# **ADA Self-Evaluation and Transition Plan**

### For the Town of Northfield

June 2021

Prepared by the Franklin Regional Council of Governments





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# **Part A – Introduction**

The Town of Northfield hired the Franklin Regional Council of Governments (FRCOG) to conduct a comprehensive evaluation of the Town's compliance under Title II of the Americans with Disabilities Act (ADA), which 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)].

Title II of the ADA applies to state and local governments, while Title III of the ADA applies to the private sector such as business and non-profit organizations.

In 2021, the Town of Northfield secured a grant from the Massachusetts Office on Disability and hired the FRCOG to conduct the ADA Self-Evaluation and prepare an ADA Transition Plan. This grant was also supplemented with municipal funding that was allocated through Town Meeting. The FRCOG assessed all Town-owned buildings and parks as well as the Town's programs, services, and activities to determine their accessibility to people with disabilities.

Like many communities in Massachusetts, Northfield is faced with a number of aging municipal buildings and facilities that may pose obstacles to residents with disabilities. The cost and work that is required to remove these barriers and bring them into compliance can be overwhelming to smaller communities with limited financial resources like Northfield. The Town has a total population of 2,981 residents, of which 21% have a disability.<sup>1</sup> This ADA Self-Evaluation and accompanying Transition Plan makes this daunting task a bit easier by identifying the issues, prioritizing them, and sorting out the high cost actions from the simpler, less expensive tasks.

Title II of the ADA sets administrative requirements on state and local governments and also requires that all Town's programs, services, and activities be accessible to people with disabilities. Part B of this document summarizes the findings regarding the administrative requirements and access to programs, activities, and services. Part C discusses the evaluation and findings of the physical facilities owned by the Town of Northfield. Part D is the ADA Transition Plan, which catalogs all accessibility issues of the Town facilities that were found during the evaluations and recommends potential solutions. These recommendations have

<sup>&</sup>lt;sup>1</sup> 2015-2019 American Community Survey 5-Year Estimates, US Census Bureau.

been prioritized, given an estimated timeframe, and assigned relative costs and responsible departments.

#### **Recent Progress**

Northfield has been proactive in implementing ADA improvements. These include both large and small projects. Below is a summary of some of the projects that the Town has completed to upgrade its facilities and meet ADA requirements:

- Constructed an addition to the library with accessible entrance, bathrooms, and elevator;
- Added an elevator to Town Hall;
- Designated an ADA Coordinator and adopted Nondiscrimination and Grievance policies in 2020; and
- Created a Complete Streets Prioritization Plan in 2020 and received funding in 2021 for pedestrian infrastructure improvements with ADA compliant crossings at various locations.

#### Methodology

To conduct the ADA Self-Evaluation of the Town's programs, services, and activities, the FRCOG staff distributed checklists designed by the New England ADA Center (a project of the Institute for Human Centered Design) to all Department Heads at an all-Department staff meeting that assessed three requirements of Title II of the ADA for each Department's programs and services:<sup>2</sup>

- Effective Communication practices
- General Nondiscrimination practices
- Website accessibility

The FRCOG also used the latest 2010 ADA Standards for Accessible Design (ADAAG 2010) to evaluate all of the Town's buildings.

<sup>&</sup>lt;sup>2</sup> Self-Evaluation Form Checklists from the New England ADA Center, <u>https://www.adaactionguide.org/resources#faqs</u>.

# Part B – Evaluation of Non-Discriminatory Policies and Practices in Programs, Services, and Activities

#### Introduction

Title II of the ADA also places administrative requirements on local governments in addition to ensuring the accessibility of the Town's programs, activities, and services. These administrative requirements include the appointment of a Town ADA Coordinator, the creation of a public notice regarding nondiscrimination policies, and the adoption of a complaint procedure. The FRCOG staff, with the assistance of Northfield staff, evaluated the Town's compliance with these administrative requirements as well as the Town's policies related to nondiscrimination, effective communication, and website accessibility.

The findings of this evaluation are discussed in this section along with recommendations to ensure compliance with Title II of the ADA.

#### Analysis

The FRCOG evaluated each of Northfield's Departments and the overall Town governance with regard to accessibility requirements. Checklists from the New England ADA Center were provided to each Department Head to complete that evaluated a Department's policies related to General Nondiscrimination, Effective Communication, and Website Accessibility. The findings of these completed checklists are summarized below and recommendations are provided to ensure that people with disabilities are provided the same opportunities as others to participate in programs, services, and activities in the Town of Northfield.

#### 1. Designation of Responsible Employer

Title II of the Americans with Disabilities Act requires that a local government designate a responsible employee to coordinate compliance with the ADA and ensure that there is a person at the Town who is knowledgeable with the many requirements of the ADA. The Town of Northfield has met this requirement by designating Andrea LLamas, the Town Administrator, as the ADA Coordinator.

#### 2. Complaint Procedures

In addition to designating an ADA Coordinator, a local government is required to provide a complaint procedure that offers ways for people to file complaints alleging discrimination on the basis of disability with regard to employment or in the provision of services, activities, and programs. The Town of Northfield has met this obligation with an approved Complaint Procedure. See Appendix A for copy of Complaint Procedure.

#### 3. Notice

Title II also requires that a local government provide public notice of the provisions of the ADA to members of the public that may participate in the Town's program, services, and activities. The Town of Northfield has met this obligation with an approved Notice that is posted at Town Hall and on the Town's website. See Appendix A for copy of Public Notice.

#### 4. Effective Communication

Under Title II of the Americans with Disabilities Act, the Town must communicate effectively with people who may have hearing, vision, or speech disabilities. To do so, this may require Northfield to provide auxiliary aids and services to meet its responsibility of effective communication. This may include, but is not limited to: providing sign language interpreters, Computer-Assisted-Real-time-Translation (CART), written materials for persons who are deaf or have difficulty hearing, Braille or large print information in digital format for people who are blind or have difficulty seeing.

Town of Northfield Department Heads completed checklists from the New England ADA Center that evaluated each department's practices and policies regarding their knowledge and ability to provide effective communication for their programs, services, and activities to allow equal participation for persons with disabilities. The completed checklists show that Town staff are willing to comply with Title II, but do not know how to do so in all elements of practice. In particular, most staff members do not know:

- how to go about arranging for different types of auxiliary aids and services to provide for effective communication when needed (there is a particular gap in knowledge as to how to provide Braille, CART services, and assistive listening devices);
- if there is a policy or procedure for handling requests for auxiliary aids; or
- what the procedure is for determining when the provision of an auxiliary aid or service is an undue financial or administrative burden.

Appendix B provides a summary of the answers to the checklist's questions regarding effective communication practices.

To ensure that Town staff comply with Title II, it is recommended that Northfield develop and distribute clear procedures for employees as to how to arrange for auxiliary aids and services. A written informational handout on Effective Communication Procedures will help staff understand their responsibilities and clarify what to do in the event a person needs assistance with communication.

