

DRAFT BEDFORD FINDINGS & RECOMMENDATIONS

KMA used the Survey responses to develop the following findings and recommendations. This document is meant to serve as a working file between KMA and Town personnel. Columns highlighted in yellow are meant to be filled out by the Town. KMA recommends reviewing this document along with the DRAFT Bedford SETP Report and the Audit Reports found in the Appendix.

Prioritization Key:

- A. Immediate priority
- B. High Priority: 6 Months to 1 Year
- C. Medium Priority: 1 to 3 Years
- D. Long-term Priority: 3 to 5 Years

DRAFT

FINDINGS & RECOMMENDATIONS

#	Findings	Recommendations	Priority	Target Date	Responsible Party	Comments
Administrative (Policies/ Print Materials/ Staff Training/etc.)						
1.	<p>ADA Coordinator:</p> <p>Colleen has been appointed to fulfill the responsibility of an ADA Coordinator.</p>	<p>Colleen Doyle should complete additional ADA training offered by the National Association of ADA Coordinators: https://www.adacoordinator.org/page/Training within the next 6 months.</p>	B			
2.	<p>Alternative Formats:</p> <p>Where Town documents are provided, department survey responses indicate that notification is not provided that documents can be requested in alternative formats. For examples, see https://www.bedfordma.gov/sites/g/files/vyhlf6866/f/uploads/abuttter_list_req_3.pdf</p>	<p>KMA recommends assessing the needs of the community for alternative formats. Based on the assessment, establish the appropriate vendors or protocols so that documents in alternative formats can be provided in a timely manner, for example: taped texts, audio recordings, Braille materials and large print materials. Include notification regarding the availability of alternative formats on the Town website. KMA recommends implementing these changes within the next year.</p>	B			

3.	<p>Auxiliary Aids and Services:</p> <p>The Town does not have a process for responding to requests for auxiliary aids and services. Responses to the department surveys indicate the need to establish the capacity across all Town departments to provide auxiliary aids and services and then to disseminate information about their availability. Additionally, limited information was provided on what external auxiliary aid resources are available (i.e. interpreters).</p>	<p>KMA recommends assessing the needs of the community for auxiliary aids and services. Based on the assessment, establish the appropriate vendors and contractual agreements so that aids and services can be provided in a timely manner, for example: TTY or telephone relay services and ASL interpreters. KMA also recommends ensuring that appropriate departments are aware of their obligations to inform the public regarding the availability of Auxiliary Aids for persons who are deaf or hard of hearing and people who are blind or have limited sight. Establish department wide guidance regarding the specific Town communications requiring notice of the availability of Auxiliary Aids (e.g. meeting announcements, events, conferences, etc.). See https://nationaldisabilitynavigator.org/ndnr-c-materials/disability-guide/auxiliary-aids-and-services/ KMA recommends implementing these changes within the next year.</p>	B			
4.	<p>COVID-19 Response</p> <p>The Town did not provide information on their response to the current COVID-19 pandemic.</p>	<p>KMA recommends reviewing the continuously changing guidance to ensure it is available in accessible formats and proposed policies are in line with the ADA. KMA recommends reviewing the current guidance and developing a policy for continued reviews within the next six months. For more information on ensuring emergency response plans are meeting their accessibility obligations please see the information on the ada.gov website. (https://www.ada.gov/emerg_prep.html).</p>	A			



5.	<p>Documents & Publication:</p> <p>Administrative survey responses indicate that Town documents/ announcements have been reviewed to ensure they do not use stigmatizing language (e.g. “handicapped”).</p>	<p>KMA recommends ensuring the Town’s policy on nondiscrimination includes information on patronizing or stigmatizing language and/or images. “People-first” or “person-first” language is a way of describing disability that involves putting the word “person” or “people” before the word “disability” or the name of a disability, rather than placing the disability first and using it as an adjective. Some examples of people-first language might include saying “person with a disability,” “woman with cerebral palsy,” and “man with an intellectual disability.” The purpose of people-first language is to promote the idea that someone’s disability label is just a disability label—not the defining characteristic of the entire individual. Many guides on disability language and etiquette may likely emphasize using person-first language, except, perhaps, when discussing certain disability cultural groups that explicitly describe themselves with disability-first language. Thus, while it is generally a safe bet to use people-first language, there are members of certain disability groups in the US who prefer not to use it, such as the American Deaf community and a number of Autistic people/ Autistics. The basic reason behind members of these groups’ dislike for the application of people-first language to themselves is that they consider their disabilities to be inseparable parts of who they are. Using person-first language, some also argue, makes the disability into something negative, which can and should be separated from the person.</p>	A			
----	--	---	---	--	--	--



