

**TOWN OF STAFFORD, CT**  

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**Americans with Disabilities Act Transition Plan**

March, 2009

Community Opportunities Group, Inc.  
Kessler McGuinness & Associates, LLC

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## INTRODUCTION

Local governments were required to prepare a plan to comply with the Americans with Disabilities Act of 1990 (ADA), as amended, by July 1992, and to remove structural barriers from public facilities by January 1995. However, many towns still operate programs and services that are inaccessible to people with disabilities. Barriers to participation persist for several reasons: misinformation about disabilities and ADA requirements, the cost of making older buildings comply, and competing priorities.

Planning to comply with ADA sometimes leads communities to place more emphasis on the minimum they must do to comply with the law than what they should do as a matter of basic fairness. ADA plans that focus solely on architectural barriers tend to omit a comprehensive evaluation of disability needs and perpetuate the view that if public buildings have barrier-free entrances and meeting rooms, a community has done its part under ADA. Although the law requires a community to document its ADA self-evaluation and transition plan efforts, planning to include people with disabilities should not be regarded as a one-time event. It requires periodic reviews of programs and services, ongoing contact with the disabilities community, and ongoing public education.

Below is a brief summary of the federal accessibility requirements that Stafford is required to address as a unit of local government.

### SECTION 504

Section 504 of the federal Rehabilitation Act of 1973 laid some important groundwork for the Americans with Disabilities Act that followed seventeen years later. Despite their similarities, these laws differ in important ways and each law reflects the era that produced it. Section 504 followed in the footsteps of the Architectural Barriers Act of 1968 (ABA), which requires all federal government buildings and space leased by federal agencies to comply with architectural access guidelines. The guidelines, known as the Uniform Federal Accessibility Standards (UFAS), have recently been replaced by the new ADA Standards for Accessible Design. ABA is enforced by the federal Architectural and Transportation Barriers Compliance Board, also known as the Access Board, created by Section 502 of the Rehabilitation Act.

Section 504 imposes non-discrimination requirements on (a) any program or activity paid for in whole or in part with federal funds, (b) all Executive-branch agencies and (c) the U.S. Postal Service. As a practical matter to Stafford, Section 504 applied (and still applies) to nearly all local governments because every state in the nation receives federal funds, and every state was directed to bring all federally-assisted state- and sub-state operations into compliance. Stafford has been a near-continuous recipient of

Community Development Block Grant (CDBG) funds since 1991 (and an intermittent grantee earlier) and currently has active CDBG grants. Although these funds are distributed by the State of Connecticut's Department of Economic and Community Development (DECD), the CDBG is a program of the federal government, established by the Housing and Community Development Act of 1974 (with subsequent amendments). In implementing these grants, Stafford has had a legal obligation to ensure that its facilities, programs, services and policies comport to Section 504, the ADA and their state-level counterparts.

Moreover, Section 504 specifically targets local and regional public schools districts as entities separate from their associated county or local governments. The introduction of Section 504 changed the way the Bureau of the Census collects and reports education data for public schools across the country. In addition, Section 504 extends to private entities receiving federal funds from a federal, state or local agency, such as social service agencies receiving CDBG funds from a unit of local government.

For any federally assisted programs or services, the fundamental requirements of Section 504 include:

- ♦ Reasonable accommodation for employees with disabilities (i.e. qualified readers and interpreters, clerical assistance, job restructuring, reassignment to a vacant position, modified work schedule, equipment, facility access, office modifications)<sup>1</sup>;
- ♦ Program accessibility (although its present-day meaning stems more from (the former) Department of Health, Education and Welfare (HEW) regulations adopted in 1977 than from the law itself);
- ♦ Effective communication to accommodate people with hearing or vision disabilities; and
- ♦ Accessible (barrier-free) new construction and alterations. Like ABA, Section 504 relies upon UFAS for accessible design standards.

Toward these ends, Section 504 charged federal funding agencies with responsibility for establishing their own regulations. There is no "central" oversight for Section 504,

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<sup>1</sup> A recipient of federal funds shall make reasonable accommodation to the known physical or mental limitations of an otherwise qualified applicant with handicaps or employee with handicaps, unless the recipient can demonstrate that the accommodation would impose an undue hardship on the operation of its program. A reasonable accommodation is an undue hardship when it is unduly costly, extensive, substantial, disruptive or would fundamentally alter the nature or operation of the organization 24 CFR 8.11.

although the U.S. Department of Justice maintains a Section 504 information clearinghouse.

## **AMERICANS WITH DISABILITIES ACT**

ADA is a uniform *civil rights law* that applies to all states and local governments regardless of funding source, and to all places of public accommodation. Further, it establishes accessibility requirements for public transportation and telecommunications. ADA prohibits discrimination on the basis of disability in employment (Title I); state and local government programs, services and employment (Title II); public transportation (Title II); public accommodations (Title III); and telecommunications (Title IV). It also prohibits retaliation against people with disabilities seeking to protect their rights under ADA (Title V). For a majority of the nation's local governments, Title II is the most important component of the law, although local governments should also fully understand the import of the requirements under Title I. The applicable administrative regulations appear at 28 CFR 35.

ADA and Section 504 have similar requirements and objectives as, over time, amendments to both laws have made Title II and Section 504 nearly identical. Unlike Section 504, ADA is subject to one agency's jurisdiction over most federal rulemaking and all federal enforcement: the U.S. Department of Justice (DOJ). Still, the oversight structure of ADA is complicated and several other agencies have a role to play in Title II, notably the Access Board, the U.S. Departments of Transportation (DOT), Interior, Housing and Urban Development (HUD), Agriculture, Education and Health and Human Services (HHS), the Equal Employment Opportunity Commission (EEOC) and the Federal Communications Commission (FCC). All of these agencies have authority to adopt ADA guidelines or standards, but only some have authority to adopt ADA regulations. Further, while all have authority to investigate complaints within their respective areas, as defined in the law, DOJ has "umbrella" authority to investigate complaints and take enforcement action on any aspect of ADA. Since 1990, ADA has gradually evolved in response to federal court decisions and changes in the law, regulations and guidelines.

ADA has some practical differences from Section 504. For example, the ADA requires all governmental units with 50 or more employees to designate an official responsible for coordinating compliance and investigating complaints; Section 504 does not. Also, ADA Title II and Section 504 have somewhat different standards for accessible design, though both standards have special provisions for historically-significant buildings. While the new ADA Standards for Accessible Design are mandatory for Title III-covered entities and federal facilities subject to the ABA, cities and towns may choose the ADA Standards or UFAS. (Note: the elevator exemption for two-story commercial buildings in the ADA Standards does not apply to public buildings.) Unlike some states, the State

of Connecticut does not have its own access code requirements. Connecticut's requirements for accessibility fall within the state building code, which incorporates the International Code Council (ICC)/ANSI A117.1 2003.

Once the Title II regulations went into effect in January 1992, local governments had six months to conduct a self-evaluation similar to the self-evaluation required by Section 504, one year to make programs and services accessible, 18 months to develop ADA transition plans for programs requiring building alterations, and three years (until July 1995) to complete all of the structural modifications identified in their transition plans. Local governments that had previously conducted a Section 504 self-evaluation were authorized to limit their ADA self-evaluations to programs or services not covered under Section 504. Often, local governments failed to prepare transition plans on time (if at all), and others never implemented their transition plans even when they met the deadline for preparing one. Compliance has occurred through voluntary actions, investigations by federal or state agencies, and enforcement actions initiated by DOJ. For urban and large suburban local governments with active Section 504 programs, Title II covered familiar territory and simply represented an expansion of existing efforts, but for many small towns, ADA seemed like another unfunded, daunting mandate. As a result, many simply refused or felt that they were unable to respond. Thus, Stafford is not alone among municipalities in its delay in conducting its self-evaluation and preparing this Transition Plan

#### **PROGRAM ACCESSIBILITY**

Under ADA and Section 504, local governments have some options for making programs accessible in lieu of making all existing buildings accessible through structural or physical modifications. While newly-constructed buildings and projects involving substantial alteration must conform to federal and state access guidelines, a public building that existed prior to ADA does not have to be altered as long as programs in the building can be modified through non-structural means or relocated to an ADA-compliant facility. Furthermore, it is important to note that barrier-free buildings do not guarantee barrier-free programs. For the person with vision loss, the need for a large-print copy of a property tax bill will never be addressed solely by improvements that enable people with physical and sensory impairments to access and to move independently and safely within a public building.

Not so long ago, many thought that program accessibility could be accomplished by offering special programs for people with disabilities. Separate programs sometimes provide more accommodation, and they may also be the choice of last resort when providing full inclusion requires extensive alterations to an older public building. However, *ADA specifically requires accommodations in an "integrated setting," which means that to the maximum extent feasible, programs and services must accommodate people with*

*disabilities in the same setting used by all other people.* Even when separate programs are made available, the law protects the right of people with disabilities to choose to participate in a regular program – and they remain entitled to reasonable accommodation.

## STAFFORD SELF-EVALUATION

The Town of Stafford engaged Community Opportunities Group, Inc., (COG) to assist with the Town's self-evaluation process and preparation of an ADA Transition Plan. Toward that end, COG retained the services of an architect, Kessler McGuinness and Associates, LLC, (KMA) to conduct an accessibility survey of Stafford's municipal buildings and public areas ("KMA Survey," Appendix A). While KMA's survey was not a comprehensive audit, it has identified non-compliant elements within Town facilities and public areas as well as offers generic barrier mitigation options and costs. In addition, COG met with department heads, distributed a self-evaluation questionnaire (Appendix B), and provided follow-up technical assistance to staff members who requested it.

### SELF-EVALUATION QUESTIONNAIRE

According to the Town's website, Stafford provides municipal programs and services through the following offices, boards and commissions and other facilities:

#### Offices

- \*Assessor
- \*Building & Zoning
- \*Health Dept. – North Central District
- \*Police Dept. (Resident Trooper)
- \*Probate
- \*Public Works
- \*Registrar of Voters
- \*Selectmen
- \*Small Cities
- \*Tax Collector
- \*Town Clerk
- \*Treasurer
- \*KMA surveyed bldgs. & public areas

#### Boards

- Assessment - Appeals
- Building Inspector - Appeals
- Education
- Family Services
- Finance
- Health – No. Central District
- Selectmen
- Zoning - Appeals

#### Other Town Facilities

- Animal Control
- Emergency Information/Management
- \*Family Services
- \*West Stafford Fire Station
- \*Staffordville Fire Dept
- \*Olympic & Kealey Fields, Hyde Park
- \*Heritage Park
- \*Stafford Public Library
- Senior/Youth Center
- \*Transfer Station
- Water Pollution Control
- \*KMA surveyed bldgs. & public areas

#### Commissions & Committees

- Americans w/ Disabilities Act
- Arts
- Cemetery Association
- Civil Preparedness
- Community & Civil Affairs
- Conservation
- Cox Regional Cable
- Economic Development

**Commissions & Committees (cont'd.)**

Hyde Park	Stafford Cemetery Association
Inland Wetlands	Stafford Public Assess Television
Open Space	Staffordville Fire House
Plan for Conservation & Development	Transfer Station
Planning & Zoning	Tree & Beautification
Public School Building	West Stafford Fire Station
Recreation	Wall of Honor
Public School Buildings	Witt & Borough School
Service District	

The First Selectman convened municipal departments to a meeting with the lead consultant (COG) to review the substance and importance of the self-evaluation questionnaire and to receive instructions and a deadline for completing it. This meeting also provided an overview and initial briefing on ADA to the attendees. The following departments returned the questionnaire for this plan. Copies of questionnaires received are on file with town's ADA Coordinator in paper and electronic form.

**Self-Evaluation Respondents**

ADA Coordinator	Registered Sanitarian for Health Dept
Assessor	Executive Assist. of Selectmen's Office
Emergency Management Director	Small Cities Director
Family Services Director	Town Clerk
Fire Marshal	Treasurer
Probate Officer	WPCA/DPW Office Manager
Public Library Director	Zoning Enforcement Officer

## KEY FINDINGS

- ♦ Self-Evaluation responses indicate that policies and procedures by most departments were written without awareness of ADA law and the Town's legal responsibilities to people with disabilities.
- ♦ Most Town departmental staff are not aware of Stafford's ADA grievance policy and few have received training on how to use it.
- ♦ With the exception of the Public Library, Family Services and the Small Cities Program Office, most Town departments that returned a self-evaluation questionnaire left several sections blank or wrote "N/A" in response to program access questions, even though all but one respondent indicated that their department serves people with disabilities. Where questions were presented in a "Yes/No" format, "No" was the most prevalent response, indicating that Town departments may not be prepared to offer ADA accommodations to people with disabilities. These findings may reflect a lack of familiarity with ADA, lack of understanding about what it means to accommodate people with physical, sensory or mental impairments, and lack of knowledge about accessible design. The responses do not indicate that accommodations are not offered, made or are attempted; however, limited knowledge may preclude full compliance with ADA requirements.
- ♦ Approximately 60% of departments, boards and commissions did not submit a completed questionnaire. Although many of the boards, committees and commissions listed above may be inactive or meet only intermittently – or do not routinely have contact with the general public – as public entities they should be aware of the public's right to access their meetings and activities. This incomplete participation prevents the Town from having a fully comprehensive picture of Stafford's actual ADA status. Importantly though, most of the departments and boards that have daily or regular interaction with the public completed the questionnaire. Stafford needs to provide technical assistance and training to all active departments, boards and commissions to increase officials' and employees' understanding of their legal obligations under ADA and take steps to provide reasonable accommodations for people with disabilities.
- ♦ Based on the questionnaire responses, where Town departments perceive a lack physical and programmatic accessibility to people with mobility or sensory impairments, they do not perceive this to be a critical problem. This likely stems from a willingness to make accommodations when necessary. However, the lack of adequate awareness and training means that these "good intentions" may fall short of what ADA requires or, inadvertently, even be discriminatory. Moreover, as long as local officials and/or staff believe existing public buildings and services comply or substantially comply with ADA laws (or will be

modified as a result of an individual request), Stafford will have trouble establishing consensus on priorities for *improving and institutionalizing increased access*, rather than simply *removing physical and programmatic barriers*.

- ♦ Most Town employees are not aware, or only nominally so, of the Town's legal obligations under ADA law or accommodations that may be made to a person with a disability so that they can access Town services and programs. Addressing this lack of understanding will require a commitment from the Board of Selectmen to educate and train town committees and employees, and provide for effective coordination of Stafford's legal responsibilities under ADA.
- ♦ The Town's ADA Commission is not active and consists of one member.
- ♦ Stafford has an Emergency Operations Plan (EOP) that was completed in May 2007. The EOP makes some references to "the disabled population" and specifically states that Stafford's "disabled population should be monitored by the Town Health and Medical Department and the Area Visiting Nurses Department" (section ANNEX E-4). The self-evaluation questionnaire completed by the Emergency Management Director indicates very limited awareness of the Town's ADA legal responsibilities.

