parking space. At least one parking space must be van-designated and must provide a sign that contain the designation “van accessible”.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### **Exterior Route**

Repair or replace all degraded walking surfaces between the parking lot and the building entrance, including the asphalt walkway. Replace all loose stone steps at top and bottom of the exterior stairway leading to the building entrance.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes.*

### Priority 2 – Access to Goods and Services

#### **Doors**

Replace all double-leaf doors with 36-inch wide doors. Alternatively, keep them open during regular hours.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Doors, Doorways, and Gates.*

#### **Floor Surfaces**

Secure the weather mat in the entry lobby with industrial-strength double-stick tape. Alternatively, replace it with a recessed walk-off mat or grate.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Interior Routes**

In the Architectural Services Drafting Room, relocate or remove bookshelves and furniture from all circulation paths to ensure a 36-inch minimum clear width.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes.*

### **Signage**

Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### **Priority 3 – Toilet Rooms**

#### **Toilet Rooms**

As Men's and Women's locker rooms are altered during a building renovation, ensure that alterations meet all ADA/MAAB requirements. In the meantime, improve signage at these inaccessible amenities by directing residents to the closest accessible toilet room in the facility (see Signage below).

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

#### **Signage**

Install an ADA-compliant sign alongside the door to accessible single-user toilet room near meeting room A. Install an ADA-compliant sign at each inaccessible locker room to indicate the location of the accessible single-user toilet room.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

## Senior Center 128 Providence Street

Built in the 1950's, this facility underwent a major renovation in the mid-90's. Senior Center is a four-story facility; however, the top floor is currently unoccupied. Although this facility features 12 parking spaces designated as accessible, toilet rooms designated as accessible on all floor levels, an accessible elevator, and a nearly impeccable signage system, IHCD recommends the following immediate upgrades to improve programs, services, and activities at Senior Center:



View of Senior Center from driveway<sup>14</sup>

- Improve parking by relocating all parking spaces along the driveway to a flat area and adding one van-designated space;
- Improve parking by re-striping all accessible parking spaces and adding one van-designated space in the parking lot;
- Ensure that exterior walkways are always unobstructed;
- Remove or secure all weather mats;
- Ensure that the computer station near the front entrance is accessible and
- Ensure that accessible seating is provided in the diner and function room;
- Provide access to the stage in the function room;
- Install an ADA-compliant sign at the inaccessible elevator to indicate the location of the accessible elevator;
- Install ADA-compliant signs at the function room on level 1, a few offices throughout the building as well as all stairways and elevators;
- Make improvements to all toilet rooms;
- Relocate signs of Women's toilet rooms on levels 2 and 3;
- Renovate the kitchen inside Craft Room;
- Install a TTY device on telephone on level 1;
- Provide coat hangers at an accessible height.

<sup>14</sup> The Senior Center leases the commercial kitchen on level 1 and a few classrooms on level 3 to Quinsigamont Community College. Although these spaces do not impact Title II of the ADA, the City must be aware that the accessibility of these spaces, or lack thereof, may impact its tenants.



Photo 1



Photo 2

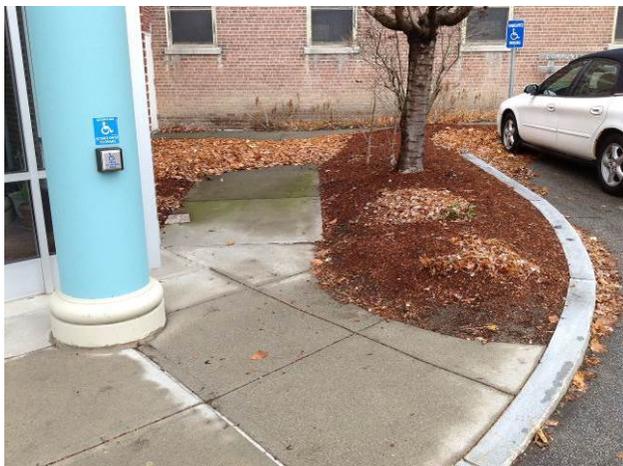


Photo 3

## Issues

### Priority 1 – Approach and Entrance

#### **Parking**

Off-street staff and public parking with over 30 spaces was identified along the driveway adjacent to the front entrance and in the parking lot at the rear of the building. Five spaces designated as accessible are provided near the front entrance while seven spaces designated as accessible are provided near the rear entrance. Along the driveway, all parking spaces exceed the maximum allowable slopes and markings are not highly visible. (Photo 1)

In the parking lot, all parking spaces are also not highly visible. (Photo 2)

No van-designated space is provided in either parking area.

#### **Exterior Route**

Although curb ramps and walkways provide an accessible route between the accessible parking and the front entrance, a poorly maintained section of such walkway was obstructed by leaves. (Photo 3)



Photo 4

## Priority 2 – Access to Goods and Services

### ***Floor Surfaces***

At all entrances as well as elevator lobbies and other circulation areas within the building, several weather mats are not secure and can become tripping hazards to visitors and staff.

### ***Work and Dining Surfaces***

On level 1, several tables and desks are offered to the public for working or dining. Near the front entrance, a computer station for sign-in not only exceeds the maximum allowable height, but also does not have the required clear floor space for those using wheeled mobility devices. (Photo 4)



Photo 5

In each seating area of the diner and the function room on level 1, 5% of accessible tables were not found. (Photo 5)

### ***Stairways***

On opposite sides of the building, two egress stairways offer vertical circulation to all floor levels. Although the newer egress stairway on the South wing meets most requirements for accessible stairways, the older egress stairway on the North wing has non-compliant handrails and nosings. (Photo 6)



Photo 6



Photo 7

### **Elevator**

On opposite sides of the building, two elevators offer vertical circulation to all floor levels.

Although the newer elevator on the South wing is completely accessible, the older elevator at the center of the building does not meet the following requirements for accessible elevators:

- minimum dimensional requirements of the elevator cab of either 1991 or the current accessibility laws and regulations (44" x 72");
- raised letters and Braille for buttons are not provided on the control panel;
- on most floor levels, jamb signs on the elevator hoistway entrances do not provide the required tactile characters and braille;
- on all floor levels, call buttons exceed the maximum allowable height (54" AFF). (Photo 7)



Photo 8

### **Access to the Stage**

On level 1, at least two stages are found inside the function room. No accessible route is provided to either stage. (Photo 8)



Photo 9

### **Signage**

Although the designating signage in this facility is mostly accessible, the following permanent rooms and spaces are not properly identified with ADA-compliant signs:

- stairways; (Photo 9)
- elevators;
- function room on level 1;
- a few offices throughout the building.



Photo 10

### Priority 3 – Toilet Rooms

#### ***Toilet Rooms***

Toilet rooms for staff and public use are located on all floor levels. Although most toilet rooms may be used by residents and staff with disabilities, they are not in full compliance with current accessibility requirements:

#### Level 1

Multi-user toilet rooms (Men's & Women's) near the Activity Room:

- lavatories with obstructed clear floor space and unprotected plumbing underneath; (Photo 10)
- mirrors above lavatories exceed the maximum allowable height (41" AFF).



Photo 11

Multi-user toilet rooms (Men's & Women's) near the Diner:

- lavatories with obstructed clear floor space and unprotected plumbing underneath; (Photo 11)
- mirrors above lavatories exceed the maximum allowable height (41" AFF);
- door to ambulatory stall inside Women's toilet rooms incorrectly swings into the stall. (Photo 12)

Single-user toilet room (Unisex) inside lobby:

- mirror above lavatory exceeds the maximum allowable height (41" AFF);



Photo 12

#### Level 2

Multi-user toilet rooms (Men's & Women's):

- lavatories with obstructed clear floor space and unprotected plumbing underneath;
- mirrors above lavatories exceed the maximum allowable height (41" AFF);
- malfunctioning self-closing hinge of door to accessible stalls; (Photo 13)
- non-compliant flush valves inside accessible toilet stall. (Photo 14)



Photo 13

### ***Toilet Rooms [continued]***

Single-user toilet room (Unisex) inside Health & Wellness:

- lavatories with obstructed clear floor space;
- mirror above lavatory exceeds the maximum allowable height (41" AFF);
- toilet is incorrectly located (centerline 17") and obstructed by adjacent baseboard heater; (Photo 115)

### **Level 3**

Multi-user toilet rooms (Men's & Women's):

- lavatories with obstructed clear floor space and unprotected plumbing underneath;
- mirrors above lavatories exceed the maximum allowable height (41" AFF);
- malfunctioning self-closing hinge of door to accessible stalls;
- non-compliant flush valves inside accessible toilet stall.



Photo 14

### ***Signage***

Signage identifying toilet rooms is compliant, except for the Women's toilet rooms on levels 2 and 3. Designation signs for such toilet rooms are incorrectly placed on the corridor instead of alongside the doors. (Photo 12)



Photo 15



Photo 16

#### Priority 4 – Additional Access

##### ***Kitchen***

Inside the Craft Room on level 1, the kitchen for public use have been renovated but lacks clear floor space and an accessible sink, among other items. (Photo 16)

##### ***Telephone***

In the lobby on level 1, the public telephone offers no TTY capability. (Photo 17)

##### ***Coat Hangers***

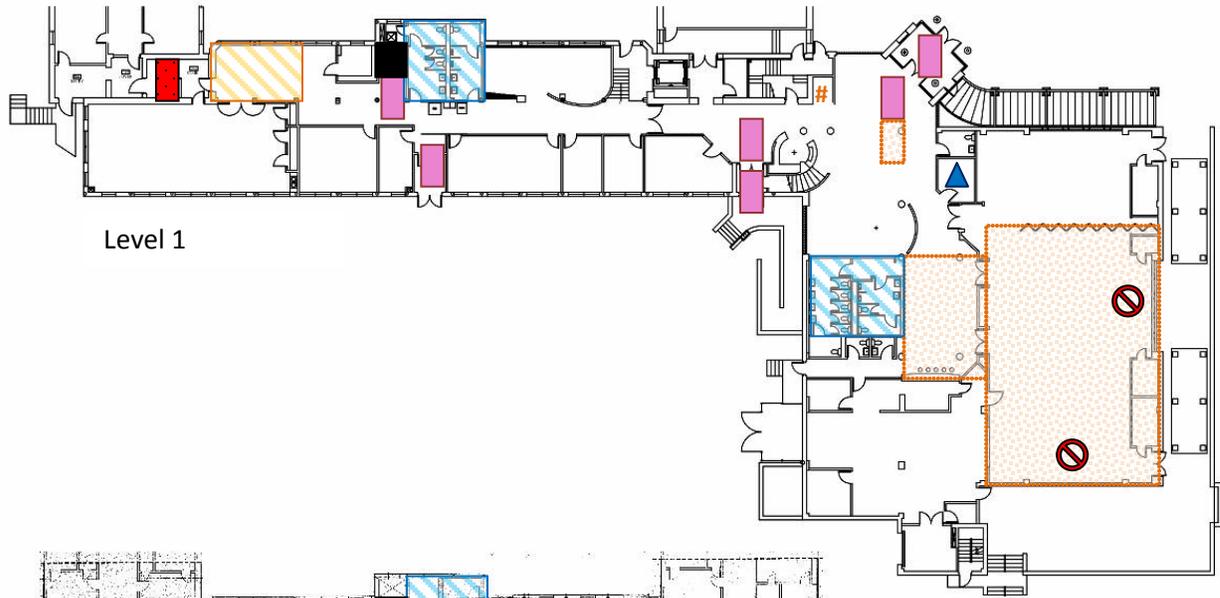
In the lobby on level 1, a coat room is located near the function room. No coat hangers are provided within the allowable reach ranges. (Photo 18)



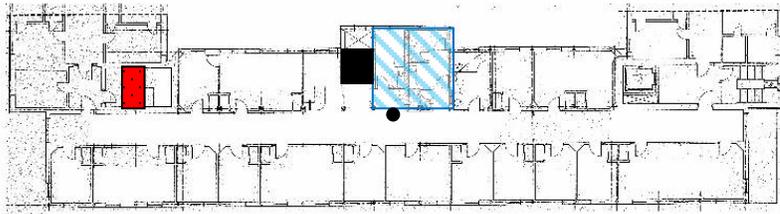
Photo 17



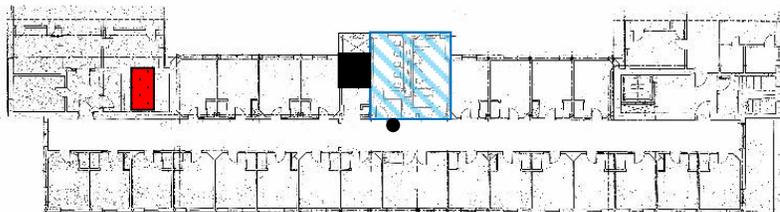
Photo 18



Level 1



Level 2



Level 3

**Legend**

- |   |                          |   |              |
|---|--------------------------|---|--------------|
|  | Floor Surfaces           |  | Toilet Rooms |
|  | Work and Dining Surfaces |  | Kitchen      |
|  | Stairways                |  | Telephone    |
|  | Elevator                 |  | Coat Hangers |
|  | Access to Stage Signage  |   |              |
|  | Signage                  |   |              |

## Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

Along the driveway, relocate all five parking spaces designated as accessible to an area near the front entrance where slopes do not exceed 2% in any direction. In the parking lot at the rear of the building, re-stripe all seven spaces designated as accessible. In each parking facility, at least one parking space must be van-designated and must provide a sign that contain the designation “van accessible”.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### **Exterior Route**

Ensure that the accessible route between accessible parking and front entrance is clear of obstructions at all times.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes.*

### Priority 2 – Access to Goods and Services

#### **Floor Surfaces**

Secure all weather mats with industrial-strength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates at all entrances.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Work and Dining Surfaces**

Replace the computer station for sign-in near the front entrance with an accessible desk no higher than 34” above the floor and with the required clear floor space underneath it. Confirm the total seating capacity of the diner and the function room on level 1 and ensure that 5% of the tables in each space are accessible.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-In Elements for Work and Dining Surfaces.*

#### **Stairways**

Install compliant handrails on both sides of the older egress stairway on the North wing and develop policies and procedures to evacuate individuals unable to navigate stairs.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping for Emergency Egress and General Site and Building Elements for Stairways.*

### **Access to the Stage**

On level 1, provide an accessible route between the main floor and the stages inside the function room.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes.*

### **Elevator**

Undertake an engineering study to evaluate enlarging the existing elevator and hoistway. At a minimum, install an ADA-compliant sign at the inaccessible elevator to indicate the location of the accessible elevator on the South wing.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Elevators.*

### **Signage**

Continue to implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to stairways, elevators, function room on level 1, a all offices throughout the building.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

## **Priority 3 – Toilet Rooms**

### **Toilet Rooms**

Make the following modifications to toilet rooms:

- Raise at least one lavatory to provide a knee clearance of 27" above the floor - Multi-user toilet rooms (Men's & Women's) near the Activity Room and the Diner on level 1, Multi-user toilet rooms (Men's & Women's) on levels 2 and 3, and Single-user toilet room (Unisex) inside Health & Wellness on level 2;
- Protect the plumbing underneath the accessible lavatory - Multi-user toilet rooms (Men's & Women's) near the Activity Room and the Diner on level 1, Multi-user toilet rooms (Men's & Women's) on levels 2 & 3;
- Lower the mirror above the accessible lavatory so that its reflective surface is no higher than 40" above the floor - Multi-user toilet rooms (Men's & Women's) near the Activity Room and the Diner on level 1, Single-user toilet room (Unisex) inside lobby on level 1, Multi-user toilet rooms (Men's & Women's) on levels 2 and 3, and Single-user toilet room (Unisex) inside Health & Wellness on level 2;
- Reverse swing of door to ambulatory stall inside the Women's toilet room near the Diner on level 1;
- Adjust or replace the self-closing hinges of doors to accessible stalls - Multi-user toilet rooms (Men's & Women's) on levels 2 & 3;
- Replace flush valve inside accessible stalls - Multi-user toilet rooms (Men's & Women's) on levels 2 and 3;
- Relocate baseboard heater away from toilet - Single-user toilet room (Unisex) inside Health & Wellness on level 2.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

### **Signage**

On levels 2 and 3, install an ADA-compliant sign alongside the door to each Women's toilet room.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### **Priority 4 – Additional Access**

#### **Kitchen**

Renovate the kitchen inside Craft Room to meet all ADA and MAAB requirements. In the meantime, ensure policies are developed to address accommodation requests.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Special Rooms, Spaces and Elements for Kitchens and Kitchenettes.*

#### **Telephone**

Install a TTY device on telephone on level 1. Install an ADA-compliant sign that directs to the TTY device. Such device must be accessible and available whenever the payphone is operable.

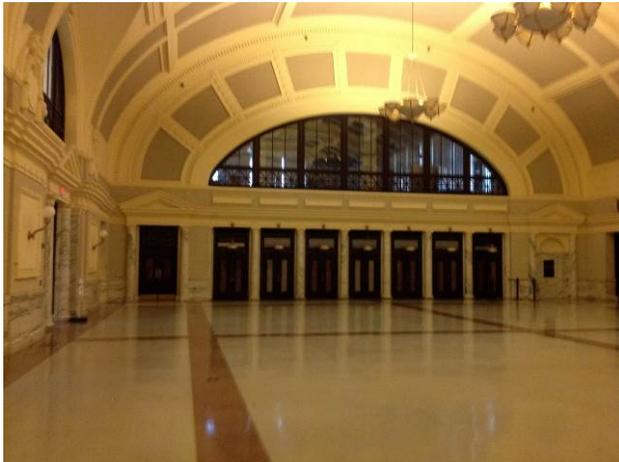
*For additional information, please refer to 2010 ADA Standards for Accessible Design: Communication Elements and Features for Telephones.*

#### **Coat Hangers**

Ensure that 5% of the coat hangers are no higher than 48" above the floor.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Special Rooms, Spaces and Elements for Storage.*

## Union Station 2 Washington Square



*View of Grand Hall inside Union Station*

Union Station is housed in this historic, two-story facility. It serves as an inter-modal hub, hosting Amtrak, Massachusetts Bay Transportation Authority commuter rail service to Boston, taxi service, as well as both intra- and inter-City bus services. A multi-story garage building with about 500 parking spaces has been recently added next to the train station. Although this facility features 9 parking spaces designated as accessible, toilet rooms designated as accessible on all floor levels, an accessible elevator, and a nearly impeccable signage system, IHCD recommends the following immediate upgrades to improve programs, services, and activities at Union Station:

- Improve access at the parking garage entrance;
- Ensure that automatic door openers are properly working;
- Remove or secure all weather mats;
- Ensure that the computer station near the front entrance is accessible and
- Ensure that vertical lift can be operated independently;
- Install an ADA-compliant sign at the entrance to the garage from the train station on level 1;
- Make minor improvements to all toilet rooms;
- Relocate signs of toilet rooms on level 1.