6.	<p>Emergency Preparedness:</p> <p>A formal emergency preparedness plan was not provided for review. Administrative survey responses indicate that an emergency preparedness plan has not been established. Department survey responses are also unclear on emergency response plans that address the needs for individuals with disabilities at their facilities.</p>	<p>KMA recommends confirming the following are provided in the existing emergency preparedness plan within the next year:</p> <p>Provisions to ensure that equal access to safe egress is provided for any visitor, member of the community or employee, including additional assistance if required to effectively evacuate and/or shelter them during an emergency.</p> <p>Protocols and signage for such issues as:</p> <ul style="list-style-type: none"> • Fire exits signage and maneuvering space; • Safe wait areas; • Evacuation Maps; • Locations of fire exits and safe wait areas serving each municipal space; and • Public and employee orientation to the Town's emergency evacuation procedures. 	B			
7.	<p>Grievance Policy:</p> <p>The Town does not have a fully developed Grievance Policy and Procedure to resolve disability related complaints. Survey responses indicate that there is a grievance policy statement in the Town's draft handbook that is given to employees on their first day and posted in employee break rooms. However, this policy is limited and does not provide a full explanation of the Grievance process.</p>	<p>Develop a Grievance Policy (see Appendix for example/ resources) and ensure it is posted in conspicuous locations in all Town buildings and distributed to all departments within the next six months.</p>	B			

8.	<p>Licensing/ Certification:</p> <p>Survey responses indicate that Town licenses or certifications (i.e. liquor, restaurant, etc.) are currently in the process of being rewritten and have had the application process thoroughly reviewed to ensure qualified persons with disabilities are not screened out.</p>	None	--			
9.	<p>Meetings at Accessible Locations:</p> <p>The Administrative Survey responses note that all meetings are held in accessible locations, though there is no formal written policy on the matter. However, some of the Department Survey responses and our physical audit findings identified some inaccessible areas where meetings are held. For example, the Richard T. Reed room in Town Hall.</p>	<p>KMA recommends that the Town develop written protocols for accessible meetings and distribute to all departments, boards and commissions. Helpful documents on how to write such protocols can be found on the mass.gov website. See: https://blog.mass.gov/mod/access/5-ways-to-improve-event-accessibility/ and https://www.mass.gov/files/documents/2016/07/uy/planning-for-accessible-events.pdf</p>	A			
10.	<p>Public Notice:</p> <p>The Town does not currently have a Public Notice of ADA Compliance.</p>	<p>KMA recommends developing a Public Notice (see Appendix for examples) and ensuring the Notice is visibly posted at Town buildings, on the Town website homepage, and in the Employee Handbook. Additionally, KMA recommends developing a policy to ensure the Public Notice is consistently provided on all Departmental literature. KMA recommends implementing these changes within the next six months.</p>	B			

11.	<p>Reasonable Modifications of Policies:</p> <p>The Town does not have a process for responding to requests for modifications to policies or practices for people with disabilities to participate. Responses to the department self-evaluation surveys indicate that personnel do not have a clear understanding of the Town's ADA policy.</p>	<p>KMA recommends developing and providing guidance on requests for reasonable modifications for all Town departments and new hires to ensure that everyone is aware of how to appropriately respond to requests within the next year. This policy should include criteria for determining whether a modification would fundamentally alter the nature of the program or a protocol, and it should ensure that all requests are reviewed by the ADA Coordinator. Some examples of how to develop this guidance can be found on the eeoc.gov website. See: https://www.eeoc.gov/policy/docs/accommodation.html.</p>	B			
12.	<p>Service Animal Policy:</p> <p>The Town of Bedford does not currently have a written policy regarding service animals in municipal facilities.</p>	<p>KMA recommends developing a written Service Animal policy and post it in Town facilities and on the website within the next six months.</p>	B			
13.	<p>Staff Training on City's Policy of Nondiscrimination:</p> <p>The Administration Survey responses indicate that it is unclear whether all Town personnel have received training in the Town's policy of nondiscrimination. Additionally, several department survey responses indicate that personnel have not received such a training.</p>	<p>KMA recommends ensuring all departments are included in a recurring training on the Town's policy of nondiscrimination within the next six months.</p>	B			