## RECOMMENDATIONS

1. Board of Selectmen announces and publicizes its commitment to achieve ADA compliance and to coordinate Stafford's legal responsibilities under ADA.
  - a) Educate and train Town commissions and employees.
  - b) Incorporate ADA Transition Plan recommendations for removal of physical barriers into Town's capital budget and departmental budgets. (See assessments completed by KMA.)
  - c) Incorporate ADA Transition Plan recommendations for non-physical measures into departmental policies, programs and services.
  - d) Activate the Disabilities Commission and charge it with moving the ADA Transition Plan forward under the direction of the ADA Coordinator. See Recommendation #3 below.
2. The Selectmen's Office demonstrates its commitment to achieve ADA compliance by the following:
  - a) Install Text Telephone technology/service (TDD/TTY) at Town Hall, and provide training to staff to operate the equipment (Interactive (i.e. typed) communications through transmission coded signals across standard telephone network).
  - b) Include TDD/TTY telephone numbers on Town letterhead.
  - c) Develop and print a brochure that can be distributed at public service counters in Town Hall, the Library and other public buildings, with the Town's nondiscrimination policy, TDD/TTY numbers, and contact information for the ADA Coordinator.
  - d) Update the Town's website to include disability information: provide basic print and audio information about Stafford's non-discrimination policies, the TDD/TTY telephone numbers for all facilities or departments with text telephone technology (Town Hall, Police & Fire Departments, and School Department), and the name and contact information for Stafford's ADA Coordinator and ADA Commission members.
3. The Board of Selectmen should activate the local ADA Commission and charge it with developing program access criteria, instituting plans to address structural and

programmatic barriers and reviewing Town policies. Cultivating "buy-in" by Town departments and boards regarding the town's obligations under ADA is important to the success of the Commission's work and should include the following goals:

- a) Coordinate the implementation of the Plan with Town Offices to achieve compliance in written policy, in practice and service to people with disabilities (employees and public) under its Title I and Title II obligations.
  - b) Conduct an analysis of program and service needs of Stafford employees and residents with disabilities. Assess use of facilities, programs and services – who is using what, where is access limited or unavailable, what can be deferred, what cannot be deferred, etc. (if there is no public use then there is no need to make it barrier free...unless it is required for an employee).
  - c) Use above analysis to develop program/service access criteria in order to determine the barrier removal measures that are necessary to provide program access.
  - d) Work with Stafford's Emergency Management Director to evaluate the Town's Emergency Operations Plan (EOP) and make recommendations for including residents with disabilities in it.
4. Prioritize Town's *programmatic/service* barrier removal projects based on above criteria for people with disabilities who access Town facilities, programs and services.
  5. Prioritize Town's *physical* barrier removal projects based on KMA survey findings and recommendations; considering factors of potential alternative accommodations, safety, independent access, degree of public contact or public use of each facility, and efficient use of public funds<sup>2</sup>. Begin with the following public facilities:
    - a) Remove structural barriers of Town Hall or pursue an alternative accessible location for Town Hall operations.
    - b) Remove structural barriers at the Community Center.
    - c) Remove structural barriers at the Stafford Public Library.

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<sup>2</sup> KMA's Facilities Report, p. 5, cites 28 CFR 35.150 which sets a time period for ADA compliance, stating, "Where structural changes in facilities are undertaken to comply with the obligations established under this section, such changes shall be made within three years of January 26, 1992, but in any event as expeditiously as possible." KMA's report further states, "Both Section 504 and Title II of the ADA presume that people with disabilities will be using the programs and services of public entities. In anticipation, they both mandate proactive steps to prevent discrimination by removing existing barriers. They do not permit public entities to wait until a person with a disability arrives before beginning to make accommodations."

6. Coordinate with the local public access cable television franchise to provide text scroll bar for viewers to be able to read what is being said at public meetings and hearings that are televised.
7. Establish technical assistance relationships with regional organizations serving people with disabilities in order to build the Town's capacity to serve Stafford residents with disabilities, to provide training to Town officials and employees, and to provide public education. The Connecticut Office of Protection and Advocacy for Persons with Disabilities is a resource for individuals and municipalities.
8. Complete the self-evaluation questionnaires for key departments such as the Registrar of Voters and boards that did not participate in this planning process and incorporate responses into ADA planning and implementation already underway.

## Glossary

Unless another citation appears, the following definitions and regulatory summaries are condensed versions of the text in ADA Title II, 28 CFR 35. This is not a complete list of ADA requirements.

**Disability:** a physical or mental impairment that substantially limits one or more of the major life activities of such individual; a record of such an impairment; or being regarded as having such an impairment.

**Physical or mental impairment:** any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine; or any mental or psychological disorder such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

The term includes but is not limited to contagious and non-contagious diseases and conditions such as orthopedic, visual, speech and hearing impairments, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, specific learning disabilities, HIV disease (whether symptomatic or asymptomatic), tuberculosis, drug addiction, and alcoholism.

The term does not include homosexuality or bisexuality; transvestism, transsexualism, pedophilia, exhibitionism, voyeurism, gender identity disorders not resulting from physical impairments, or other sexual behavior disorders; compulsive gambling, kleptomania, or pyromania; or psychoactive substance use disorders resulting from current illegal use of drugs.

**Major life activities:** functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.

**Record of such an impairment:** the individual has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

**Regarded as having an impairment:** the individual has a physical or mental impairment that does not substantially limit major life activities but that is treated by a public entity as constituting such a limitation; or a physical or mental impairment that substantially limits major life activities only as a result of the attitudes of others toward such impairment; or

has none of the impairments defined above but is treated by a public entity as having such an impairment.

**Historic property:** any property listed or eligible for listing in the National Register of Historic Places, or properties designated as historic under state or local law. (ADA Title II provides special exceptions for architectural barrier removal when modifications would threaten the historically significant elements of a building.)

**Individual with a disability:** a person who has a disability. The term does not apply to an individual who is currently engaging in the illegal use of drugs when the public entity acts on the basis of such use (i.e., law enforcement actions).

**Qualified individual with a disability:** an individual with a disability who, with or without reasonable modifications to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a public entity.

**Program accessibility:** the operation of a public service, program, or activity so that when viewed in its entirety, it is readily accessible to and usable by individuals with disabilities.

**Existing buildings:** In lieu of making structural modifications to existing buildings, public entities may provide program accessibility through such means as redesign of equipment, reassignment of services to accessible buildings, assignment of aides to beneficiaries, home visits, delivery of services at alternate accessible sites, alteration of existing facilities and construction of new facilities; use of accessible rolling stock or other conveyances, or any other methods that result in making its services, programs, or activities readily accessible to and usable by individuals with disabilities. A public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance. In choosing among available methods for providing program access, a public entity shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

**New construction or major alterations:** For construction commencing after January 26, 1992 [effective date of 28 CFR 35.00], each facility or part of a facility constructed or altered by, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities... Design, construction, or alteration of facilities in conformance with the Uniform Federal Accessibility Standards (UFAS) or with the Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities

(ADAAG) shall be deemed to comply...except that the elevator exemption [for commercial buildings] shall not apply to a public entity.

**Historic properties:** Alterations to historic properties shall comply, to the maximum extent feasible, with the applicable provisions of UFAS or ADAAG. When it is not feasible to provide physical access to an historic property in a manner that will not threaten or destroy the historic significance of the building or facility, alternative methods of [program] access shall be provided...

**Curb ramps:** Newly constructed or altered streets, roads, and highways must contain curb ramps or other sloped areas at any intersection having curbs or other barriers to entry from a street level pedestrian walkway. In addition, newly constructed or altered street-level pedestrian walkways must contain curb ramps or other sloped areas at intersections to streets, roads, or highways.

**Communications:** A public entity shall take appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others.

**Auxiliary aids:** Appropriate auxiliary aids and services shall be furnished where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity conducted by a public entity. In determining what type of auxiliary aid and service is necessary, a public entity shall give primary consideration to the requests of the individual with disabilities. [Example: for an individual with a hearing impairment, local governments may not limit the form of accommodation to a sign language interpreter – especially since not all people with hearing impairments have been trained to use ASL or SEE. Local governments also may not assume that people with hearing impairments have been trained in speechreading. The needs of a community's hearing-impaired population should be assessed as part of any accommodation plan.]

**Telecommunications:** When a public agency typically communicates by telephone with applicants, program participants or employees, TDD's or equally effective telecommunication systems shall be used to communicate with individuals with impaired hearing or speech. [Telephone relay systems are a permissible alternative, especially in small towns. TDD/TTY is much preferred, but the technology is effective only when town staff have been properly trained to use the equipment.]

**Signage:** A public agency shall ensure that interested persons, including persons with impaired vision or hearing, can obtain information about the existence and location of accessible services, activities, and facilities. Signage shall be provided at all inaccessible entrances to each of its facilities, directing users to an accessible entrance or to a location at which they can obtain

information about accessible facilities. The international symbol for accessibility shall be used at each accessible entrance of a facility.

## Appendices

Appendix A: Kessler McGuinness & Associates Municipal Facilities Report

Appendix B: Compliance Overview Questionnaire

Appendix C: Self-Evaluation Questionnaire

Appendix D: Self-Evaluation Response Matrix

Appendix E: Sample ADA Grievance Procedure/Policy

**Appendix A: Kessler McGuinness & Associates Municipal Facilities Report**

**Design for Diversity  
Accessibility Planning**

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## TOWN OF STAFFORD, CT

### Municipal Facilities: Accessibility



August 30, 2007

# **TOWN OF STAFFORD, CT**

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## **Town of Stafford, CT – ADA Issues**

KMA was retained by Community Opportunities Group, Inc (COG) to perform an accessibility survey of the public areas of the following Stafford, CT (the Town) municipal facilities:

Stafford Community Center	Stafford Public Library
Dennis Pond	Muzio Town Hall
Stafford Family Services	Olympic Field
Staffordville Fire Department	Resident State Trooper
Heritage Park <sup>1</sup>	Warren Memorial Town Hall
Stafford Historical Society	Transfer Station
Hyde Park	West Stafford Fire Station
Kealey Field	

The purpose of this report is to provide a discussion of the Town's pro-active barrier removal obligations under Title II of the Americans with Disabilities Act (ADA) and to identify the principal existing architectural elements that may present barriers to individuals with disabilities in accessing the programs and services of the Town.

### **Program Accessibility**

The Town has a regulatory obligation to insure that it does not discriminate against individuals with disabilities in the provision of municipal programs and services. The ADA does not necessarily require that all of its facilities are fully accessible. Rather it requires that all of the Town's programs and services, "when viewed in their entirety" are accessible. The law provides public entities with some flexibility in how this standard can be met. Both structural and nonstructural methods of providing "program access" can be used.

The Town is required to perform a Self Evaluation to determine the barriers that exist to its programs and services. Then it must develop and implement a plan to remove the barriers. The only limit to the Town's obligation is if an action will result in a fundamental alteration to the program or service or create undue administrative or financial burdens. The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee and must be accompanied by a written statement of the reasons for reaching that conclusion. If it is determined that barrier removal will result in such an alteration or burdens, the Town must still "take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity."

### **Existing Conditions**

The facility surveys identified numerous non-compliant existing conditions, however,

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<sup>1</sup> The Sewer Treatment Plant and Highway Department were not surveyed based on confirmation by Doug Minich that no public programs or services are provided at these locations. However, Heritage Park was added to the list and surveyed.

result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity."

### Discussion

The *Americans with Disabilities Act* (ADA) (1990) was signed by President G. H. W. Bush on July 26<sup>th</sup> 1990. The ADA created a new "protected class." This protected class includes people with disabilities, as well as people who are associated with a person with a disability. It is broad civil rights legislation that protects roughly 54 million individuals in the United States. As a municipality, the Town of Stafford (the Town) has extensive obligations to individuals with disabilities under the ADA.

The ADA defines individuals with disabilities as those who fall into one of the following three categories:

1. individuals who have a physical or mental impairment that substantially limits one or more major life activities,
2. individuals with a record of such an impairment,
3. individuals regarded as having such an impairment.

The broad prohibition against discrimination based on disability requires that all of the Town's programs and services be accessible to individuals with disabilities.

The ADA requires a public entity to take five administrative action steps:

1. Designate an employee responsible for carrying out compliance activities.
2. Provide notice to the public of its rights and protections under the ADA and how the entity complies with those obligations.
3. The Town must establish a grievance procedure.
4. Conduct a Self-Evaluation, a comprehensive review of policies and procedures.
5. Develop An ADA *Transition Plan*.

### The Regulatory Context

There are four federal requirements for architectural barrier removal from existing buildings and in alterations to existing buildings. These are:

1. **PL101-336: 1990 Americans with Disabilities Act (ADA).** This is the federal civil rights statute whose first purpose is:  
...To provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities. (42 USC 12101, Sec.2(b))
2. **28 CFR Part 35: Department of Justice: Nondiscrimination on the Basis of Disability in State and Local Government Services; Final Rule (1991).** These are the U.S. Department of Justice's regulations implementing the ADA, as required in 42 USC 12101, Sec.204(a)).
3. **29 USC 794: Section 504 of the 1973 Rehabilitation Act (504).**

### **ADA and 504 Barrier Removal Requirements**

There are two requirements under Title II of the ADA that require a public entity such as the Town to remove existing barriers to bring an end to and to prevent discrimination against a person or people with disabilities. These two requirements are:

- Program Access
- Alterations to existing facilities

These ADA requirements are substantially similar to those of Section 504 of the Rehabilitation Act of 1973. Section 504 was the first federal statute to extend civil rights protections to people with disabilities, drawing on language from the Civil Rights Act of 1964. It requires that programs and services operated by recipients of federal funds must be "accessible to and usable by individuals with handicaps." The word "handicap" was changed to "disability" in subsequent legislation to reflect the preferred vernacular. Although enacted in 1973, Section 504 was not effective until 1977 when regulations implementing it were promulgated.

Section 504 was not rigorously enforced, however. As a result, relatively little changed between the promulgation of the Section 504 regulations and the enactment of the ADA. Section 204 of Title II of the ADA specifically states that the ADA's implementing regulations relative to program access and facilities should be consistent with regulations implementing 504. Therefore, when contemplating a compliance plan, it is critical to recognize that the Town's obligations began not in 1990, but in 1977.

### **Program Access**

The ADA's Section 202. Discrimination states:

*... no qualified individual with a disability shall, by reason of such 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 such entity.*

The ADA's Section 204 required that the U.S. Department of Justice (DoJ) promulgate implementing regulations by 26 July 1991, one year after enactment of the legislation. These regulations are 28 CFR 28, published on July 26, 1991. 28 CFR 35.149 states:

*... no otherwise qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, 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. 28 CFR 35.150 states that: A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.*

This statutory and regulatory language above describes what is known as "program access" - all programs must be readily accessible to, and usable by, qualified persons with disabilities. In addition, qualified students with disabilities must be provided with equal services in as integrated a setting as possible. The determination of what is an equal and integrated setting will be made on a case-by-case basis. What is appropriate for one person with a specific impairment may not be useful or appropriate for another person with the same impairment. Failure to provide "program access" is an illegal act of discrimination

under Title II of the ADA. The Town must identify and correct policies and practices that have the effect of discriminating against individuals with disabilities.

### **Methods of Providing Program Access**

28 CFR 35.150 details the methods that a public entity such as the Town may use to provide program access. These include:

- Reassignment of services to accessible buildings
- Delivery of services at alternate accessible sites
- Alteration of existing facilities and construction of new facilities, or
- Any other methods that result in making its services, programs, or activities readily accessible to and usable by individuals with disabilities.

From an architectural standpoint, this requirement does not mean that every building has to be accessible. However, every program must be accessible.

### **Limitations On Obligation to Provide Program Access**

The ADA's regulations specify certain clear limitations on a public entity's obligation to provide program access. An entity is not required to perform an action that poses an undue financial or administrative burden or constitutes a fundamental alteration. The threshold for an action constituting an undue burden is a high one for state and local government entities.

### **Transition Plan**

Where the Town's Self Evaluation determines that structural changes are required to provide program access, the ADA requires that a Transition Plan be developed that establishes the planned barrier removal. The plan is required to:

- *Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities*
- *Describe in detail the methods that will be used to make the facilities accessible*
- *Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and indicate the official responsible for implementation of the plan.*

A copy of the transition plan is required to be made available for public inspection.

If the Town receives federal funds, it was required in 1980 to develop a similar transition plan to achieve program accessibility under Section 504 of the Rehabilitation Act. Under 504, structural or architectural barriers to program access identified in the 504 Transition Plan were to be removed by 1983.

The ADA's transition plan was intended as an update of the 504 plan to cover any new programs and services not covered and made accessible under the 504 barrier removal program. The ADA requires public entities either to supplement their 504 Transition Plans or

replace them with ADA Transition Plans. The Town should have developed an ADA Transition Plan by July 1992.