During the COVID-19 Pandemic, the Town of Northfield had been conducting much of its municipal business virtually. The Town uses Zoom as its video conferencing platform. Zoom has many accessible features and meets almost all website-related Section 508 and WCAG 2.1 AA accessibility recommendations. Zoom also has various options that can be enabled to allow features such as closed captioning directly or through third parties. However, employing these features takes some practice and training. As Northfield continues to use either this or other video conferencing platforms, it will be very important that staff be trained on the software's accessibility features to ensure effective communication.

#### 5. Reasonable Modifications of Policies, Practices, and Procedures

Title II of the ADA also requires that local governments ensure that people with disabilities have an equal opportunity to participate in the services, programs, and activities that the Town provides. This may require that the Town of Northfield provide "reasonable modifications" to policies and practices to allow equal participation. When applying to Town staff, this requirement may include modifying work schedules; job restructuring; and making facilities used by employees readily accessible to an employee with a disability. When applying to members of the public to be able to participate in a program, service, or activity, this requirement may include allowing service animals in locations where animals are not typically permitted; allowing the use of motorized devices in places where they are not allowed; or providing assistance with application completion.

The results of the completed checklists from the Town's Department Heads show that with respect to the general nondiscrimination requirements of Title II, Northfield staff members are very willing to comply and have a good, general understanding of the many responsibilities and requirements that they have as a local government. However, there are topics with which Department staff could be more familiar. For example, some departments do not know that they are supposed to require assurances from contractors to fulfill Title II requirements. Appendix B provides a summary of the answers to the checklist's questions regarding general nondiscrimination practices.

A written and distributed summary of nondiscrimination policies will help staff ensure that all participants have the opportunity for equal participation.

#### 6. Website Accessibility

Title II of the Americans with Disabilities Act requires that local governments ensure that, when viewed in their entirety, the programs, services, and activities offered are equally available to people with disabilities. Websites of a local government are considered to be a "program" and should be accessible to the standards of the Web Content Accessibility Guidelines 2.1 AA or Section 508 Standards.

To evaluate the Town of Northfield's websites, a checklist was sent to each Department that maintained its own website or had website administrative privileges. The completed checklists show that the staff members who have administrative rights are not aware of website accessibility standards and were not sure if the webpages have been updated and tested for compliance with the latest standards. They would like a policy to clarify this and to help make sure that future content is accessible.

Northfield should develop a written policy stating that the Town websites should be accessible to ensure that existing and future staff members who have website administrative privileges maintain the accessibility of the website. In addition, staff should be provided guidance about the requirements of the Web Content Accessibility Guidelines 2.0 AA. It would also be very helpful to the Town if people with disabilities who use screen reading software and other assistive technology periodically evaluate the website.

The FRCOG assessed the main Town of Northfield Website (<u>https://www.northfieldma.gov/</u>) in the free Web Accessibility Evaluation Tool (WAVE), which evaluates web content for accessibility under the Web Content Accessibility Guidelines. The results show that there are only a few major errors on the website, although there are many warnings and alerts that could prevent or hinder visually-impaired individuals from fully accessing the Town's website. Fortunately, many can be easily fixed with simple actions, such as changing the color of backgrounds or providing alternative text for images.

# Part C – Evaluation of Facilities and Infrastructure

### Introduction

FRCOG staff evaluated the following Town-owned buildings and facilities for this ADA Self-Evaluation between February and May 2021 according to the 2010 ADA Standards:

Buildings and Facilities owned by the Town of Northfield and Evaluated by FRCOG

- Dickinson Memorial Library
- Northfield Elementary School
- Northfield EMS Facility
- Fire Station
- Highway Garage
- King Phillips Hill
- Town Hall
- Transfer Station
- Town Forest/Brush Mountain

### Analysis of Building Accessibility

Northfield's Town-owned buildings range in levels of accessibility. For this report, the FRCOG has assigned categories of "functional accessibility" to each building for ease of reference. These categories are:

- Accessible the facility is fully accessible to a wheeled mobility device user or person with mobility challenges;
- **Mostly Accessible** A wheeled device user or person with mobility challenges can enter the facility, access the primary function within the facility, and access the bathroom;
- Moderately Accessible A wheeled device user or person with mobility challenges can enter the facility, access the primary function within that facility, but cannot use the bathroom;
- **Minimally Accessible** A wheeled device user or person with mobility challenges can only enter the facility, but cannot access the primary function or the bathroom;
- Inaccessible A physical barrier exists that would prevent a wheeled device user from entering the facility.

Accessible	Mostly Accessible	Moderately	Minimally	Inaccessible
		Accessible	Accessible	
	Town Hall	Fire Station	Transfer	Town Forest
	TOWITHAI	File Station	Station	TOWITFOLEST
	Dickinson Memorial	Northfield		King Dhilling Hill
	Library	EMS Facility		King Phillips Hill
	Northfield	Highway		
	Elementary School	Garage		

The following table places each building or facility into one of these categories:

The above assessment rates each building's accessibility based on the ability of people with disabilities to access the programs, services, and activities that are offered within those buildings. However, it should be noted that many Town buildings have areas within them that are not accessible at all (ex. basements or staff-only storage areas). Making these spaces accessible according to the 2010 ADA Standards may be structurally difficult and/or practically infeasible. Despite these potential obstacles, this accompanying Transition Plan identifies issues within these spaces and recommends ways to improve accessibility in ways that may be feasible – at least for users who do not require wheeled mobility devices – while acknowledging the inaccessibility these spaces pose for some persons with disabilities.

An important caveat to this rating system is that it primarily evaluates the Town facilities from a member of the public's perspective, not necessarily from the perspective of an employee who must work in these facilities and access non-public spaces on a regular basis. However, all of the deficiencies in the buildings with respect to the 2010 ADA Guidelines have been noted in the ADA Transition Plan that is included in this Report.

#### Summary of Building Evaluation Findings

#### Mostly Accessible Buildings

#### Northfield Elementary School

The Northfield Elementary School is rated as mostly accessible in that users can enter the building, access its primary function, use the bathroom, and access most of its amenities. However, because there are small issues that could be addressed to improve the ADA compliance, the school could not be rated as fully accessible. These issues include: ensuring that stall/bathroom doors are self-closing; installing signage; upgrading the playground to be ADA compliant; repairing sidewalks to ensure a smooth route of travel; and other relatively minor fixes.

#### **Dickinson Memorial Library**

The Library has a new addition that includes an accessible entrance, elevator, and accessible bathrooms. The reason that the building is not considered fully accessible is that the book stacks are very narrow, which means that users with mobility devices would not be able to access the books on their own.

#### Town Hall

The Town Hall is rated as mostly accessible because users can enter the building, access its primary functions, and use the bathrooms. However, there are some minor issues that make accessing some of the building's functions difficult due: to height of transaction counters; non-compliant way-finding signage; sidewalk safety at accessible entrance; and bathroom size limitations in the Women's Restroom. Of particular note, the Police Station on the lower level of the Town Hall was not accessible due to limited maneuvering space.