14.	<p>Surcharges:</p> <p>In the response to the Administrative Survey, the Town confirmed that surcharges are not imposed to recover the cost of accommodations, effective communication services, or accessibility features. However, the Recreation Department indicated otherwise in their responses to the Department Survey.</p>	<p>Develop a policy to ensure surcharges are not imposed by the Town within the next six months.</p>	B			
15.	<p>Title III Entities Using City Facilities:</p> <p>The Town's policies on the reservation and use of Town Facilities do not include information on the obligation of the Title III Entity (i.e. sports leagues, theater groups, fundraisers) to facilitate the participation of persons with disabilities. For example, see https://www.bedfordma.gov/sites/g/files/vyhlij6866/f/uploads/town_center_rental_package_2.pdf</p>	<p>KMA recommends developing language to be included in Town rental agreements that ensure Title III entities of their obligations to facilitate the participation of persons with disabilities within the next six months.</p>	A			
16.	<p>Training:</p> <p>Submitted department worksheets indicated a need for training of front-line Town personnel in several aspects of accessible program delivery.</p>	<p>KMA recommends providing training to appropriate personnel in the Town's nondiscrimination policy, 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, and how to respond to requests for reasonable modifications, auxiliary aids and services, and documents in alternative formats. KMA recommends implementing these changes within the next year.</p>	B			

17.	<p>Transportation.</p> <p>Administrative survey responses indicate that the Town does not contract for transportation services. However, departmental survey responses indicate that there is a Bedford Local Transit service and the Council on Aging provides transportation via local taxi services.</p>	<p>Within the next 6 months, clarify whether the Bedford Local Transit service or the Council on Aging transportation services are contracted through the Town. If so, ensure procedures for responding to requests from persons with disabilities to provide schedule and route materials in a timely manner in an accessible form are established. The Town transportation services also should develop procedures to provide information with no delay nor additional cost to persons with disabilities, provide training and testing to assure employees are fully qualified to serve passengers with disabilities by their contracts with the Town, and provide regular and frequent checks of lifts, as well as other access-related equipment or vehicles.</p>	B			
18.	<p>Use of Contractors:</p> <p>It is unclear whether the Town of Bedford has included language in its contracts to ensure that contractors are aware of their obligations to facilitate the participation of persons with disabilities in programs and activities the contractor operates on behalf of the Town. Additionally, the Town has not developed a procedure to disseminate information about ADA requirements to contractors.</p>	<p>Within the next 6 months, KMA recommends developing language to be included in Town contracts that alerts contractors of their obligations to facilitate the participation of persons with disabilities in programs and activities the contractor operates on behalf of Bedford. The Town should also develop materials for contractors explaining the Title II obligations they inherit when contracting with the Town and disseminate the information to all current contractors.</p>	A			

19.	<p>Website:</p> <p>The Town's website and websites run by Town Departments do not fully conform with Section 508 technical design accessibility standards and there is little information on the websites regarding access to programs and services for people with disabilities. See Appendix for more in depth technical analysis.</p> <p>The Town is currently in the beginning phases of a website upgrade. Recommendations flagged below should be coordinated with that redesign. Additionally, Public Survey comments indicate difficulties finding information on the Town's website.</p>	<p>Redesign the website to fully conform with Section 508 of the Rehabilitation Act and W3C-WAI's WCAG 2.0. This should also include independent websites run by Town departments (i.e. the Library).</p> <p>Include an accessibility page that includes more information regarding access to programs and services for people with disabilities. Information on the accessibility of facilities, information on the Town's accessibility policies (nondiscrimination, service animal, grievance procedure) communication materials, and the process for requesting accommodations or auxiliary aids/services would be helpful.</p> <p>Include how to request an accommodation in all meeting announcements posted to the Town's website.</p>	B			
Department Specific						
20.	<p>Assessors Department</p> <p>The Assessors Department did not respond to the SETP Department Survey.</p>	<p>KMA recommends following up with the Department regarding ADA compliance and their current understanding of the Town's obligations.</p>	A			