**Schedule for Program Access Compliance**

28 CFR 35.150 sets a time period for ADA compliance stating:

*Where structural changes in facilities are undertaken to comply with the obligations established under this section, such changes shall be made within three years of January 26, 1992, but in any event as expeditiously as possible.*

Both 504 and Title II of the ADA presume that people with disabilities will be using the programs and services of public entities. In anticipation, they both mandate proactive steps to prevent discrimination by removing existing barriers. They do not permit public entities to wait until a person with a disability arrives before beginning to make accommodations. 504 and Title II mandate proactive barrier removal so that when a student with a disability arrives at school, the programs and services are substantially accessible. Minor accommodations may be needed, but the significant assessment and barrier removal should be complete.

## **SURVEY FINDINGS AND RECOMMENDATIONS**

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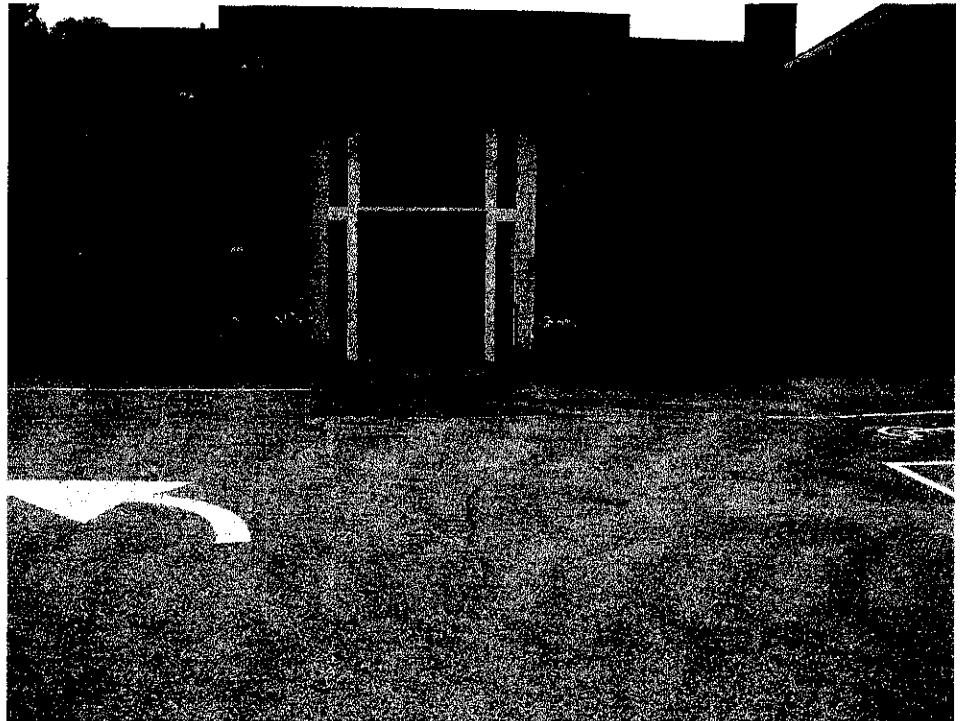
I performed the facility surveys on Tuesday, August 8 and Wednesday, August 9, 2007. Neither the ADA nor the US DoJ regulations implementing Title II provide a standard for *program accessibility*. It is up to the Town to establish its own criteria. The ADA provides no means of verifying the adequacy of an entity's *program access* criteria other than through judicial review. Lacking *program access* criteria established by the Town, for the purpose of my survey I used the following general criteria:

- 1) **Public Parking:** Where parking for the public is provided, or where accessible on-street parking exists, provide accessible space(s).
- 2) **Exterior Route:** Provide an unobstructed exterior route between public streets the public entrance **and** exterior route between public accessible parking and the public entrance.
- 3) **Public Entrance:** The public entrance will be accessible without assistance. Locked entrances will **not** be considered accessible public entrances.
- 4) **Visual Alarms:** In buildings with a fire alarm system, visual alarms will be provided in toilet rooms and other rooms where someone might be alone. If an existing building has no fire alarm, no visual alarms will be added.
- 5) **Signage:** Signage will be added to identify all accessible elements when not all elements are accessible, including parking, entrances and toilet rooms. Permanent rooms and spaces will have tactile/Braille signs.
- 6) **Transaction counters:** Provide an accessible route to each municipal department (unless it would require an elevator solely for the purpose of access to that office). At transaction counters provide an accessible counter, folding shelf, or table.
- 7) **Toilet room:** Provide a fully compliant single user toilet room or accessible elements in one male and one female multi-user toilet room.
- 8) **Drinking Fountain:** If public drinking fountains are provided in the facility, provide at least one combination hi-lo drinking fountain, or one accessible fountain and a cup dispenser.
- 9) **Interior path of travel:** Provide an unobstructed interior route (doors, thresholds, hardware, maneuvering spaces, and floor surfaces etc.) connecting the accessible entrance with all of the accessible elements listed here.

I recommend that COG and the Town establish *program access* criteria with which to evaluate and determine the barrier removal that is necessary to provide *program access*.

# STAFFORD COMMUNITY CENTER

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The Stafford Community Center, located at 3 Buckley Highway contains a Youth Center (two stories) and a Senior Center (one story). The entrances to both centers are substantially accessible. There is no accessible path of travel to the 2<sup>nd</sup> story of the Youth Center.

### Youth Center

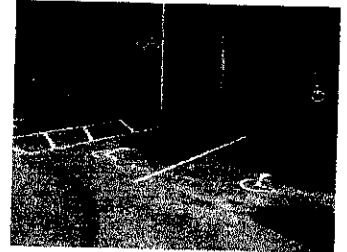
1. **Issue:**

- No van accessible space;
- Signs at accessible parking spaces are mounted at a height that can be obscured by a parked car.

**Recommendation:**

- Restripe to provide an access aisle a min. 96" wide;
- Raise signs to a height of not less than 5' or more than 8' to the top of the sign.

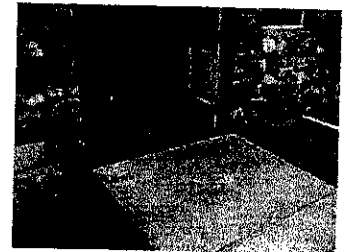
**Est. Cost:** \$500



2. **Issue:** Youth Center – entrance, neither leaf of double doors provides <32" clear width.

**Recommendation:** Provide automatic door opener.

**Est. Cost:** \$1,375



3. **Issue:** Youth Center – entrance, thresholds (2) > ½".

**Recommendation:** Replace with a compliant threshold.

**Est. Cost:** \$350

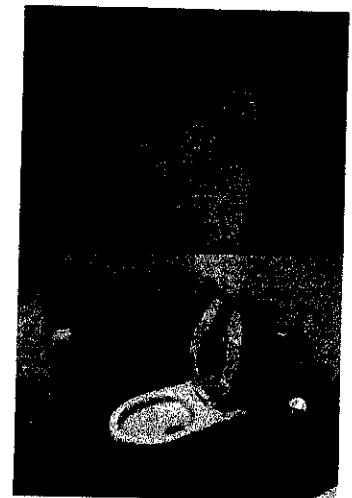


4. **Issue:** Accessible toilet room (Men's)

- Toilet flush valve is on narrow side;
- Rear grab bar < 36" long;
- No visual alarm;
- No tactile/Braille sign.

**Recommendation:** Install rear grab bar, reverse side of flush valve, install new tactile/Braille signage, add visual alarm.

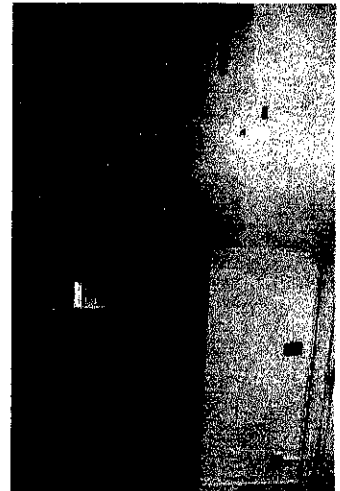
**Est. Cost:** \$2,200



5. **Issue:** Doors lack min. 18" clear maneuvering space on latch pull side.

**Recommendation:** Rebuild one door; or provide automatic door opener or hold doors open during hours of operation.

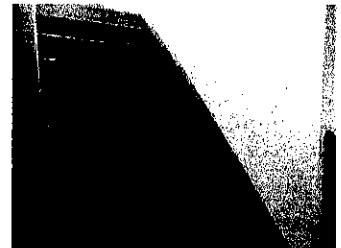
**Est. Cost:** \$1,800



6. **Issue:** No accessible path of travel to 2<sup>nd</sup> floor. Stairs lack handrails on both sides.

**Recommendation:** Provide a new two stop elevator or relocate 2<sup>nd</sup> floor programs to an accessible location as needed and provide a wall mounted handrail.

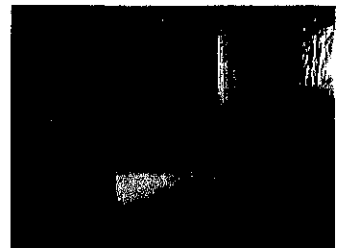
**Est. Cost:** \$140,000



7. **Issue:** 2<sup>nd</sup> floor typical - < 32" min clear width at doorways (7).

**Recommendation:** Widen doors or relocate programs to an accessible location as needed.

**Est. Cost:** \$16,100

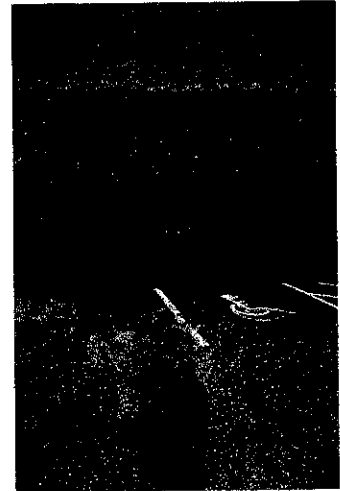


**Senior Center**

8. **Issue:** Path of travel from accessible parking to entrance is broken, uneven and has lips > 1/2".

**Recommendation:** Regrade and repave.

**Est. Cost:** \$2,500



9. **Issue:** No drinking fountain is provided for individuals who have difficulty bending.

**Recommendation:** Provide a drinking fountain with spout at 42" AFF.

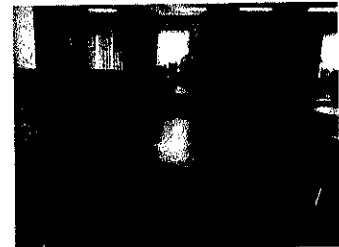
**Est. Cost:** \$3,200



10. **Issue:** No accessible path of travel to stage.

**Recommendation:** Provide a vertical wheelchair lift.

**Est. Cost:** \$10,600



11. **Issue:** No accessible path of travel to and on to gazebo.

**Recommendation:** Provide new asphalt walkway and wooden ramp.

**Est. Cost:** \$5,000



**Total Estimated Cost = \$183,625**

# DENNIS POND

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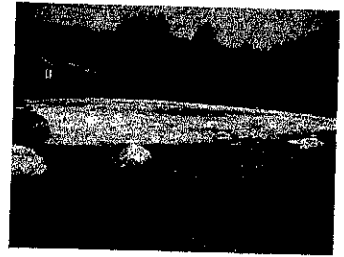


Dennis Pond, off Ice House Rd., provides general recreational facilities. The building at the site was not audited as this consultant understands that it is not open to the general public.

1. **Issue:** No accessible parking spaces.

**Recommendation:** Provide a minimum 1 accessible parking space (van accessible).

**Est. Cost:** \$1,400



2. **Issue:** No accessible path of travel to pond or gazebo.

**Recommendation:** Provide an accessible path of travel.

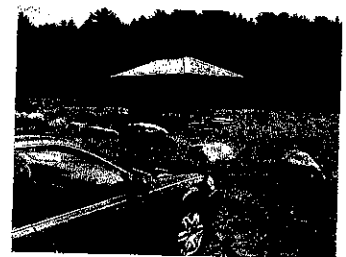
**Est. Cost:** \$5,000



3. **Issue:** No accessible path of travel on to gazebo.

**Recommendation:** Build a wooden ramp.

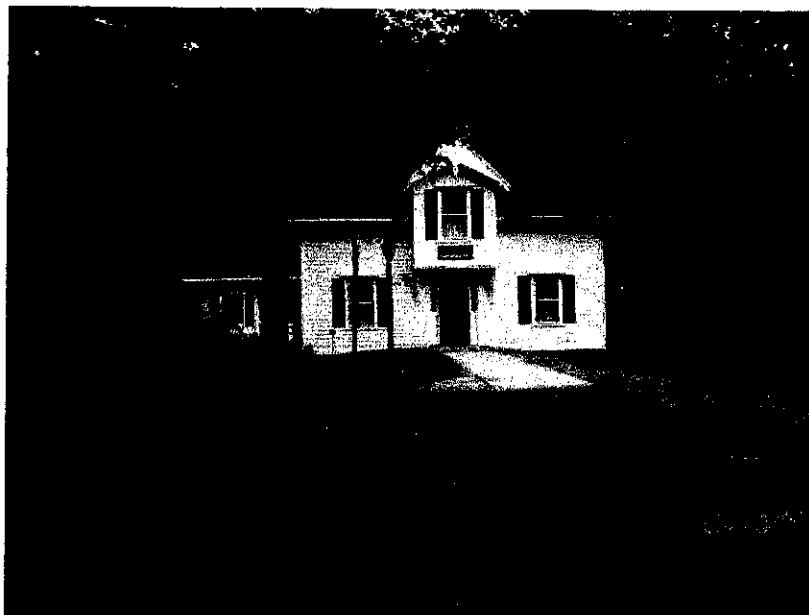
**Est. Cost:** \$4,500



**Total Estimated Cost = \$10,900**

# STAFFORD FAMILY SERVICES

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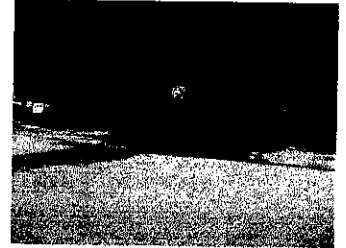


Stafford Family Services, located at 21 Hyde Park Rd is a three story building constructed in 1900 with a 1992 addition. There are public entrances at each to both sections of the building that are substantially accessible. There is no accessible interior path of travel between the building levels.

1. **Issue:** No van accessible space.

**Recommendation:** Restripe and mount "van" sign under International Symbol of Access.

**Est. Cost:** \$500



2. **Issue:** Front parking space has slopes >2%, there is no signage, and transition to walkway is uneven and has slope >5%.

**Recommendation:** Regrade/repave, provide signage.

**Est. Cost:** \$3,500



3. **Issue:** Path of travel between the two building entrances has surface that is broken and uneven, running slopes > 5% and cross-slope >2%.

**Recommendation:** Additional study required.

**Est. Cost:** \$20,000 estimated place holder



4. **Issue:** Addition entrance: threshold > 1/2".

**Recommendation:** Replace/modify threshold.

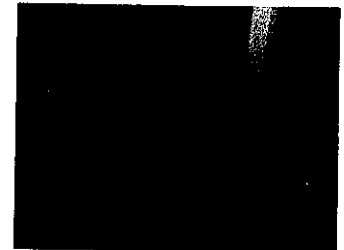
**Est. Cost:** \$350



5. **Issue:** No min. 36" long section of counter at max. height of 36" AFF.

**Recommendation:** Provide auxiliary counter or shelf at max. height of 36" AFF.

**Est. Cost:** \$250



6. **Issue:** 1<sup>st</sup> Floor Bathroom:
- No rear grab bar and side grab bar < 42" long;
  - No tactile/Braille sign;
  - Toilet flush valve is on narrow;
  - No visual alarm;
  - Bottom of mirror > 40" AFF;
  - Highest operable part of towel dispenser > 48" AFF.

**Recommendation:** Relocate flush valve to wide side, add grab bars, tactile/Braille sign and visual alarm, lower mirror and paper towel dispenser.

**Est. Cost:** \$2,800

7. **Issue:** No interior accessible path of travel between levels.