#### Moderately Accessible Buildings

#### **Fire Station**

The Northfield Fire Station is moderately accessible because users are able to enter the building through the garage doors (if they are open) and access its primary function of seeking help within. Small changes such as repairing the sidewalk at the front door would improve access to the building. To make the fire station fully accessible would require a much larger and complicated renovation/relocation of the bathroom, which is on the lower level.

#### **EMS Building**

Similar to the Fire Station, the EMS building is technically moderately accessible because users could enter the building through the garage doors if they are open to access the primary function of the building. There are steps to enter the main door and would require the construction of a small ramp to make that entrance accessible. The bathrooms would also need a large renovation to make the building more accessible.

#### **Highway Garage**

The Highway Garage is rated as moderately accessible because users could enter the building and access the primary function of the building. To improve the accessibility of the building would be complicated due to the steps leading to the bathroom, office, and break room.

#### Minimally Accessible Buildings

#### **Transfer Station**

The Transfer Station is rated as minimally accessible because users may have difficulty accessing the primary function of the site and may need assistance for some of the functions, such as reaching the recycling and waste areas or the food pantry. However, the obstacles that prevent users from accessing these elements are easily fixed with repairs to wood planking. These repairs would move the Transfer Station to the Moderately Accessible category.

#### Inaccessible Buildings/Facilities

#### Brush Mountain and King Phillips Hill

These outdoor recreational facilities are inaccessible to wheeled device users due to rough and steep terrain and their nature as conservation lands. The Brush Mountain/Town Forest trails can be maintained for users with limited disabilities, but it is not practical to create a wheelchair, fully accessible path here due to the slope and terrain. The King Phillips Hill facility is a historic site and very steep. To create accessible paths on this site would change the historic nature of it and is not recommended.

#### **Program Accessibility**

There are several programs in Northfield that may be inaccessible to individuals with disabilities. The most inaccessible program is the Police Department due its very small size and presence of large counters/furniture filling the spaces. Simple removal of the counters and furniture would provide more clearance and could make it much more accessible. Depending on the nature of the business with the Police Department, some business may be able to take place in more accessible rooms in the Town Hall. For issues that require privacy or for safety reasons, the Police Station may not be able to accommodate users with disabilities.

The Town Hall does have accessibility issues for other programs; mainly that transaction counters are too high, particularly for wheeled mobility device users. In those instances, it is possible for that program to move to another location within Town Hall to accommodate the necessary program or service to be provided.

The Fire Department and EMS are available via 911 phone calls for emergencies. For nonemergency needs, staff in those buildings could meet in other accessible locations such as the Town Hall.

# **Part D – ADA Transition Plan**

The ADA Transition Plan for Northfield catalogs every issue that the FRCOG staff discovered during the Self-Evaluation of the Town's buildings and facilities between February and May 2021. The Transition Plan recommends solutions to bring these identified issues into compliance with the 2010 ADA Guidelines and then prioritizes them, provides relative costs, estimates a feasible timeframe of implementation, and assigns the issue to the appropriate implementing department. In addition, the majority of issues have been documented with photographs, which can be found in Appendix C.

The following categories were used for the Transition Plan's prioritization:

- 1) **Priorities**: High Medium Low
- 2) Timeframe: Short (0-4 years) Medium (5-9 years) Long (10+ years) Ongoing
- Cost: \$\$\$\$ (Major capital project) \$\$\$ \$\$ \$ (Maintenance costs)

Issues were assigned a "High" priority if they:

- Made it difficult and/or prevented a person with a disability to enter a room in which a service is provided;
- Made it difficult and/or prevented a person with a disability to use the bathroom facilities; or
- Made it difficult and/or prevented a person with a disability to access an important civic site as a pedestrian on a sidewalk.

EMS Building (41 Main Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Ent	rances								
Sidewalk	Accessible Route	4779	Main entrance to office has several steps.	2"-5"	Create a ramp to enter the office area.	Low	Long	\$\$\$\$	Highway
Parking					Create 1 ADA space with paint and a signage				
Parking	Accessible Parking	4778	There is no space designated as accessible.	0	near the entrance.	High	Short	\$\$	Highway
Access to Goods a	ind Services		1						
Bathroom	Doorway	4784	Doorway to bathroom is too narrow.	26"	Widen doorway to be a minimum of 32" wide.	Low	Long	\$\$\$	Highway
	Doorway	4784	Door hardware are turn knobs that cannot be operated with a closed fist.		Replace door hardware with ones that can be operable with one hand and not require tight grasping, pinching, or twisting of the wrist.	Low	Long	\$\$	Highway
	Toilet	4786	There is no rear grab bar behind toilet.		Install a rear grab bar that is 36" long and between 33"-36" from floor.	Medium	Medium	\$\$	Highway

Fire Station (93 Main Street)

				Current		Duiouitus	Timeframe	Cast	Responsible
Location	Element	Photo	Issues	Measure	Recommendations	Priority	Timeframe	Cost	Dept.
Approach and Ent	trances								
			There is a 1.5" in threshold difference at						
			doorway entrance between concrete and						
Sidewalk	Accessible Route	4974	asphalt.	1.5"	Fill cracks to create a smooth path.	Medium	Short	\$	Highway
Parking					•				
					Install a sign at least 60" in height designating				
					the accessible space. Space should be marked				
					with paint that is at least 8 feet wide with 5ft				
Parking	Accessible Parking	4977	There is no designated ADA parking space.		wide aisle.	High	Short	\$	Highway
Access to Goods a	and Services								• •
					Replace door hardware with ones that can be				
			Door hardware are turn knobs that cannot be		operable with one hand and not require tight				
	Doorway	4971	operated with a closed fist.		grasping, pinching, or twisting of the wrist.	Low	Long	\$\$	Highway
			Bathroom is located on lower level and is not		Install a new bathroom on the main floor of				
Bathroom			ADA compliant.		the Fire Station.	Low	Long	\$\$\$\$	Highway

Highway Garage (49 Caldwell Road)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
Parking	Accessible Parking	4750	There is no sign marking an ADA space.		Install a sign at least 60" in height designating the accessible space. Space should be at least 8 feet wide with 5ft wide aisle.	High	Short	\$	Highway
Access to Goods and	Services		•						
Office/Break									
Room/Bathroom	Accessible Route	4759	There is a step to access each of these rooms.	8"	Create a ramp to access these rooms.	Low	Long	\$\$\$\$	Highway
	Doors		Door hardware are turn knobs that cannot be operated with a closed fist.		Replace door hardware with ones that can be operable with one hand and not require tight grasping, pinching, or twisting of the wrist.	Low	Long	\$\$	Highway
			The only way to access the top floor is via a						
2nd Floor	Accessible Route	4762	staircase.		Install a lift or elevator for 2nd Floor access.	Low	Long	\$\$\$\$	Highway
					Cover the piping with insulation to protect				
Bathroom	Sink	4754	There is exposed piping under the sink.		against contact.	Low	Medium	\$\$	Highway
			Flush control is on the wrong side of the		Relocate flush control to the open side of the				
	Toilet	4754	toilet.		toilet.	Low	Long	\$\$	Highway
	Grab bars	4754	There are no grab bars for toilet.	0	Install side and rear grab bars.	Low	Long	\$\$	Highway

