

Town of Randolph, Massachusetts

PART A – Executive Summary

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Introduction

The Institute for Human Centered Design (IHCD) has prepared this report on behalf of the Town of Randolph as part of the Town’s ongoing effort to assess the current level of Americans with Disabilities Act (ADA) compliance in programs, services and activities and Town-owned facilities. In preparing for this report, IHCD teams surveyed the Town’s portfolio of facilities and properties that were included in the Request for Proposal.

The facility survey set includes nine (9) public buildings and five (5) Town Park and playground facilities. The accessibility survey of those facilities includes all the spaces where the Town offers programs, services and activities to members of the public. The accessibility survey of the outdoor parks and playgrounds encompassed elements such as accessible routes, walking surfaces, slopes, picnic tables, play areas and recreational areas. In addition, IHCD team surveyed one (1) municipal parking lot. The accessibility survey included the accessible parking spaces and the accessible routes leading to them.

IHCD submitted separate reports for each facility that was surveyed. To assist in prioritizing accessibility improvements to ensure compliance with Title II of the ADA, each of the building and outdoor area reports includes an overview that identifies the most substantial accessibility issues and order of magnitude cost estimates for corrective action. Additionally, a detailed survey catalog that supplements the ADA Self-Evaluation narrative overview is also included. The catalog provides element-by-element photos of compliance issues, location and measurements - when applicable - accompanied by recommendations and cost estimation for each accessibility issue. Please note that IHCD only provided cost estimations for indoor elements; cost associated with accessibility renovations for exterior elements was not included.

In addition, a set of spreadsheets detailing priorities for corrective action organized by survey location and including order-of-magnitude costs was provided to the Town of Randolph. When the Town presents findings and recommendations to the community and receives feedback, some recommendations may need cost adjustment. Once fully updated, these spreadsheets are a capital planning and budgeting resource – “ADA Transition Plan”– and are intended as a long-term tool to update as work is completed. The Town should make a good faith effort to complete the work in a reasonable time (IHCD recommends a three to five-year period). The ADA regulations do not set out precise timeframes to complete the work; IHCD bases the recommended timeframes on conversations with the Department of Justice and their Project Civic Access settlement agreements with municipalities. Together, the ADA Self-Evaluation and

ADA Transition Plan will enable the Town to make substantial progress in meeting its ADA responsibilities.

IHCD also submitted a complete assessment of the Town’s policies, practices and procedures. The ADA administrative requirements help ensure that the needs of people with disabilities are addressed in all services, programs and activities that the Town provides. See the complete summary in *Part B – Evaluation of Non – Discriminatory Policies and Practices in Programs, Services and Activities* report.

The recommendations for corrective action that apply to policies, practices and procedures of the Town are not included in the ADA Transition Plan since the Transition Plan spreadsheet is limited to capital accessibility issues. Policy, practices and procedure recommendations are a blueprint for meeting compliance responsibilities other than capital expenses.

Most of the Town-owned facilities that have been recently altered or renovated are substantially accessible and meet most architectural requirements. Continued facility alterations, and/or renovations will significantly reduce barriers and help realize the Town’s commitment to inclusion and equal rights. In the meantime, the greatest problems posed by existing barriers can be ameliorated by establishing policies and procedures to accommodate members of the community with disabilities. It is worth noting that the Town has taken several significant steps in this direction:

- The Town of Randolph has hired a consultant (IHCD) to undertake its ADA self-evaluation (as the basis for the ’s Transition Plan).
- The Town of Randolph has a Notice of Nondiscrimination.
- The Town of Randolph has developed a Grievance Procedure.

As of the time of this assessment, the Town of Randolph had not named a responsible employee(s) to coordinate its obligations under the ADA. On the Town’s website, Inspectional Service is identified as the department responsible for physical access including compliance with the 2010 ADA Standards for Accessible Design, but the Town should also designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities Under Title II of the ADA.

IHCD's review and recommendations for Town-owned facilities is based on compliance with the 2010 ADA Standards for Accessible Design if an element or elements are not compliant with the 1991 ADA Standards and/or 521 CMR, the regulations of the Massachusetts Architectural Access Board (MAAB). Best practice and inclusive design recommendations are also provided for most properties. Inclusive design recommendations include elements that are not required in the accessibility standards but may create enhanced experiences for all users.

Many key facilities are generally usable by people with disabilities but are not in full compliance with current accessibility requirements. For example, in Chapin Hall the public toilet rooms are not fully accessible, and while Turner Library has many accessible features, it lacks complaint accessible parking and includes an area near the main entrance that staff referenced as an accessible parking location that has an excessive cross slope. At Belcher Park and Cochato Camp House the Camp House has a ramp to a side entry, but the ramp is not maintained in operable working condition so there is no accessible entrance to or egress from the Camp House building.