**Recommendation:** Relocate programs/services to an accessible location as needed.

**Est. Cost:** N/A

8. **Issue:** 3<sup>rd</sup> Floor bathroom – No accessible elements.

**Recommendation:** Provide tactile/Braille sign and sign indicating location of accessible bath room.

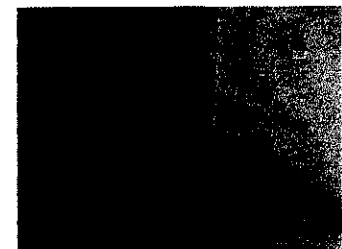
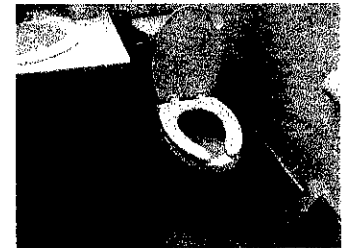
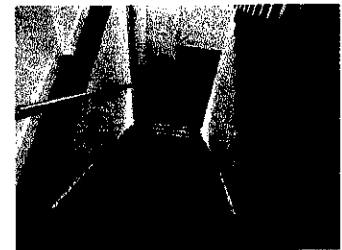
**Est. Cost:** \$250

9. **Issue:** 3<sup>rd</sup> floor doors lack min. 18" clear maneuvering space on latch pull side.

**Recommendation:** See recommendation # 7 above.

**Est. Cost:** N/A

**Total Estimated Cost = \$27,650**



6. **Issue:** 1<sup>st</sup> Floor Bathroom:
- No rear grab bar and side grab bar < 42" long;
  - No tactile/Braille sign;
  - Toilet flush valve is on narrow;
  - No visual alarm;
  - Bottom of mirror > 40" AFF;
  - Highest operable part of towel dispenser > 48" AFF.

**Recommendation:** Relocate flush valve to wide side, add grab bars, tactile/Braille sign and visual alarm, lower mirror and paper towel dispenser.

**Est. Cost:** \$2,800

7. **Issue:** No interior accessible path of travel between levels.

**Recommendation:** Relocate programs/services to an accessible location as needed.

**Est. Cost:** N/A

8. **Issue:** 3<sup>rd</sup> Floor bathroom – No accessible elements.

**Recommendation:** Provide tactile/Braille sign and sign indicating location of accessible bath room.

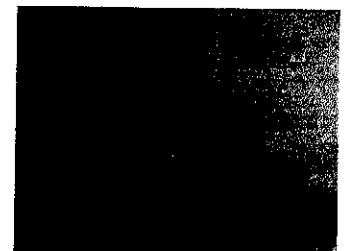
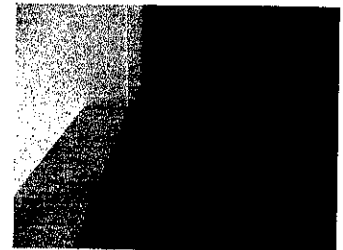
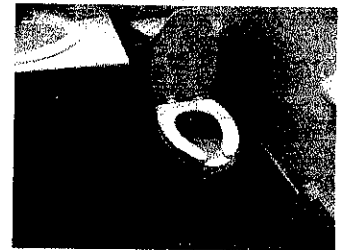
**Est. Cost:** \$250

9. **Issue:** 3<sup>rd</sup> floor doors lack min. 18" clear maneuvering space on latch pull side.

**Recommendation:** See recommendation # 7 above.

**Est. Cost:** N/A

**Total Estimated Cost = \$27,650**



# **WILLINGTON AVE. FIRE SUBSTATION**

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The Willington Avenue Fire Substation, is a two story building located at 11 Willington Ave.,

1. **Issue:** No accessible parking space.

**Recommendation:** Provide a minimum of one accessible parking space ("van" accessible).

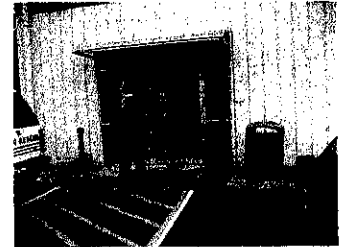
**Est. Cost:** \$2,200



2. **Issue:** Exterior landing at entrance is not level (@4%).

**Recommendation:** See recommendation #3 below.

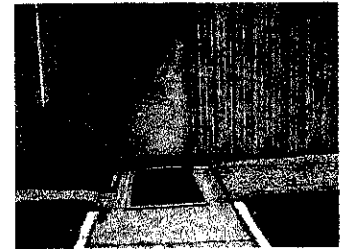
**Est. Cost:** N/A



3. **Issue:** There is a step at the public entrance.

**Recommendation:** Regrade/repave approach to provide a compliant walkway leading to a 60" deep level landing.

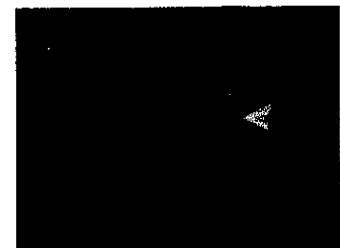
**Est. Cost:** \$2,200



4. **Issue:** Women's Room: Door lacks min. 18" on latch pull side, no tactile/Braille sign mounted on wall adjacent to latch side of door, flush valve is on narrow side of toilet, no side grab bar, visual alarm, hot water pipe under lavatory are not insulated, shower is not accessible.

**Recommendation:** Provide automatic door opener, tactile/Braille sign, side grab bar, accessible shower, visual alarm, toilet with flush valve on wide side and pipe insulation.

**Est. Cost:** \$7,500



5. **Issue:** Men's Room: Door lacks min. 18" on latch pull side, no tactile/Braille sign mounted on wall adjacent to latch side of door, no grab bars, hot water pipe under lavatory are not insulated, toilet seat < 17" AFF, bottom of mirror > 40" AFF, paper towel dispenser > 54" AFF, no visual alarm.

**Recommendation:** Provide automatic door opener, tactile/Braille sign, grab bars, visual alarm, and pipe insulation. Lower mirror.

**Est. Cost:** \$3,500

6. **Issue:** No accessible route to 2<sup>nd</sup> floor. Handrails mounted > 38" AFF.

**Recommendation:** Relocate programs to an accessible location as needed. Lower handrails.

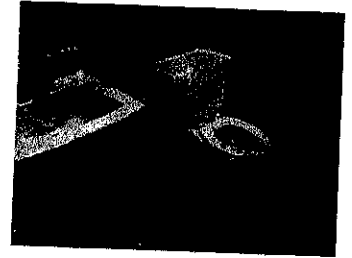
**Est. Cost:** \$300

7. **Issue:** 2<sup>nd</sup> floor restrooms have no accessible elements

**Recommendation:** Provide signage indicating location of accessible elements.

**Est. Cost:** \$120

**Total Estimated Cost = \$15,820**



# HERITAGE PARK

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# STAFFORD HISTORICAL SOCIETY

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The Stafford Historical Society, located at 5 Spring Street is a three story building constructed in 1877. The 1<sup>st</sup> floor public entrance is substantially accessible. With the use of a portable ramp, the basement entrance is functionally accessible. There is no interior accessible path of travel between levels.

1. **Issue:** No accessible parking spaces.

**Recommendation:** Provide one van accessible parking space in parking lot behind building and install a curb cut in front of the building adjacent to wooden approach walk.

**Est. Cost:** \$2,500



2. **Issue:** There is no accessible drop-off and transition from sidewalk to wood deck, has running slope >5% and cross-slope >2%.

**Recommendation:** Reconstruct sidewalk and transition to provide level landing and accessible drop-off.

**Est. Cost:** \$5,000



3. **Issue:** Curb cut has cross-slope > 2% and lip at intersection with street.

**Recommendation:** Rebuild compliant curb cut.

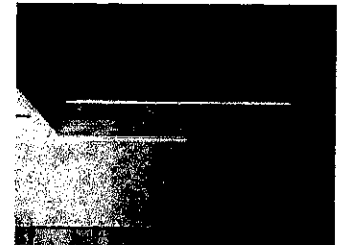
**Est. Cost:** \$1,600



4. **Issue:** Threshold, bevel is steeper than 1:2.

**Recommendation:** Install new threshold or modify bevel.

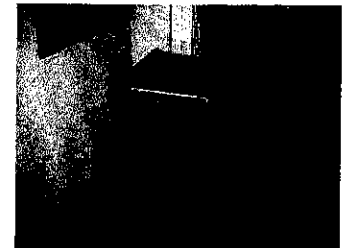
**Est. Cost:** \$350



5. **Issue:** No accessible drinking fountain.

**Recommendation:** Install hi-lo fountain.

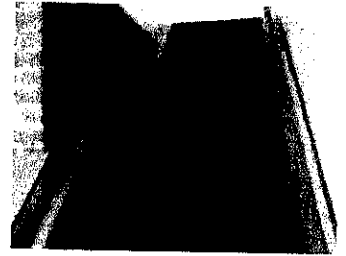
**Est. Cost:** \$3,200



6. **Issue:** No accessible interior path of travel between levels.

**Recommendation:** Install 3-stop elevator or provide alternative means of viewing basement and 2<sup>nd</sup> floor exhibits.

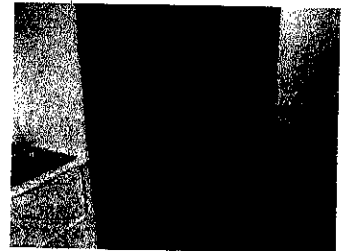
**Est. Cost:** \$5,000



7. **Issue:** Basement: bathroom  
No accessible elements.

**Recommendation:** Construct accessible uni-sex toilet room.

**Est. Cost:** \$15,000



8. **Issue:** Basement entrance: Interior step.

**Recommendation:** Construct wooden ramp or use portable ramp.

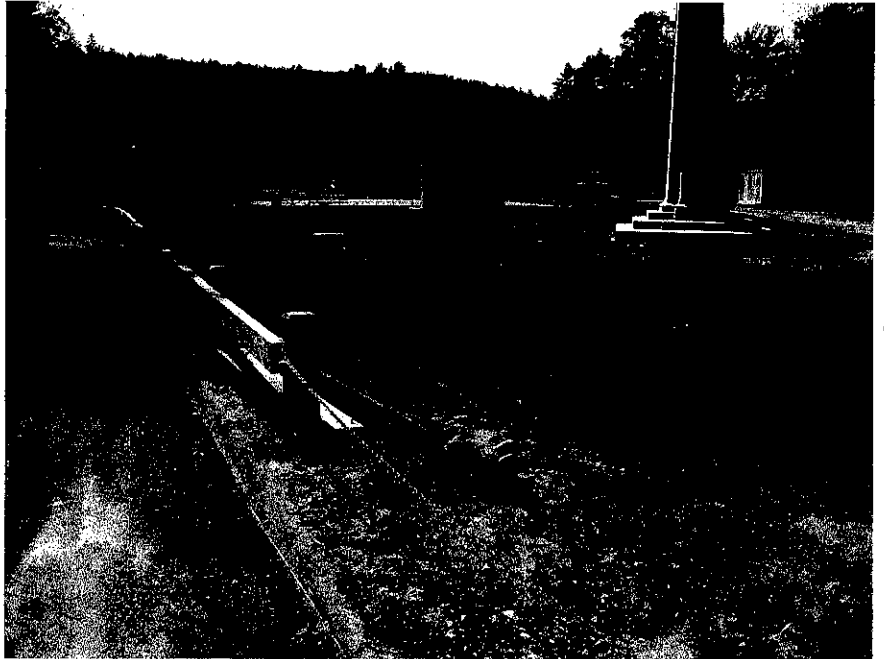
**Est. Cost:** \$1,200



**Total Estimated Cost = \$33,850**

# HYDE PARK

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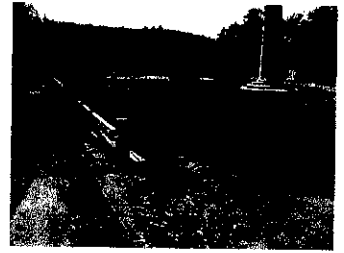


Hyde Park located near the town center, provides general recreation and sport facilities.

1. **Issue:** No accessible parking spaces.

**Recommendation:** Provide a minimum 2 accessible parking spaces (at least one van accessible).

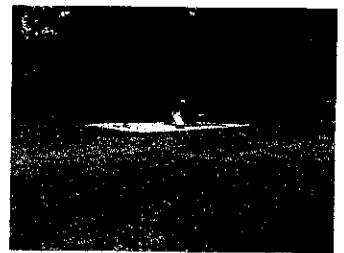
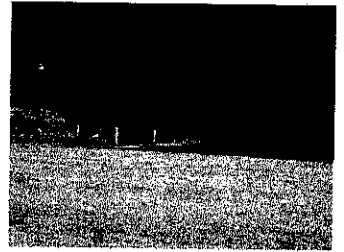
**Est. Cost:** \$1,850



2. **Issue:** There is no accessible path of travel to any of the playing fields or viewing areas.

**Recommendation:** Additional study required.

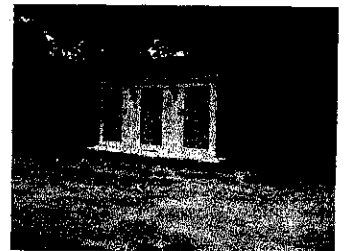
**Est. Cost:** \$10,000 estimated place holder.



3. **Issue:** Toilet rooms signed as accessible have step at entrance.

**Recommendation:** Construct level landing at threshold height and accessible walkway.

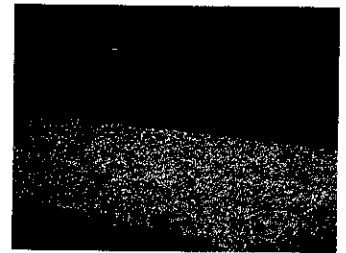
**Est. Cost:** \$2,700



4. **Issue:** Concession building: no accessible path of travel to concession window because of loose gravel.

**Recommendation:** Provide a minimum 3' wide path that is stable, firm and slip resistant and minimum 60" x 60" landing at window.

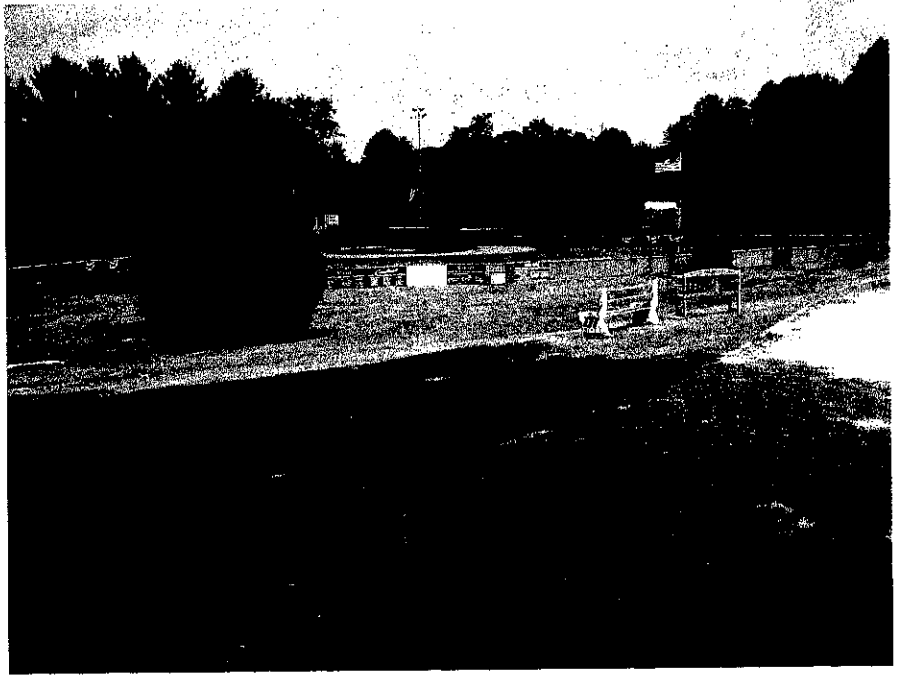
**Est. Cost:** \$2,200



**Total Estimated Cost = \$16,750**

## KEALEY FIELD

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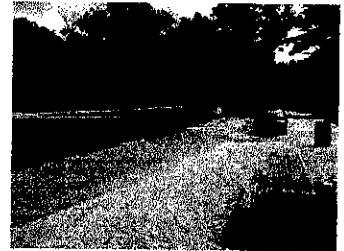


Kealy Field, located at 305 East St. provides general recreation and sport facilities. None of the facilities are fully accessible.