21.	<p>Department of Public Works (DPW)</p> <p>The Public Works Department mainly works out of the Public Works Building; however they also have recycling programs at 108 Carlisle Road and cemetery interments at 1 Shawsheen Road. The recycling program and the cemetery interments were not included in our review.</p> <p>Survey responses indicate that the Public Works Department considers the second-floor offices an accessibility barrier to their programs.</p> <p>They also have received feedback that Town sidewalks are inaccessible.</p> <p>Public survey responses indicate concerns with snow removal and accessibility.</p>	<p>KMA recommends reviewing the recycling program and the cemetery interments.</p> <p>KMA recommends developing a policy to ensure all programs offered to the public on the second floor of Public Works Building can be provided in an alternative accessible location. Ensure information on the alternative accessible location is disseminated appropriately to staff and the public.</p> <p>Although sidewalks were not included as part of this review, KMA recommends the Town perform a sidewalk analysis for accessibility compliance within the next year.</p> <p>KMA recommends reviewing the snow removal policies to ensure they prioritize clearing required accessible routes within the next six months.</p>	<p>A</p> <p>B</p> <p>B</p> <p>A</p>			
22.	<p>Facilities Department</p> <p>The website lists their address as 101 McMahan Road, which is not a property that was included in our list of facilities to audit.</p> <p>Audit reviews indicate concerns related to the maintenance of accessible features, such as lifts and automatic door openers.</p>	<p>KMA recommends reviewing the 101 McMahan Road facility.</p> <p>KMA recommends developing a policy to ensure accessible elements are regularly serviced within the next six months at the schools and Town buildings.</p>	<p>A</p> <p>B</p>			
23.	<p>Fire Department</p> <p>Survey responses indicate that the Fire Station has limited accessibility during off hours and they have received complaints about public restrooms during off hours.</p>	<p>KMA recommends reviewing accessible toilet room availability during off hours to ensure it can be made available to individuals with disabilities when requested.</p>	<p>A</p>			



24.	<p>Recreation Department</p> <p>Many of the Recreation program facilities were not included in our review of Town facilities.</p> <p>Survey responses indicate that the Recreation Department has charged fees to cover one on one staff to assist participants with disabilities when there are no other options for making participation feasible and safe.</p>	<p>KMA strongly recommends a review of all Recreation program locations that were not previously reviewed for accessibility compliance within the next six months.</p> <p>Develop a policy on how to handle surcharges for accommodations and ensure they will no longer be the responsibility of residents with disabilities, as this is not allowed per Title II of the ADA.</p>	<p>A</p> <p>B</p>			
25.	<p>Police Department</p> <p>Survey responses indicate that the Bedford Police Department offers special training for high risk families and residents, for example trainings for people with Autism.</p>	<p>KMA recommends reviewing the separate programs offered by the Police Department for individuals with disabilities to ensure they are not discriminatory.</p>	<p>B</p>			

DRAFT



26.	<p>Council on Aging</p> <p>The COA offers a food bank at Ashby Place (Bedford Housing Authority), which not included in our audits.</p> <p>The COA provides medical rides by a local taxi services, arranged over the phone.</p> <p>According to survey responses, there is not enough disabled parking, or general parking at times, in the rear of 12 Mudge Way, which is the Council on Aging main entrance. The COA has also received complaints regarding this issue.</p> <p>The COA has received complaints that the BLT bus ends service before the COA programs end, limiting access to activities after 2:30PM.</p> <p>The COA has received complaints regarding how the single doors are hard to get through with a wider wheelchair as only one side opens with push button and going through the other side of the building is difficult/ more circuitous.</p>	<p>KMA recommends a reviewing the food pantry at Ashby Place to ensure it is accessible.</p> <p>KMA recommends reviewing the local taxi services that provide medical rides to ensure they are equipped to provide accessible rides when requested.</p> <p>KMA recommends completing a parking study within the next 6 months to see whether providing more accessible parking spaces at the Council on Aging entry is feasible, as the route through the front entry is more circuitous.</p> <p>KMA recommends reviewing the Bedford Local Transit service to ensure the busses are accessible and how frequently it is utilized by residents with disabilities. Consider making schedule adjustments accordingly.</p> <p>KMA recommends adding another automatic door opener at the COA entrance so wider wheelchairs can use the entrance, as there have been complaints regarding this issue.</p>	<p>A</p> <p>A</p> <p>A</p> <p>A</p> <p>B</p>			
27.	<p>Health and Human Services Department</p> <p>According to survey responses, the Health and the Youth and Family Services Departments have offices on the second floor of the Town Center building that are not easily accessed if residents park in front of the building. There is a small lift, that is not easy to operate, that brings people to the ground level, they then have to walk to the back of the building and take the elevator to the 2nd floor.</p>	<p>KMA recommends completing a parking study within the next 6 months to see whether providing more accessible parking spaces at the back entrance is feasible, as the route through the front entry is more circuitous.</p>	<p>A</p>			