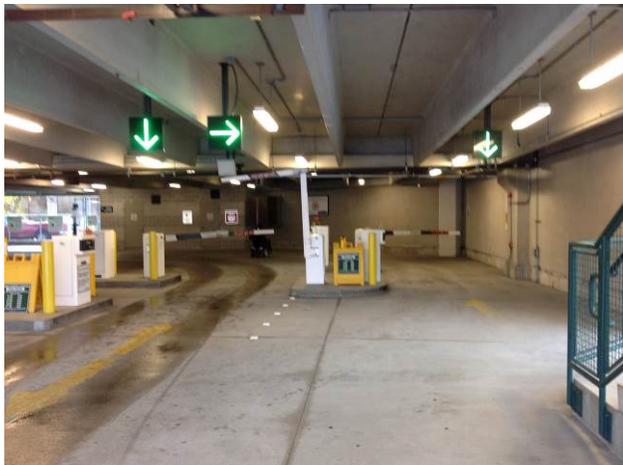


Photo 1

## Priority 1 – Approach and Entrance

### **Parking**

Off-street public and staff parking are provided in a multi-story garage building connected to the train station. Nine spaces designated as accessible for public use were identified on several levels. Although the garage entrance establishes the vertical clearance as 8'-2", the vehicular gate only provides a vertical clearance of 7'-8", which obstructs the access of accessible vans. (Photo 1)



Photo 2

## Priority 2 – Access to Goods and Services

### **Doors**

The rear entry door on level 1 has a malfunctioning door opener on the exterior. (Photo 2)

### **Floor Surfaces**

At most entrances as well as circulation areas within the building, several weather mats are not secure and can become tripping hazards to visitors and staff.

Additionally, at the entrance on level 2, the surface adjacent to the exterior doors is deteriorated and can also become tripping hazards to visitors and staff. (Photo 3)



Photo 3



Photo 4

**Lift**

Near the parking garage, a vertical platform lift provides access between level 1 and the lower level to the rear exit; however, it cannot be operated independently. (Photos 4 & 5)

**Signage**

Although the designating signage in this facility is mostly accessible, the entrance to the garage from the train station on level 1 is not properly identified with ADA-compliant signs. (Photo 6)



Photo 5



Photo 6



Photo 7

### Priority 3 – Toilet Rooms

#### **Toilet Rooms**

One set of multi-user toilet rooms (one for each gender) for staff and public use are located on levels 1 and 2. On level 1, both toilet rooms have lavatories with unprotected plumbing underneath. (Photo 7)

On levels 1 and 2, the doors to the accessible and ambulatory stalls inside the Men's toilet rooms incorrectly swing into the stall. (Photo 8)

#### **Signage**

Signage identifying toilet rooms is compliant, except for the toilet rooms on level 1. Designation signs for such toilet rooms are incorrectly placed on the doorways to the grand hall instead of alongside the doors. (Photo 9)



Photo 8



Photo 9

## Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

Replace the vehicular gate at the garage entrance so that a vertical clearance of 8'-2" is provided.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

### Priority 2 – Access to Goods and Services

#### **Doors**

Ensure that the automatic door opener is operable at all times.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Doors, Doorways, and Gates.*

#### **Floor Surfaces**

Secure all weather mats with industrial-strength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Lift**

Upgrade the vertical platform lift so that it is independently operable by the public without staff assistance.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Platform Lifts.*

#### **Signage**

Continue to implement a comprehensive signage plan to ensure that an ADA-compliant sign is installed alongside all doors to the entrance to the garage on level 1.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### **Priority 3 – Toilet Rooms**

#### ***Toilet Rooms***

Make the following modifications to toilet rooms:

- Protect the plumbing underneath the accessible lavatory in both toilet rooms on level 1;
- Reverse swing of door to the accessible and ambulatory stalls inside the Men's toilet rooms on levels 1 and 2.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

#### ***Signage***

On level 1, install an ADA-compliant sign alongside the door to each toilet room.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

## Administration Building at Hope Cemetery 119 Webster Street



*View of Administration Building at Hope Cemetery  
from driveway*

The Administration Building at Hope Cemetery is housed in this small, one-story facility. Although this facility features mostly accessible toilet rooms, all programs, services, and activities provided at this facility are completely inaccessible to residents with disabilities because the entrance is inaccessible. IHCD recommends the following immediate upgrades to improve programs, services, and activities at Administration Building at Hope Cemetery:

- Improve the on- and off-street parking designated as accessible by relocating them to a level surface and installing signs that contain the designation “van accessible”;
- Improve the public entrance by eliminating the step;
- Remove or secure all weather mats;
- Ensure that the counter inside the office is accessible;
- Ensure that ADA-compliant signage is provided at all spaces that are open to the public;
- In both toilet rooms, lower mirrors above the lavatories and adjust or replace the self-closing hinges of the doors to the accessible stalls;
- Relocate the flush valve of the accessible toilet stall in the Men’s toilet room.



Photo 1



Photo 2



Photo 3

## Issues

### Priority 1 – Approach and Entrance

#### **Parking**

On-street public parking in front of the building and off-street staff parking with 11 spaces was identified in parking lot at the rear of the building. Although one space designated as accessible for public use is provided near the public entrance, the following issues were identified:

- the sign identifying the parking space is too low and hidden by bushes;
- markings are not highly visible;
- parking space has excessive slopes that render it completely unusable by those arriving by vehicles (4%). (Photo 1)

Although one space designated as accessible for staff use is provided near the service entrance, the following issues were identified:

- the sign identifying the parking space is too low;
- markings are not highly visible;
- parking space has excessive slopes that render it completely unusable by those arriving by vehicles (8%). (Photo 2)

#### **Entrance**

The public entrance is not accessible because it has one step up from the sidewalk (2.5”). (Photo 3)



Photo 4

## Priority 2 – Access to Goods and Services

### ***Floor Surfaces***

At the public entrance as well as circulation areas within the building, weather mats are not secure and can become tripping hazards to visitors and staff. (Photo 4)

### ***Sale and Service Counters***

One counter for transactions with the public can be found inside the office. The counter is inaccessible because it exceeds the maximum allowable height for visitors using wheeled mobility devices or who are of short stature (42" AFF). (Photo 5)



Photo 5

### ***Signage***

Although the designating signage in this facility is mostly accessible, the office and the area restricted to staff are not properly identified with ADA-compliant signs. (Photo 6)



Photo 6



Photo 7

### Priority 3 – Toilet Rooms

#### ***Toilet Rooms***

One set of multi-user toilet rooms (one for each gender) for staff and public use are located near the front entrance. In both toilet rooms, mirrors above lavatories exceed the maximum allowable height (41" AFF) and door to accessible stalls have malfunctioning self-closing hinges. (Photos 7 & 8)

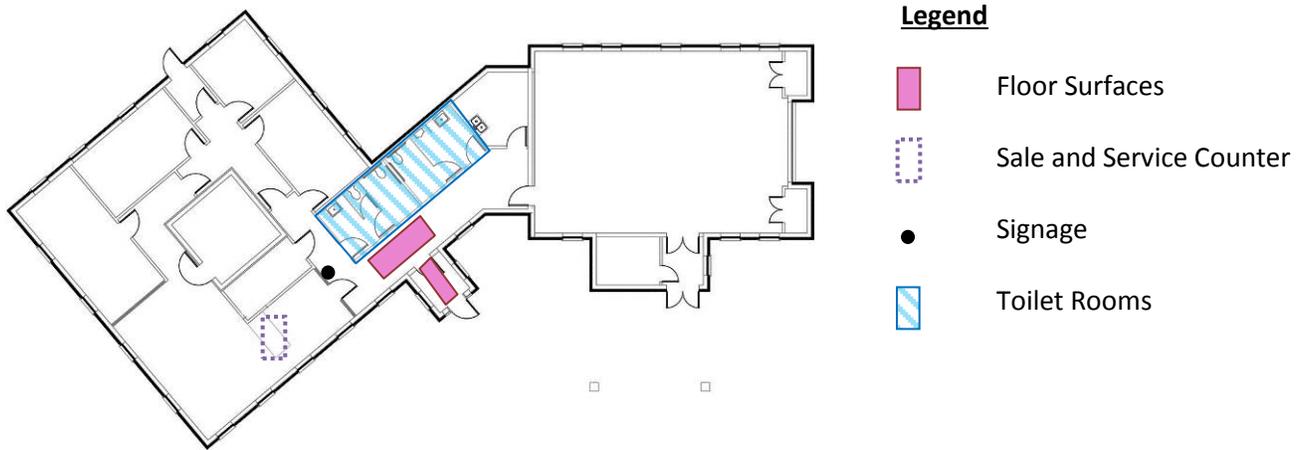
Inside the accessible toilet stall in the Men's toilet room, the flush valve is located on the incorrect side of the toilet. (Photo 9)



Photo 8



Photo 9



## Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

Relocate the on- and off-street parking spaces designated as accessible to a level surface and install a sign that contains the designation “van accessible” within 10 feet of the head of each parking space.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### **Entrance**

Re-grade the concrete landing adjacent to the public entry door in order to eliminate its step.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Doors, Doorways, and Gates.*

### Priority 2 – Access to Goods and Services

#### **Floor Surfaces**

Secure all weather mats with industrial-strength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates at all entrances.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Sales and Service Counters**

Modify the counter inside the office so that it is accessible. In the meantime, provide an auxiliary counter no higher than 36” above the floor in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-in Elements for Sales and Service Counters.*

#### **Signage**

Continue to implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside the doors to the office and the restricted staff area.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### **Priority 3 – Toilet Rooms**

#### ***Toilet Rooms***

In both toilet rooms, lower the mirrors above the accessible lavatories so that their reflective surface is no higher than 40" above the floor. Additionally, adjust or replace the self-closing hinges of doors to accessible stalls. In the Women's toilet room, modify the plumbing of the accessible toilet stall so that the flush valve is on the left side of the toilet.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

## Green Hill Golf 1929 Skyline Drive

Green Hill Golf is an 18-hole municipal golf course adjacent to Green Hill Pond. The clubhouse as well as the Sand Wedge Shoppe is housed in small, one-story facilities. Although these facilities feature an accessible entrance and mostly accessible toilet rooms, IHCD recommends the following immediate upgrades to improve programs, services, and activities at Green Hill Golf:



*View of Green Hill Golf Clubhouse from parking lot*

- Improve the off-street parking designated as accessible;
- Improve the ramp leading to the accessible entrance of the clubhouse;
- Remove or secure all weather mats in the clubhouse;
- Ensure that the counter inside the golf pro shop is accessible;
- Ensure that ADA-compliant signage is provided at all spaces that are open to the public;
- Make minor improvements to all toilet rooms.



Photo 1



Photo 2

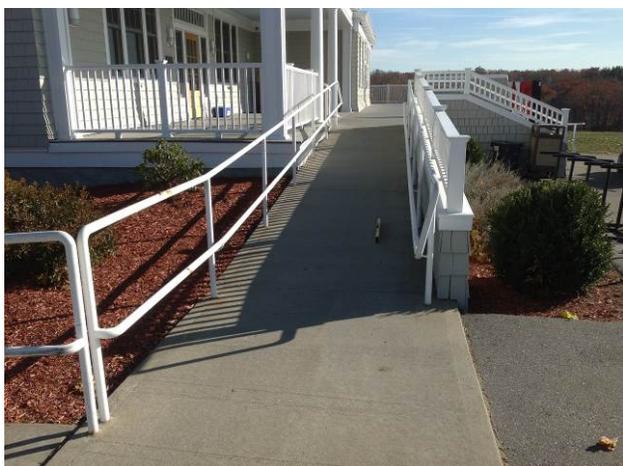


Photo 3

## Issues

### Priority 1 – Approach and Entrance

#### **Parking**

Off-street public parking for staff and public use is provided along the parking lot with about 150 parking spaces. Although six parking spaces designate as accessible use are provided, the following issues were identified:

- the signs identifying all parking spaces designated as accessible are too low (below 5' above the ground); (Photo 1)
- five parking spaces designated as accessible have excessive slopes that render them completely unusable by those arriving by vehicles (2-4.5% slopes at parking spaces near accessible entrance and 2-6.5% slopes at parking spaces near Skyline Drive); (Photo 2).
- a van-designated parking space is not provided at this parking facility.

#### **Entrance**

The clubhouse has one public entrance facing the golf course. The exterior ramp leading to the accessible entrance lacks an edge protection on the side along the landscaped areas. (Photo 3)

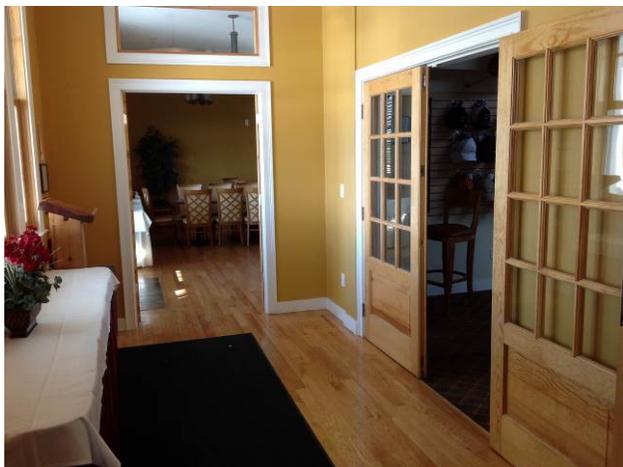


Photo 4

## Priority 2 – Access to Goods and Services

### ***Floor Surfaces***

In the lobby near the golf pro shop, a weather mat is not secure and can become a tripping hazard to visitors and staff. (Photo 4)

### ***Sale and Service Counters***

One counter for transactions with the public can be found inside the golf pro shop. The counter is inaccessible because it exceeds the maximum allowable height for visitors using wheeled mobility devices or who are of short stature (42" AFF). (Photo 5)



Photo 5

### ***Signage***

Although the designating signage in this facility is mostly accessible, the golf pro shop and the area restricted to staff are not properly identified with ADA-compliant signs. (Photo 6)



Photo 6



Photo 7

### Priority 3 – Toilet Rooms

#### ***Toilet Rooms***

One set of multi-user toilet rooms (one for each gender) for staff and public use are located in the clubhouse and one set of single-user toilet rooms (one for each gender) for staff and public use are located in the Sand Wedge Shoppe building near Skyline Drive. All toilet rooms have lavatories with unprotected plumbing underneath. (Photos 7 & 8)

Additionally, inside both toilet rooms in the clubhouse, wall-mounted soap dispensers exceed the maximum allowable height (52" above the floor). (Photo 9)



Photo 8



Photo 9

## Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

Make the following modifications to the parking spaces designated as accessible:

- raise all signs identifying the accessible parking spaces so that their bottom is at least five feet above the ground;
- relocate parking spaces designated as accessible to level surfaces of the parking lot so that slopes do not exceed 2% in any direction;
- Convert one of the parking spaces designated as accessible near the accessible entrance into a van-designated space. Install a sign that contain the designation “van accessible” within 10 feet of the head of the parking space.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### **Entrance**

Modify railings along the “open side” of the ramp to include a lower rail no higher than 4” above the ramp surface. Alternatively, install a curb between the ramp and the landscaped areas.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Doors, Doorways, and Gates.*

### Priority 2 – Access to Goods and Services

#### **Floor Surfaces**

Secure the weather mat with industrial-strength double-stick tape. Alternatively, replace it with a recessed walk-off mat or a grate.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Sales and Service Counters**

Modify the counter inside the golf pro shop so that it is accessible. In the meantime, provide an auxiliary counter no higher than 36” above the floor in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-in Elements for Sales and Service Counters.*

#### **Signage**

Continue to implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside the doors to the golf pro shop and the restricted staff area.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### **Priority 3 – Toilet Rooms**

#### ***Toilet Rooms***

In all toilet rooms, protect the plumbing underneath the accessible lavatories. Lower the wall-mounted soap dispenser inside the toilet rooms in the clubhouse so that their controls are not higher than 48" above the floor.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

## DCU Center 50 Foster Street

DCU Center is an indoor arena and convention center complex that hosts a variety of events, including concerts, sporting events, family shows, conventions, trade-shows, and meetings. It is owned by the City of Worcester and managed by SMG, a private management firm for public assembly facilities. Public parking is offered at the multi-story parking garage across the street.

Built in 1982, the 14,800-seat arena underwent three phases of extensive renovations between 2009-2014, including an improved concourse, concessions; new and improved toilet rooms, the addition of four accessible suites, and a club lounge. Most spaces within the arena are largely accessible; however, the adequate number of accessible seating, tables and drinking fountains is not provided for patrons with disabilities.

The convention center, located on the North side of the site, was built as an addition to arena in 1997. It is mostly accessible, except for minor barriers such as weather mats and missing signs. Both arena and convention center have numerous minor barriers inside toilet rooms, including newly renovated facilities. IHCD recommends the following immediate upgrades to improve programs, services, and activities at DCU Arena:

- Make minor improvements to the off-street parking designated as accessible inside the nearby parking garage;
- Improve accessible seating and tables inside the arena;
- Ensure that ADA-compliant signage is provided at all spaces open to the public;
- Make minor improvements to toilet rooms;
- Install ADA-compliant drinking fountains inside the arena.



View of DCU Center from street





Photo 1

## Convention Center - Issues

### Priority 2 – Access to Goods and Services

#### **Floor Surfaces**

At most entrances, weather mats are not secure and can become tripping hazards to visitors and staff. (Photo 1)

#### **Signage**

Although the designating signage in this facility is mostly accessible, the following permanent rooms and spaces are not properly identified with ADA-compliant signs:

- women's toilet room on level 3;
- exhibition halls on level 1 and grand ball rooms and meeting rooms on level 3; (Photo 2)
- 'staff-only' service areas off of exhibition halls on level 1 and grand ball rooms and meeting rooms on level 3.

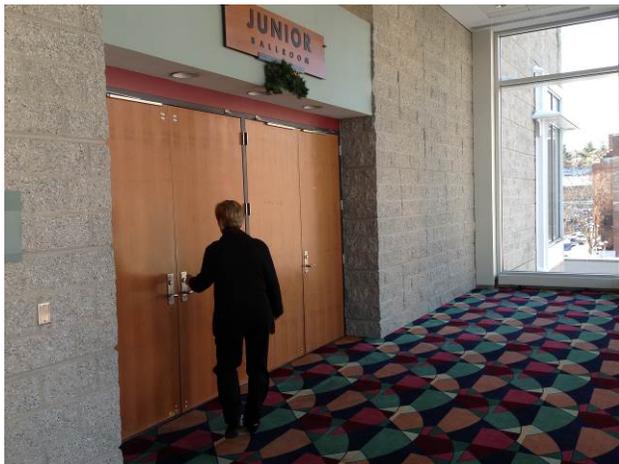


Photo 2

### Priority 3 – Toilet Rooms

#### **Toilet Rooms**

- lavatories exceed the maximum allowable height (35" above the floor) inside toilet rooms on level 3; (Photo 3)
- mirrors above lavatories exceed the maximum allowable height (42" above the floor) in the Men's and Women's toilet rooms inside exhibition halls on level 1;
- malfunctioning self-closing hinge of door to accessible stalls on all levels;
- flush valve on incorrect side of toilet in accessible toilet stall of Men's and Women's toilet rooms inside gallery on level 1 and Men's toilet room inside north exhibition hall on level 1.