1. **Issue:** No accessible parking spaces.

**Recommendation:** Provide a minimum 2 accessible parking spaces (at least one van accessible).

**Est. Cost:** \$1,850



2. **Issue:** There is no accessible path of travel to any of the buildings and facilities because the soft gravel does not provide a surface that is stable, firm and slip resistant.

**Recommendation:** Provide min. 36" wide accessible route to all facilities.

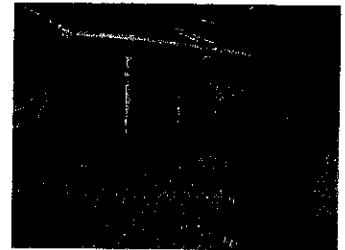
**Est. Cost:** \$7,000



3. **Issue:** Concession building:  
No accessible path of travel to window because of 3" step to wooden deck.

**Recommendation:** See Issue #2 above.

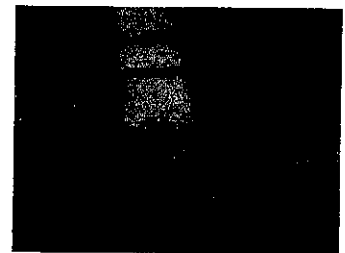
**Est. Cost:** N/A



4. **Issue:** Concession building:  
No accessible path of travel to building entrance.

**Recommendation:** See Issue #2 above.

**Est. Cost:** N/A



5. **Issue:** No accessible path of travel to dug-outs.

**Recommendation:** Additional study required.

**Est. Cost:** \$10,000 estimated place holder



6. **Issue:** No accessible path of travel to press box.

**Recommendation:** No action recommended. Although required under the current enforceable standard, the new ADAAG (July 2004) does not require an accessible route to free-standing press boxes that are elevated above grade 12 feet minimum provided that the aggregate area of all press boxes is less than 500 square feet.

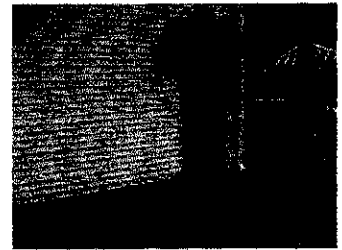
**Est. Cost:** N/A



7. **Issue:** Batting Cage: entrance is not accessible because of step.

**Recommendation:** Regrade/repave entrance approach.

**Est. Cost:** \$2,500



8. **Issue:** Portable toilet is not accessible.

**Recommendation:** Replace existing unit with an accessible portable toilet.

**Est. Cost:** TBD

No photo

**Total Estimated Cost = \$21,350**

# STAFFORD PUBLIC LIBRARY

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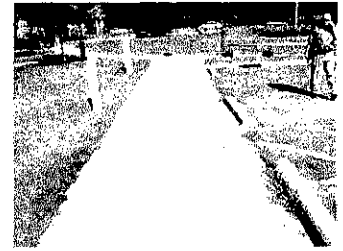


The Stafford Public Library, located at 10 Levithal Run 242 Union Street is a one story building constructed in 2001. The library is substantially accessible.

1. **Issue:** Walkway at accessible parking spaces has cross-slope > 2%.

**Recommendation:** Regrade/repave to create level walkway with in-line ramps.

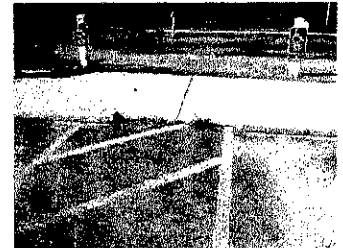
**Est. Cost:** \$4,000



2. **Issue:** Parking signs are mounted too low (can be obscured by a parked vehicle).

**Recommendation:** Raise signs so that the top of sign is between 5' – 8' AFF.

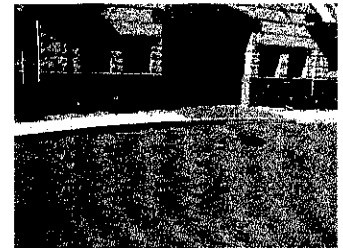
**Est. Cost:** \$250



3. **Issue:** Drop-off lacks curb ramp.

**Recommendation:** Provide new curb ramp.

**Est. Cost:** \$2,250



4. **Issue:** Entrance threshold > 1/2".

**Recommendation:** Modify/replace threshold.

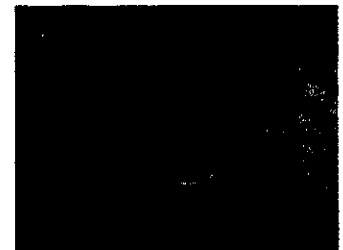
**Est. Cost:** \$350



5. **Issue:** Children's toilet room lacks required min. turning space.

**Recommendation:** Additional study required.

**Est. Cost:** \$10,000 (estimated place holder)



6. **Issue:** Women's room lacks a visual alarm.

**Recommendation:** Provide visual alarm.

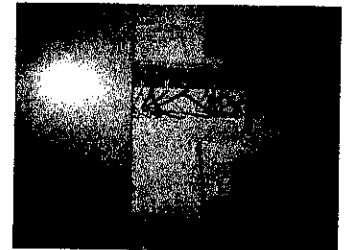
**Est. Cost:** \$350



7. **Issue:** Meeting room coat closet lacks hooks or pole at maximum 54" AFF.

**Recommendation:** Provide coat hooks at max. 54" AFF.

**Est. Cost:** \$30



8. **Issue:** History Room- tables lack min. 27" high knee clearance.

**Recommendation:** Provide accessible table.

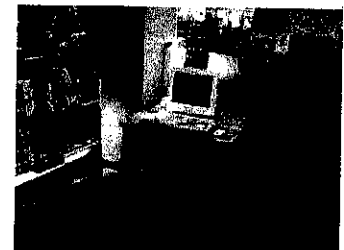
**Est. Cost:** \$300



9. **Issue:** "Accessible" public access computer table lacks min. 27" high knee clearance.

**Recommendation:** Provide accessible table.

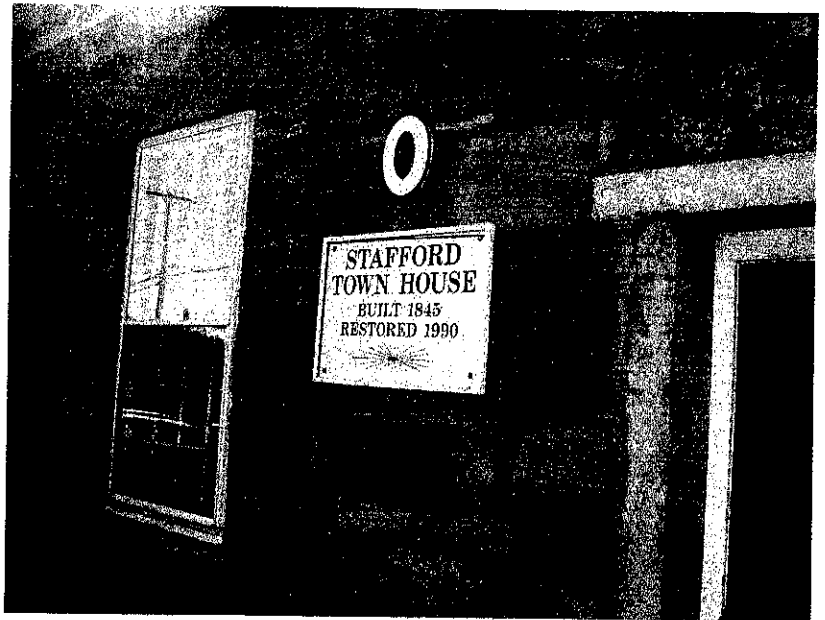
**Est. Cost:** \$200



**Total Estimated Cost = \$17,730**

# MUZIO TOWN HALL

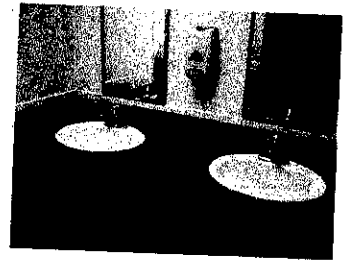
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6. **Issue:** Women's room lacks a visual alarm.

**Recommendation:** Provide visual alarm.

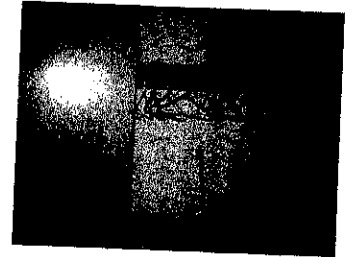
**Est. Cost:** \$350



7. **Issue:** Meeting room coat closet lacks hooks or pole at maximum 54" AFF.

**Recommendation:** Provide coat hooks at max. 54" AFF.

**Est. Cost:** \$30



8. **Issue:** History Room- tables lack min. 27" high knee clearance.

**Recommendation:** Provide accessible table.

**Est. Cost:** \$300



9. **Issue:** "Accessible" public access computer table lacks min. 27" high knee clearance.

**Recommendation:** Provide accessible table.

**Est. Cost:** \$200



**Total Estimated Cost = \$17,730**

The Muzio Town Hall, located at 275 Orcuttville Rd., is a two story building constructed in 1845. The building serves as a polling site. The entrance may require assistance for individuals with disabilities.

1. **Issue:** No accessible parking.

**Recommendation:** Provide a minimum 1 accessible parking space.

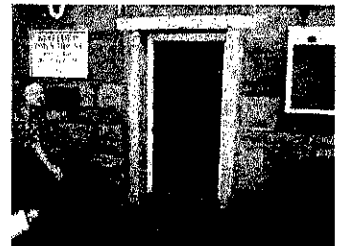
**Est. Cost:** \$1,000



2. **Issue:** Surface of approach to entrance is uneven.

**Recommendation:** Repave.

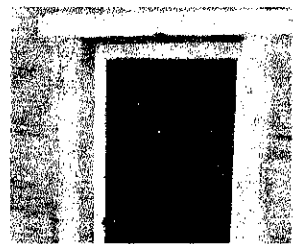
**Est. Cost:** \$1,900



3. **Issue:** Entrance lacks 18" minimum clear space on latch pull side.

**Recommendation:** Provide automatic door opener.

**Est. Cost:** \$ 1,400



4. **Issue:** Threshold > ½".

**Recommendation:** Replace threshold.

**Est. Cost:** \$350

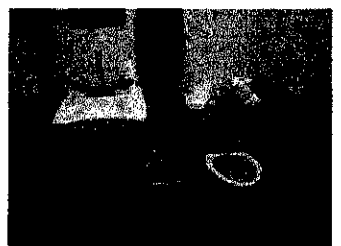


5. **Issue:** Men and Women's Room

- Toilet lacks grab bars;
- Bottom of mirror > 40" AFF;
- Door hardware is knob type;
- No tactile & Braille sign;
- No visual alarm.

**Recommendation:** Add grab bars, lever hardware, visual alarm and tactile/Braille sign. Lower mirror.

**Est. Cost:** \$1,170

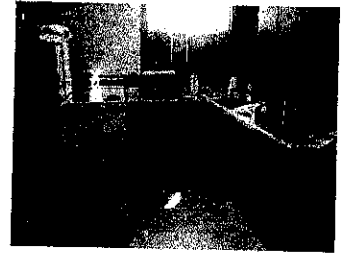


6. **Issue:** Sink lacks knee space.

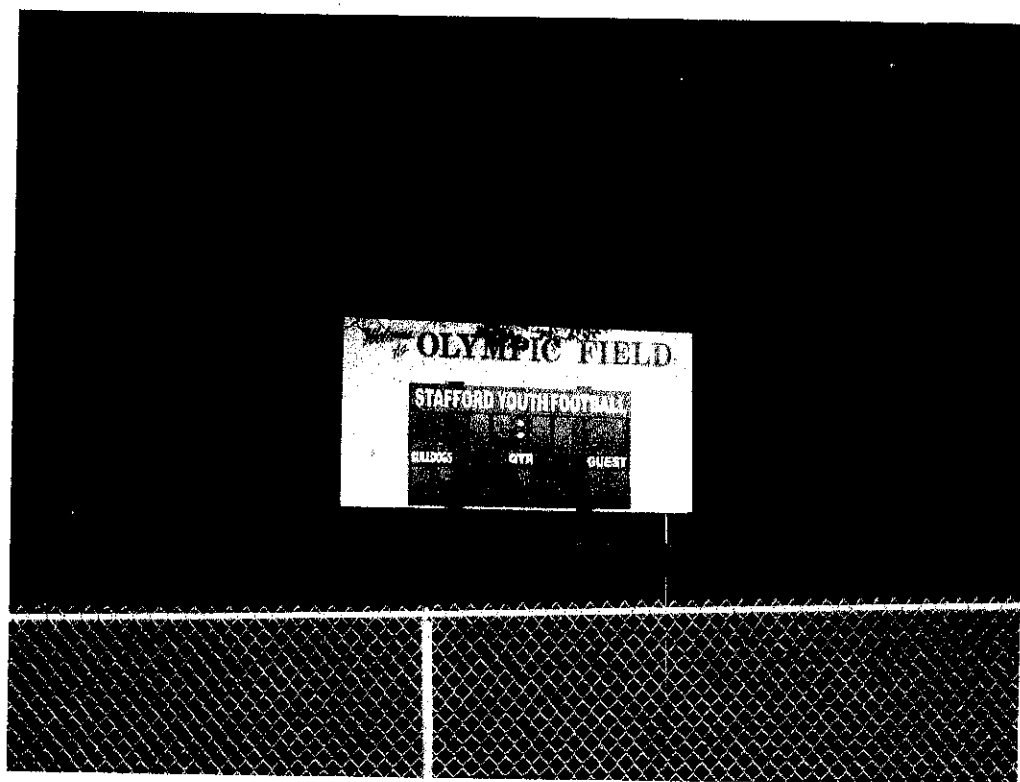
**Recommendation:** Provide minimum 30" wide 27" high clear knee space.

**Est. Cost:** \$900

**Total Estimated Cost = \$6,720**



# OLYMPIC FIELD

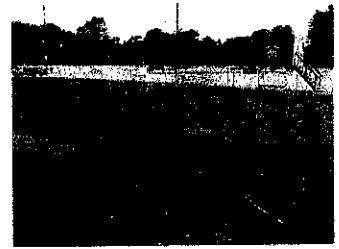


Olympic Field, located at 30 Olympic Ave. provides general recreation and sport facilities. None of the facilities are fully accessible.

1. **Issue:** No accessible parking spaces.

**Recommendation:** Provide a minimum 2 accessible parking spaces (at least one van accessible).

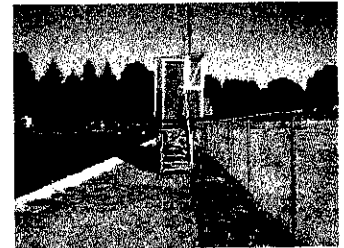
**Est. Cost:** \$4,000



2. **Issue:** No accessible path of travel to press box.

**Recommendation:** No action recommended. Although required under the current enforceable standard, the new ADAAG (July 2004) does not require an accessible route to free-standing press boxes that are elevated above grade 12 feet minimum provided that the aggregate area of all press boxes is less than 500 square feet.

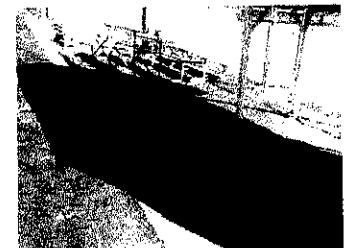
**Est. Cost:** N/A



3. **Issue:** There is no accessible path of travel to any of the playing fields bleachers or viewing areas.