28.	<p>Town Center Department</p> <p>Survey responses indicate that while a wheelchair lift is available at the main door, it travels only to the first floor. The occupant of the wheelchair then can travel to the far end of the building to access an elevator to the second floor, which is a more circuitous route.</p>	<p>KMA recommends completing a parking study within the next 6 months to see whether providing more accessible parking spaces at the back entrance is feasible, as the route through the front entry is more circuitous.</p>	A			
Employment						
29.	<p>Human Resources</p> <p>A review of the Employment Survey responses indicates that some of the Town's employment practices, procedures, and personnel have not been thoroughly reviewed for accessibility. The employee manual reviewed was in draft form and did not include a fully developed Grievance Policy (see Administrative section of this report for more information). Additionally, the Employment Application_enabled document included stigmatizing language (see Administrative section of this report for more information) and none of the submitted documents included information on how to request the application in alternative formats.</p>	<p>KMA recommends reviewing the Town's job postings and employment application process, job descriptions to distinguish between essential functions and marginal functions, ensuring all staff who conduct interviews have received ADA training, and ensuring the Town's employment documents are available in alternate formats. KMA recommends implementing all of the policy recommendations noted above within the next year.</p>	B			

Buildings

<p>30.</p>	<p>Department of Public Works</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • The accessible parking spaces are not on the shortest accessible route, have slopes >2%, lack signage, and one access aisle is too small. • The entry door automatic opener was not working at the time of the audit. • The trauma kits, AED boxes, and first aid kits protrude into the circulation space and are mounted too high. • The lobby computer station is mounted too high. • The administration computer station and reception desk are mounted too high. • The 2nd floor kitchen sink is mounted too high. • The 2nd floor kitchen drinking fountain protrudes >4” into the circulation space. • The 2nd floor employee single-user toilet room entry doors lack the required maneuvering clearance and have accessible elements mounted in incorrect locations. • The lower level employee lounge sink is mounted too high and lacks 50% of the storage space within an accessible reach range. • The employee locker rooms have thresholds that are too high, lack door maneuvering clearances, have accessible elements mounted in incorrect locations, have benches that do not provide back support, and have transfer showers that do not conform. 	<p>Due to the relatively low traffic of this building and limited public access, KMA recommends prioritizing mitigations to the areas open to the public. KMA recommends mitigating all other barriers identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as Town budget permits within the next 3-5 years.</p>	<p>D</p>			
------------	---	--	-----------------	--	--	--

31.	<p>Depot Park Freight & Station</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • Accessible parking spaces have slopes >2%, lack compliant access aisles, and have signage that is mounted too low. • The Freight House curb ramp landing is too steep. • The entry ramps at both buildings are too steep. • The Freight House entry counter is too high. • The Freight House drinking fountain protrudes into the circulation space. • The Freight House toilet room thresholds are too high and they have accessible elements mounted in incorrect locations. • The Station entry threshold is too high. • The Station stairs lack the required handrails. • The Station toilet rooms have accessible elements mounted in incorrect locations. 	<p>Due to the relatively low traffic of these buildings and limited public access, KMA recommends prioritizing mitigations to the areas open to the public. KMA recommends mitigating all other barriers identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as Town budget permits within the next 3-5 years. If areas in the Station are rented to the public, higher priority should be given to the common spaces/ accessible routes serving these areas.</p>	D			
-----	---	---	---	--	--	--

<p>32.</p>	<p>Fire Station</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • Lack of accessible parking. • The entry ramp is too steep and there is a vertical level change > 1/4". • The entrances on Great Road and at the employee sleep quarters are not accessible due to the steps. • Phones and fire pulls are mounted >48" AFF. • Some rooms lack the required tactile/ braille signage. • The public toilet room lacks the required door maneuvering clearance, the required 60" turning space, and has accessible elements mounted in incorrect locations. • There is no interior accessible route to the apparatus bay due to the steps. The route through the bay doors (which is typically used for public tours) has a vertical change in level > 1/4". • Many of the employee only spaces (turnout room, toilet rooms, laundry areas) are not located on an accessible route due to the steps. • Employee kitchens/ breakrooms have sinks mounted too high that lack the required knee/ toe clearance for a forward approach and controls located too high. • Employee toilet and shower rooms lack the required footprint for accessibility and have accessible elements mounted in incorrect locations. 	<p>Due to the moderate traffic at the Fire Station, KMA recommends prioritizing mitigations to the areas open to the public - including spaces used for tours within the next one to three years. KMA recommends mitigating all other barriers identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as Town budget permits within the next three to five years.</p>	<p>D</p>			
------------	--	--	-----------------	--	--	--