Photo 3

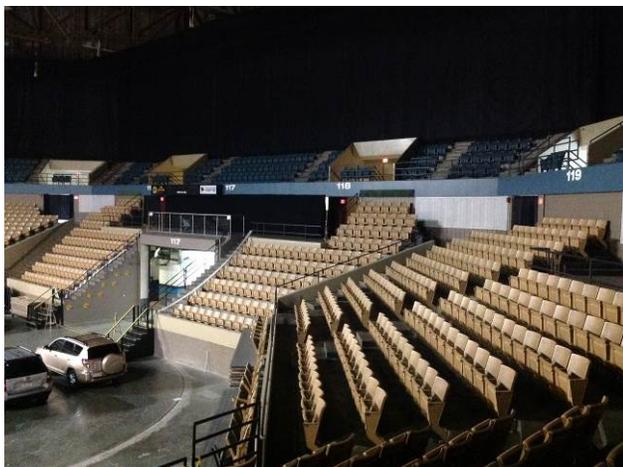


Photo 1

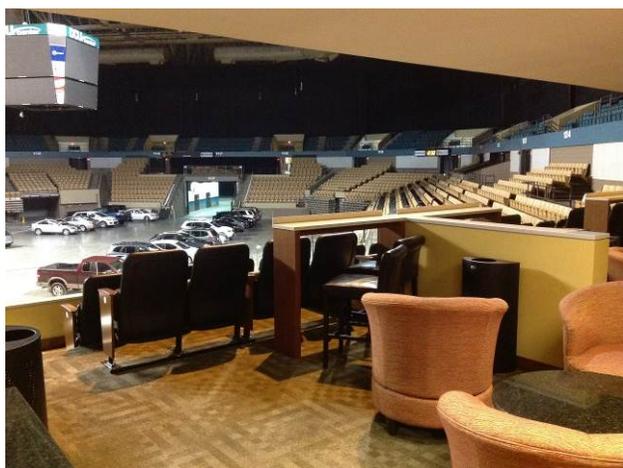


Photo 2



Photo 3

## Arena - Issues

### Priority 2 – Access to Goods and Services

#### Seating

The arena has a total capacity of 14,800 seats. Depending on the type of event, the seating configuration may decrease the capacity to approximately 5,000 seats. Based on the total number of seats, at least 89 wheelchair spaces as well as 89 companion seats are required. However, approximately, 53 wheelchair spaces and 48 companion seats are provided within the 14 viewing areas designated for accessible seating. These viewing areas, which vary between 11 feet and 24 feet in length, are located in sections 102, 103, 104, 106, 108, 110, 112, 113, 117, 118, 120, 121, 123, and 125. There are three levels of seating; however, wheelchair spaces are offered only on the main level (elevation 100) and lack the required vertical dispersion. In addition to companion seats within the viewing areas, the row of seats directly in front of the accessible seating is also designated for companion seating. Designated aisle seats are provided near the accessible seating on each end of row J. (Photo 1)

On the main level, there are six luxury suites, including four recently built suites that are accessible. Each suite has a total capacity of 16 fixed seats distributed within two rows of tiered seating. Two seats can be readily removable (seats 3 and 4 in row B) in order to make space for the required wheelchair space. (Photo 2)

#### Dining Surfaces

At least five tables are provided within the new bar along Foster Street. Although the tables meet the maximum allowable height, none provide the required knee clearance because they are not-ADA compliant. (Photo 3)



Photo 4

### Priority 3 – Toilet Rooms

#### **Toilet Rooms**

Toilet rooms for public use are located on the main level (elevation 100). Although most toilet rooms may be used by patrons with disabilities, they are not in full compliance with current accessibility requirements:

- lavatories with unprotected plumbing underneath: Men's and Women's toilet rooms near 'Coors Light Cold Zone', near 'Shark Tank' and along Major Taylor Boulevard, new Men's, Women's, and Family toilet rooms along Foster Street, and toilet rooms inside new suites; (Photo 4)
- mirrors above lavatories exceed the maximum allowable height: Men's and Women's toilet rooms near 'Shark Tank' (42" above the floor);
- malfunctioning self-closing hinge of door to accessible stalls inside Men's and Women's toilet rooms near 'Shark Tank'; (Photo 5)
- grab bars do not meet the minimum allowable height (31" above the floor): accessible toilet stall inside Men's and Women's toilet rooms near 'Coors Light Cold Zone', and Men's toilet rooms along Commercial Street and Major Taylor Blvd.;
- coat hook inside accessible toilet stalls exceeds the maximum allowable height or is not provided: Men's toilet room near 'Shark Tank' (66"), Men's toilet rooms near 'Coors Light Cold Zone' (58"), and along Commercial Street and Major Taylor Blvd. (not provided);
- door to accessible stall incorrectly swings into space inside Men's toilet room along Commercial Street; (Photo 6)
- flush valve is located on the incorrect side of toilet in the toilet room inside 'Shark Tank', Women's toilet room near 'Coors Light Cold Zone', and accessible toilet stall of Men's toilet room along Commercial Street.



Photo 5



Photo 6



Photo 7

### **Signage**

Although the designating signage in this facility is mostly accessible, the following permanent rooms and spaces are not properly identified with ADA-compliant signs:

- accessible stall inside Men's toilet room along Major Taylor Boulevard; (Photo 7)
- inaccessible Men's toilet rooms along Commercial Street and Major Taylor Boulevard (signs directing users to the accessible toilet rooms). (Photo 8)

### **Priority 4 – Additional Access**

#### **Drinking Fountains**

Wall-mounted drinking fountains are provided near the toilet rooms. None are ADA-compliant. (Photo 9)

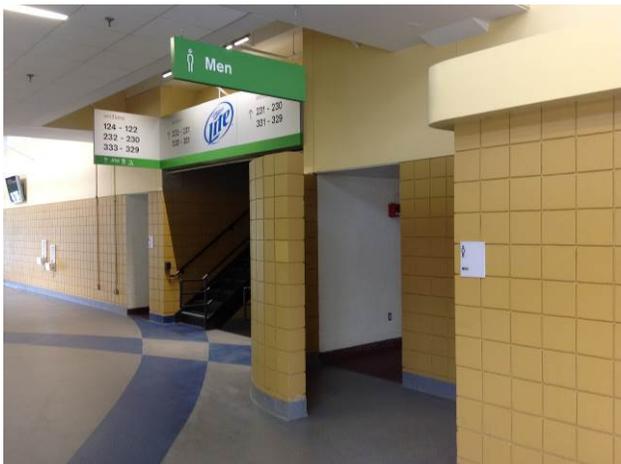


Photo 8



Photo 9

## Major Taylor Municipal Garage - Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

Make the following modifications to the parking spaces designated as accessible:

- raise all signs identifying the accessible parking spaces so that their bottom is at least five feet above the ground;
- relocate van-designate spaces to level surfaces within level G so that slopes do not exceed 2% in any direction;
- re-stripe all spaces designated as accessible that are not highly visible;
- remove all traffic directional signs from accessible parking.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### **Elevators**

Install ADA-compliant signs on both sides of the hoistway entrances of both elevators on each floor level.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Elevators.*

## Convention Center - Recommendations

### Priority 2 – Access to Goods and Services

#### **Floor Surfaces**

Secure weather mats with industrial-strength double-stick tape or replace them with low-profile, ADA-compliant weather mats.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Signage**

Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

## Priority 3 – Toilet Rooms

### **Toilet Rooms**

Make the following modifications to toilet rooms:

- Lower the mirror above all accessible lavatories so that their reflective surface is no higher than 40" above the floor;
- Adjust or replace the self-closing hinges of doors to all accessible stalls;
- Replace the flush valve of toilet in accessible toilet stall of the Men's and Women's toilet rooms inside the gallery on level 1 and the Men's toilet room inside the north exhibition hall on level 1.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

## Arena - Recommendations

### **Priority 2 – Access to Goods and Services**

#### **Seating**

Undertake an architectural study to evaluate the feasibility of increasing the current number of wheelchair and companion seats (89 seats each, at a minimum) by providing vertical dispersion to additional levels of the arena. New wheelchair spaces must be an integral part of the seating plan and must provide spectators with choices of seating locations and viewing angles that are substantially equivalent to, or better than, the choices of seating locations and viewing angles available to all other spectators.

Additionally, confirm that at least 5% of the total number of aisle seats is provided in the arena.

Ensure that staff is properly aware and trained to readily remove fixed seats for one wheelchair space in the new luxury suites.

#### **Dining Surfaces**

Confirm the total seating capacity of the new bar along Foster Street and ensure that 5% of the tables are accessible.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-In Elements for Work and Dining Surfaces.*

### Priority 3 – Toilet Rooms

#### **Toilet Rooms**

Make the following modifications to toilet rooms:

- Protect the plumbing underneath the accessible lavatory - Men's and Women's toilet rooms near 'Coors Light Cold Zone', near 'Shark Tank' and along Major Taylor Boulevard, new Men's, Women's, and Family toilet rooms along Foster Street, and toilet rooms inside new suites;
- Lower the mirror above the accessible lavatory so that its reflective surface is no higher than 40" above the floor - Men's and Women's toilet rooms near 'Shark Tank';
- Adjust or replace the self-closing hinges of doors to accessible stalls - Men's and Women's toilet rooms near 'Shark Tank';
- Raise grab bars so that they are mounted between 33" and 36" above the floor - accessible toilet stall inside Men's and Women's toilet rooms near 'Coors Light Cold Zone', and Men's toilet rooms along Commercial Street and Major Taylor Blvd.;
- Install at least one coat hook inside accessible toilet stalls so that they are no higher than 48" above the floor - Men's toilet room near 'Shark Tank', Men's toilet rooms near 'Coors Light Cold Zone', and along Commercial Street and Major Taylor Blvd.;
- Replace flush valve of toilet - toilet room inside 'Shark Tank', Women's toilet room near 'Coors Light Cold Zone', and accessible toilet stall of Men's toilet room along Commercial Street.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

#### **Signage**

Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### Priority 4 – Additional Access

#### **Drinking Fountains**

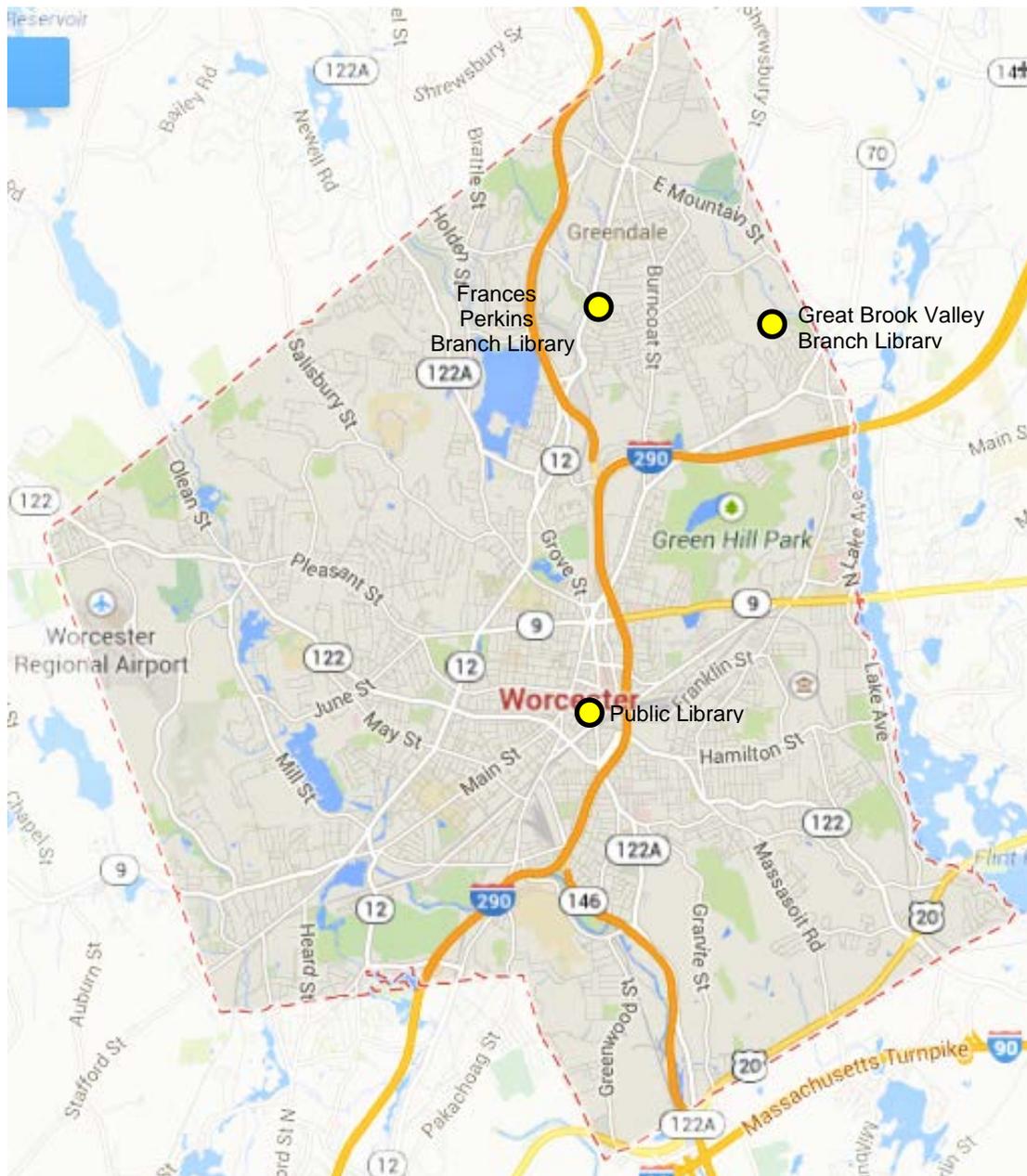
Install at least one set of accessible drinking fountains in the arena. In the meantime, provide an adjacent water cooler with cups for equivalent access at a few inaccessible drinking fountains.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Drinking Fountains.*

**Libraries:**

The City of Worcester owns and operates three library buildings that were built between 1859 and 1981. When looked at in entirety, Worcester’s libraries offer an impressive array of programs, services, and activities in addition to the standard inter-library loan program. These programs include but are not limited to Book Club, Learning Club Meeting, Free Citizenship Classes, Movie Nights, and Musical Events at:

- Public Library;
- Frances Perkins Branch Library;
- Great Brook Valley Branch Library.



## Public Library 3 Salem Square

A major renovation of this five-story facility was completed in 2001. While levels 1, 2, 3 are open to the public, the basement and level 4 are restricted to staff only. Although this facility features accessible parking, two accessible entrances, an elevator, accessible single- and multi-user toilet rooms on all floor levels, and has accessible routes through most of the building, IHCD recommends the following immediate upgrades to improve programs, services, and activities at Public Library:

- Ensure that the circulation counter on level 1 is accessible;
- Install cane-detectable barriers to protect protruding objects;
- Make minor improvements to certain toilet rooms;
- Install a TTY device on the public telephone on level 1.



*View of Public Library from parking lot*



Photo 1

## Issues

### Priority 2 – Access to Goods and Services

#### ***Sale and Service Counters***

Circulation counters can be found on most levels. On level 1, the circulation counter near the accessible entrance is inaccessible because it exceeds the maximum allowable height (39" AFF). (Photo 1)

#### ***Protruding Object***

The following hazardous protruding objects were found in certain levels of the library:

- partially unprotected underside of the stairway on level 2; (Photo 2)
- wall-mounted shelf adjacent to circulation counter on level 2;
- wall-mounted display adjacent to circulation counter on level 3. (Photo 3)

These protruding objects increase the likelihood of injuries among people with low or no vision or others who may be unobservant.



Photo 2



Photo 3



Photo 4

### Priority 3 – Toilet Rooms

#### **Toilet Rooms**

One set of multi-user toilet rooms (one for each gender) for staff and public use are located on all levels. On level 1, although the urinal inside the Men's toilet room is at an accessible height, its clear floor space is obstructed because the space between partitions does not meet the minimum allowable clear width (27").

On level 3, both Men's and Women's toilet rooms have coat hooks that exceed the maximum allowable height (64" above the floor).

On level 4, inside the Men's toilet room, furniture obstructs the approach to the accessible stall and the doors to the accessible stall incorrectly swing into the stall. (Photo 4)



Photo 5

*NOTE: Both Men's and Women's locker rooms in the basement level are not fully accessible because ADA-compliant lockers are not provided, curtain rods create hazardous protruding objects, and doors to the accessible stall incorrectly swing into the stall. (Photo 5) Although these locker rooms are restricted to staff use only, the Americans with Disabilities Act prohibits discrimination in the workplace against disabled individuals and the library must be prepared to address a reasonable accommodation request by an employee with a disability.*

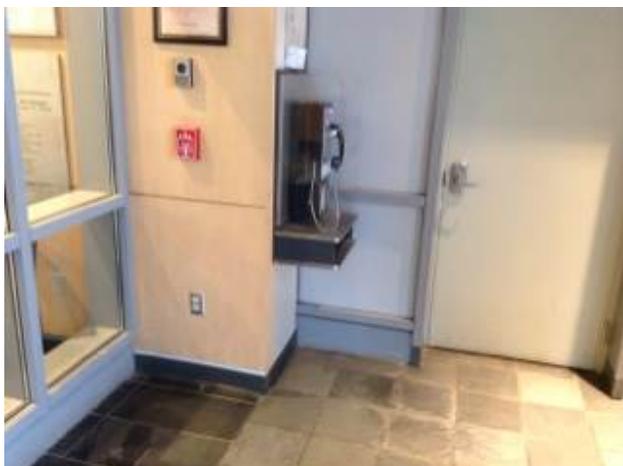


Photo 6

### Priority 4 – Additional Access

#### **Telephone**

In the vestibule of the accessible entrance facing the parking lot, the public telephone offers no TTY capability. (Photo 6)

## Recommendations

### Priority 2 – Access to Goods and Services

#### **Sales and Service Counters**

Modify the circulation counter on level 1 so that it is accessible. In the meantime, provide an auxiliary counter no higher than 36" above the floor in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-in Elements for Sales and Service Counters.*

#### **Protruding Objects**

Install cane-detectable barriers on both sides of the wall-mounted shelf and display on levels 2 and 3. On level 2, extend the railing protecting the underside of the stairway so that the required headroom of 80" above the floor is provided. Alternatively, install a cane-detectable barrier underneath it.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Building Blocks for Protruding Objects.*

### Priority 3 – Toilet Rooms

#### **Toilet Rooms**

Make the following modifications to toilet rooms:

- Modify the partitions adjacent to the urinal inside the Men's toilet room on level 1;
- Lower coat hooks inside both Men's and Women's toilet rooms on level 3 so that they are no higher than 48" above the floor;
- Relocate or remove furniture inside toilet room to ensure access to accessible stalls and plumbing fixtures.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

#### **Telephone**

Install a TTY device on telephone on level 1. Install an ADA-compliant sign that directs to the TTY device. Such device must be accessible and available whenever the payphone is operable.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Communication Elements and Features for Telephones.*

## Frances Perkins Branch Library (former Greendale Branch Library) 470 West Boylston Street



*View of Frances Perkins Branch Library from street*

This two-story facility was originally built in 1914 as one of three Carnegies libraries in Worcester. In 1996, the original structure was enlarged and a one-story addition on the North side of the building provided an accessible entrance, two single-user toilet rooms, and a vertical platform lift to the upper and lower levels. IHCD recommends the following immediate upgrades to improve programs, services, and activities at this library branch:

- Improve parking by adding an identification sign, enlarging the access aisle to eight feet wide, and adding a van-designated space;
- Remove tripping hazards near accessible entrance;
- Relocate drop box so that a clear floor space is provided for easy access;
- Install self-closing devices on the doors to the toilet rooms;
- Remove or secure all weather mats;
- Ensure that at least one computer station of each type is accessible and unobstructed by storage and furniture at all times;
- In the entry lobby and reading rooms, relocate or remove bookshelves, furniture, storage, or floor-mounted chords from all circulation paths to ensure a 36-inch minimum clear width;
- Ensure that vertical lift can be operated independently;
- Implement a comprehensive signage plan to ensure that ADA-compliant signage is provided at all spaces that are open to the public;
- Make improvements to the toilet rooms.