Dickinson Memorial Library (115 Main Street)

Leastion	Flowert	Dhata		Current	Decommendations	Priority	Timeframe	Cost	Responsible
Location Approach and Entrances	Element	Photo	issues	Measure	Recommendations				Dept.
Approach and Entrances		1	There is no signage on front of building						
			indicating where the accessible entrance is		Install sign near front entrance to let users				
	Signage		located.	0	know that accessible entrance is in the rear.	High	Short	\$	Highway
Parking							• •		
			The sign marking the accessible parking space		Raise height so that bottom of sign is at least				
Parking	Accessible Parking	4790	is too low.	50"	60" from ground.	High	Short	\$	Highway
Access to Goods and Ser	rvices								
			There is no signage in hallway indicating if		Install sign outside bathroom letting users				
Lower Level Bathroom	Signage	4803	bathroom is accessible.	0%	know which one is accessible.	High	Short	\$	Highway
			Marble threshold is tag high between Jobby		Install beveled edge to threshold to reduce				
1st Floor Stacks	Threshold	4818	Marble threshold is too high between lobby and stacks.	1/2"	vertical height to no more than 1/4".	High	Short	Ś	Highway
		4010		1/2		ingn	511011		Ingilway
					Routes can be 32" wide for a minimum length				
Library Stacks	Accessible Route	4833	Routes between shelving are too narrow.	19" - 29"	of 2ft, then have to be at least 36" wide.	Medium	Medium	\$\$\$	Highway
			Threshold from main room to Teen Room is		Install beveled edge to threshold to reduce				
2nd Floor	Threshold	4848	too high.	1/2"	vertical height to no more than 1/4".	High	Short	\$	Highway
			Table in Teen Room is too low for a		Replace table with one is between 28" - 34"				
2nd Floor	Seating	4852	wheelchair to fit under.	25"	from floor.	High	Short	\$\$	Library

				Current			<b>T</b>	0	Responsible
Location	Element	Photo	Issues	Measure	Recommendations	Priority	Timeframe	Cost	Dept.
Approach and Entranc	es								
			There are >3" gaps between asphalt and						
Main entrance ramp	Accessible Route	4455	concrete surfaces.	>3"	Fill gaps to create a smooth surface.	High	Short	\$	School District
			There are >1" gaps between asphalt and						
Sidewalks	Accessible Route	4458	concrete surfaces and within the asphalt.	>1"	Fill gap to create a smooth surface.	High	Short	\$	School District
			There is a 1.5" in threshold difference at		Create an even transition to threshold to				
Rear Entrance B1	Accessible Route	4476	doorway entrance.	1.5"	reduce vertical height to < 1/4".	High	Short	\$	School District
Parking					F	-			-
					Install a sign marking the space to be ADA Van				
					Accessible. Sign should be 60" above the				
Accessible Parking	Signage	4460	The van-accessible space is missing a sign.		ground.	High	Short	\$\$	School District
					Install a sign marking the spaces to be ADA				
					Accessible. Signs should be 60" above the				
	Signage	4466	The ADA spaces are missing a sign.		ground.	High	Short	\$\$	School District
Playground						-			
					Make sure that ground surface complies with				
					current ASTM Standard Specification for				
					Determination of Accessibility of Surface	Medium	Medium	\$\$\$	
			Wood mulch surface may be too loose/soft		Systems Under and Around Playground				
Playground	Accessible Route	3	for access to play components.		Equipment.				School District
			There are no paths from the parking lot to the						
			field bleachers, basketball court, or		Provide an accessible route with smooth	Medium	Medium	\$\$\$	
	Accessible Route	5	playground.		surface to each element.				School District
			Benches on basketball court do not have			Low	Short	\$\$	
	Accessible Route	1	backs for support.		Replace benches with back support.	LOW	311011	ŞŞ	School District
Access to Goods and S	ervices				1	1			1
			Classroom sinks do not have toe or knee		Provide a sink with toe and knee clearance			****	
Entire building	Classroom sinks	4296	clearance positioned for a forward approach.		between 17"-25" for a forward approach.	Low	Long	\$\$\$\$	School District

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
			Most rooms are missing signs or signs are not		Install signage with visually contrasting/tactile				
			accessible with tactile or visually contrasting		lettering and braille on the wall on latch side				
	Signage	4270	lettering.		of door no higher than 60".	Medium	Medium	\$\$	School District
			Not enough room on pull side of door for		Relocate furniture so that there is a minimum				
	Doorways	4316	maneuvering due to furniture/shelving.		of 18" to latch side of door to pull open.	Medium	Short	\$	School District
	,		There is no signage in building directing					·	
			people to the location of the ADA designated		Install signage directing users to the ADA				
Accessible Bathrooms	Signage		bathroom.		bathrooms.	High	Short	\$	School District
						0		,	
			Sink does not have toe or knee clearance		Provide a sink with toe and knee clearance of				
Staff Lounge	Staff Kitchen Sink	4217	positioned for a forward approach.		17"-25" for a forward approach.	Low	Long	\$\$\$	School District
					Lower counter to a maximum height of 36"		0		
			Service counter has no clearance underneath	37" high	and provide clearance of 17"-25" in depth				
Main Office	Service Desk	4207	and is too high.	3" deep	underneath.	Medium	Medium	\$\$	School District
			Flush control is on the wrong side of the		Relocate flush control to the open side of the				
Front Entrance Bathroom	Accessible Toilet	4246	toilet.		toilet.	Medium	Medium	\$\$	School District
					Cover the piping with insulation to protect				
Nurse's Office	Bathroom Sink	4251	There is exposed piping under the sink.		against contact.	Medium	Short	\$\$	School District
			There is no signage directing people to the		Install ADA signage directing users to the				
	Signage	3930	Nurse's Office and bathroom.		Nurse's Office from hallway.	High	Short	\$	School District
			Sink does not have toe or knee clearance		Provide a sink with toe and knee clearance of				
	Staff Sink	4249	positioned for a forward approach.		17"-25" for a forward approach.	Low	Long	\$\$\$	School District
					Relocate furniture so that there is 18" of				
			There is not 18" to the latch side on the pull		clearnace to the side of the latch so that door				
Room 16	Accessible Route	4258	side of the door.	12"	can be pulled open.	High	Medium	\$\$\$	School District
					Relocate furniture so that there is 18" of				
			There is not 18" to the latch side on the pull		clearnace to the side of the latch so that door				
Room 20	Accessible Route		side of the door.	12"	can be pulled open.	High	Medium	\$\$\$	School District
					Relocate furniture so that there is 18" of				
			There is not 18" to the latch side on the pull	"	clearnace to the side of the latch so that door				
Room 23	Accessible Route	4305	side of the door.	12"	can be pulled open.	High	Medium	\$\$\$	School District
			Threshold of doorway is too high on rear		Install beveled edge to threshold to reduce	High	Short	\$	
	Accessible Route	4305	entrance.	1"	vertical height to a maximum of 1/4".	, ingli	SHOL	ڔ	School District
		-303		1	Install side grab bar that is a min. of 42" long				
Teacher's Bathroom	Grab bars	4310	There is no side grab bar for toilet.	0	to a height of 33" to 36".	Medium	Medium	\$\$	School District