33.	<p>Job Lane House</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • Lack of accessible parking. • Lack of accessible routes and accessible entrances. • Lack of accessible seating. 	<p>Due to the fact that the Job Lane House is used for public tours, KMA recommends prioritizing mitigations to the exterior areas open to the public (parking and seating) within the next one to three years.</p> <p>KMA also recommends developing an alternative means of providing tours for individuals with disabilities who cannot access the historic house (make a recorded video tour, host tours through an online platform, etc.) within the next year. KMA also recommends reviewing whether any other programs are provided at the Job Lane House and ensuring alternative means of accessibility are in place.</p>	<p>C</p> <p>B</p>			
-----	--	--	-------------------	--	--	--

DRAFT

<p>34.</p>	<p>Library</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • Lack of accessible seating/ work stations. • Book drops mounted too high. • Uneven/ deteriorating exterior walkways. • Curb ramps that are too steep. • Accessible parking lacks the required signage. • Some accessible parking spaces have access aisles that are too narrow. • The side entry ramp lacks a level landing and is too steep. • The historic entrance lacks directional signage to the accessible entrance. • Toilet rooms lack door maneuvering clearances, have thresholds that are too high, and have accessible elements in incorrect locations. • The interior ramp to the historic building has handrails that are obstructed. • Glass doors lack the required minimum 10" of smooth surface along the bottom of the push side. 	<p>Due to the high traffic of the Library, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years.</p> <p>In the next year, KMA recommends mitigating the exterior items flagged in the report (parking, curb ramps, walkways, book drops), providing accessible tables/ desks in each separate location, and designating the toilet rooms as unisex and modify at least one per floor to be fully accessible.</p>	<p>C</p> <p>B</p>			
------------	---	--	-------------------	--	--	--

35.	<p>Old Town Hall</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • The accessible parking lacks signage and has slopes >2%. • The walkway from the accessible parking has running slopes >5%. • The side entry door lacks the required maneuvering clearances and is obstructed by the corbels. • The historic entrance with stairs lacks directional signage to the accessible entrance. • The exterior ramp has landings with slopes >2% and handrails mounted too high. • The door to the leased space on the first floor lacks the required maneuvering clearances. • Thresholds are >1/2”. • Toilet rooms have accessible elements mounted in incorrect locations. • The Great Room has a stage that is not located on an accessible route, has sconces that protrude >4” into the circulation space, and coat hooks mounted too high. • The Great Room kitchen has a sink that is mounted too high and lacks the required knee/ toe clearance for a forward approach, non-compliant appliances, and a door that lacks the required maneuvering clearances. • The headroom under the spiral staircase is <80” AFF. 	<p>Due to the moderate traffic at the Old Town Hall, KMA recommends prioritizing mitigations to the areas open to the public – including the Great Room that is leased to the Public, within the next one to three years.</p> <p>KMA recommends mitigating all other barriers identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as Town budget permits within the next three to five years.</p>	<p>C</p> <p>D</p>			
-----	--	---	---------------------------------	--	--	--

<p>36.</p>	<p>Police Station</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • Lack of accessible parking. • Accessible parking spaces with slopes >2%. • Lack of a curb ramp along the accessible route from the parking area. • Walkways along the accessible route have running slopes >5%. • Phones are mounted too high. • Tactile/ braille signage is missing or mounted too high. • The drinking fountains protrude >4” into the circulation space. • The lobby reception desk is too high. • The toilet rooms have thresholds that are too high, doors that lack maneuvering clearances, and accessible elements mounted in incorrect locations. • The locker rooms have thresholds that are too high, doors that lack maneuvering clearances, accessible elements mounted in incorrect locations, and showers that are the incorrect size/ do not provide the required clearances. • The sally port is not located on an accessible route due to the step. • The processing area has a reception desk that is too high, a sink that lacks knee/ toe clearance and pipe protection, dispensers/ controls that are not located within an accessible reach range, and lacks accessible seating at the interrogation area. 	<p>The public may need to access the jail cells, providing at least one fully accessible jail cell is essential. KMA recommends developing a policy to ensure an accessible jail cell can be provided as needed in one of the existing men’s/ women’s/ juvenile cells. Ensure information on the accessible jail cell is properly disseminated within the next 6 months.</p> <p>Due to the high traffic at the Police Station, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years. In the next year, KMA recommends prioritizing mitigations to the exterior areas due to their high visibility and use, the toilet rooms, and the processing area. Where policies are developed, KMA recommends ensuring information is disseminated to the public and staff as required.</p>	<p>A</p> <p>C</p>			
------------	---	--	-------------------	--	--	--