Photo 1

## Issues

### Priority 1 – Approach and Entrance

#### **Parking**

Off-street staff and public parking was identified in the parking lot at the rear of the building. Although one accessible parking space is provided near the accessible entrance, it does not meet the minimum requirements for access aisle and signage – signage is located on the building over 25 feet away. Additionally, based on the total number of parking spaces in the parking lot, an additional accessible parking space is required. (Photos 1 & 2)



Photo 2

#### **Entrance**

Near the accessible entrance, the transition between asphalt driveway and concrete landing creates a tripping hazard to those entering or exiting the library. Further, the drop box offered at this location does not have clear floor space for those who use wheeled mobility devices. (Photo 3)



Photo 3

## Priority 2 – Access to Goods and Services

### **Doors**

The doors to the toilet rooms swing into the room and the required maneuvering clearances are provided. However, the doors lack the required door closers or other self-closing devices. (Photo 4)

### **Floor Surfaces**

At the entry lobby as well as other circulation areas within the building, several weather mats are not secure and can become tripping hazards to visitors and staff. (Photo 5)

### **Work Surfaces**

In the reading room on the upper level, none of the computer workstations provide the required knee and toe clearance. Workstations include the catalog station, queue/sign-up station, computer station with internet access, and computer station in children section. (Photo 6)



Photo 4

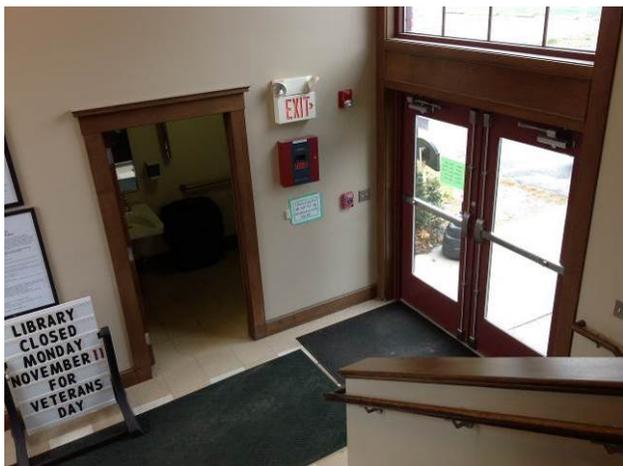


Photo 5



Photo 6



Photo 7

### **Interior Routes**

A few barriers can be found within the building. In the entry lobby, a storage shelf and trash can obstruct the approach to one of the single-user toilet rooms. (Photo 7)

In the adult section of the reading room on the upper level, a floor-mounted chord creates a barrier to those using wheeled mobility devices as well as a tripping hazard to those not paying attention. In the children section, bookshelves at the rear obstruct the accessible route and circulation paths to less than 36" of width. (Photo 8)



Photo 8

### **Lift**

Near the accessible entrance, a vertical platform lift provides access to all floor levels; however, it is key-operated and requires staff assistance. (Photo 9)

### **Signage**

Very little signage is provided at this library and not all permanent rooms and spaces are properly identified with ADA-compliant signs.



Photo 9



Photo 10



Photo 11

### Priority 3 – Toilet Rooms

#### **Toilet Rooms**

A set of single-user toilet rooms (one for each gender) for public use are located near the accessible entrance. Although these toilet rooms may have been code-compliant at the time of their installation, they do not meet the minimum requirements of either 1991 or the current accessibility laws and regulations. Each toilet room has issues such as:

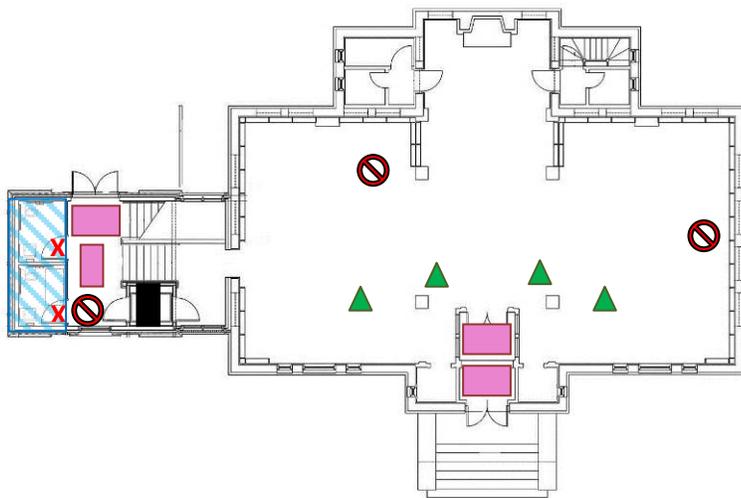
- the clear floor space underneath the lavatory is obstructed by instant hot water heater; (Photo 10)
- the approach to the toilet is obstructed by trash can; (Photo 11)
- the flush valve is located on the incorrect side of the toilet;
- the rear grab bar is obstructed by the toilet tank; (Photo 11)
- the side grab bar does not meet minimum height (30”) and is obstructed by toilet paper dispenser; (Photo 11)
- the baby changing station exceeds the maximum allowable (38”).

#### **Signage**

Toilet rooms are not identified with accessible signage. (Photo 12)



Photo 12



**Legend**

- X** Doors
- Floor Surfaces
- ▲** Work Surfaces
- ⊘** Interior Routes
- Lift
- Signage
- ▨** Toilet Rooms

## Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

Enlarge the access aisle to eight feet wide and provide an additional accessible parking space – both accessible parking spaces may share the access aisle. Install a sign within 10 feet of the head of each parking space. At least one parking space must be van-designated and must provide a sign that contain the designation “van accessible”.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### **Entrance**

Repair or replace the transition between asphalt driveway and concrete landing near the accessible entrance. Relocate the drop box so that a clear floor space of 30” by 48” is provided in front of the receptacle.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes and Scoping Requirements for Depositories.*

### Priority 2 – Access to Goods and Services

#### **Doors**

Install a door closer or other self-closing device on each door to the toilet rooms.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Doors, Doorways, and Gates.*

#### **Floor Surfaces**

Secure all weather mats with industrial-strength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates at the entry lobby.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Work Surfaces**

Ensure that at least one of each work surface in the reading room is accessible.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-In Elements for Work and Dining Surfaces.*

#### **Interior Routes**

In the entry lobby, remove or relocate the storage shelf and trash can at least 48” away from the door to the toilet room. In the adult section of the reading room, remove or recess the floor-mounted chord. In the children section, relocate bookshelves to ensure a 36-inch minimum clear width throughout the space.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes.*

**Lift**

Upgrade vertical platform lift near the accessible entrance so that it is independently operable by the public without staff assistance.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Platform Lifts.*

**Signage**

Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

**Priority 3 – Toilet Rooms**

**Toilet Rooms**

Modify both single-user toilet rooms near the accessible entrance by removing or relocating the instant hot water heater that obstructs the clear floor space underneath the lavatory, relocating the trash can away from the toilet, replacing the toilet tank so that the flush valve is on the left side of the toilet, raising both grab bars between 33” and 36” above the floor, lowering the toilet paper dispenser at least 1-1/2” below the side grab bar, and lowering the baby changing station so that the surface is no higher than 34” above the floor when it is folded down.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

**Signage**

Install an ADA-compliant sign on the latch side of the door to each toilet room.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

## Great Brook Valley Branch Library 89 Tacoma Street

This library branch is located on a steep hillside within the Great Brook Valley housing project. The library was opened in 1981 by the Worcester Housing Authority (WHA) and occupies a converted townhouse. This single-story facility is owned by WHA and is intended to serve residents of the housing project as well as the general public. Although this library branch may be a convenient location to the residents located uphill, it presents serious difficulties to those arriving by public transit or car on Tacoma Street. In addition to the recommendation under Program Accessibility, IHCD recommends the following immediate upgrades to improve programs, services, and activities at this library branch:



*View of Great Brook Valley Branch Library from street*

- Relocate the parking space designated as accessible to a flat area;
- Completely re-arrange the exterior route between the sidewalk, the parking, and the entrance to the library;
- Install an automatic door opener on the pull side of the entry door;
- Remove or secure the weather mat near the entrance and toilet room;
- Ensure that the circulation counter and catalog station are unobstructed at all times;
- Implement a comprehensive signage plan to ensure that ADA-compliant signage is provided at all spaces that are open to the public;
- Make improvements to the toilet room.



Photo 1

## Issues

### Priority 1 – Approach and Entrance

#### **Parking**

Off-street staff and public parking was identified in the small parking lot near the building. These parking spaces seem to be used by staff and public from the adjacent offices and are not exclusively used by the library occupants. Although one space is designated as accessible for public use, it does not meet the minimum requirements for access aisle and signage. Additionally, being located on a hillside, this parking space has excessive slopes that render it completely unusable by those arriving by vehicles. (Photo 1)



Photo 2

#### **Exterior Route**

The long walkway between the sidewalk, the parking, and the entrance to the library (about 135 feet) is excessively steep and poorly maintained. Despite one segment of this walkway is served by a ramp, the entire walkway exceeds 5% slope and should be treated as an accessible ramp with railings on both sides. Further, the ramp has non-compliant and damaged railings as well as a slippery surface. Both the lowest and highest points of this exterior route are served by railings on only one side. (Photos 2 & 3)



Photo 3



Photo 4

## Priority 2 – Access to Goods and Services

### **Doors**

The only entry door to the library, although usable by those with wheeled mobility devices, lacks the required maneuvering clearance on its pull, latch side (less than 48"). (Photo 4)

### **Floor Surfaces**

Near the entrance and toilet room, a weather mat is not secure and can become tripping hazards to visitors and staff. (Photo 4)

### **Sale and Service Counter**

In the reading room, approach to the circulation counter is obstructed by the nearby bookshelves and storage. (Photo 5)



Photo 5

### **Work Surfaces**

In the reading room, the clear floor space to the catalog station is obstructed by a trash can. (Photo 6)

### **Signage**

Very little signage is provided at this library and not all permanent rooms and spaces are properly identified with ADA-compliant signs.



Photo 6



Photo 7



Photo 8



Photo 9

### Priority 3 – Toilet Rooms

#### ***Toilet Rooms***

One unisex, single-user toilet room for public use is located near the accessible entrance. Although this toilet room may have been code-compliant at the time of its installation, it does not meet the minimum requirements of either 1991 or the current accessibility laws and regulations for the following reasons:

- the clear floor space underneath lavatory does not meet the minimum allowable height; (Photo 7)
- the plumbing underneath the lavatory is not properly insulated or protected against touch; (Photo 7)
- the approach to the toilet is obstructed by a trash can; (Photo 8)
- the flush valve is incorrectly located on the top of the toilet tank; (Photo 8)
- the side grab bar is obstructed by the toilet paper dispenser; (Photo 8)
- no visible and audible fire alarms are provided inside the toilet room.

#### ***Signage***

The toilet room is identified with an ADA-compliant sign. However, the sign is incorrectly mounted on the door instead of on the wall alongside the door latch. (Photo 9)

## Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

Re-grade the small area where the parking space is located so that slopes do not exceed 2% in any direction. Enlarge the access aisle to eight feet wide. Install a sign that contain the designation “van accessible”.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### **Exterior Route**

Re-grade and reconstruct a ramp along the entire route between the sidewalk, the parking, and the entrance to the library. Running slopes must not exceed 8.3%, cross slopes must not exceed 2%, and railings must be provided on both sides.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Ramps.*

### Priority 2 – Access to Goods and Services

#### **Doors**

Install an automatic door opener on the pull, latch side of the entry door to the library.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Doors, Doorways, and Gates.*

#### **Floor Surfaces**

Near the entrance and toilet room, remove or secure the weather mat with industrial-strength double-stick tape.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Sale and Service Counter**

In the reading room, remove all nearby bookshelves and storage that obstruct the approach to the circulation counter. A clear floor space of 30” by 48” must be provided adjacent to the counter.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-in Elements for Sales and Service Counters.*

#### **Work Surfaces**

In the reading room, remove the trash so that the clear floor space to the catalog station is not obstructed.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-In Elements for Work and Dining Surfaces.*

#### **Signage**

Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### **Priority 3 – Toilet Rooms**

#### ***Toilet Room***

Modify the single-user toilet room by raising the lavatory to provide a knee clearance of 27” above the floor, protecting the plumbing underneath the lavatory, and removing the trash can that obstruct the approach to the toilet.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

#### ***Signage***

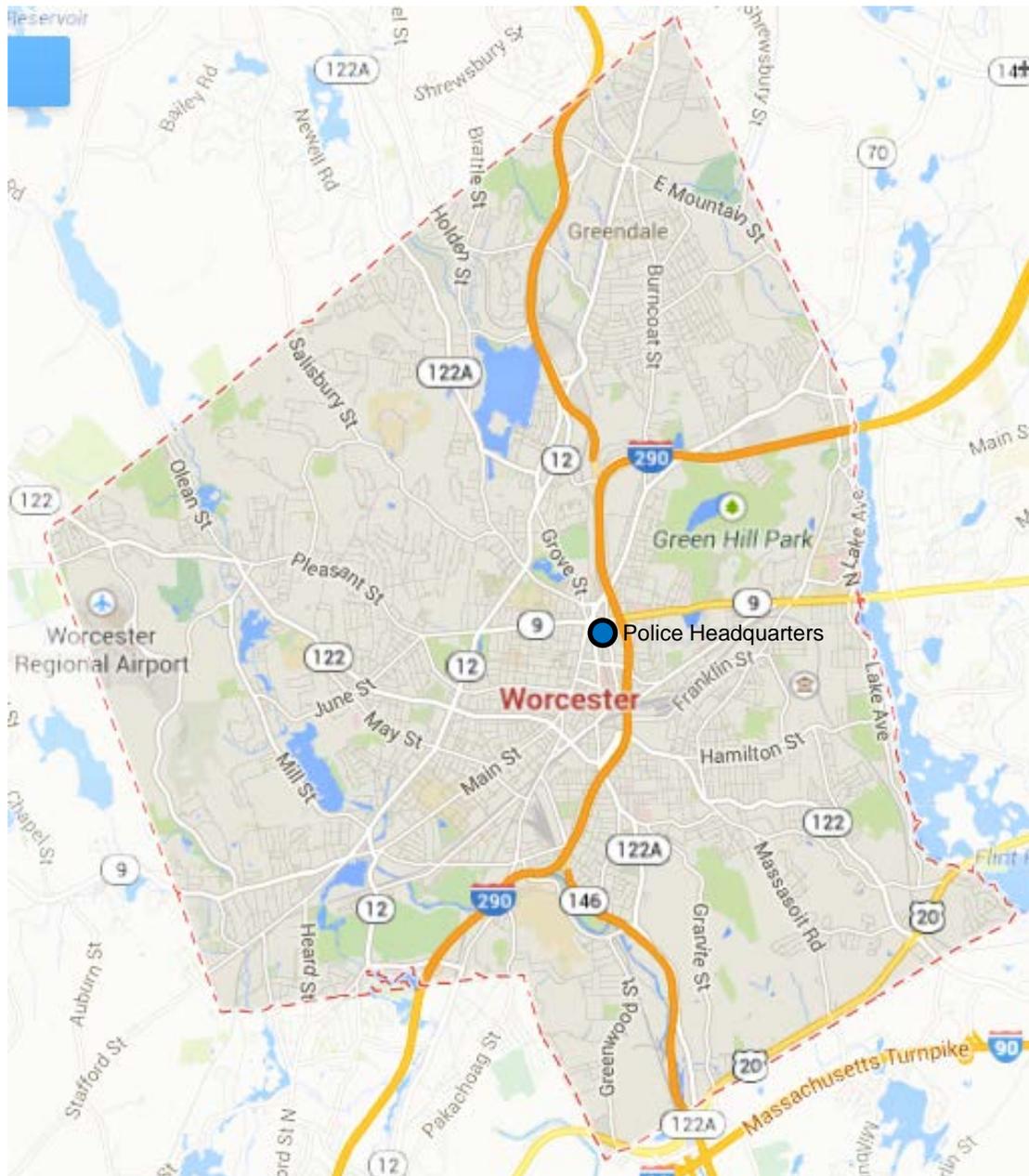
Install an ADA-compliant sign on the latch side of the door to the toilet room.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

**Police Station:**

The City of Worcester owns and operates one police station:

- Police Headquarters.



## Police Headquarters 9 Lincoln Square

This four-story facility houses several divisions, including Administrative, Investigative, Patrol, Uniform/Services, etc. The Police Headquarters appears to be designed and constructed for vehicular access only and do not provided any direct pedestrian route for those arriving by public transit.

IHCD recommends the following immediate upgrades to improve programs, services, and activities at the Police Headquarters:

- Improve parking near the entrance;
- Ensure that an accessible route is provided between the public rights-of-way/parking / public transit stop and the entrance;
- Improve exterior stairway between lower and upper parking lots and entrance;
- Provide accessible counters inside lobby;
- Make improvements to public toilet rooms on level 1;
- Implement a comprehensive signage plan to ensure that ADA-compliant signage is provided at all spaces that are open to the public;
- Ensure that at least one of each type of cell is accessible on the basement level;
- Replace the drinking fountain in the lobby with an ADA-compliant fixture.