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
					Move shelving to a min. height of 80" or	N A a allowed	N 4 a alivuus	~	
	Shelving	4312	Shelving hangs too low and is a strike hazard.	62"	relocate away from doorway.	Medium	Medium	\$	School District
Kid's Bathroom	Grab bars	4307	Shelving hangs too low and is a strike hazard.	0	Install side and rear grab bars.	Medium	Medium	\$\$	School District
Elevator	Signage	4313	The signage includes a AED/Medical sign instead of a star to indicate ground level.	0	Install a tactile star on both jambs at the main entry level and remove AED/Medical sign.	Medium	Short	\$	School District
Room 34	Accessible Route		Threshold of doorway is too high on rear entrance.	1"	Install beveled edge to threshold to reduce vertical height.	High	Short	\$	School District
2nd Floor Staff Bathroom	Toilet	4337	Flush control is on the wrong side of the toilet.		Relocate flush control to the open side of the toilet.	Medium	Medium	\$\$	School District
Ground Floor Single-User	Grab bars	4372	There are no side or rear grab bar for toilet.	0	Install side and rear grab bars or install signage directing users to ADA designated bathroom.	High	Short	\$	School District
	Sink		There is exposed piping under the sink.		Cover the piping with insulation to protect against contact.	Medium	Short	\$\$	School District
	Toilet Stall	4382	Door to ADA stall is not self-closing.		Adjust closer on hinge so that door is self- closing.	High	Short	\$	School District
	Toilet	4384	Flush control is on the wrong side of the toilet.		Relocate flush control to the open side of the toilet.	Medium	Medium	\$\$	School District
Library	Service Desk	4417	Service counter has no clearance underneath and is too high.	2.5" deep	Provide clearance of 17"-25" in depth underneath the counter.	Low	Long	\$\$	School District
Ground Floor Girls Bath Room	ADA Toilet Stall	4446	Door to ADA stall is not self-closing.		Adjust closer on hinge so that door is self- closing.	Medium	Short	\$	School District
		4446	Stall is not big enough for maneuvering.	48" x 48"	Enlarge stall to be at least 60" wide and 59" deep.	Medium	Long	\$\$\$\$	School District
		4446	Stall door lock is difficult to operate.		Replace lock with one that is operable with one hand and without tight grasping, twisting of wrist.	Medium	Medium	\$	School District
	Signage		There is no signage indicating location of ADA designated bathroom is.		Install signage directing users to the ADA bathrooms.	High	Medium	\$	School District
	Sinks	4447	There is exposed piping under the sink.		Cover the piping with insulation to protect against contact.	Medium	Medium	\$\$	School District
Ground Floor Boys Bath Room	ADA Toilet Stall		Door to ADA stall is not self-closing.		Adjust closer on hinge so that door is self- closing.	Medium	Short	\$	School District
			Stall is not big enough for maneuvering.	30" x 36"	Enlarge stall to be at least 60" wide and 59" deep.	Medium	Long	\$\$\$\$	School District
			There is exposed piping under the sink.		Cover the piping with insulation to protect against contact.	Medium	Medium	\$\$	School District

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
			There is no signage indicating location of ADA		Install signage directing users to the ADA				
			designated bathroom is.		bathrooms.	High	Medium	\$	School District

Town Hall (69 Main Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrance	es l						· · ·		-
			Sidewalk surface leading to accessible		Repair surface so that there is a smooth, even				
Sidewalk	Accessible Route	4953	entrance is very rough and uneven.		surface.	High	Short	\$\$	Highway
Rear Entrance Lower			Drop box outside of the entrance blocks space		Move drop box so that there is at least 18" of clear space to the latch side of the door to				
Level	Accessible Route	4959	for wheelchair users to pull door open.	9"	pull open.	High	Short	\$	Highway
Rear Entrance Lower Level	Accessible Route	4857	There is a 1" in threshold difference at doorway entrance.	1"%	Create an even transition to threshold to reduce vertical height to < 1/4".	High	Short	\$	Highway
Parking			· · ·		•				
Accessible Parking	Signage	4954	The accessible parking near lower level entrance is missing painted lines.		Paint lines on pavement designating the ADA space. It should be at least 8 feet wide with 5 foot wide aisle.	High	Short	Ś	Highway
Pavilion		1						T	
Playground	Accessible Route	4963	There is a 1" in threshold difference between asphalt and concrete surfaces.		Create an even transition to threshold to reduce vertical height to < 1/4".	Medium	Short	\$	Highway
Access to Goods and Se	ervices						·		
			Computer is too high for wheelchair users to access and protrudes into walking space and		Replace with one is between 28" - 34" from floor. If it is attached to the wall, it cannot protrude more than 4" from wall. If it does, it must have something below it to be				
Senior Center	Computer	4866		42"	detectable by a blind person's cane.	Medium	Medium	\$\$	Highway

Town Hall (69 Main Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
					Adjust elevator car height so that elevation				
					between elevator car and hallway floor does				
			Threshold to elevator on Lower Level is hard		not have a difference of more than a 1/4" in				
Elevator	Threshold	4871	to wheel across.	1"	height.	High	Short	\$\$	Highway
	Cinners on First Floor						Chara I	<u>,</u>	
	Signage on First Floor	4027	The signage includes a AED/Medical sign	0	Install a tactile star on both jambs at the main	Medium	Short	\$	
	Door Jamb	4927	instead of a star to indicate ground level.	0	entry level and remove AED/Medical sign.				Highway
					Adjust closer so that stall door automatically			4	
Men's Bathroom	Accessible Stall	4879	Stall door does not self-close.		closes.	High	Short	\$	Highway
					Adjust closer so that stall door automatically				
Women's Bathroom	Accessible Stall	4896	Stall door does not self-close.		closes.	High	Short	\$	Highway
					Relocate stall walls so that there is at least				
	Accessible Stall	4896	Stall is not big enough for maneuvering.	42" x 62"	48"x 66" of clearance.	High	Short	\$\$	Highway
					Lower counter to a maximum height of 36"				
			Service counter has no clearance underneath	42" high	and provide clearance of 17"-25" in depth				
Police Station	Service Desk	4883	and is too high.	4" deep	underneath.	Medium	Medium	\$\$	Highway
					Remove desk for a pathway that is at least				
			Booking room has no clearance - pathway is		36" wide and a maneuvering space that is at				
	Booking Room	4888	too narrow.	30"	least 30"x48".	Medium	Medium	\$	Highway
1st Floor Mutli-Purpose			Sink does not have toe or knee clearance		Provide a sink with toe and knee clearance of				
Room	Staff Sink	4915	positioned for a forward approach.		17"-25" for a forward approach.	Low	Medium	\$\$\$	Highway
	Microwave	4915	Microwave is too high to reach.		Lower microwave to counter height.	Low	Medium	\$	Highway
Mail/Copier Room	Doorway	4917	Doorway is too narrow.	27"	Widen doorway to a minimum width of 32".	Medium	Medium	\$\$\$	Highway
					Lower counter to a maximum height of 36"				
Treasurer/Collector's			Service counter has no clearance underneath	45" high	and provide clearance of 17"-25" in depth				
Office	Service Desk	4920	and is too high.	2" deep	underneath.	Medium	Medium	\$\$	Highway
					Lower counter to a maximum height of 36"				
			Service counter has no clearance underneath	42" high	and provide clearance of 17"-25" in depth				
Administrator's Office	Service Desk	4939	and is too high.	0" deep	underneath.	Medium	Medium	\$\$	Highway
					Install a tactile sign that indicates the				
			There is no sign indicating location of		direction of the elevator and accessible	Medium	Short	\$	
2nd Floor Passage	Signage	4949	accessible entrance/elevator.		entrance/exit.				Highway