**Recommendation:** Additional study required.

**Est. Cost:** \$10,000 estimated place holder.



- 4.

**Issue:** Field house entrance – 3" step and exterior landing has slope > 2%. (Note: Toilet rooms were not audited as they were locked. It does not appear that they are accessible.)

**Recommendation:** Regrade/repave approach to entrance.

**Est. Cost:** \$1,200



5. **Issue:** Portable toilet is not accessible.

No photo

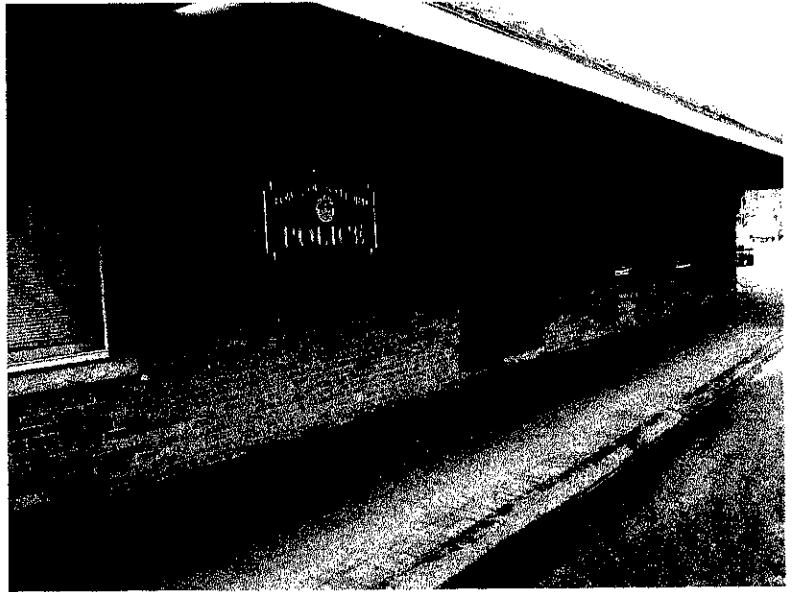
**Recommendation:** Replace existing unit with an accessible portable toilet.

**Est. Cost:** TBD

**Total Estimated Cost = \$15,200**

# RESIDENT STATE TROOPER

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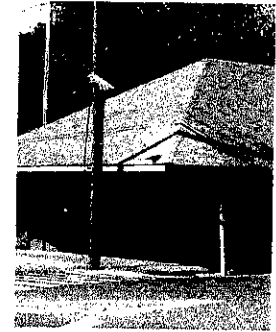


The Resident State Trooper Office, located at 2 Main Street is a one story building constructed in 1900. Neither entrance is currently fully accessible. Inside, there is no accessible path of travel to either the Sergeant's office or toilet room. The toilet room has no accessible elements.

1. **Issue:** Curb ramp running slope > 8.3%.

**Recommendation:** Reconstruct curb ramp.

**Est. Cost:** \$2,250



2. **Issue:** Sidewalk from curb ramp to front entrance has cross-slopes >2%.

**Recommendation:** Regrade/relay brick sidewalk.

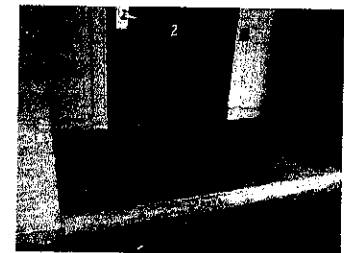
**Est. Cost:** \$7,000



3. **Issue:** Front entrance: 5" step and landing < 60' deep.

**Recommendation:** Options include improving the side entrance. Additional study required. See recommendation #4 below.

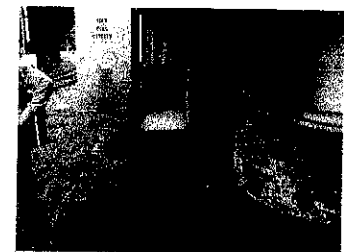
**Est. Cost:** N/A



4. **Issue:** Side entrance: approach has sections with running slope >5%; door lacks minimum 48" wide clear maneuvering space for latch pull-side approach.

**Recommendation:** Regrade/repave and widen approach.

**Est. Cost:** \$5,000



5. **Issue:** No min. 36" long section of counter at max. height of 36" AFF.

**Recommendation:** Provide auxiliary counter or shelf at max. height of 36" AFF.

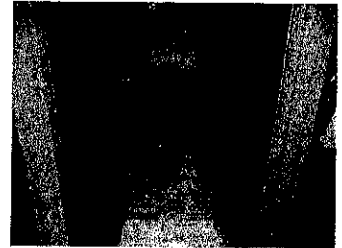
**Est. Cost:** \$250



6. **Issue:** Sergeant's office; no accessible path of travel – steps and door lacks min. 32" clear width.

**Recommendation:** Relocate services to an accessible location as needed.

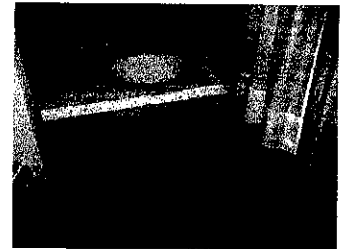
**Est. Cost:** N/A



7. **Issue:** Bathroom: no accessible path of travel and no accessible elements.

**Recommendation:** Construct accessible uni-sex bathroom on an accessible route elsewhere in the facility.

**Est. Cost:** \$15,000



**Total Estimated Cost = \$29,500**

# WARREN MEMORIAL TOWN HALL

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The Warren Memorial Town Hall, located 1 Main St is a three story building constructed in 1920. There is an accessible entrance however the path of travel to this entrance from the parking lot is not accessible. There is no accessible path of travel to the 2<sup>nd</sup> and 3<sup>rd</sup> floors.

1. **Issue:** Main Street curb cut – flared sides have slope > 8.3%

**Recommendation:** Construct new compliant curb ramp.

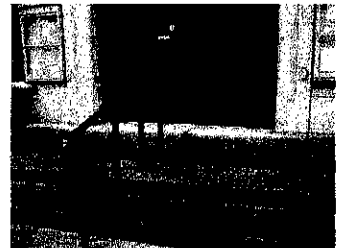
**Est. Cost:** \$2,250



2. **Issue:** Main St. - Inaccessible entrance lacks directional signage to accessible entrance.

**Recommendation:** Provide directional signage.

**Est. Cost:** \$175



3. **Issue:**
- Accessible entrance lacks exterior level landing.
  - No barrier under open stairs (min. 80" headroom)

**Recommendation:**

- Regrade/repave landing
- Provide permanent barrier under stair

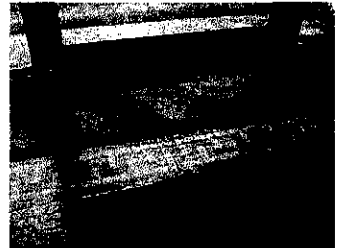
**Est. Cost:** \$1,850



4. **Issue:** Interior approach to accessible entrance has 1/2" lip without bevel.

**Recommendation:** Bevel lip.

**Est. Cost:** \$150



5. **Issue:** 1<sup>st</sup> floor - No barrier under (2) open stairs (min. 80" headroom).

**Recommendation:** Provide permanent barrier under stairs.

**Est. Cost:** \$2,950



6. **Issue:** Path of travel from parking lot to accessible entrance has running slope greater than 5%.

**Recommendation:** Additional study required.

**Est. Cost:** Place holder: \$10,000



7. **Issue:** Parking lot lacks accessible parking.

**Recommendation:** Provide a minimum 2 accessible parking space (1 must be van accessible). Accessible parking spaces must be closest to the accessible entrance.

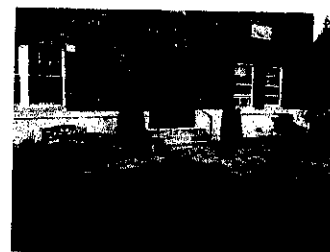
**Est. Cost:** \$4,000



8. **Issue:** Inaccessible entrance lacks directional signage to accessible entrance.

**Recommendation:** Provide directional signage.

**Est. Cost:** \$175



9. **Issue:** 1<sup>st</sup> floor public toilet rooms – no accessible elements.

**Recommendation:** Provide new accessible uni-sex toilet room.

**Est. Cost:** \$25,000



10. **Issue:** Typical – door hardware requires tight grasping and twisting of wrist.

**Recommendation:** Provide lever hardware or hold doors open during business hours.

**Est. Cost:** \$6,250 (\$250 x 25 units [estimate])



11. **Issue:** Typical – visual alarms are >80" AFF.

**Recommendation:** Lower alarms.

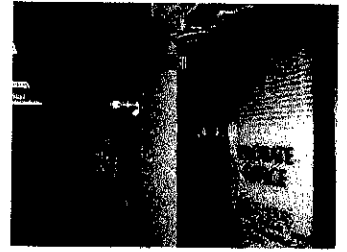
**Est. Cost:** \$1,500 (\$300 x 5 units [estimate])



12. **Issue:** Typical  
Permanent spaces lack tactile and Braille signs. Brass signs are protruding objects.

**Recommendation:** Provide tactile/Braille signs  
Raise brass signs.

**Est. Cost:** \$2,400 (\$120/ea. x 20 [estimate])



13. **Issue:** Typical - Signed exits lacks tactile and Braille signs.

**Recommendation:** Provide tactile/Braille signs  
Raise brass signs.

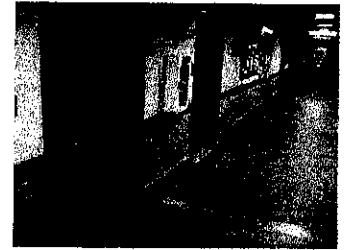
**Est. Cost:** \$840 (\$120/ea. x 7 [estimate])



14. **Issue:** 1<sup>st</sup>. floor – Defibrillator case is a protruding object.

**Recommendation:** Provide wing walls.

**Est. Cost:** \$250



15. **Issue:** Building, Health, Zoning Office
- No min. 36" long section of counter at max. height of 36" AFF;
  - No wheelchair turning space.

**Recommendation:**

- Provide auxiliary counter or shelf at max. height of 36" AFF;
- Relocate counter.

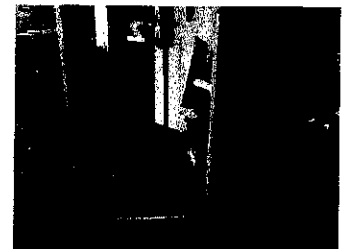
**Est. Cost:** \$1,500



16. **Issue:** Building Official Office – door lacks min. 32" clear width and 3 steps. Two other offices have doors that lack 32" clear width.

**Recommendation:** Provide service in an alternative accessible location.

**Est. Cost:** N/A



17. **Issue:** 1<sup>st</sup> floor – no drinking fountain accessible to individuals who use wheelchairs.

**Recommendation:** Provide accessible drinking fountain.

**Est. Cost:** \$3,200



18. **Issue:** Veteran's Hearing Room – table lacks min. 27" high knee space.

**Recommendation:** Modify apron to provide a minimum 30" wide space with min. 27" high knee space.

**Est. Cost:** \$250



19. **Issue:** 1<sup>st</sup> Floor – neither leaf of double doors provides min. 32" clear width.

**Recommendation:** Hold doors open during normal business hours.

**Est. Cost:** N/A



20. **Issue:** Assessor's Office - No min. 36" long section of counter at max. height of 36" AFF.

**Recommendation:** Provide auxiliary counter or shelf at max. height of 36" AFF.

**Est. Cost:** \$250

No photo

21. **Issue:** No accessible path of travel to 2<sup>nd</sup> and 3<sup>rd</sup> floor.

**Recommendation:** Provide an elevator or provide services in an alternative accessible location. If an elevator is provided, then the barriers at stairs identified below do not have to be mitigated.

**Est. Cost:** \$190,550

No Photo

22. **Issue:** Main lobby stairs. Handrails are not on both sides. Existing handrail is not continuous.

**Recommendation:** Provide new handrails on both sides of stairs.

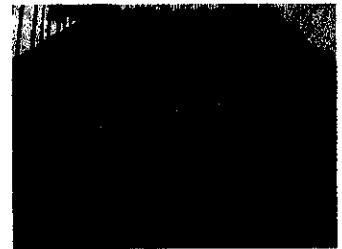
**Est. Cost:** \$5,000



23. **Issue:** Main lobby stairs. Treads have protruding nosings.

**Recommendation:** Modify treads/risers to eliminate protruding nosing.

**Est. Cost:** \$1,750



24. **Issue:** Stairs lacks handrails on both sides.

**Recommendation:** Provide new wall mounted handrails.

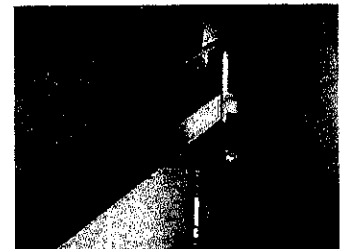
**Est. Cost:** \$1,500



25. **Issue:** Voter Registration Office & Community Development Office – no accessible path of travel.

**Recommendation:** See recommendation #21.

**Est. Cost:** N/A



26. **Issue:** 2<sup>nd</sup> Floor Conference Room – door lacks min. 32" clear width.

**Recommendation:** Widen door or provide service in an alternative accessible location.

**Est. Cost:** \$3,500



27. **Issue:** 2<sup>nd</sup> floor Selectman Man's Office – door lacks min. 32" clear width.

**Recommendation:** Widen door or provide service in an alternative accessible location.

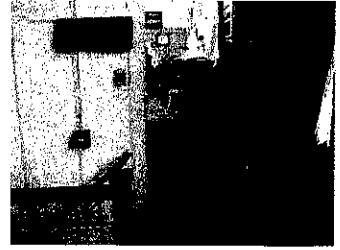
**Est. Cost:** \$3,500



28. **Issue:** DPW & Treasurer's Office - no accessible path of travel.

**Recommendation:** Provide service in an alternative accessible location.

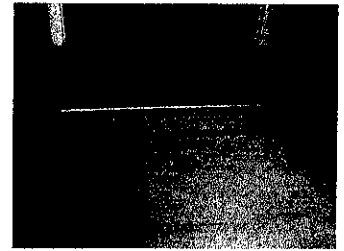
**Est. Cost:** N/A



29. **Issue:** Auditorium – threshold > ½".

**Recommendation:** Remove threshold, fill floor flush with existing flooring.

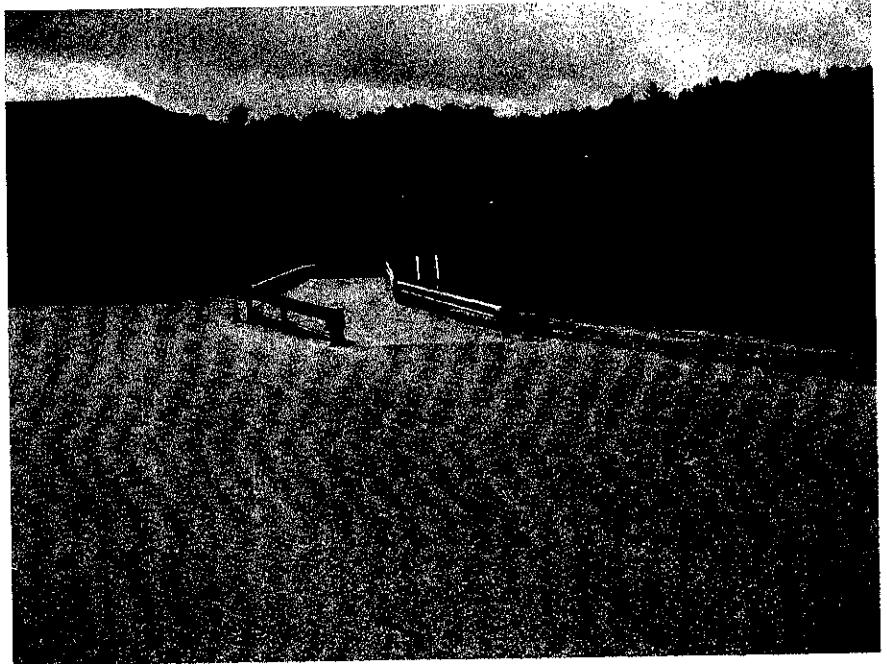
**Est. Cost:** \$500



**Total Estimated Cost = \$269,290**

## TRANSFER STATION

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The Stafford Transfer Station, is located at 80 Upper Rd. No architectural barriers were identified

# WEST STAFFORD FIRE STATION

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The West Stafford Fire Station, located at 144 W. Stafford Rd., was constructed in 1995. The fire station is substantially accessible.