*View of Police Headquarters from street*



Photo 1



Photo 2



Photo 3

## Issues

### Priority 1 – Approach and Entrance

#### **Parking**

Off-street staff and public parking with over 150 parking spaces was identified in the large parking lot off of Goldsberry Street. Although nine spaces are designated as accessible for public use, none of them meet the minimum requirements for slopes and signage – parking spaces have slightly excessive slopes (2-3%) that render them completely unusable by those arriving by vehicles and parking signs do not meet the minimum allowable height.

Additionally, the five parking spaces designated as accessible north of the parking lot circle do not have the required access aisles. (Photo 1)

No van-designated space is provided in this parking facility.

#### **Exterior Route**

The exterior route between the bus stops, site entrances, the parking, and the entrance to the police station are not connected to an accessible route. The accessible entrance is approximately 875 feet from the bus stop on Goldsberry Street and can only be reached via a steep vehicular driveway within the busy parking lot. (Photo 2)

The accessible entrance is approximately 2,500 feet from the bus stop at the intersection of Major Taylor Boulevard and Belmont Street and can only be reached via two long flights of stairs on the southeast corner of the building. (Photo 3)



Photo 4

## Priority 2 – Access to Goods and Services

### **Doors**

On level 1, the door to the License Division has a non-compliant hardware.

### **Floor Surfaces**

In the vestibule and lobby on level 1, weather mats are not secure and can become tripping hazards to visitors and staff. (Photo 4)

### **Protruding Object**

In the lobby on level 1, a wall-mounted display case is a hazardous protruding object that increases the possibility of injury to visitors and staff. (Photo 5)



Photo 5

### **Sale and Service Counter**

Counters for transactions with the public can be found on level 1. Most of them are inaccessible because they exceed the maximum allowable height (42" AFF):

- Services Division; (Photo 6)
- Records Division; (Photo 6)
- License Division.

### **Signage**

Very little signage is provided within the public areas on level 1 and not all permanent rooms and spaces are properly identified with ADA-compliant signs.



Photo 6



Photo 7



Photo 8



Photo 9

### Priority 3 – Toilet Rooms

#### **Toilet Rooms**

A set of multi-user toilet rooms (one for each gender) for public use are located near the accessible entrance on level 1. Although these toilet rooms may have been code-compliant at the time of their installation, they do not meet the minimum requirements of either 1991 or the current accessibility laws and regulations:

#### Men's Toilet Room:

- faucet is non-compliant; (Photo 7)
- the plumbing underneath the lavatory is not properly insulated or protected against touch; (Photo 7)
- the control of the paper towel dispenser exceeds the maximum allowable height (59" AFF); (Photo 7)
- malfunctioning self-closing hinges of door to accessible stall;
- the side and rear grab bars inside accessible toilet stall are non-compliant.

#### Women's Toilet Room:

- the control of the paper towel dispenser exceeds the maximum allowable height (59" AFF);
- malfunctioning self-closing hinges of door to accessible stall;
- the side and rear grab bars inside accessible toilet stall are non-compliant. (Photo 8)

#### **Signage**

Toilet rooms for public use on level 1 are not identified with accessible signage. (Photo 9)



Photo 10

#### Priority 4 – Additional Access

##### ***Drinking Fountains***

One wall-mounted drinking fountain is provided near the toilet rooms on level 1. Such fixture is not ADA-compliant. (Photo 10)

##### ***Holding Cells***

At the basement level, no accessible holding cells are provided. (Photos 11& 11)



Photo 11



Photo 12

## Recommendations

### Priority 1 – Approach and Entrance

#### **Parking**

Raise all parking signs identifying the accessible parking spaces so that their bottom is at least five feet above the floor. North of the parking lot circle, replace two spaces designated as accessible with access aisles and install a sign that contain the designation “van accessible”. When the entire parking lot is repaved, re-grade all parking spaces so that slopes do not exceed 2% in any direction.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### **Exterior Route**

Establish an accessible entrance on the lower level of the building and ensure that an accessible route is provided to the nearby bus stop.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site.*

### Priority 2 – Access to Goods and Services

#### **Doors**

Replace the door knob at License Division with a lever hardware.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Doors, Doorways, and Gates.*

#### **Floor Surfaces**

In the vestibule and lobby on level 1, remove or secure the weather mat with industrial-strength double-stick tape.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

#### **Protruding Object**

Remove or relocate the wall-mounted display case in the lobby on level 1. Alternatively, install a cane-detectable barrier underneath it.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Building Blocks for Protruding Objects.*

#### **Sale and Service Counter**

In the lobby on level 1, modify all counters with public interface so that they are accessible. In the meantime, provide an auxiliary counter no higher than 36” above the floor in close proximity to each counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-in Elements for Sales and Service Counters.*

### **Signage**

Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces within the public areas on level 1.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### **Priority 3 – Toilet Rooms**

#### **Toilet Room**

Modify each multi-user toilet room by lowering the paper towel dispensers so that their controls are no higher than 48" above the floor, adjusting or replacing the self-closing hinges of doors to accessible stalls and replacing all grab bars inside the accessible stalls. In the Men's toilet room, replace the faucet and protect the plumbing underneath the lavatory.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

### **Signage**

Install an ADA-compliant sign on the latch side of the door to each toilet room.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and Communication Elements and Features for Signs.*

### **Priority 4 – Additional Access**

#### **Drinking Fountains**

Replace the existing fixture in the lobby on level 1 with an accessible drinking fountain. In the meantime, provide an adjacent water cooler with cups for equivalent access at the inaccessible drinking fountain.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Drinking Fountains.*

#### **Holding Cells**

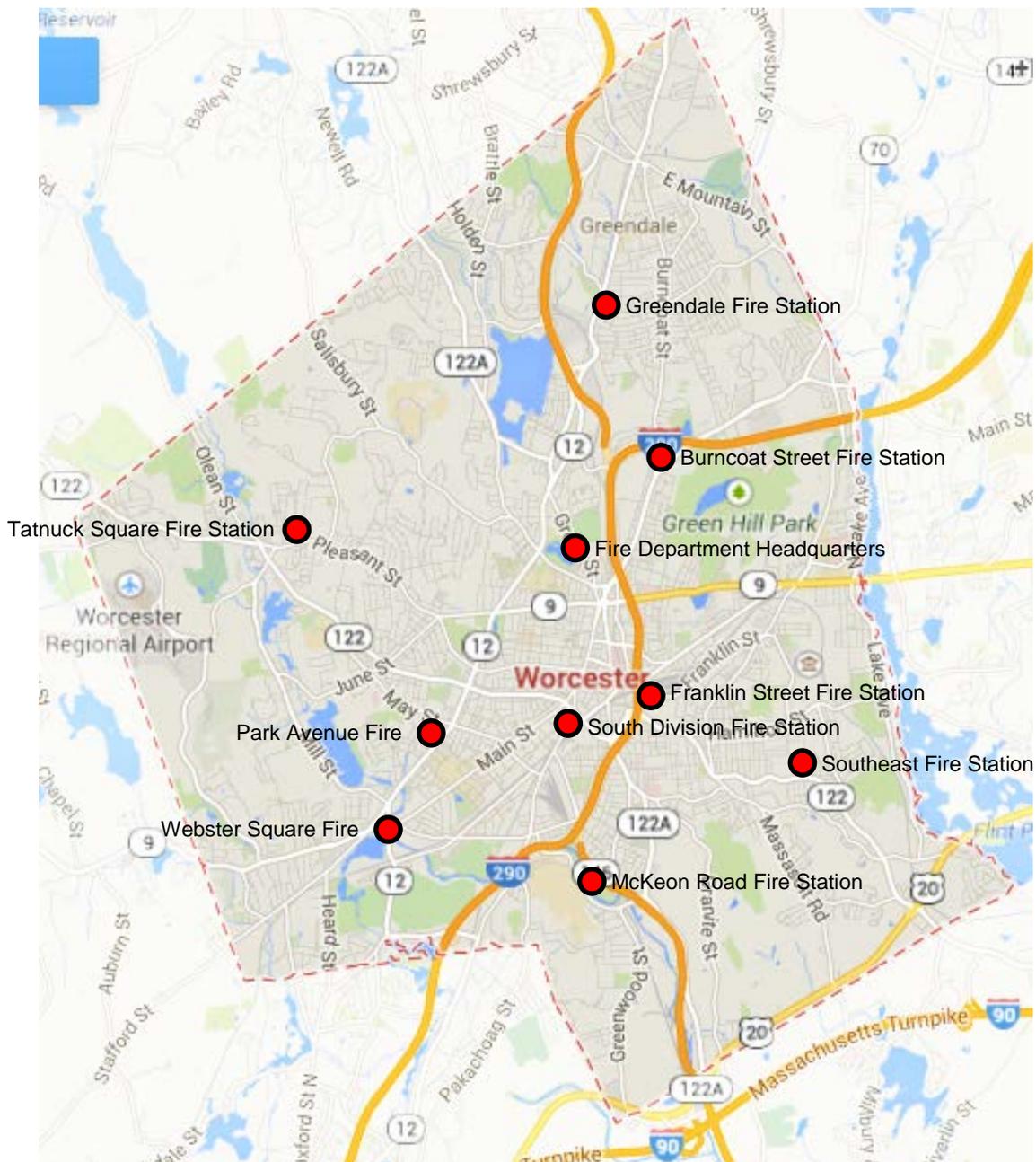
Holding cells will need to be made accessible when renovated.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Special Rooms, Spaces and Elements for Holding Cells and Housing Cells.*

## Fire Stations:

The City of Worcester owns and operates 10 fire stations:

- Fire Department Headquarters;
- Burncoat Street Fire Station;
- Franklin Street Fire Station;
- Greendale Fire Station;
- McKeon Road Fire Station;
- Park Avenue Fire Station;
- South Division Fire Station;
- Southeast Fire Station;
- Tatnuck Square Fire Station;
- Webster Square Fire Station.



## Fire Stations

The Worcester Fire Department is currently the second largest fire department in Massachusetts after the Boston Fire Department and protects over 180,000 people living in approximately 37 square miles of land. Worcester's fire stations and auxiliary facilities are staffed with over 400 employees. Fire stations are commonly designed in two forms regardless of the year built: single-story structures with staff spaces on one or more sides of the apparatus bay or multi-story structures with staff spaces above the apparatus bay. Regardless of whether a station houses one truck or more trucks, each station has a dispatch office, day room, crew sleeping quarters, kitchen, lockers, showers and toilet rooms.

Similar to many other municipalities, the multi-story fire stations (such as Headquarters, Franklin Street, Greendale, McKeon Road, Park Avenue, South Division, Tatnuck Square, and Webster Square) are not equipped with elevators. While many people assume accessibility and especially elevators, are not required by the ADA at fire stations, this is a mistaken assumption. Fire stations are typically thought of as employee work areas and therefore subject to requests by employees for reasonable accommodations such as accessible parking, lockers, showers and toilet rooms, etc.

However, by their nature, fire stations are also frequently and unofficially visited by the public whether by nursery and elementary classes, girl and boy scout troops, neighbors, or the public during Fire Protection Week open houses. Located in strategic areas known to residents, fire stations, as needs arise, can serve many purposes such as voting precincts, meeting locations for neighborhood committees, vaccination clinic locations for people or pets, emergency shelters or aid distribution locations

post disaster. While many of Worcester's stations may not fill any of these roles currently, future uses are unpredictable. In Worcester, though public access to many stations is reported to be quite limited, all stations also serve as safe havens for children and some maybe identified for use in emergency preparedness plans. Finally, after decommissioning, fire stations often take on a second life, reused by non-profits, open artist studios, community centers or youth centers (apparatus bays make great temporary enclosed gyms). Thus, achieving physical accessibility remains critical, albeit secondary to achieving programmatic access to the Fire Department's services.

Paramount to Worcester's ADA obligations regarding emergency services is ensuring programmatic access to emergency services such as 911, as well as emergency planning and preparedness including the development of policies and procedures to evacuate and shelter residents regardless of disability or functional needs. The emergency planning and preparedness obligations remain even when counties, state agencies or institutions such as the American Red Cross may typically coordinate responses to larger incidents.

Beyond these critical but often invisible areas, in terms of prioritization of physical facility access, the City of Worcester first needs to ensure that exterior emergency intercoms and buzzers are accessible and located on accessible routes. This ensures that members of the public who arrive at a station can contact station staff in emergency situations. Where stations lack accessible routes into the building, procedures can be developed to ensure that at a minimum, the public is allowed into the apparatus bay and personnel can address the specific need. Addressing minor fixes or upgrades such as relocating grab bars should

be addressed by annual maintenance. Moderate expenses such as re-grading accessible parking or replacing inaccessible drinking fountains may be best handled in packages across several stations. Capital expenses such as renovating restrooms, showers or installing elevators need to be prioritized within both the Fire Department's capital budget (similar to adding facilities for women firefighters) and Worcester's master capital budget.

While older fire stations have undergone little or no accessibility upgrades, at least three fire stations, McKeon Road, Webster Square and Franklin Street, have been built since 1995. Despite being built after the passage of the Americans with Disabilities Act, these facilities offer no accessible amenities, such as kitchen, lockers, showers and toilet rooms for their firefighters. It is not clear how the Worcester Fire Department handles requests by employees for reasonable accommodations when none of the fire stations is completely accessible.

For the purpose of this report, only public areas within fire stations, where programs, services, and activities are provided to the public, were assessed for accessibility. Paramount to Worcester's obligations under Title II of the ADA, is ensuring that, when 'viewed in its entirety' the programs, services, and activities offered at fire stations are equally available to people with disabilities. Thus, achieving physical accessibility remains critical, albeit secondary to achieving programmatic access to the Fire Department's services.

IHCD recommends the following immediate upgrades to improve programs, services, and activities at all fire stations:

- Improve parking, when provided for public use;
- Ensure that an accessible route is provided between the public rights-of-way/parking / public transit stop and the entrance;
- Ensure that entrances are accessible to residents with disabilities. When entrances cannot be made accessible, ensure that policies and procedures are in place to allow residents with disabilities to enter the fire station through the apparatus bay.
- Install exterior emergency call boxes at an accessible location and height to ensure that members of the public who arrive at a station can contact station staff in emergency situations.



Photo 1

## Fire Department Headquarters (a.k.a. Grove Street Fire Station) 141 Grove Street

Fire Department Headquarters consists of three buildings: an office space attached to the fire station and the maintenance shop, a fire tower, and a training center. For the purpose of this report, only the office space and the fire station, where programs, services, and activities are provided to the public, were assessed for accessibility. These facilities are served by sidewalks in good conditions (including pedestrian crosswalks and curb ramps with detectable warnings) as well as three accessible parking spaces (including one van-designated space).

### Office Space:

Also known as Office of Chief Engineer, this one-story facility is located nearest to the accessible parking spaces. This facility features an at-grade, accessible entrance; however, the following accessibility barriers were identified within spaces that are open to the public:

- in the reception, a weather mat is not secure and can become tripping hazards to visitors and staff;
- also in the reception, a counter for transactions with the public exceeds the maximum allowable height for visitors using wheeled mobility devices or who are of short stature (41" AFF); (Photo 1)
- a completely inaccessible single-user toilet room. (Photo 2)

### Fire Station:

This two-story fire station has staff spaces beside and above the apparatus bay. This facility does not offer an at-grade entrance into the watch room (4" step) or toilet rooms for public use. (Photo 3)



Photo 2



Photo 3



Photo 1

## Burncoat Street Fire Station 19 Burncoat Street

Located in a small lot near the intersection of Burncoat and Lincoln Streets, this one-story fire station has staff spaces on one side of the apparatus bay. (Photo 1)

Nearby sidewalks are in poor conditions and no off-street parking or toilet rooms for public use are offered at this facility. The following accessibility barriers were identified within spaces that are open to the public:

- approach to the entrance is often obstructed by staff vehicles; (Photo 2)
- the inaccessible entry door has a small step, a non-compliant door knob, and inadequate maneuvering clearances on the latch side of the door. (Photo 3)



Photo 2

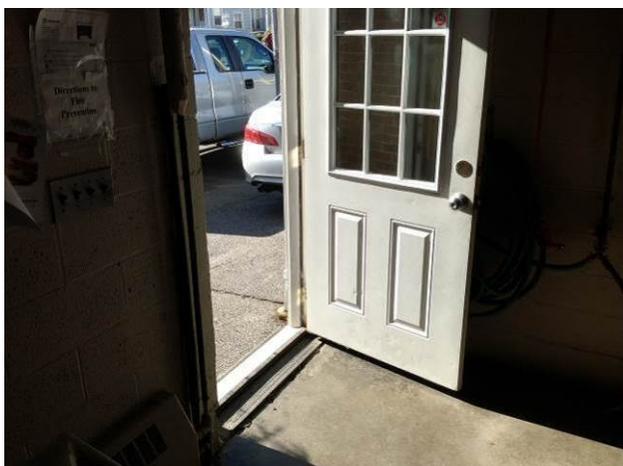


Photo 3

## Franklin Street Fire Station 266 Franklin Street



Photo 1

This is Worcester's newest fire station which opened in late 2008. Located in at the intersection of Franklin and Artic Streets, this two-story fire station has staff spaces beside and above the apparatus bay. (Photo 1)

It features sidewalks in good conditions (including curb ramps and a driveway with detectable warnings), two accessible parking spaces (including one van-designated space), an accessible entrance, and a single-user, unisex toilet room and an accessible counter inside the watch room. The following accessibility barriers were identified within spaces that are open to the public:

- at the front entrance, no clear floor space is provided underneath the doorbell; (Photo 2)
- in the parking lot, the van-designated parking space is obstructed by trash can and recycling bins; (Photo 3)
- a barbeque grille obstructs the accessible route between the accessible parking and the entrance; (Photo 3)
- in the watch room, the designation sign identifying the accessible toilet room is incorrectly located on the hinge side of the door.



Photo 2



Photo 3



Photo 1

## Greendale Fire Station (a.k.a W. Boylston Street Fire Station) 438 West Boylston Street

Located in at the intersection of West Boylston Street and Sumerhill Avenue, this two-story fire station has staff spaces beside and above the apparatus bay. (Photo 1)

The facility features sidewalks that are in moderate conditions (including curb ramps with detectable warnings) and *ad hoc* off-street parking for public use. No toilet rooms for public use are offered at this facility. The following accessibility barriers were identified within spaces that are open to the public:

- the *ad hoc* parking space designated as accessible is not located on a level surface, does not have the required access aisle, and has a sign that needs maintenance; (Photo 2)
- near the at-grade entrance, the transition between asphalt driveway and concrete landing creates a tripping hazard to those entering or exiting the fire station; (Photo 3)
- at the at-grade entrance, a weather mat is not secure and can become tripping hazards to visitors and staff. (Photo 3)



Photo 2



Photo 3

## McKeon Road Fire Station 80 McKeon Road



Photo 1

This two-story fire station, with staff spaces beside and above the apparatus bay, is located within a heavily wooded area along McKeon Road with no sidewalks for pedestrian access; therefore, this fire station can only be accessed via a steep vehicular driveway. (Photo 2)

The facility features one parking space designated as accessible for public use and an at-grade entrance. The following accessibility barriers were identified within spaces that are open to the public:



Photo 2

- the space designated as accessible has markings that are not highly visible and is missing an identification sign for van-designated spaces; (Photo 2)
- near the at-grade entrance, the transition between the walkway and landing of the covered porch creates a tripping hazard to those entering or exiting the fire station.
- at the at-grade entrance, a weather mat is not secure and can become tripping hazards to visitors and staff;
- in the watch room, a service counter exceeds the maximum allowable height for visitors using wheeled mobility devices or who are of short stature (42" AFF); (Photo 3)
- the single-user toilet room near the watch room is completely inaccessible.