Town Hall provides access to many programs and can be accessed by most people because the building features accessible entrances and has an elevator providing an interior accessible route to all floors. Yet some of the key areas, such as the Health Department, the DPW Superintendent's Office and the Town Council's Office lack accessible service counters, a key component to access some of the services provided by the Town. The Police Station, which is part of the same overall structure as Town Hall, is another example of a facility that provides access to its programs, yet the elevator lacks tactile stars on the elevator door jambs at the main egress level and on the elevator control panel, and it lacks a tactile egress sign (with raised characters and braille) and the required illuminated exit sign with the International Symbol of Accessibility (ISA) at the accessible exit (north side).

Police department staff who accompanied IHCD team members on the day of the survey indicated that both employees of the police department and members of the public have stated a preference for an automatic door at the main entrance to the police department. An automatic door is not required at this location, but providing one there would be an example of a best practice and inclusive design element as it would be an accessibility enhancement that is not required in the standards but it may create enhanced experiences for all users.

Randolph may comply with the requirements of Title II of the ADA through means such as reassignment of programs or services to accessible buildings or delivery of services at alternate

accessible sites. The Town may also comply with the requirements by renovation or alteration of existing facilities and/or construction of new facilities, or any other methods that result in making the 's programs, services and activities readily accessible to and usable by individuals with disabilities. Note that a public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with its Title II obligations. In choosing among available methods for meeting the requirements of the ADA, the Town of Randolph should give priority to those methods that offer programs, services, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

In order to comply with ADA Title II program accessibility obligations, the Town of Randolph should consider:

1. Relocation of programs, services, and activities to an accessible location within a current facility.

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

2. Relocation of programs, services, and activities to an accessible location in another facility.

When it is not possible to relocate them to an accessible location within the current facility, programs, services, and activities should be relocated to an accessible facility.

3. Renovation and/or alteration of Town facilities to ensure access to programs, services, and activities.

The Town may consider the renovation of its facilities or the provision of new accessible facilities to ensure that programs, services, and activities are offered in the most integrated setting appropriate.

Note that any corrective actions needed to ensure program accessibility must comply with the requirements of the 2010 ADA Standards and/or 521 CMR, the Regulations of the Massachusetts Architectural Access Board (MAAB). Furthermore, when completing alterations and/or renovations, keep in mind that an alteration that decreases the accessibility of a building below the requirements for new construction at the time of the alteration is prohibited.

To determine which buildings must be made accessible, the Town should consider:

- How to provide the program in the most integrated setting appropriate;

- The locations where the activities are offered;
- Which facilities are accessible and to what extent.

The analysis of existing conditions that encompasses the basis for the Self-Evaluation is based on observations and documentation completed by IHCD team during site visits. Facilities surveyed include the following:

Municipal Buildings: The Department of Public Works was included in the original RFP but was not surveyed because no public programming is offered at that location.

| Municipal Buildings | |
|-----------------------------|--|
| Central Fire Station | Randolph Intergenerational Community Center (RICC) |
| Corkin Building | Stetson Hall |
| Friendly Food Pantry | Town Hall |
| North Randolph Fire Station | Turner Free Library |
| Police Station | |

Key Recommendations for Municipal Facilities:

- If parking is provided, ensure fully accessible parking spaces are provided in the correct manner, number and location. There are issues with accessible parking at multiple locations such as lack of or noncompliant accessible parking spaces, access aisles and signs. For example, the parking spaces at Town Hall lack access aisles. In addition, the identification signs at the accessible parking spaces at both the Town Hall and at the Police Department are mounted lower than the minimum height required, and the sign located at the van accessible space at both locations lacks the designation “Van Accessible”.
- Ensure that fully accessible toilet rooms are provided in each building that has a toilet room or toilet rooms available for use by members of the public. For instance, a single-user toilet room at the Cochato Camp House lacks the minimum required turning space at the toilet and accessible plumbing fixtures and a public single-user toilet room at the Central Fire Station is largely accessible, but it has a mirror mounted higher than the maximum height allowed and a storage shelf that protrudes into the circulation path. Where it is technically infeasible to provide accessible multi-user toilet rooms, provide an accessible single-user toilet room usable by all genders in the same area as the existing multi-user toilet rooms.
- Ensure that where programs, services, or activities are offered that there is a sufficient number of accessible features (accessible counters, accessible work surfaces, etc.). Particular

attention should be given to facilities where key services are being offered to many members of the community like Town Hall or the Police Station.

- If audible communication is integral to the use of a space, provide a compliant assistive listening system and a sign with the International Symbol of Access for Hearing Loss to inform visitors of its availability. This should be a priority at Chapin Hall, the Lincoln Room and in the Washington Room at Town Hall, in the Police Station Roll Call and Training Room and at the Great Hall in the Stetson Hall building.
- Assembly areas should have accessible routes provided to all areas that are accessed by members of the public. In the case of Stetson Hall which lacks an accessible route to an interior balcony area overlooking the stage and the Great Hall, since the building is on the National Register of Historic Buildings, Randolph should keep in mind that there are exceptions for alterations to qualified historic buildings and facilities under the ADA Standards. Those exceptions apply to accessible routes, among other key elements. If alterations to a qualified historic building or facility to achieve program accessibility would threaten or destroy the historic significance of the building or facility, fundamentally alter the program, or result in undue financial or administrative burdens, the ADA regulations allow alternative methods to be used to achieve program accessibility.