Transfer Station (31 Caldwell Road)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking	·		•	•					
Parking	Accessible Parking	4774	There is no sign designating an ADA space.		Install a sign at least 60" in height designating the accessible space. Space should be at least 8 feet wide with 5ft wide aisle.	High	Short	\$	Highway
Approach and Entrance	25								
Trash Dumpsters	Accessible Route	4769	Transition between wood decking and pavement is uneven.		Repair wood decking so that there is a smooth transition or a vertical height of no more than 1/4".	High	Short	\$\$	Highway
Recycle Dumpsters	Accessible Route	4777	Wood decking is uneven.		Repair wood decking so that there is a smooth transition or a vertical height of no more than 1/4".	High	Short	\$\$	Highway

Location		Photo	Issues	Current		Priority	Timeframe	Cost	Responsible
	Element			Measure	Recommendations				Dept.
Parking									
1					Designate at least 1 space as accessible with a	Low	Long	\$\$	Recreation
Parking	Accessible Parking		There is no ADA parking designated.	0	sign.	LOW			Committee
Access to Goods	and Services	-			-	_			_
					minor ambulatory disabilities. Creation of a	Medium	Ongoing	\$\$	Recreation Committee
	Accessible Route		Trail is rugged and uneven.		wheelchair accessible trail is not practical.				
King Phillips	Accessible Route	Road)		Current	wheelchair accessible trail is not practical.				Responsible
		,		Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Location	Hill (Old Bernardston	,				Priority	Timeframe	Cost	Responsible Dept.
King Phillips Location Parking Parking	Hill (Old Bernardston	Photo					Timeframe	Cost \$\$	-
Location Parking	Hill (Old Bernardston Element Accessible Parking	Photo	Issues	Measure	Recommendations Designate at least 1 space as accessible with a				Dept.

#### Brush Mountain/Northfield Town Forest (Gulf Road)

# **Appendix A**

Northfield's Notice of Nondiscrimination and Complaint Procedure



www.northfieldma.gov **69 MAIN STREET** NORTHFIELD, MASSACHUSETTS 01360-1017

#### **ADA** Coordinator Designation Form

ADA Coordinator Name: Andrea Llamas

Name of Town Department the ADA Coordinator Works: Selectboard Office/Administration

Job Title: Town Administrator

E-Mail: allamas@northfieldma.gov

Phone: (413) 498-2901 x115

Address: 69 Main Street, Northfield, MA 01360

Date Appointed: September 14, 2020

Is this Appointment: **PERMANENT** or Acting

Does this ADA Coordinator report directly to the appointing authority? YES or no

Are the ADA Coordinator Duties Full-Time or **PART-TIME** 

Direct Supervisor (Name and Title): Selectboard (See Chair Below)

Appointing Authority Signature:

Alex R. Meisner, Chair

Heath F. Cummings Town of Northfield Selectboard

Date: September 14, 2020

Barbara L. Jacque

Date: September 14, 2020

ADA Coordinator Signature:



www.northfieldma.gov 69 Main Street Northfield, Massachusetts 01360-1017

#### GRIEVANCE PROCEDURE UNDER THE AMERICANS WITH DISABILITIES ACT

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). This may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the Town of Northfield.

The Town of Northfield's Personnel Policy governs employment-related complaints of disability discrimination. The complaint should bin in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible, but no later than 60 calendar days after the alleged violation to: The Town Administrator, Northfield Town Hall, 69 Main Street, Northfield, MA 01360.

Within 15 calendar days after receipt of the complaint, the Town Administrator or the Town Administrator's designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the Town Administrator or the Town Administrator's designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the Town of Northfield and offer options for substantive resolution of the complaint.

If the response by the Town Administrator or the Town Administrator's designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after the receipt of the response to the Selectboard or the Selectboard's designee.

Within 15 calendar days after receipt of the appeal, the Selectboard, or the Selectboards's designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Selectboard or the Town Selectboard's designee



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will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the Town Administrator or the Town Administrator's designee, appeals to the Selectboard or the Selectboard's designee, and responses from these town offices will be retained by the Town of Northfield for at least three years.



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### PUBLIC NOTICE

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), the Town of Northfield will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs or activities.

Employment: The Town of Northfield does not discriminate on the basis of disability in its hiring or employment practices and complies with all the regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the ADA.

Effective Communication: The town of Northfield will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the Town of Northfield's programs, services, and activities, including qualified sign language, interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

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

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the Town of Northfield, should contact the office of the Town Administrator as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the Town of Northfield to take any action that would fundamentally alter the nature of its programs, services, or impose an undue financial or administrative burden. Complaints that a program, service, or activity of the Town of Northfield is not accessible to persons with disabilities should be directed to the Town Administrator.

The Town of Northfield will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons in wheelchairs.