Photo 3



Photo 19

## Park Avenue Fire Station 424 Park Avenue

This one-story fire station has staff spaces on both sides and above the apparatus bay. Nearby sidewalks are in poor conditions and no off-street parking for public use is offered at this facility. (Photo 1)

The following accessibility barriers were identified within spaces that are open to the public:

- the inaccessible entry door has a small step, a non-compliant door knob, and a doorbell that exceeds the maximum allowable height (54" AFF); (Photo 2)
- the single-user toilet room near the watch room is completely inaccessible. (Photo 3)



Photo 20



Photo 21

## South Division Fire Station (a.k.a Southbridge Street Fire Station) 180 Southbridge Street



Photo 1

Located in lot between Southbridge Street, Hermon Street, and Frances J. McGrath Boulevard, this two-story fire station has staff spaces beside and above the apparatus bay. (Photo 1)

Nearby sidewalks are in poor conditions and off-street parking for public use is offered at this facility. The following accessibility barriers were identified within spaces that are open to the public:

- although off-street parking for public use is offered at this facility, no accessible parking spaces are provided;
- an accessible route is not provided between the parking on the East side and entrance on the West side of the lot;
- near the at-grade entrance, the transition between asphalt driveway and concrete landing creates a tripping hazard to those entering or exiting the fire station. (Photo 2)
- the inaccessible entry door has a small step; (Photo 2)
- the multi-user toilet room near the watch room is completely inaccessible. (Photo 3)



Photo 2



Photo 3



Photo 1



Photo 2



Photo 3

## Southeast Fire Station (a.k.a. Grafton Street Fire Station) 745 Grafton Street

Located in at the intersection of Grafton Street and Ernest Avenue, this one-story fire station has staff spaces on both sides of the apparatus bay. (Photo 1)

The facility features sidewalks that are in poor conditions (most specifically, between parking and entrance), off-street parking for public use off of Ernest Avenue, and an at-grade entrance. The following accessibility barriers were identified within spaces that are open to the public:

- Although two accessible parking spaces are provided, they exceed the maximum allowable slope (7%) and do not meet the minimum requirements for access aisle (42" wide) and signage;
- The concrete landing adjacent to the entry door exceeds the maximum allowable cross slope (3%);
- Although it may be generally used by those with mobility disabilities, the single-user toilet room near the watch room does not meet all accessibility requirements because the door hardware is not compliant, the mirror and soap dispenser exceed the maximum allowable heights (45" and 51" AFF, respectively), grab bars do not meet the minimum allowable height (30" AFF), and approach to the toilet is obstructed by the heating baseboard. (Photo 3)



Photo 1

### **Tatnuck Square Fire Station (a.k.a. Pleasant Street Fire Station) 1067 Pleasant Street**

Located in at the intersection of Pleasant Street and Chesterfield Road, this two-story fire station has staff spaces on both sides and above the apparatus bay. (Photo 1)

The facility features sidewalks that are in moderate conditions (most specifically, between parking and entrance) and off-street parking for public use off of Pleasant Street.

In terms of accessibility, this facility represents the worst fire station in Worcester. It is completely inaccessible because no accessible parking, entrance, or toilet rooms are provided.



Photo 2



Photo 3



Photo 1

## Webster Square Fire Station (a.k.a. Webster Street Fire Station) 40 Webster Street

Opened in 2001, this is one of Worcester's newest fire stations. Located at the intersection of Webster and Mill Streets, this two-story fire station has staff spaces beside and above the apparatus bay. (Photo 1)

It features an accessible entrance, an accessible service counter inside the watch room and accessible toilet rooms and drinking fountains. Surrounding sidewalks were in poor condition due to the roadwork being performed during the assessment. The following accessibility barriers were identified within spaces that are open to the public:

- although off-street parking for public use is offered at this facility, no accessible parking spaces are provided;
- a cigarette disposal dispenser and electrical cords obstruct the maneuvering clearance of the at-grade entrance; (Photo 2)
- at the at-grade entrance, a weather mat is not secure and can become tripping hazards to visitors and staff. (Photo 2)

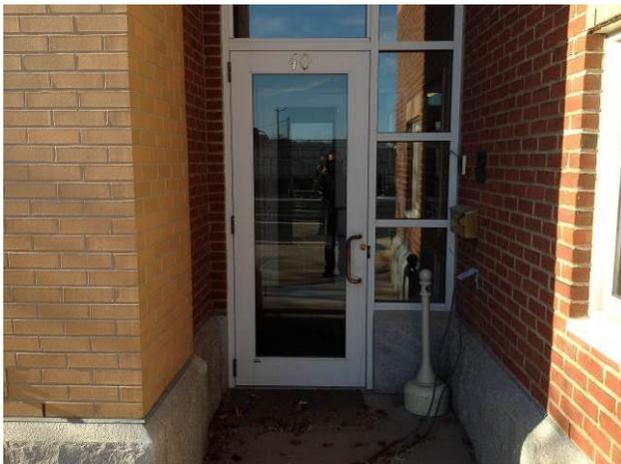


Photo 2

## Recommendations

### Priority 1 – Approach and Entrance

#### ***Parking and Drop-off Area***

Title II entities, such as fire stations, are not required to provide off-street parking for public use; however, when fire stations do provide public parking, accessible parking spaces must also be provided:

1. Provide new or improve existing accessible parking spaces at the following fire stations: Franklin Street, Greendale, McKeon Road, South Division, Southeast, Tatnuck Square, and Webster Square.
2. Ensure that accessible parking spaces are free of trash cans, recycling bins, or any other obstructions at Franklin Street Fire Station.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### ***Exterior Routes***

1. Ensure that staff vehicles do not obstruct the entrance at Burncoat Street Fire Station.
2. Ensure that the barbeque grille does not obstruct the accessible route between the accessible parking and the entrance at Franklin Street Fire Station.
3. Provide an accessible route between the accessible parking and the entrance at the following fire stations: South Division Fire Station, Tatnuck Square, and Webster Square.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes.*

#### ***Entrances***

1. Modify entrances with steps at the following fire stations: Headquarters (fire station), Burncoat Street, Park Avenue, South Division, Southeast, and Tatnuck Square. When improvements to an inaccessible entry door are not possible, policies and procedures should be developed to ensure that, at a minimum, an accessible route is provided into the apparatus bay where department personnel can address the specific need.
2. Fix tripping hazards or remove or secure weather mats near the entrance at the following fire stations: Greendale, McKeon Road, and Webster Square.
3. Relocate the doorbell at entrance at the following fire stations: Franklin Street and Park Avenue.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Doors, Doorways, and Gates, and Floor Surfaces and Building Blocks for Operable Parts.*

## Priority 2 – Access to Goods and Services

### **Sale and Service Counters**

1. Modify the counter at the following fire stations: Headquarters (office space) and McKeon Road.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Built-in Elements for Sales and Service Counters.*

### **Floor Surfaces**

1. Remove or secure weather mats at the following fire stations: Headquarters (office space), and McKeon Road.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Floor Surfaces.*

## Priority 3 – Toilet Rooms

Title II entities, such as fire stations, are not required to provide toilet rooms for public use; however, when fire stations do provide public toilet rooms, accessible amenities must be provided:

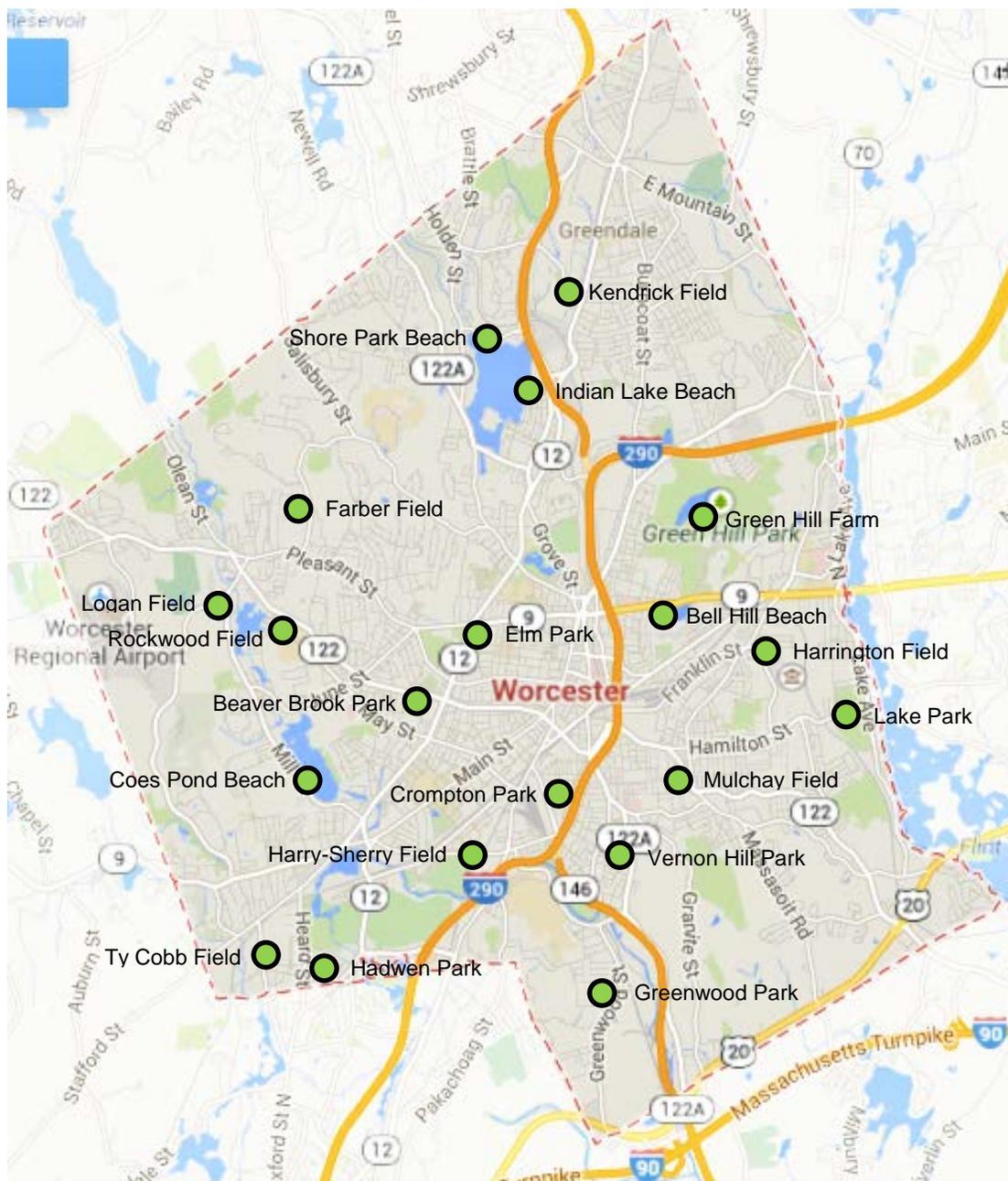
1. Modify toilet rooms at Headquarters (office space). As toilet rooms are altered during a building renovation in fire stations, ensure that alterations meet all ADA/MAAB requirements.
2. Relocate sign at the accessible toilet room at Franklin Street Fire Station.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms.*

### Open Spaces:

The City of Worcester owns and operates over 1,250 acres of open spaces, including over 60 parks and playgrounds, four beaches, and 160 acres of cemetery:

- Beaver Brook Park
- Bell Hill Beach
- Coes Pond Beach
- Crompton Park
- Elm Park
- Farber Field
- Green Hill Farm
- Greenwood Park
- Hadwen Park
- Harrington Field
- Harry-Sherry Field
- Indian Lake Beach
- Kendrick Field
- Lake Park
- Logan Field
- Mulchay Field
- Rockwood Field
- Shore Park Beach
- Ty Cobb Field
- Vernon Hill Park



## Open Spaces

Worcester's Parks, Recreation & Cemetery Department provides operations, programs, and maintenance relative to over 60 parks and playgrounds, four beaches, and a 160-acre cemetery. The department is also responsible for:

- the coordination and support for special events;
- the management of a comprehensive summer recreation program;
- the maintenance and management of the City's urban forest (trimming, clean-up of storm damage, condemned tree removals, contracted forestry services and tree plantings);
- the physical set-up for all City elections;
- the maintenance and repairs to public buildings (carpentry, plumbing, electrical, etc.).

It is the City's policy to make open space facilities accessible to residents with disabilities whenever possible. All new construction and rehabilitation projects of open space facilities are made fully accessible in accordance with 2010 ADA Standards for Accessible Design. Recent rehabilitation project includes Crompton Park with accessible toilet rooms, showers, pool, and other amenities.

For open space facilities which have not been rehabilitated in recent years or decades, IHCD has identified the following items as suggested starting points for future accessibility improvements:

### Parking Recommendations:

1. Parking Surfaces
2. Striping
3. Accessible Parking Spaces
4. Access Aisles
5. Parking Signage
6. Curb Ramps at Parking

### Toilet Room Recommendations:

1. Major Alterations
2. Minor Modifications
3. Signage

### Other Recommendations:

1. Curb Ramps
2. Pedestrian Access
3. Ramps
4. Stairways
5. Drinking Fountains
6. Concession Counters

Additionally, although they are not covered under the 2010 ADA Standards, IHCD identified the following items as recommended best practices:

1. On-Street Parking
2. Crosswalks
3. Beach Access



Photo 1

## Beaver Brook Park 9 Mann Street

*NOTE: The baseball field in this facility is currently being renovated and certain areas are not open to the public.*

### Parking Issues:

- Parking signs are not provided;
- Van-designated space is not provided;
- Stripping is worn out;
- Curb ramps adjacent to parking spaces are in poor condition.

### NOTES:

*Total number of parking spaces: 65*

*Number of accessible parking spaces: 4*

### Toilet Room Issues (both Men's and Women's):

- ADA-compliant designating signs are not provided alongside doors;
- Deteriorated surface along doors thresholds of toilet rooms create barriers and tripping hazards;
- Toilets are too high (20" above floor);
- Self-closing hinges of door to accessible toilet stall are malfunctioning.



Photo 2

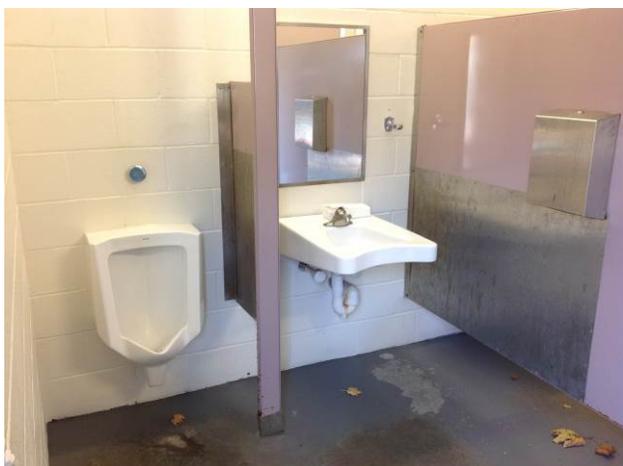


Photo 3



Photo 1

## Bell Hill Beach 238 Belmont Street

### Parking Issues:

- Access aisle of van-designated spaces near the beach is too narrow (5').

### NOTES:

Total number of parking spaces: 35+

Number of accessible parking spaces: 3 (van)

### Toilet Room Issues:

- Designating signs are not provided alongside doors;
- Doors lack the maneuvering clearance required to open them;
- Lavatories have non-compliant faucets;
- Lavatories have unprotected plumbing underneath;
- Accessible toilet stalls have grab bars that are too low (32" above the floor);
- Doors to accessible toilet stalls with malfunctioning self-closing hinges;
- Fire alarms are not provided.

### Other Issues:

- Drinking fountain near toilet rooms is not ADA-compliant;
- An accessible route is not provided between the concrete walkway and the beach.



Photo 2



Photo 3



Photo 1

## Coes Pond Beach 200 Mill Street

This facility is completely inaccessible:

- Poor pedestrian access
- Parking lot is not paved and accessible parking (including van-designated space) is not provided
- Toilet rooms are not accessible
- An accessible route is not provided between the sidewalk and the beach



Photo 2



Photo 3



Photo 1

## Crompton Park 40 Canton Street

### Parking Issues:

- Parking stripping is not provided;
- Accessible parking (including van-designated space) is not provided;
- Curb ramp between parking lot and building is in poor condition.

### NOTES:

*Total number of parking spaces: unknown*

*Number of accessible parking spaces: 0*

### Other Issues:

- Curb ramp off of Canton Street (adjacent to playground) lacks the top landing and is too steep (12%).



Photo 2



Photo 3



Photo 1

## Elm Park 121 Russell Street

*NOTE: No off-street parking is provided at this facility.*

### Toilet Room Issues:

- ADA-compliant designating signs are not provided alongside doors;
- Doors have non-compliant hardware;
- Lavatories have non-compliant faucets;
- Accessible toilet stalls have grab bars that are too low (32" above the floor).

### Other Issues:

- Nearby curb ramps are in poor condition;
- Crosswalk at the intersection of Highland and Russell Street lacks a curb ramp.



Photo 2



Photo 3



Photo 1



Photo 2



Photo 3

## Farber Field 100 Camelot Drive

### Parking Issues:

- Accessible parking (including van-designated space) is not provided
- Stripping is worn out

### NOTES:

Total number of parking spaces: 50+

Number of accessible parking spaces: 0

### Toilet Room Issues:

- ADA-compliant designating signs are not provided alongside doors;
- Toilet rooms are completely inaccessible.

### Other Issues:

- Accessible pedestrian route between sidewalk and building is not provided;
- Drinking fountain near toilet rooms is not ADA-compliant;
- Concession counter is too high (44" above ground).

*NOTE: Pedestrian crosswalk is not provided between parking lot and field/building.*



Photo 1

## Green Hill Farm 301 Green Hill Parkway

### Parking Issues:

- Van-designated space is not provided;
- Stripping is worn out;
- Slopes of parking spaces are slightly excessive (3%).