Issues were often encountered with signage. Below are recommendations regarding the most common signage accessibility issues.

1. Signs that designate permanent rooms and spaces, such as conference rooms and egress signs should:
 - have raised characters duplicated in braille;
 - have braille located below the corresponding text;
 - have a minimum 18" by 18" clear floor space centered on the tactile characters;
 - be located on the wall, alongside the door, on the latch (door handle) side of the door; where a tactile sign is provided at double doors with one (1) active leaf, the sign should be located on the inactive leaf; where a tactile sign is provided at double doors with two (2) active leafs, the sign should be located to the right of the right-hand door; where there is no wall space at the latch side of a single door or at the right side of double doors, signs should be located on the nearest adjacent wall.
2. When not all entrances are accessible, accessible entrances should have signage containing the International Symbol of Accessibility (ISA). In addition, inaccessible entrances and exits should have directional signs indicating the location of the nearest accessible entrances/exits.

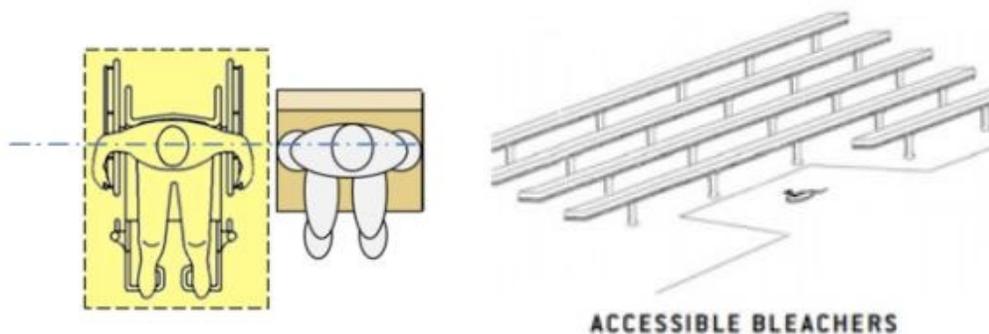
3. When illuminated exit signs are provided at accessible exits, the sign must include an illuminated International Symbol of Accessibility (ISA).
4. When not all public toilet rooms in a facility are accessible, accessible toilet rooms should have signage with the International Symbol of Accessibility (ISA). In addition, inaccessible toilet rooms should have directional signs indicating the location of the nearest accessible toilet room.

Parks and Outdoor Facilities: In addition to the municipal facilities, IHCD also surveyed the following parks/outdoor facilities:

| Parks/Outdoor Facilities | | |
|-----------------------------------|---------------------------------|----------------------------|
| Belcher Park & Cochato Camp House | Powers Farm - Bertha Soule Park | Zapustas Ice Arena |
| Imagination Station | South Main Station | Moulton Street Parking Lot |

Key Recommendations for Parks and Outdoor Facilities:

- Ensure an accessible route is provided on to the Zapustas ice rink and to rink amenities including locker rooms, shower rooms, the penalty box and team seating. Also ensure the provision of accessible locker, toilet and shower facilities for those using the rink and the provision of accessible toilet facilities for spectators.
- Ensure there is an accessible route to all elements in the parks/outdoor spaces (baseball fields, basketball courts, playgrounds, picnic areas, toilet facilities, etc.).
- Ensure there is a stable and firm clear floor space adjacent to the bench at team seating areas and spectator seating areas at the baseball fields, softball fields, soccer fields, basketball courts, etc., and that there is an accessible route to the seating. See the following diagrams:



- Ensure that accessible routes are provided to and around playgrounds and to play components. In addition, ensure that an impact-attenuating accessible route is provided

under each play component.

Note that the Massachusetts Architectural Access Board (MAAB) does not consider engineered wood fiber (EWF) to comply with its regulation requiring an accessible route to and around playground equipment.

- Provide an accessible route to at least one bench in each distinct area of each park where benches are provided.
- Ensure that at least 5% but no less than one amenity, such as picnic tables is accessible and is located on an accessible route.

Municipal Parking Lot: IHCD also surveyed the Moulton Street parking lot located between approximately 14 School Street and 171 North Main Street.

Key Recommendations for Municipal Parking Lots:

- Ensure that at least the minimum required number of compliant van and car accessible parking spaces are provided.
- Ensure that accessible parking spaces and access aisles are connected to an accessible route.
- Locate accessible parking spaces on the shortest accessible route to an accessible entrance for the buildings, parks or other amenities served by the parking lot.