# **Appendix B**

Summary of responses by Northfield Department Heads regarding ADA Policy Requirements

Effective Communication Checklists

General Nondiscrimination Checklists

Website Checklists

### Northfield ADA Self-Evaluation

_	Effective Communication Checklist	Total Responses	
	Questions	Yes	No
1)	Does the public entity know how to provide the following for people who are deaf		
	or hard of hearing?		
	a. Sign language, oral, and cued speech interpreters	1	9
	b. Video remote interpreting (VRI) services		8
	c. Computer-assisted real-time transcription (CART) services		10
	d. Assistive listening devices		10
	e. Open and closed captioning of videos	2	8
	f. Real time captioning of television programs	1	8
	g. Other		4
2)	Does the public entity know how to provide documents in the following formats for people how are blind or visually impaired and others with print disabilities?		
	a. Braille		9
	b. Large print	7	4
1	c. Audio recordings	5	5
	d. Accessible electronic formats that can be accessed by screen reading software (plain text or html)	4	5
	e. Screen reader software installed on a computer that is used by the public (ie. library)	2	6
	f. Magnification software installed on a computer that is used by the public (ie. computer lab)	2	7
	g. Optical readers	2	8
	h. Other		
3)	Does the public entity have a policy or procedure to handle requests for auxiliary		
- /	aids and services?		8
4)	Are employees and officials aware of the public entity's obligation to provide		
,	auxiliary aids and services?	1	6
5)	Do employees and officials know how to arrange for auxiliary aids and services?		
-,	Arrangements could be made directly or through the ADA coordinator or another	1	9
	staff person.		
6)			
	Does the public entity give primary consideration to the person with a disability		4
	when determining what type of auxiliary aid or service to provide?		
7)	Are employees and officials aware that it is inappropriate to request that family members and friends of people who are deaf serve as sign language interpreters, except in emergencies or if the individual wants the family member or friend to interpret and it's appropriate to do so?	4	6
8)	Are employees and officials aware that a companion of a program participant has a right to auxiliary aids and services if the companion has a communication disability and is an appropriate person with whom the public entity should or would communicate?	4	5
9)	Are captions and audio description provided on videos and television programs the public entity produces and videos on its website?	2	6
10)	Does the public entity have a policy or procedure for determining if an auxiliary aid or service would be an undue financial and administrative burden?		8
11)	Do employees and officials know how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls?	1	7

### Northfield ADA Self-Evaluation

	Effective Communication Checklist	Total Responses		
	Questions	Yes	No	
	Where telephones are available to the public for making outgoing calls, such as in hospital waiting rooms, are TTYs available for people with hearing and speech disabilities?		5	
13)	Do telephone emergency services, including 911, provide direct access to people who use TTYs and computer modems?	1	3	

## Northfield ADA Self-Evaluation

	General Nondiscrimination Checklist	Total R	esponses
	Questions	Yes	No
L)	Do policies, practices and procedures provide an equal opportunity for people with disabilities to participate in services, programs and activities; that is, do policies not discriminate against people on the basis of disability?	5	3*
2)	Are there circumstances in which the participation of a person with a disability would be excluded or restricted?	4*	4
)	If yes, are the exclusions or restrictions necessary to the operation of the program or to the safety of other participants?	4*	
)	Are there separate services, programs or activities for people with disabilities or a class of people with disabilities?		3
)	Do all employees who contract with outside agencies, organizations or businesses know that the public entity's obligations apply whether the public entity provides the service, program or activity directly or contracts for it?	2	3
)	Does the public entity notify each contractor of its responsibilities for providing contracted services in a nondiscriminatory manner?	1	3
)	Does the public entity require assurances from contractors of their fulfillment of Title II requirements?	1	3
)	Are there procedures to ensure that contractors provide the services, programs and activities in a nondiscriminatory manner consistent with the Title II requirements?	1	3
)	Are employees and officials aware that the public entity is obligated to make a reasonable modification in policies, practices, or procedures if the modification is necessary for a person with a disability to participate?	6	2
0)	Are employees and officials aware that: a. The public entity must allow service animals to accompany people with disabilities in all areas where people without service animals are allowed to go?	8	
	b. Only two questions may be asked: (1) Is the dog a service animal required because of a disability? and (2) What work or task has the dog been trained to perform?	6	2
	c. The public entity may not ask about a person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task?	8	
	d. A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken and, in these circumstances employees must offer the person with the disability the opportunity to obtain goods or services without the animal's presence?	5	2
	e. The public entity must permit a miniature horse to accompany a person with a disability where reasonable?	2	3
11)	Are employees and officials aware that: a. People with mobility disabilities may use wheelchairs, scooters and manually- powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities in any areas open to pedestrian use?	7	2
	b. People with mobility disabilities may use other power-driven mobility device in any areas open to pedestrian use unless the public entity can demonstrate that the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements?	7	2

specific depts, such as Highway, Fire, and Police indicated that there are limitations or exclusions that occur due to the safety of the job requirements.

# Northfield ADA Self-Evaluation

	General Nondiscrimination Checklist	Total Responses	
	Questions	Yes	No
	c. They may not ask about the nature and extent of the individual's disability, but may ask an individual to provide a credible assurance that the mobility device is required because of the person's disability?	6	2
12)	Are employees and officials aware that the public entity may not place a surcharge on people with disabilities to cover the costs of measures, such as the provision of auxiliary aids or program accessibility, that are required to provide nondiscriminatory treatment?	7	2
13)	Are tickets for accessible seats sold during the same hours; through the same methods of purchase (by telephone, on site, through a website, or through third-party vendors); and during the same stages of sales (pre-sales, promotions, general sales, wait lists, or lotteries) as non-accessible seats?		
14)	If accessible seating is not available in areas of the venue with lower prices, is lower priced accessible seating available in higher priced locations?		
15)	Do venues and third-party sellers provide the same information about accessible seats as provided about non-accessible seats?		
16)	Can ticket sellers describe accessible seating in enough detail to permit the purchaser to determine if a seat meets his or her needs?		
17)	Do ticket sellers know that people purchasing a ticket for a wheelchair space may purchase up to three additional seats for their companions as close as possible to the wheelchair space and that these companion seats may include wheelchair spaces?		
18)	Do ticket sellers know that unsold accessible seats may be released and sold to members of the general public in only one of three circumstances: when all non- accessible seats have been sold (excluding luxury boxes, club boxes, suites, and seats the venue holds been sold; or when all non-accessible seats in a particular price category have been sold back when declaring a sell-out); or when all non-accessible seats in a particular seating section have been sold; or when all non-accessible seats in a particular price category have been sold?		
19)	If the venue permits patrons to give or sell their tickets to others, does the venue know that the same right must be extended to patrons with disabilities and that those tickets may be sold to someone who does not have a disability?		
20)	Do ticket sellers know that for single event tickets, venues may ask purchasers to state that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?		
21)	Do ticket sellers know that for series of events tickets, purchasers may be asked to attest in writing that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?		
22)	Is information about the public entity's accessible services, activities and facilities available to the public and to current and future program participants?	2	2

# Northfield ADA Self-Evaluation

Website Accessibility Checklist		Total Responses	
	Questions	Yes	No
1)	Is there a policy that the public entity's webpages will be accessible,		
	that is, in compliance with the W3C Web Content Accessibility		6
	Guidelines (WCAG) 2.0 or Section 508 Standards?		
2)	Are the staff and contractors who are responsible for webpage and		6
	content development aware of the policy?		
3)			
	Are the staff and contractors who are responsible for webpage and		6
	content development knowledgeable about these standards?		
4)	Has the website been tested for compliance with either of these		c
	standards?		6
5)			
	If yes, have people with disabilities who use screen reading software		4
	and other assistive technology participated in the evaluation?		
6)	Is there a plan for making the existing web content accessible?	1	5
7)	Is there a paln for making future web content accessible?		4