1. **Issue:** No van accessible parking.

**Recommendation:** Restripe to provide an 8' wide access aisle.

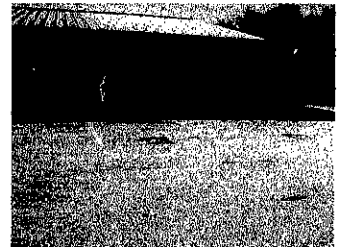
**Est. Cost:** \$450



2. **Issue:** Parking signs are mounted too low (can be obscured by a parked vehicle)

**Recommendation:** Raise signs so that the top of sign is between 5' – 8' AFF

**Est. Cost:** \$250



3. **Issue:** Approach to public entrance has running slope >5% and door lacks min. 18" clear maneuvering space on latch pull side.

**Recommendation:** Regrade/repave and widen concrete approach.

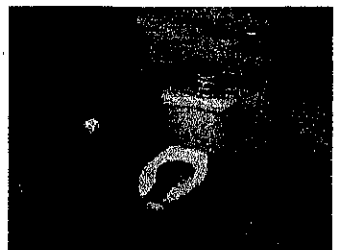
**Est. Cost:** \$2,000



4. **Issue:** Women's Room – Flush valve is on narrow side of toilet, coat hook in accessible stall >54" AFF, no visual alarm, bottom of mirror > 40" AFF

**Recommendation:** Provide flush valve on wide side of toilet, provide accessible coat hook, if building has an alarm system, provide visual alarm, lower mirror.

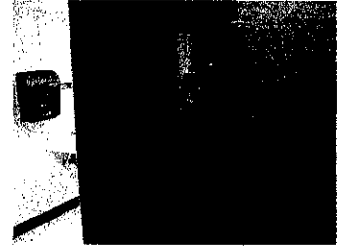
**Est. Cost:** \$2,000



5. **Issue:** Men's Room – Coat hook in accessible stall >54" AFF, no visual alarm, bottom of mirror > 40" AFF

**Recommendation:** Provide accessible coat hook, if building has an alarm system, provide visual alarm, lower mirror.

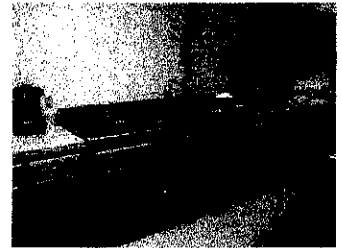
**Est. Cost:** \$450



6. **Issue:** Kitchen sink lacks clear knee space

**Recommendation:** Remove base cabinets to and modify plumbing as necessary to provide min. 30" wide, 27" high and 19" deep clear knee space.

**Est. Cost:** \$500



**Total Estimated Cost = \$5,650**

## **Appendix B: Compliance Overview Questionnaire**

**TOWN OF STAFFORD**  
**Americans with Disabilities Act Evaluation**  
**Compliance Overview Questionnaire**

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**A. Organization**

1) 504/ADA Coordinator name: \_\_\_\_\_

- a) Is this individual a ☐ full-time or ☐ part-time employee, or a ☐ volunteer?
- b) How long has this individual served as the Town's 504/ADA Coordinator?
- c) When did this individual most recently attend a 504/ADA conference, training workshop or educational/professional development seminar related to disability law or disability accommodation?

Year: \_\_\_\_\_

2) Disabilities Committee Members:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

a) Does the Committee include people with disabilities?

☐ Yes                      ☐ No                      ☐ Not Applicable

3) Does the Town have a written grievance policy and procedures to address complaints from people with disabilities? *(If yes, attach a copy.)*

☐ Yes                      ☐ No                      ☐ Not Applicable

a) If yes, is the policy available in multiple formats, e.g., large-print or cassette? *(Provide an example.)*

☐ Yes                      ☐ No                      ☐ Not Applicable

b) How does the Town make the grievance policy known to the public?

4) In the past five years, has the Town received a complaint from an individual asserting that he/she was denied or unable to obtain access to a local government program, service or

activity due to a disability? If the Town has not received a direct complaint, has it been notified of any complaint received by another public agency, such as the Massachusetts Office on Disability, Department of Education, or Department of Elder Affairs; or the U.S. Department of Justice? (*Examples of possible complaints: a person who could not enter or move within a public building or use a public park because of architectural barriers, a person who could not participate in town meeting because the meeting hall lacks assistive listening devices, a person who could not make proper payment of a tax bill or other municipal charge because she could not read small print, or a person for whom intersections and crosswalks are unsafe because there are no accessible pedestrian systems?*)

☐ Yes                      ☐ No                      ☐ Not Applicable

a) If yes, what was the complaint and how did the Town resolve it?

b) If the complaint is not resolved, what is its status?

5) Does the Town have an emergency evacuation plan and procedures?

☐ Yes                      ☐ No                      ☐ Not Applicable

a) If yes, please briefly describe the plan and procedures.

b) Are the plans procedures documented in written form?

☐ Yes                      ☐ No                      ☐ Not Applicable

c) Does the evacuation plan and procedures include specific provisions for evacuation for people with disabilities?

☐ Yes                      ☐ No                      ☐ Not Applicable

d) If yes, please briefly describe these provisions.

e) How are members of the public notified of the emergency evacuation procedures?

f) Are Town buildings equipped with visual emergency alarms (e.g., flashing lights) in addition to audio alarms?

☐ Yes                      ☐ No                      ☐ Not Applicable

**B. Non-Discrimination in Employment**

- 1) How many full- and part-time employees does the Town have? (*Approximate count is fine.*)  
\_\_\_\_\_ Full-time      \_\_\_\_\_ Part-time
- 2) Does the Town currently have any employees with disabilities?  
☐ Yes      ☐ No      ☐ Not Applicable
- 3) Has the Town had any employees with disabilities at any point in the past five years?  
☐ Yes      ☐ No      ☐ Not Applicable
- a) If "yes," has the Town made reasonable accommodations, (i.e., modifications to public buildings or the job structure) to accommodate the employee(s)?  
☐ Yes      ☐ No      ☐ Not Applicable
- b) If yes, summarize modifications:
- c) If no, were modifications necessary?  
☐ Yes      ☐ No      ☐ Not Applicable
- d) If the Town did not make modifications because of undue hardship, explain the hardship. What accommodations were necessary, and what was their approximate cost?
- 4) Does the Town make its employment advertisements or notices, recruitment methods, and job application process accessible to people with various disabilities, including people with hearing, visual or speech impairments? For example, do you use Braille or large-print text, audio cassette, captioned CATV announcements and job application forms? (*If yes, attach a sample.*)  
☐ Yes      ☐ No      ☐ Not Applicable
- 5) Do job recruitment materials contain a nondiscrimination policy? (*Attach the Town's standard employment application form, if there is one, or job notices placed in publications or professional journals. Attach a copy of the Town's personnel plan or personnel bylaw; it may contain a nondiscrimination policy.*)  
☐ Yes      ☐ No      ☐ Not Applicable

6) Does the Town require pre-employment medical examinations?

☐ Yes

☐ No

☐ Not Applicable

7) Has the Town ever received a complaint from a job applicant asserting that he/she was denied employment on the basis of a disability? Or a complaint from an employee asserting that he/she was denied promotion or transfer on the basis of a disability, or reasonable accommodation? *(If yes, summarize what happened in the space below.)*

☐ Yes

☐ No

☐ Not Applicable

## **Appendix C: Self-Evaluation Questionnaire**

**TOWN OF STAFFORD**  
**Americans with Disabilities Act**  
**Self-Evaluation**

**Disability:** a *physical or mental impairment* that *substantially limits* one or more of the *major life activities* such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working. Examples of disabilities: epilepsy, paralysis, HIV infection, AIDS, a substantial hearing or visual impairment, mental retardation, a specific learning disability.

**Town Services, Programs, Activities**

To be completed by ALL Town departments, boards, and committees. Please PRINT responses. The estimated time commitment for this survey is 30-minutes.

1. Name of person completing: \_\_\_\_\_  
Title: \_\_\_\_\_  
Phone: \_\_\_\_\_  
FAX: \_\_\_\_\_  
Email: \_\_\_\_\_
2. Primary Location of Service, Activity or Program.  
Street Address: \_\_\_\_\_  
Town: \_\_\_\_\_  
State: \_\_\_\_\_  
Zip Code: \_\_\_\_\_
3. How many employees work in this Department/Program?  
\_\_\_\_ 1-5      \_\_\_\_ 6-10      \_\_\_\_ 11-30      \_\_\_\_ 31-50 employees
4. Does your Department/Program issue licenses, permits or certifications (e.g. foster home, marriage, dog licenses or building related permits)?  
\_\_\_\_ Yes      \_\_\_\_ No
5. Please describe the contact your department/program/board/committee has with the public.  
(For example, people come into our office for x, y and z; no one ever comes to our office but we provide information that is used by the public; we do fieldwork and interact with members of the public in the field; we have clients who must apply for our program and meet certain criteria for continuing to receive service from us, etc.)  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### **A. Population Information**

1. Approximately how many members of the public receive service from your program(s) and/or activities each year?  
  
\_\_\_\_ Under 500  
\_\_\_\_ 500 -1,000  
\_\_\_\_ 1,001-5,000  
\_\_\_\_ 5,001-10,000  
\_\_\_\_ Over 10,000
  
2. Approximately what percentage of these individuals have a disability? (Note; we understand that your program/office may not collect this data and do not expect you to do so.) However, please use your best estimate to give us a clearer picture of your program. In your estimate, please be sure to consider those people with hidden disabilities (for example, psychiatric illnesses) as well as those with visible disabilities (i.e. visual impairments).  
  
\_\_\_\_ None  
\_\_\_\_ Under 10%  
\_\_\_\_ 10% - 25%  
\_\_\_\_ 26% - 50%  
\_\_\_\_ Over 50%  
\_\_\_\_ Have no idea

### **B. General Policies, Procedures & Practices**

1. How do you inform members of the public about your services, activities and programs? (Check all that apply.)  
\_\_\_\_ Verbal Outreach  
\_\_\_\_ Brochures  
\_\_\_\_ Flyer/Notice in the Community  
\_\_\_\_ Advertisement in newspaper, bulletin, etc.  
\_\_\_\_ Website  
\_\_\_\_ Other, please specify (i.e.: radio talk shows, cable TV, etc.) \_\_\_\_\_  
\_\_\_\_\_
  
2. Does your service, activity or program ever provide transportation for its applicants or participants?  
\_\_\_\_ Yes (Go to 2.1.)  
\_\_\_\_ No (Go to 3.)  
  
2.1. If yes, what type of transportation?  
\_\_\_\_ Mini-van  
\_\_\_\_ Wheelchair lift van or bus  
\_\_\_\_ Bus pass or tokens  
\_\_\_\_ Other - Please specify: \_\_\_\_\_

2.2. Do you provide wheelchair accessible transportation for people who need it?  
☐ Yes  
☐ No

3. Does your service, activity or program have safety standards (e.g. applicants must be able to care for themselves, participants may not have a history of violent or criminal behavior)?  
☐ Yes (Go to 3.1.)  
☐ No (Go to 4.)

3.1. If yes, please describe these standards.

3.2. How do you determine whether an individual meets these standards?  
☐ Self identification by individual  
☐ Staff observation  
☐ Staff interview  
☐ Testing  
☐ Records check  
☐ Other, please name: \_\_\_\_\_

4. Does your service, activity or program have any components or services that are exclusively for people with disabilities (e.g., a housing program designated for persons with disabilities, an alternative employment program, counseling/therapy program, a different application process, special meeting times, etc.)?  
☐ Yes (Go to 4.1.)  
☐ No (Go to Section C.)

4.1. If yes, please list these components or services:

4.2. May people with disabilities also participate in the general program if they so choose?  
☐ Yes, always  
☐ Yes, under special circumstances  
☐ No

4.2.a. If you answered "Yes, under special circumstances" or "No", please explain:

### **C. Communications**

1. Does your office, activity or program use an automated phone menu system to access staff and/or information on services (i.e., "Push 1 for..., push 2 for...")?

☐ Yes (Go to 1.1.)

☐ No (Go to 2.)

If yes, does the system offer a simple (1 step) way for a caller to bypass the menu and speak directly with a program representative?

☐ Yes

☐ No

2. Does your department use a TT/TTY/TTD service (**Text Telephone/TeleTYpewriter/ or a Telecommunications Device for the Deaf** for communicating with people with hearing and/or speech impairments)?

☐ Yes (Go to 2.1.)

☐ No (Go to 3.)

2.1. If yes, do you have a dedicated phone line for the TT/TTY/or TTD?

☐ Yes

☐ No

2.2. What is the TT/TTY/TTD number? \_\_\_\_\_

2.3. Where is the TT/TTY/TTD number listed? (Check all that apply.)

☐ Brochure or other distributed written material

☐ Public phone directory

☐ Recorded message

☐ Website

☐ Other, please name: \_\_\_\_\_

2.4. Does the TT/TTY/TTD have an answering machine that answers all calls when a live person is not available (i.e. is your TT/TTY/TTD functional 24 hours a day)?

☐ Yes

☐ No

2.5. Are members of your staff trained in how to use the TT/TTY/TTD?

☐ Yes (Go to 2.5.a.)

☐ No (Go to 3.)

2.5.a. If yes, please briefly describe the training they receive:

2.5.b. How frequently is this training provided?

☐ At orientation

☐ On request

☐ Semi-annually

☐ Annually

☐ Other, please specify \_\_\_\_\_

3. Does your service, activity or program provide phones for the public to use to make outgoing calls when needed (e.g. to call for transportation or to track down a required document?)  
\_\_\_ Yes (Go to 3.1.)  
\_\_\_ No (Go to 4.)

3.1. If yes, is there a TT/TTY/TTD available for making these calls?  
\_\_\_ Yes  
\_\_\_ No

4. Are your service, activity or program staff trained how to use the Connecticut Relay 24 Hour Service?  
\_\_\_ Yes  
\_\_\_ No

5. Are people with disabilities portrayed in any of the material used by your service, activity or program (e.g. written descriptions, pictures, videos, etc.)?  
\_\_\_ Yes (Go to 5.1.)  
\_\_\_ No (Go to 6.)

5.1. If yes, please describe briefly:

6. Does your service, activity or program notify the public about whether your program offices are architecturally accessible (e.g. whether or not it is accessible to people who use wheelchairs, whether or not there are obstructions that would hinder people who are blind?)  
\_\_\_ Yes (Go to 6.1.)  
\_\_\_ No (Go to 7.)

6.1 Do you ever provide information to the public through videos, movies or television broadcasts?  
\_\_\_ Yes (Go to 7.1.)  
\_\_\_ No (Go to 8.)

7. If yes, do these videos, movies or broadcasts have captioning for individuals with visual impairments (i.e., is the verbal portion of the broadcast transcribed and displayed at the bottom of the screen)?  
\_\_\_ Yes  
\_\_\_ No

7.1 Do these videos, movies or broadcasts have an audio narration option for individuals who have visual impairments?  
\_\_\_ Yes  
\_\_\_ No

8. Does your service, activity or program include exhibits and/or interpretive displays (i.e. art exhibits, historical displays, information kiosks, etc.)?  
\_\_\_ Yes (Go to 8.1.)  
\_\_\_ No (Go to 9.)