<ul style="list-style-type: none"> • There are no accessible holding cells. • Employee kitchen areas have sinks that are mounted too high and controls that are not within an accessible reach range. • The 2nd floor conference room lacks accessible seating and the TV protrudes into the circulation space. 					
--	--	--	--	--	--

DRAFT

<p>37. Town Center</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • Lack of van accessible parking. • Accessible parking spaces have slopes >2%. • One of the accessible parking spaces has an access aisle that is not wide enough. • Curb ramps are too steep. • Entry door landings are sloped >2%. • The historic entry door has a threshold that is too high. • Trauma kits and AED boxes are mounted too high and protrude >4" into the circulation space. • Doors lack tactile/ braille signage. • Drinking fountains are mounted too low and/ or protrude >4" into the circulation space. • The connector ramp to the kid's club is too steep and lacks a 60" landing. • Toilet rooms have accessible elements mounted in incorrect locations. • Toilet Rooms 131 & 132 lack the required footprint for an accessible bathroom. • The COA kitchenette has a sink that is mounted too high and lacks pipe protection, has hood controls that are not within an accessible reach range, and lacks accessible storage. • The COA toilet rooms have door widths <32" and do not provide the required clearances and/ or turning space. • Reception counters are too high. 	<p>Due to the high traffic of Town Center and the fact that it houses the Council on Aging and social service departments, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years.</p> <p>In the next year, KMA recommends prioritizing mitigations to the exterior areas due to their high visibility and use, and the toilet rooms. Where policies are developed, KMA recommends ensuring information is disseminated to the public and staff as required.</p>	<p>C</p> <p>B</p>			
--	--	-------------------	--	--	--

<ul style="list-style-type: none"> • Wall mounted televisions protrude >4” into the circulation space. <p><u>Recreation Kid’s Club</u></p> <ul style="list-style-type: none"> • Exterior walkways are too steep. • The entry intercom lacks an adjacent level clear floor space. • Intercom controls are mounted too high. • The picnic area entry lacks the required door maneuvering clearances. • Lack of accessible picnic tables. • Trauma kits and AEDs are mounted too high and protrude >4” into the circulation space. • Doors lack maneuvering clearances. • Sinks lack the required knee/ toe clearance for a forward approach and/ or they are mounted too high. • Toilet rooms have accessible elements mounted in incorrect locations. • The toilet rooms at the Teen Center lack the required footprint for an accessible bathroom. 					
---	--	--	--	--	--

DRAFT

<p>38.</p>	<p>Town Hall</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • Accessible parking spaces have slopes >2%. • Lack of accessible parking. • The entry ramp is too steep, lacks level landings, and has handrails that are too high. • The automatic door openers were not operable at the time of KMA’s audit. • The Richard T. Reed room is not on an accessible route, due to the stairs. • Phone controls, AED boxes, and trauma kits are mounted too high. • Some rooms lack tactile/ braille signage. • The elevator is too small. • Several doors lack maneuvering clearances. • Reception counters are mounted too high. • The ramp in the Richard T. Reed room is too steep, lacks level landings, and is missing the required handrails. • The toilet rooms have accessible elements mounted in inaccessible locations. • The employee lounge sink is mounted too high and there are several controls located too high. • The door to the employee men’s multiuser toilet room on the second floor lacks a level landing. 	<p>Due to the high traffic of Town Hall, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years.</p> <p>In the next year, KMA recommends prioritizing mitigations to the exterior areas due to their high visibility and use, and the toilet rooms. Where policies are developed, KMA recommends ensuring information is disseminated to the public and staff as required.</p>	<p>C</p> <p>B</p>			
------------	---	--	-------------------	--	--	--

39.	<p>VFW</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • The entry ramp is too steep, lacks the required handrails, and is not located on an accessible route. • The main entrance is not on an accessible route due to the stairs. • The men’s room door lacks maneuvering clearances. • The toilet rooms have accessible elements mounted in incorrect locations and the thresholds are too high. 	<p>This building is planned to be converted into a Food Bank. KMA recommends mitigating all the barriers identified within the next one to three years as intended in the planned renovation.</p>	B			
Parks						
40.	<p>Parks</p> <p>When provided, the parks lacked accessible parking, accessible routes to amenity features, and accessible seating.</p>	<p>KMA recommends mitigating all the barriers identified in at least one park within the next one to three years with priority going to the park that has the highest use/ traffic and parks with unique amenity features, especially the memorials that are utilized for Town events.</p>	C			