### NOTES:

*Total number of parking spaces: 6*

*Number of accessible parking spaces: 2*

### Toilet Room Issues (both Men's and Women's):

- ADA-compliant designating signs are not provided alongside doors;
- Non-compliant door hardware;
- Doors with 2" step along thresholds;
- Lavatories with unprotected pipes underneath them;
- Non-compliant faucets;
- Wall-mounted paper dispensers are too high (55" above floor);
- Toilets are too far from side wall (20");
- Side grab bar is too low (30" above floor);
- Rear grab bar obstructed by toilet tank.



Photo 2

### Other Issues:

- Wall- or post-mounted soap dispensers are too high (53" above ground);
- Certain segments of the asphalt walkway are too steep (8%);
- Picnic tables are not accessible and are not located on accessible routes.



Photo 3



Photo 1

## Greenwood Park 20 Forsberg Street

*NOTE: This facility is currently being renovated and most areas are not open to the public.*

### Parking Issues:

- Parking signs are not provided;
- Van-designated space is not provided;
- Stripping is worn out;
- Slopes of parking spaces at top of park are slightly excessive (2.5%);
- Slope of parking space near splash park is excessive (5.5%);
- Curb ramp between parking lot at top of park and buildings is in poor condition.

### *NOTES:*

#### *Upper Parking:*

*Total number of parking spaces: 40+*

*Number of accessible parking spaces: 2*

#### *Lower Parking:*

*Total number of parking spaces: 1*

*Number of accessible parking spaces: 1 (van)*



Photo 2



Photo 3



Photo 1

## Hadwen Park 9 Heard Street

### Parking Issues:

- Parking signs are not provided;
- Van-designated spaces are not provided;
- Slope of parking space at top of park is excessive (8%);
- Slope of parking space near playground is excessive (3.5%);
- Inadequate number of accessible parking spaces.

### NOTES:

#### *Upper Parking:*

*Total number of parking spaces: 1*

*Number of accessible parking spaces: 1*

#### *Lower Parking:*

*Total number of parking spaces: 31*

*Number of accessible parking spaces: 1*



Photo 2

### Toilet Room Issues:

- ADA-compliant designating signs are not provided alongside doors;
- Toilet rooms are completely inaccessible;
- Portable toilet room is not located on an accessible route.



Photo 3

### Other Issues:

- Curb ramps on Heard Street are in poor condition.



Photo 1

## Harrington Field 290 Harrington Way

### Parking Issues:

- Parking stripping is not provided;
- Accessible parking (including van-designated space) is not provided.

### NOTES:

*Total number of parking spaces: unknown*

*Number of accessible parking spaces: 0*

### Other Issues:

- Sidewalk along Harrington Way in poor condition;
- Accessible route to the baseball field is not provided;
- Stairway between building and baseball field lacks handrails.



Photo 2



Photo 3



Photo 1

## Harry-Sherry Field 55 Camp Street

### Parking Issues (North Parking Lot only):

- Parking signs are not provided;
- Van-designated space is not provided;
- Curb ramps along parking lot lack the top landing.

### NOTES:

#### North Parking:

*Total number of parking spaces: 16*

*Number of accessible parking spaces: 2*

#### South Parking:

*Total number of parking spaces: 17*

*Number of accessible parking spaces: 1 (van)*

### Other Issues:

- South Worcester Neighborhood Center is completely inaccessible.



Photo 2



Photo 3



Photo 1



Photo 2



Photo 3

## Indian Lake Beach 20 Clason Road

### Parking Issues:

- Parking stripping is not provided;
- Accessible parking (including van-designated space) is not provided.

### NOTES:

*Total number of parking spaces: unknown*

*Number of accessible parking spaces: 0*

### Toilet Room Issues:

- ADA-compliant designating signs are not provided alongside doors;
- Toilet rooms are completely inaccessible.

### Other Issues:

- Poor pedestrian access;
- Walkway between parking and building in poor condition;
- An accessible route is not provided between the asphalt walkway and the beach.



Photo 1

## Kendrick Field 45 Brook Street

### Parking Issues:

- Parking stripping is not provided at lower parking lot;
- Accessible parking (including van-designated space) is not provided at lower parking lot.

### NOTES:

#### *Upper Parking:*

*Total number of parking spaces: unknown*

*Number of accessible parking spaces: 2 (van)*

*Most of parking lot is unpaved, except for accessible parking spaces.*

#### *Lower Parking:*

*Total number of parking spaces: 25+*

*Number of accessible parking spaces: 0*



Photo 2



Photo 1



Photo 2



Photo 3

## Lake Park Lake Avenue and Hamilton Street

*NOTE: This facility is currently being renovated and most areas are not open to the public.*

### Parking Issues:

- Parking lot off of Coburn Street is not paved;
- Parking stripping is not provided at parking lot off of Hamilton Street;
- Access aisles are not provided;
- Van-designated spaces are not provided;
- Slopes of parking space at parking lot off of Coburn Street are slightly excessive (2.5%);
- Slopes of parking spaces at parking lot off of Hamilton Street are excessive (5.5%).

### *NOTES:*

#### *Coburn Street Parking:*

*Total number of parking spaces: unknown*

*Number of accessible parking spaces: 1*

#### *Hamilton Street Parking:*

*Total number of parking spaces: unknown*

*Number of accessible parking spaces: 2*

## Logan Field 539 Mill Street

*NOTE: No off-street parking is provided at this facility.*

### Toilet Room Issues:

- ADA-compliant designating signs are not provided alongside doors;
- Lavatories have unprotected plumbing underneath;
- Grab bars adjacent to toilets are too low (32" above the floor);
- Fire alarms are not provided.



Photo 1



Photo 2



Photo 3



Photo 1

## Mulchay Field 158 Dorchester Street

### Parking Issues:

- Parking sign is not provided;
- Van-designated space is not provided;
- Access aisle is too narrow (4');
- Slopes are slightly excessive (2.5%);
- Curb ramp between parking lot and field is in poor condition.

### NOTES:

Total number of parking spaces: 9

Number of accessible parking spaces: 1



Photo 2

### Toilet Room Issues:

- ADA-compliant designating signs are not provided alongside doors;
- Lavatories have unprotected plumbing underneath;
- Mirrors above lavatories are too high (53" above the floor);
- Grab bars adjacent to toilets are too low (30" above the floor);
- Toilets are located too far from side wall and grab bar (25-27" from wall);
- Fire alarms are not provided.

### Other Issues:

- Crosswalk on Dorchester Street lacks a curb ramp;
- Building with ramp missing one handrail;
- Drinking fountain near toilet rooms is not ADA-compliant.

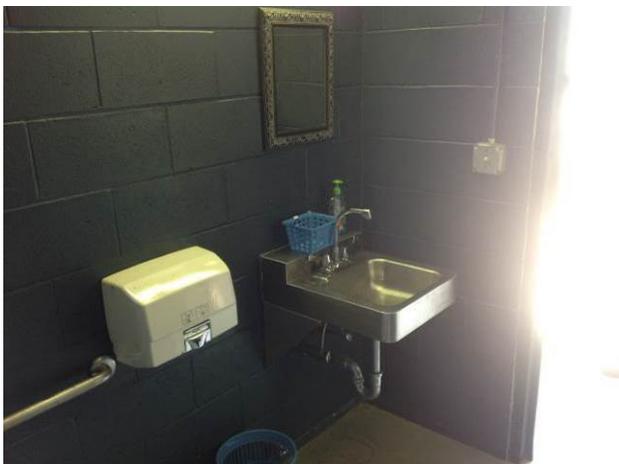


Photo 3



Photo 1

## Rockwood Field 540 Chandler Street

*NOTE: No off-street parking is provided at this facility.*

### Toilet Room Issues:

- ADA-compliant designating signs are not provided alongside doors to all toilet rooms;
- Inside toilet rooms at center baseball field, mirrors above lavatories are too high (41" above the floor);
- Inside toilet rooms at center baseball field, lavatories have unprotected plumbing underneath;
- Inside toilet rooms at center baseball field, fire alarms are not provided;
- Toilet rooms near Chandler Street are completely inaccessible.

### Other Issues:

- Accessible route between the sidewalk and bleachers/building is not provided;
- Concession counter is too high (37" above ground).



Photo 2



Photo 3



Photo 1

## Shore Park Beach 115 Shore Drive

### Parking Issues:

- Van-designated space is not provided;
- Access aisles are too narrow (4').

### NOTES:

Total number of parking spaces: 50+

Number of accessible parking spaces: 3

### Toilet Room Issues:

- ADA-compliant designating signs are not provided alongside doors;
- Toilet rooms are completely inaccessible.

### Other Issues:

- Poor pedestrian access;
- Walkway between parking and building is in poor condition;
- An accessible route is not provided between the concrete walkway and the beach.



Photo 2



Photo 3



Photo 1



Photo 2



Photo 3

## Ty Cobb Field 43 South Ludlow Street

*NOTE: No off-street parking is provided at this facility.*

### Toilet Room Issues:

- ADA-compliant designating signs are not provided alongside doors;
- Toilet rooms are completely inaccessible.

### Other Issues:

- Curb ramps at intersection of South Ludlow and Laurier Street are in poor condition;
- Stairways along South Ludlow and Laurier Streets lack handrails;
- Ramp along Laurier Street lacks railings;
- Concession counter is too high (40" above ground).



Photo 1



Photo 2



Photo 3

## Vernon Hill Park 150 Vernon Street

### Parking Issues:

#### Issues:

- Slopes are excessive (4%);
- Curb ramp near van-designated space lacks a level landing and has excessive running slope (12%).

#### NOTES:

Total number of parking spaces: 40+

Number of accessible parking spaces:

- 2 near top baseball field
- 1 van-designated near toilet rooms

### Toilet Room Issues:

- Designating sign of Men's toilet rooms is broken;
- Lavatories have unprotected plumbing underneath;
- Fire alarms are not provided.

### Other Issues:

- Stairway between parking lot and top ball field lacks one handrail;
- Concession counter is too high (39" above ground).

## Recommendations

### Parking Recommendations:

#### 1. *Parking Surfaces*

Pave parking spaces and access aisles so that their ground surface is stable, firm, slip-resistance, and no steeper than 2% in any direction:

- Coes Pond Beach;
- Lake Park (Coburn Street parking).

Re-grade the parking spaces and access aisles with slopes up to 4% whenever the parking lot is repaved:

- Green Hill Farm;
- Greenwood Park (upper parking);
- Hadwen Park (lower parking);
- Lake Park (Coburn Street parking);
- Mulchay Field.

Re-grade the parking spaces and access aisles with slopes over 4% immediately:

- Greenwood Park (lower parking);
- Hadwen Park (upper parking);
- Lake Park (Hamilton Street parking);
- Vernon Hill Park.

#### 2. *Striping*

(Re-)stripe all accessible parking spaces and access aisles so that they are highly visible:

- Beaver Brook Park;
- Coes Pond Beach;
- Crompton Park;
- Farber Field;
- Green Hill Farm;
- Greenwood Park;
- Harrington Field;
- Indian Lake Beach;
- Kendrick Field (lower parking);
- Lake Park (Hamilton Street parking).

#### 3. *Accessible Parking Spaces*

Confirm the total number of parking spaces and provide the required number of accessible parking spaces, including parking signs:

- Coes Pond Beach;
- Crompton Park;
- Farber Field;
- Harrington Field;
- Indian Lake Beach;
- Kendrick Field (lower parking).

Confirm the total number of parking spaces and increase the number of accessible parking spaces, including parking signs:

- Hadwen Park (playground parking);

Confirm the total number of parking spaces and provide the required number of van-designated spaces, including parking signs:

- Beaver Brook Park;
- Coes Pond Beach;
- Crompton Park;
- Farber Field;
- Green Hill Farm;
- Greenwood Park;
- Hadwen Park;
- Harrington Field;
- Harry-Sherry Field (north parking);
- Indian Lake Beach;
- Kendrick Field (lower parking);
- Lake Park;
- Mulchay Field;
- Shore Park Beach.

#### 4. Access Aisles

Increase the width of the access aisles serving accessible parking spaces to 5 feet:

- Mulchay Field;
- Shore Park Beach.

Provide additional access aisles alongside accessible parking spaces:

- Lake Park.

#### 5. Parking Signage

Install ADA-compliant signs at each accessible parking space (mounted between 5' to 8'):

- Beaver Brook Park;
- Greenwood Park;
- Hadwen Park;
- Harry-Sherry Field (north parking);
- Mulchay Field.

Remove the signs of the van-designated spaces:

- Bell Hill Beach (beach parking).

#### 6. Curb Ramps at Parking

Improve all curb ramps adjacent to accessible parking spaces:

- Beaver Brook Park;
- Crompton Park;
- Greenwood Park (upper parking);
- Harry-Sherry Field (north parking);
- Mulchay Field;
- Vernon Hill.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Scoping Requirements and General Site and Building Elements for Accessible Parking.*

#### Toilet Room Recommendations:

##### 1. Minor Modifications

Replace door hardware or reposition plumbing fixtures and accessories within partially accessible toilet rooms:

- Bell Hill Beach;
- Green Hill Farm;
- Elm Park;
- Mulchay Field;
- Logan Field;
- Rockwood Field.

##### 2. Major Alterations

As inaccessible toilet rooms are renovated, they will have to be brought into compliance with accessibility and life safety codes. Alternatively, provide accessible portable toilets that are located on accessible routes:

- Coes Pond Beach;
- Farber Field;  
Hadwen Park;
- Harry-Sherry Field;
- Indian Lake Beach;
- Shore Park Beach;
- Ty Cobb Park.

##### 3. Signage

Install ADA-compliant designating signs alongside the door to each toilet room:

- Beaver Brook Park;
- Bell Hill Beach;
- Coes Pond Beach;
- Elm Park;
- Farber Field;
- Green Hill Farm;
- Greenwood Park;
- Hadwen Park;
- Indian Lake Beach;
- Logan Field;
- Lake Park;

- Mulchay Field;
- Rockwood Field;
- Shore Park Beach;
- Ty Cobb Park.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Plumbing Elements and Facilities for Toilet and Bathing Rooms, and Communication Elements and Features for Signs.*

## **Other Recommendations:**

### **1. Curb Ramps**

Improve curb ramps that are in poor condition or install new curb ramps where they are not provided, including at end of crosswalks and intersection leading to facilities:

- Crompton Park;
- Elm Park;
- Hadwen Park;
- Mulchay Field;
- Ty Cobb Field.

### **2. Pedestrian Access**

Improve pedestrian access to and within facilities, including sidewalks and walkways between public transit stops/parking and the amenities provided in the facilities:

- Coes Pond Beach;
- Farber Field;
- Harrington Field;
- Indian Lake Beach;
- Rockwood Field;
- Shore Park Beach.

### **3. Ramps**

Install compliant handrails on one or both sides of ramps:

- Mulchay Field;
- Ty Cobb Field.

### **4. Stairways**

Install compliant handrail on one or both sides of stairways:

- Harrington Field;
- Ty Cobb Field;
- Vernon Hill Park.

## 5. **Drinking Fountains**

As facilities are renovated, inaccessible drinking fountains will have to be replaced with ADA-compliant fixtures:

- Bell Hill Beach;
- Farber Field;
- Mulchay Field.

## 6. **Concession Counters**

As facilities are renovated, modify counters on each little league building with public interface so that they are accessible. During public events, provide an auxiliary counter no higher than 36" above the ground in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means:

- Farber Field;
- Rockwood Field;
- Ty Cobb Field;
- Vernon Hill Park.

## 7. **Inaccessible Neighborhood Centers**

As inaccessible neighborhood centers are renovated, they will have to be brought into compliance with accessibility and life safety codes:

- Harry-Sherry Field.

*For additional information, please refer to 2010 ADA Standards for Accessible Design: Accessible Routes for Curb Ramps and Ramps, General Site and Building Elements for Stairways, Plumbing Elements and Facilities for Drinking Fountains, and Built-in Elements for Sales and Service Counters.*

## Recommendations for Best Practices:

### 1. **On-Street Parking**

Although on-street parking is not covered under the 2010 ADA Standards for Accessible Design, consider installing or improving the accessible parking spaces on streets along the following facilities:

- Elm Park;
- Logan Field;
- Rockwood Field;
- Ty Cobb Field.

### 2. **Crosswalks**

Although the location of new crosswalks is not covered under the 2010 ADA Standards for Accessible Design, consider installing crosswalks on streets along the following facilities:

- Greenwood Park;
- Farber Field;
- Harrington Field;
- Kendrick Field;
- Indian Lake Beach;
- Vernon Hill Park.

### 3. **Beach Access**

Although paths within beaches are not covered under the 2010 ADA Standards for Accessible Design, consider installing permanent or removable accessible routes to the water edge and/or providing beach wheelchairs to the public at the following facilities:

- Bell Hill Beach;
- Coes Pond Beach;
- Indian Lake Beach;
- Shore Park Beach.

## Appendices

## Appendix A

### Request for Proposals by City of Worcester

#### REQUEST FOR PROPOSALS

##### **Consulting for Americans with Disabilities Act (ADA) Evaluation and Transition Plan Update WORCESTER, MASSACHUSETTS**

The City of Worcester (the “City”) is seeking professional services from qualified consultant firms to prepare an Updated Self Evaluation and Transition Plan that wholly complies with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), including the modifications made by the ADA Amendments Act of 2008. Additionally where the requirements under the Massachusetts Architectural Access Board (AAB) (521 CMR) are more protective than the ADA, the City will be in compliance with the AAB.

The completed Evaluation and Plan will enable the City to engage in capital budgeting preparation for capital work to be completed within the next seven to ten years to address the operational needs and obligations of city departments.

The contract will be awarded to the most responsible bidder whose proposal is within the competitive range and offers the most advantageous proposal, taking into consideration responsiveness to the evaluation criteria established within this Request for Proposals, as well as Cost for the proposed services.

After the deadline for submission of proposals to the City of Worcester Purchasing Department, all proposals shall be reviewed for compliance with the Minimum Evaluation Criteria. All proposals will be reviewed by the Chief Procurement Officer or his/her designee as well as a team of employees from key user groups across the city.

Any proposal failing to satisfy any portion of the Minimum Evaluation Criteria will be rejected. Proposals will then be reviewed against the Comparative Evaluation Criteria and a joint recommendation will be made by the Chief Procurement Officer or his/her designee and the team of key users. The City Manager will subsequently make the final designation of the winning proposal.

## **BACKGROUND**

The City's current Transition Plan (Plan) was published in 2004. Although progress has been achieved towards completing objectives in the Plan as capital projects have been completed, the Plan itself does not adequately reflect the current state of city property. Additionally, the earlier Plan lacked the comprehensive evaluation across city properties that this Proposal intends to accomplish. For instance, the use of current technologies such as the Customer Service Complaint System (CSCS) complaint tracking system that has driven an improved communication between service requests and complaints across city departments, FilePermit, and the increased reliance on GIS layering to enhance development and communication have all improved the efficiency and coordination of everyday services as well as city wide planning. The current Plan does not reflect the current state of city properties and it is necessary that the Update be integrated into existing planning tools.