# Appendix C

Photographs documenting issues found in the Transition Plan

EMS BUILDING



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IMG\_4784



IMG\_4785



IMG\_4786



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IMG\_4973



IMG\_4974





HIGHWAY GARAGE



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IMG\_4749



IMG\_4750



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IMG\_4752







IMG\_4754



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LIBRARY



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IMG\_4839



IMG\_4840



IMG\_4841



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IMG\_4844



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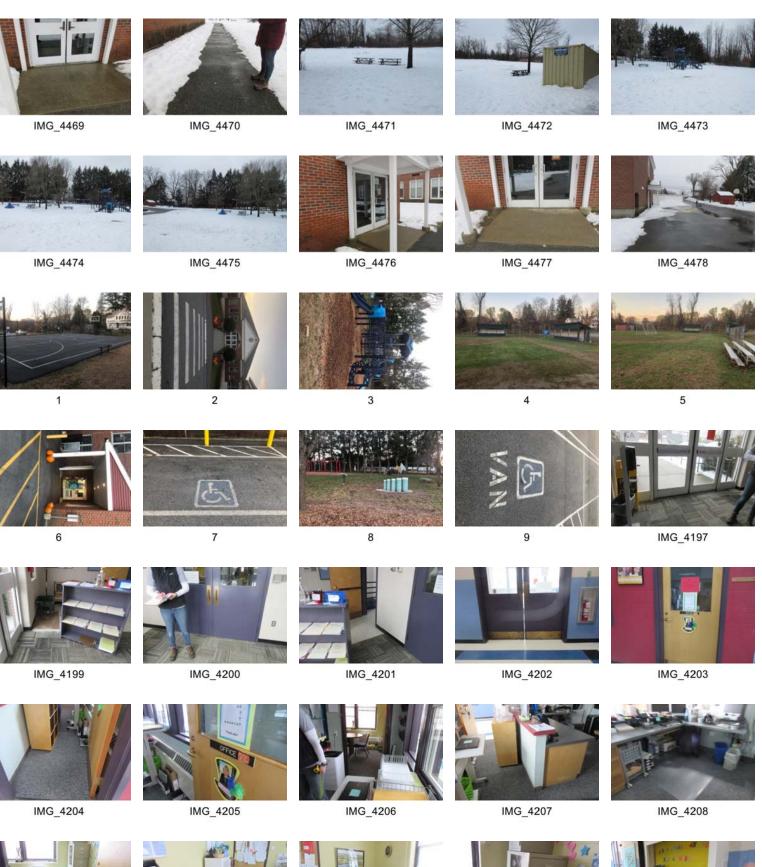


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ELEMENTARY SCHOOL





IMG\_4209



IMG\_4210



IMG\_4211



IMG\_4212



IMG\_4213



IMG\_4214



IMG\_4215



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IMG\_4300



IMG\_4305



IMG\_4301







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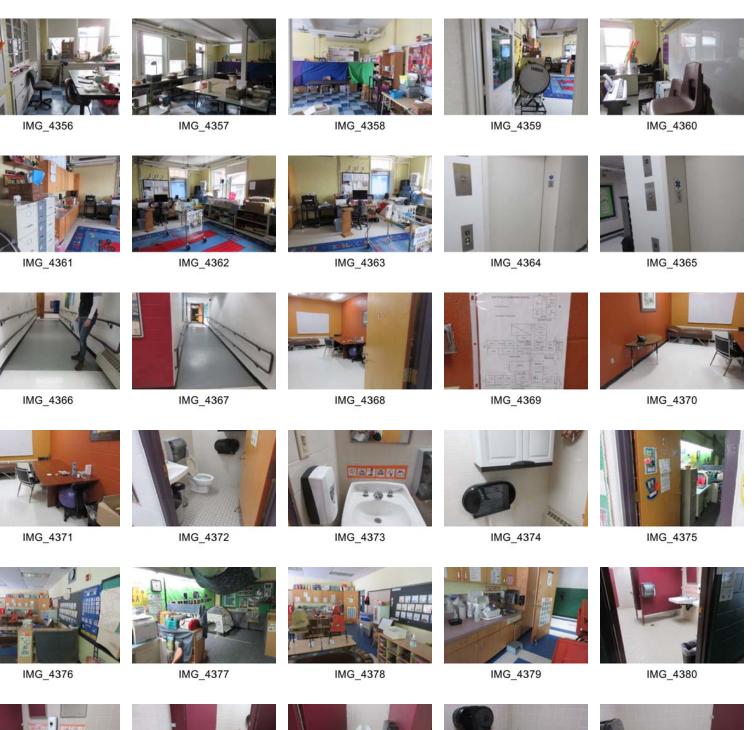
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#### ELEMENTARY SCHOOL





IMG\_4381



IMG\_4382



IMG\_4383



IMG\_4384



IMG\_4385



IMG\_4386





IMG\_4388



IMG\_4390

#### ELEMENTARY SCHOOL





IMG\_4392



IMG\_4393



IMG\_4394



IMG\_4395



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IMG\_4462





IMG\_4464



IMG\_4465



IMG\_4466



IMG\_4467



IMG\_4468

TOWN HALL



IMG\_4961

IMG\_4962





IMG\_4963



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IMG\_4967



IMG\_4969



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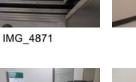


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TOWN HALL



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IMG\_4892



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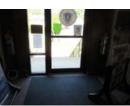


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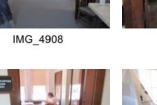
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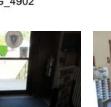


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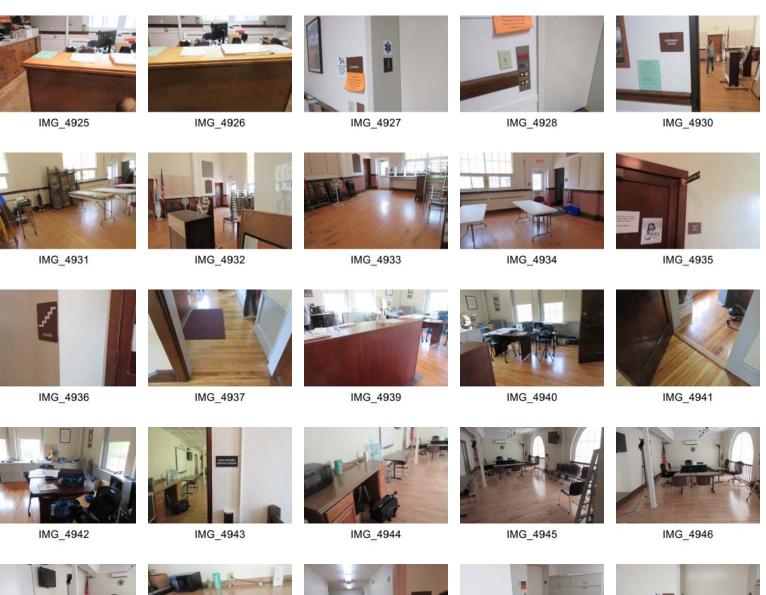
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TOWN HALL





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IMG\_4952



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