Playgrounds					
41.	<p>Playgrounds</p> <p>KMA did not observe any fully accessible play areas in the Town of Bedford. The play areas lacked an accessible route, an accessible play surfaces, accessible play features, accessible seating, and accessible parking spaces. It is also unclear which department oversees the Town's playgrounds and whether they are aware of the accessibility obligations.</p>	<p>KMA recommends providing at least one fully accessible playground in the next one-three years with priority going to the one with the highest use. Ensure any modifications to existing play areas or newly constructed play are done in compliance with the 2010 ADA Standards. Information regarding the accessible playgrounds should be disseminated to residents and available on the Town website. For information on accessible play area requirements please see: https://www.access-board.gov/attachments/article/1369/play-guide.pdf.</p>	C		

DRAFT

Schools

<p>42.</p>	<p>Schools</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • Lack of accessible parking. • Accessible parking with non-compliant slopes and signage. • Accessible parking spaces not located on the shortest accessible route to the accessible entrance. • Exterior walkways with slope issues and changes in level >1/4". • Curb ramps that are too steep. • Entry doors lack level landings. • Thresholds that are too high. • Lack of accessible picnic tables. • Phones, trauma kits, and AEDs mounted too high and protrude into the circulation space. • Lack of accessible desks/ tables. • Drinking fountains mounted too low. • Classroom monitors protrude into the circulation space. • Several doors lack maneuvering clearances. • Toilet rooms have accessible elements mounted in incorrect locations. • Classroom sinks are mounted too high and/or lack the required knee/ toe clearance for a forward approach. • Specialty classroom equipment (for example, lab fume hoods and eye wash stations) have controls that are not within an accessible 	<p>Due to the high traffic at the School buildings and the fact that the buildings also serves the student population of the Town, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years.</p> <p>In the next year, KMA recommends prioritizing mitigations to the exterior areas due to their high visibility and use, the toilet rooms, and at least one of each type of unique classroom per school. Where policies are developed, KMA recommends ensuring information is disseminated to the public, students, and staff as required.</p>	<p>C</p> <p>B</p>			
------------	---	---	-------------------	--	--	--

<p>reach range and/ or lack the required adjacent clear floor space.</p> <ul style="list-style-type: none"> • Locker room showers are not configured correctly and they lack accessible benches. • Some rooms lack the required tactile/ braille signage. • Gymnasiums lack accessible seating at the retractable wooden bleachers. • The headroom underneath open stairs is <80" AFF. • High School ramps are too steep. • The lift in the gymnasium at the High School lacks door maneuvering clearances and has a gap at the landing. • The High School auditorium lacks accessible seating and the lift lacks the required door maneuvering clearances. • The Middle School auditorium lacks accessible seating. • The Davis Elementary School playgrounds are not accessible, due to the wood chip and grass surfaces. • The Davis Elementary School dugouts are not located on an accessible route due to the grass surface. • The Lt. Job Lane Elementary School dugouts and bleachers at the softball field, soccer field, and greenhouse are not located on an accessible route due to the grass surface. • The playground at the Lt. Job Lane Elementary School was obstructed by snow at the time of KMA's audit. Confirm an accessible surface is provided. 					
--	--	--	--	--	--

Sports Facilities						
43.	<p>Sports Facilities</p> <p>KMA did not observe any fully accessible athletic facilities in the Town of Bedford. Athletic facilities lacked accessible routes, accessible parking, accessible seating, accessible concessions, and accessible.</p> <p>Additionally, KMA did not observe any accessible portable toilets at the athletic facilities.</p>	<p>Due to the intensive use of the Bedford athletic facilities, KMA recommends providing accessible athletic facilities within the next one to three years. At least one of each type of athletic facility (e.g. baseball field, tennis court, basketball court, skateboard park, etc.) should be made accessible, with priority going to those with the highest use.</p> <p>If provided, ensure at least one accessible portable toilet serving each athletic facility will be installed and designated as unisex within the next year. Ensure the accessible portable toilet is located on an accessible route.</p>	C			
			B			
Trails						
44.	<p>Trails</p> <p>KMA did not observe any fully accessible trails in the Town of Bedford. The Wilson Mill Site lacked accessible parking spaces and an accessible route to the trail/ seating areas/ canoe launch. It is unclear which Department oversees the Town's trails and whether they are aware of the accessibility obligations.</p>	<p>KMA recommends reviewing the ADA obligations and including Town Trail personnel in departmental trainings within the next six months.</p> <p>In the next one to three years, provide at least one trail with accessible parking and a route to the trailhead/ canoe launch, with priority going to the one that has the highest use.</p>	A			
			C			