The City has performed a preliminary internal needs analysis and has determined that the greatest return for future capital planning and expenditures would be best met by focusing on updating the Plan for city buildings.

The City wishes to engage an outside consulting firm to provide expertise in the areas of surveying and needs assessment.

## **SCOPE OF SERVICES**

### **Vertical Aspects**

This initial work of the Plan covers vertical aspects including: city owned and leased buildings (interior, exterior, and accessible routes from public way.) (Attached is a list of buildings).

*Areas not included: Worcester Public Schools, Worcester Housing Authority, Conservation Land, public and private streets.*

The following are the key services sought:

- **Update** the City's 2004 Self Evaluation and Transition Plan to comply with current ADA standards (2010 ADA Standards for Accessible Design) and 521 CMR.
- The consultant will provide a **field review** of City owned and leased buildings, parking garages & facilities to identify physical barriers and provide remedial options for compliance.
- Provide a **program/database** that uses native functionality of GIS (Geographic Information System) that tracks proposed modifications with the ability for the City to amend timeframes and priorities. Data delivery must be compatible with Esri's ArcGIS v10.
- The consultant will provide a **report** with complete compliance evaluation of City owned and leased buildings, parking garages & facilities (excluding areas not included in the scope of work, above) including recommendations for any and all modifications and

costs for proposed modifications separated by the categories of facilities and building features and priorities for completion of proposed modifications.

- Provide the City with an **itemized cost estimate** that addresses barrier mitigation and capital budgeting.

### **TIMELINE**

The City anticipates an aggressive timeline for beginning the project with the aim of beginning implementation with a vendor as soon as is practicable and with the expectation that the implementation would be complete within 6 to 12 months from the beginning of implementation with a vendor.

### **PLAN OF SERVICES**

The Plan of Services shall contain specifics as to how the Consultant will satisfy the Scope of Services, including but not limited to:

- Approach to meeting the project Scope of Services. Please describe your process to include input from all City departments, as well as the public in order to provide the needs analysis. To the greatest extent possible, please provide a written summary identifying the types of information, data and assistance expected from the City of Worcester in order to complete this project.
- Community and Staff Evaluation/Involvement: The consultant will provide options and recommendations regarding the involvement of staff and the community in the process of preparation of a self-evaluation plan. The consultant will be required to attend and facilitate three (3) meetings with the City Transition Plan Advisory Committee to be identified as described in the scope of services. The consultant will be required to attend and provide presentations at two (2) Commission on Disability meetings to solicit public input. The consultant will present findings at two (2) public hearings.
- A preliminary report will be required when approximately 75% of the evaluation is complete. This report will be presented to the ADA Transition Plan Advisory Committee for review and input.
- List the specific technology and equipment you will utilize to create a profile inventory of existing infrastructure.
- Project costs: Under separate cover, identify the cost for each bulleted task in the Scope of Services. Include the number of staff needed to complete each task. Provide a complete summary of costs – cost by task, by staff person, components, optional work, etc.
- A sample of a project outline for related work completed together with a sample of the database program that your firm proposes to use for the inventory and tracking of remediation work.

ADA RFP Vertical Aspects

ATTACHMENT A  
 Description of Facilities

Building	Street Number	Street	Zip Code	Department	Building Area Square Feet	State or National Designations
City Hall	455	Main Street	01608	City	73,100	Nat'l Register District (3/29/1978); Preservation Restriction
Main Library	3	Salem Square	01602	City	150,000	None
Frances Perkins Library	470	West Boylston Street	01605	City	3,250	Nat'l Register Individual Property (3/5/1980); Nat'l Register MRA (3/5/1980)
Great Brook Valley -Branch Library	89	Tacoma Street	01605	City	1,000	None
Police Headquarters*	9	Lincoln Square	01605	City	124,656	None
Worcester Senior Center	128	Providence Street	01604	City	97,500	MACRIS
Union Station	2	Washington Square	01604	City	148,000	Nat'l Register District (8/15/1995); Nat'l Register Individual Property (3/5/1980); Nat'l Register MRA (3/5/1980); Preservation Restriction (9/30/1998)
Inspectional Services	25	Meade Street	01610	City	27,756	None
DPW Administrative Buildings	Misc.	East Worcester Street	01602	City	89,037	16 & 20 E. Worc MACRIS
Fire Department Headquarters*	141	Grove Street	01605	City	20,812	The firefighter's memorial and the fire station bell are listed on MACRIS, not the building
McKeon Road Fire Station*	70	McKeon Rd	01607	City	12,750	None
Hermon Street Fire Station*	80	Hermon Street	01608	City	12,448	None
West Boylston Fire Station*	438	West Boylston Street	01606	City	6,840	None
Pleasant Street Fire Station*	1067	Pleasant Street	01609	City	6,580	None
Park Avenue Fire Station*	424	Park Ave	01602	City	4,400	None
Burncoat Fire Station*	19	Burncoat Street	01606	City	2,715	None
Grafton Fire Station*	745	Grafton Street	01604	City	4,223	None
Southbridge Street Fire Station*	180	Southbridge Street	01602	City	revising	None
Webster Street Fire Station*	40	Webster Street	01603	City	14,454	Nat'l Register Individual Property (3/5/1980); Nat'l Register MRA (3/5/1980)
Hope Cemetery	119	Webster Street	01603	City	13,101	Nat'l Register Individual Property (12/22/1997)
Green Hill Golf	2	Green Hill Pkwy	01605	City	12,777	None
Green Hill Zoo	2	Green Hill Pkwy	01605	City	3,220	None
Lake Park/East Park	281	Lake at Hamilton St	01604	City	1,000	None
Beaver Brook Park	9	Mann St	01602	City	1,785	None
Beaver Brook Park Ted Williams Little League	80	Mayfield St	01602	City	1,984	None
Parks Building	50	Skyline Drive	01602	City	revising	None

\* Only areas open to the public

## Appendix B

### Reference List of Relevant Laws and Executive Orders

#### Federal Laws:

1. American with Disabilities Act (ADA)\*
2. Section 504 of the Rehabilitation Act\*
3. Fair Housing Act
4. Voting Accessibility for the Elderly and Handicapped Act
5. National Voter Registration Act
6. Civil Rights of Institutionalized Persons Act
7. Individuals with Disabilities Education Act

\* Requires a Transition Plan

#### Commonwealth of Massachusetts Laws and Executive Orders:

1. Massachusetts Constitutional Amendment - Article 114
2. Massachusetts Equal Rights Law - G.L. c. 93 § 103
3. Massachusetts Executive Order 526 - EO 526
4. Massachusetts Architectural Access Board - G.L. c. 22, § 13A
5. Massachusetts Secretary of State, Election Division Regulations - 950 C.M.R. §51
6. Massachusetts Zoning Law, Access Ramps - G.L. c. 40A § 3 ¶8
7. Massachusetts Zoning Law, General and Community Residences - G.L. c. 40A § 3 ¶4
8. Massachusetts Disability Commissions - G.L. c. 40, § 8J
9. Handicapped Parking Laws - Parking Lots: G.L. c. 40 § 21, ¶ 23; Parking Meter Fees G.L. c. 40 § 22A; Over Time Parking Limits G.L. c. 40 §22; Reserved Spaces and Towing G.L. c. 40 §22D:
10. Administration of Handicapped Parking Program - G.L. c. 40, § 22G
11. Massachusetts Automobile Excise Tax Exemption - G.L. c. 60A, § I
12. Massachusetts Automobile Sales Tax Exemption - G.L. c. 64H, § 6(U)
13. Massachusetts Public Education Law, Ch. 766 - G.L. c. 71B, §§ 1 - 14
14. Massachusetts Transitional Planning Services, Turning 22 (Commonly Known as Chapter 688) - G.L. c. 71 B, §§ 12A - C
15. Massachusetts Employment Discrimination Law - G.L. c. 151B, 4, ¶ 16

## Appendix C

### DOJ Polling Places Language

As reference for the pertinent City of Worcester's staff, below is the language utilized by the Department of Justice (DOJ) concerning Polling Places:

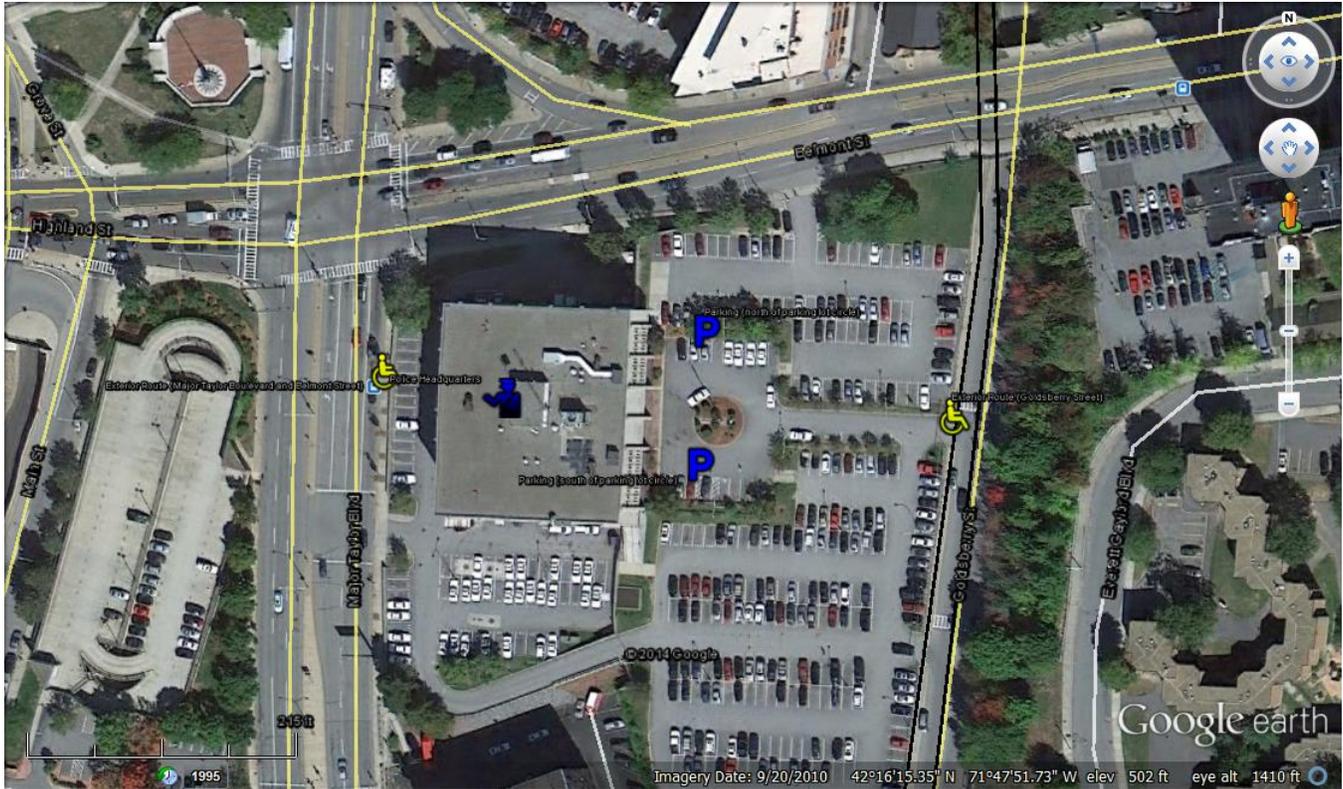
1. Some of the County or Municipal polling places may be owned or operated by other public entities subject to title II or by public accommodations subject to title III and, as such, would be subject to the obligation to provide program access or to remove barriers to accessibility under the ADA. This Agreement does not limit future enforcement action against the owners or operators of these polling places by any person or entity, including the Department.
2. Before designating any site as a new polling place, the County or Municipality will survey the site using the survey instrument at Attachment F to determine whether the site contains barriers to access by people with disabilities in the parking, exterior route to the entrance, entrance, interior route to the voting area, or voting area. The County or Municipality will not designate any such site as a polling place until all such barriers have been removed.
3. The Department surveyed certain of County or Municipal's polling places. Barriers to access at such polling places owned by the County or Municipality and the dates by which the County or Municipality will remove barriers are noted in Attachments I, J, and K.
4. Barriers to access at the polling places not owned by the County or Municipality which were surveyed by the Department are noted in Attachment E. Within one (1) month of the effective date of this Agreement, the County or Municipality will request in writing that each of the owners and operators of the polling places listed in Attachment E remove the noted barriers to access for persons with disabilities within one (1) year of the effective date of this Agreement. The County or Municipality will provide a copy of the Department's ADA Checklist for Polling Places ([www.ada.gov/votingck.htm](http://www.ada.gov/votingck.htm)) with the written request. The County or Municipality will simultaneously send a courtesy copy of the request to the Department.
5. Within nine (9) months of the effective date of this Agreement, the County or Municipality will survey all facilities listed in Attachment E to determine whether the barriers noted have been removed. If not, for each polling place that still contains inaccessible parking, exterior route to the entrance, entrance, interior route to the voting area, or voting area, the County or Municipality will identify within eighteen (18) months of the effective date of this Agreement an alternate location where these elements are accessible. That identification will utilize the survey instrument that appears as Attachment F to this Agreement. The County or Municipality will then take immediate steps to change its polling place to the new location. Under this provision of the Agreement, the County or Municipality will ensure that barriers at each polling place identified in Attachment E are either removed or a substitute accessible polling place is in operation before the next election occurring more than twelve (12) months after the effective date of this Agreement.

6. Within twelve (12) months of the effective date of this Agreement, using the survey instrument at Attachment F, the County or Municipality will survey all polling places not surveyed by the Department to identify barriers to access by people with disabilities in the parking, exterior route to the entrance, entrance, interior route to the voting area, and voting area. For each such polling place, the County or Municipality will then either (1) ensure that all barriers to access by people with disabilities have been removed or (2) identify an alternate polling place with no barriers to access by people with disabilities. That identification of accessible polling places will utilize the survey instrument that appears as Attachment F to this Agreement. The County or Municipality will then take immediate steps to change each new inaccessible polling place to a new accessible location. Under this provision of the Agreement, the County or Municipality will ensure that barriers at each polling place the Department did not survey are either removed or a substitute accessible polling place is in operation before the next election occurring more than twelve (12) months after the effective date of this Agreement.
7. Until all polling places in each precinct or voting district have accessible parking, exterior routes, entrances, interior routes to the voting area, and voting area, prior to each election, the County or Municipality will identify and widely publicize to the public and to persons with disabilities and organizations serving them the most accessible polling place(s) for each precinct or voting district.
8. Within three (3) months of the effective date of this Agreement, the County or Municipality will provide opportunities for same-day balloting for voters with disabilities whose assigned polling place does not have accessible parking, exterior route to entrance, entrance, interior route to the voting area, and voting area. The method for providing these opportunities may include allowing the individual to vote at another nearby location that is accessible, allowing individuals with disabilities to vote by an absentee ballot that is accepted if postmarked on the day of the election (or picked up by election officials at the home of the voter on the same day as the election), providing curbside voting at the inaccessible polling place, or any other method that ensures that voters with disabilities have the same degree of information available to them when casting their ballots as others. If curbside assistance is provided and a polling place official is not stationed outside to provide assistance to people with disabilities in curbside voting, it must include a reliable, effective mechanism by which individuals with disabilities can summon election officials to provide curbside assistance without leaving their vehicles and ensure prompt response and assistance with curbside voting from polling officials.
9. Within three (3) months of the effective date of this Agreement, the County or Municipality will survey its voter registration locations for accessibility to persons with disabilities by using the form provided at Attachment F and will report the results of this survey to the Department. If barriers to access are identified, the County or Municipality will implement and report to the Department its plan to provide program access, which may include allowing persons to register to vote through alternative means or at alternative locations.
10. Within three (3) months of the effective date of this Agreement, the County or Municipality will make all voter registration materials available in alternate formats, including Braille, large print, audio tape, and accessible electronic format (e.g., HTML).

11. Within the month prior to the next election that utilizes the County or Municipality's polling places, and at yearly anniversaries of the effective date of this Agreement until it expires, the County or Municipality will train poll workers on the rights of people with disabilities and the practical aspects of assuring those rights. The training will cover, at minimum, the need to maintain the physical accessibility of polling locations; how to assist people with disabilities, as necessary; and how to operate any non-standard voting equipment or accessible features of standard equipment (particularly new, accessible equipment).

## Appendix D

### Sample of Geographic Information System (GIS) database for assessed facilities



## Appendix E

### Sample of ADA Transition Plan database with cost estimation

Microsoft Excel - City of Worcester - ADA Transition Plan Database 100% DRAFT.xlsx												
Information Provided by Institute for Human Centered Design						Information Provided by City of Worcester						
FACILITY	ELEMENT	ISSUE / PHYSICAL BARRIER	LOCATION WITHIN FACILITY	PRIORITY FOR BARRIER REMOVAL	ACTION FOR BARRIER REMOVAL	ESTIMATED COST OF BARRIER REMOVAL <i>Estimates are intended as a guide to budgeting access modifications and are not intended to be absolutely comprehensive or definitive.</i>	PROJECT START DATE	PROJECT COMPLETION DATE	RESPONSIBLE FOR BARRIER REMOVAL	BARRIER REMOVED	X	
4	City Hall	Parking	identification signs	underground parking garage	Priority 1 - Approach & Entrance	In the underground garage off of Front Street, raise all four signs identifying the accessible parking spaces so that their bottom is at least five feet above the floor.	\$1,046.00					
5	City Hall	Exterior Route	ramp	exterior ramp off of Front Street	Priority 1 - Approach & Entrance	Repair or replace all degraded walking surfaces along the ramp.	\$1,200.00					
6	City Hall	Doors	threshold	throughout building	Priority 2 - Access to Goods & Services	Repair or remove the thresholds from doors to all offices with public interface.	\$6,800.00					
7	City Hall	Floor Surfaces	weather mat	entrances, elevator lobbies, entry doors to offices, and circulation areas	Priority 2 - Access to Goods & Services	Secure all weather mats with industrial-strength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates at all entrances.	\$5,000.00					
8	City Hall	Sale & Service Counters	counters	Treasury & Collector of Taxes (room 203), Payroll Parking (room 204), City Clerk (room 205), Election Commission (room 208), Division of Assessing (room 209)	Priority 2 - Access to Goods & Services	Modify counters on each office with public interface so that they are accessible. In the meantime, provide an auxiliary counter no higher than 36" above the floor in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.	\$3,200.00					
9	City Hall	Sale & Service Counters	counters	Customer Services on level 4	Priority 2 - Access to Goods & Services	On level 4, ensure that the counter at Customer Services is unobstructed at all times.	\$0.00					
10	City Hall	Sale & Service Counters	counters	Customer Services on level 4	Priority 2 - Access to Goods & Services	Install compliant railings on both sides of the ramp	\$1,800.00					