8.1. If yes, is information in the exhibit/display provided in a variety of formats?

- \_\_\_ Written  
\_\_\_ Audio  
\_\_\_ Graphic/Pictorial  
\_\_\_ Other, please specify \_\_\_\_\_

9. Does your service, activity or program use any of the following alternative formats and/or auxiliary aids to make program materials and services accessible to people with disabilities (e.g. to make written materials accessible to people with visual impairments, to make interviews accessible to people who are deaf, etc.)? Check all that apply:

Alternative Formats

- \_\_\_ Audiotape  
\_\_\_ Enlarged print  
\_\_\_ Braille  
\_\_\_ Computer disk  
\_\_\_ Website  
\_\_\_ Email  
\_\_\_ Other, please specify: \_\_\_\_\_

Auxiliary Aids

- \_\_\_ Sign language interpreter  
\_\_\_ Assistive listening devices  
\_\_\_ Real-time captioning  
\_\_\_ Readers  
\_\_\_ Call in/speaker phone capability  
\_\_\_ Assistant (who perform tasks such as translating for a person with a speech impediment)  
\_\_\_ Other, please specify: \_\_\_\_\_

9.1. Please briefly describe the procedure someone must follow to request materials in alternative formats and/or auxiliary aids:

9.1.a. Is this procedure documented in written form?

- \_\_\_ Yes  
\_\_\_ No

9.2. Do you notify the public that they may request alternative formats and/or aids if needed?

- \_\_\_ Yes (Go to 9.2.a.)  
\_\_\_ No (Go to 9.3.)

9.2.a. How are members of the public notified that they may request alternative formats and/or auxiliary aids if needed? (Check all that apply.)

- ☐ Verbal explanation at time of service
- ☐ Posted notice in program office
- ☐ Brochure or other distributed written material
- ☐ Recorded message
- ☐ Website
- ☐ Other, please specify: \_\_\_\_\_

9.3. What is the average time that someone must wait for approval of a request?

- ☐ Less than 1 hour
- ☐ 1 hour to 24 hours
- ☐ 25 hours to 72 hours
- ☐ 73 hours to 1 week
- ☐ over 1 week

9.4. Please list the firm(s) and/or organizations that you use to access auxiliary aids (e.g., the firms you use to access ASL interpreters, etc.)

10. Does your service, activity or program hold public meetings, hearings or other events?

- ☐ Yes (go to 10.1.)
- ☐ No (Go to 10.2.)

10.1. If yes, does your service, activity or program hold public meetings, hearings or other events regularly scheduled at specific locations (i.e. at locations other than your program locations listed in Section 1)?

- ☐ Yes (Go to 10.1.a.)
- ☐ No (Go to 10.2.)

10.1.a. If yes, please list these specific locations: \_\_\_\_\_

10.2. Does your service, activity or program notify the public about whether or not the locations of public meetings, hearings or other events are architecturally accessible?

- ☐ Yes (go to 10.2.a.)
- ☐ No (Go to 10.3.)

10.2.a. If yes, please indicate the methods you use to communicate this information: (check all that apply.)

- ☐ Verbal Outreach
- ☐ Brochures
- ☐ Flyer/Notice in the Community
- ☐ Advertisement in newspaper, bulletin etc.
- ☐ Website
- ☐ Other, please specify: \_\_\_\_\_

10.3. Do you use any of the following alternative formats and/or auxiliary aids to make public meetings, hearings or other events accessible to people with disabilities?

Alternative Formats

- ☐ Audiotape
- ☐ Enlarged print
- ☐ Braille
- ☐ Computer disk
- ☐ Website
- ☐ Email
- ☐ Other, please specify: \_\_\_\_\_

Auxiliary Aids

- ☐ Sign language interpreter
- ☐ Assistive listening devices
- ☐ Real-time captioning
- ☐ Readers
- ☐ Call in/speaker phone capability
- ☐ Assistant (who perform tasks such as translating for a person with a speech impediment)
- ☐ Other, please specify: \_\_\_\_\_

10.3.a. If you answered yes to any of the above, is the procedure for requesting or receiving alternative formats and/or auxiliary aids for public meetings, hearings or other events different from the procedure for requesting these formats and aids for program services?

- ☐ Yes (Go to 10.3.a.1.)
- ☐ No (Go to 11.)

10.3.a.1. If yes, please explain these differences. (Be sure to note any difference in the ways the public is notified, requests procedure, length of requested approval period, firms used, etc.):

11. How does your service, activity or program pay for costs incurred from accommodations for people with disabilities (e.g. paying for interpreters, alternative formats, individual staff assistance, etc.)?

- ☐ Fees from participants with disabilities
- ☐ Fees from all participants
- ☐ Specific budget line item
- ☐ Included in general budget
- ☐ Other, please name: \_\_\_\_\_

#### **D. Modification of Policies, Procedures & Practices**

1. Does your service, activity or program allow an individual to request a modification of program policies, procedures or practices to accommodate his/her disability (e.g., waiver of an orientation requirement for someone who cannot attend at the required time due to a disability, a home visit for someone who is homebound and cannot come into the office, assistance completing a required form for someone with a cognitive impairment, etc.)?
- ☐ Yes (Go to 1.1.)
- ☐ No (Go to 2.)

1.1. If yes, please describe the procedure for requesting and providing modifications.

1.1.a. Is this procedure documented in written form?

- ☐ Yes
- ☐ No

1.2. Do you notify the public that they may request such modifications when needed?

- ☐ Yes (Go to 1.2.a.)
- ☐ No (Go to 1.3.)

1.2.a. If yes, what does the notice include?

- ☐ Notice of right to non-discrimination
- ☐ Notice of right to reasonable modification of policies, procedures and practices
- ☐ Information on how to request a modification
- ☐ Phone number to call to request a modification
- ☐ TT/TTY/TDD number to call to request a modification
- ☐ A form to complete to request a modification
- ☐ An address at which to make a request in person
- ☐ Contact information of an advocate or ombudsperson
- ☐ Other, please specify: \_\_\_\_\_

1.2.b. How are members of the public notified they may request modifications if needed?  
(Check all that apply.)

- ☐ Verbal explanation at time of service
- ☐ Posted notice in program office
- ☐ Brochure or other distributed written material
- ☐ Recorded message
- ☐ Website
- ☐ Other, please specify: \_\_\_\_\_

1.3. What is the average length of time that someone must wait for approval of a request?

- ☐ Less than 1 hour
- ☐ 1 hour to 24 hours
- ☐ 25 hours to 72 hours
- ☐ 73 hours to 1 week
- ☐ Over 1 week

2.1. If yes, are there alternatives available for individuals whose physical or mental disabilities make it unduly difficult to stand or wait for an extended period of time (e.g., a means of holding someone's place in line, staff available to assist people with disabilities, etc.)?

☐ Yes (go to 2.1.a.)

☐ No (Go to 3.)

2.1.a. If yes, please briefly describe the alternative:

2.1.b. Can any staff offer these alternatives or must a request be approved by a designated staff member?

☐ Any staff may offer upon request

☐ Request must be approved by designated staff member

☐ Other, please specify: \_\_\_\_\_

3. Does your service, activity or program and/or the facility in which the service, activity or program is located have a policy that restricts animals?

☐ Yes (Go to 3.1.)

☐ No (Go to Section E)

3.1. If yes, may this policy be modified to allow for service or companion animals used by people with disabilities (e.g. the guide dog of a person who is blind, or the cat of a person with post-traumatic stress syndrome)?

☐ Any staff may offer upon request

☐ Request must be approved by designated staff member

☐ Other, please specify: \_\_\_\_\_

#### **E. Grievance Policies & Procedures**

1. Does your service, activity or program have a grievance procedure (i.e., a procedure for resolving complaints by the public alleging noncompliance with the ADA in any of your program's services, activities and/or benefits.)?

☐ Yes (Go to 1.1.)

☐ No (Go to Section F)

1.1. If yes, please briefly describe this procedure:

1.1.a. Is this procedure documented in written form?

☐ Yes

☐ No

1.4. How are staff (including receptionists, service window attendants, client service staff, etc.) informed about how to handle requests for modification? (Check all that apply.)

- ☐ Word-of mouth/experience
- ☐ Employee handbook
- ☐ Other documented procedure
- ☐ Training
- ☐ Other, please specify: \_\_\_\_\_

1.5. Approximately how frequently does your service, activity or program receive requests for modifications of policies, procedures or practices?

- ☐ Never
- ☐ 1 -10 times a year
- ☐ 11 to 25 time a year
- ☐ 25 to 50 times a year
- ☐ more than 50 times a year

1.6. In the last year, has your service, activity or program modified a policy, procedure and/or practice for a person with a: (Check all that apply.)

- ☐ Psychiatric disability
- ☐ Learning or cognitive disability
- ☐ Speech impairment
- ☐ Hearing impairment
- ☐ Visual impairment
- ☐ Mobility impairment
- ☐ Immune disorder (such as HIV, Multiple Chemical Sensitivities, etc.)?

1.6.a. Please give an example of a modification that was made for each "yes" checked:

1.7. Does your service, activity or program provide alternatives to an individual whose request for modification is denied (e.g., instead of a home visit to fill out an application, you offer a phone interview and mail the application to be signed by the homebound individual)?

- ☐ Yes (Go to 1.7.a.)
- ☐ No (Go to 2.)

1.7.a. If yes, please give an example of a situation in which an alternative to a requested modification was provided.

2. Does your service, activity or program require applicants or participants to wait in line at any time (e.g., information window, to apply for service, etc.)?

- ☐ Yes (go to 2.1.)
- ☐ No (Go to 3.)

1.2. Do you notify the public of the grievance procedure?

☐ Yes (Go to 1.2.a.)

☐ No (Go to 1.3.)

1.2.a. If yes, what does the notice include? (Check all that apply.)

☐ Information on how to file a grievance

☐ Phone number to call to register the grievance

☐ TT/TTY/TDD number to call to register the grievance

☐ A form to complete to register the grievance

☐ An address to register the grievance in person

☐ Contact information of an advocate or ombudsperson

☐ Other, please specify: \_\_\_\_\_

1.3 Does your service, activity or program modify the grievance procedure for individuals whose disabilities prevent them from meeting the requirements of the procedure (e.g., providing an alternative to completing a complaint form)?

☐ Yes (Go to 1.3.a.)

☐ No (Go to 1.4.)

1.3.a. If yes, is the procedure for requesting modification included in public grievance notice?

☐ Yes

☐ No

1.4. Approximately how frequently is the grievance procedure used?

☐ Never

☐ Once every couple of years

☐ 1 – 10 times a year

☐ 11 – 20 times a year

☐ More than 20 times a year

1.5. Do staff members who make decisions on grievances receive training in the requirements of federal and state disability laws.

☐ Yes (Go to 1.5.a.)

☐ No (Go to Section F)

1.5.a. If yes, please briefly describe the training provided:

1.5.b. How frequently is training provided?

☐ At orientation

☐ Semi-annually

☐ Annually

☐ Bi-annually

☐ Other, please specify: \_\_\_\_\_

**F. Emergency Policies, Procedures and Practices**

1. Does the building or site that houses your service, activity or program have emergency evacuation procedures?

☐ Yes (Go to 1.1.)

☐ No (Go to 2.)

1.1. If yes, please briefly describe these procedures.

1.2. Are these procedures documented in written form?

☐ Yes

☐ No

1.3. Do these evacuation procedures include specific provisions for evacuation people with disabilities?

☐ Yes (Go to 1.3.a.)

☐ No (Go to 1.4.)

1.3.a. If yes, please describe these provisions:

1.4. How are members of the public notified of the emergency evacuation procedures? (Check all apply.)

☐ Verbal explanation

☐ Posted notice in program office

☐ Brochure or other distributed written material

☐ Recorded message

☐ Not notified

☐ Other, please name: \_\_\_\_\_

2. Is the building where your service, activity or program located equipped with visual emergency alarms (e.g., flashing lights) in addition to audio alarms?

☐ Yes

☐ No

**Thank you very much for your time in filling out this evaluation.**

**TOWN OF STAFFORD**  
**ADA Self-Evaluation Respondents (13)**  
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Assessor	Town Clerk	Small Cities	Library
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**Part I. Services, Activity & Program Background**

1) Name of Person completing evaluation	Virginia Guilmette	Carol M. Davis	Peter Sanborn	Ann Davis
Title	Assessor	Town Clerk	Program Manager	Library Director
Phone	860.684.1788	860.684.1765	860.684.5567	860.684.2852
Fax	860.684.1775	860.684.1795	860.684.1785	860.684.2128
Email	<a href="mailto:assessor@stafford.org">assessor@stafford.org</a>	<a href="mailto:clerk@stafford.org">clerk@stafford.org</a>	<a href="mailto:psanborn@coginccorp.com">psanborn@coginccorp.com</a>	<a href="mailto:adavis@biblio.org">adavis@biblio.org</a>

2) Primary Location of Service, Activity or Program

Street Address	1 Main St	1 Main St	10 Levinthal Run
Town	Stafford Springs	Stafford	Stafford
State	CT	CT	CT
Zip Code	06076	06076	06075

3) Number of employees in dept/program

1-5	1-5	1-5	11-30
6-10			
11-30			
31-50			

4) Issue licenses, permits, certifications?

Yes	Yes	no	no
No			

5) Contact with the public?

Yes	Yes	Yes	Yes
No			

**TOWN OF STAFFORD**  
**ADA Self-Evaluation Respondents**  
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**Part I. Services, Activity & Program Background**

	WPCA/ DPW	Zoning	Probate	Civil Preparedness
1) Name of Person completing evaluation	Jane LaMorte	Richard Shuck	Brenda Wilde	Frank Prochaska
Title	Office Manager	Zoning Enforcement Officer	Clerk of Probate	Emergen Manage Dir
Phone	860.684.1763	860.684.1793	860.684.1783	860.684.3777
Fax	860.684.1785	860.684.1768	860.684.1797	860.684.4437
Email	<a href="mailto:wpcad@staffordct.org">wpcad@staffordct.org</a>	<a href="mailto:zoning@staffordct.org">zoning@staffordct.org</a>	<a href="mailto:probate@staffordct.org">probate@staffordct.org</a>	<a href="mailto:sgtprochaska@cox.net">sgtprochaska@cox.net</a>
2) Primary Location of Service, Activity or Program				
Street Address	1 Main St	1 Main St	1 Main St	2 Main St
Town	Stafford Springs	Stafford	Stafford	Stafford
State	CT	CT	CT	CT
Zip Code	06076	06076	06076	06076
3) Number of employees in dept/program	1-5	1-5	1-5	1-5
1-5				
6-10				
11-30				
31-50				
4) Issue licenses, permits, certifications?	Yes	Yes	Yes	no
Yes				
No				
5) Contact with the public?	Yes	Yes	Yes	no
Yes				
No				

# TOWN OF STAFFORD

## ADA Self-Evaluation Respondents

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### Part I: Services, Activity & Program Background

Health/Sanitarian					Family Service		Treasurer	Self-empmen
1) Name of Person completing evaluation Title Phone Fax Email	Richard Zulick Registered Sanitarian 860.684.5609 860.684.1765 <a href="mailto:ruzulick@hotmail.com">ruzulick@hotmail.com</a>				Carol Therrien Executive Director 860.684.4239 860.684.0511 <a href="mailto:caroltherrien@staffordct.org">caroltherrien@staffordct.org</a>		Darlene Dion Treasurer 860.684.1772 860.684.1785	Beth Executive Assistant
					<a href="mailto:ruzulick@hotmail.com">ruzulick@hotmail.com</a>		<a href="mailto:Treasurer@staffordct.org">Treasurer@staffordct.org</a>	
2) Primary Location of Service, Activity or Program Street Address Town State Zip Code	1 Main St Stafford Springs CT 06076				21 Hyde Park Rd. Stafford Springs CT 06076		1 Main St Stafford Springs CT 06076	1 Main St Stafford CT 06076
3) Number of employees in dept/program 1-5 6-10 11-30 31-50	1-5				1-5		1-5	1-5
4) Issue licenses, permits, certifications? Yes No	Yes				no		no	no
5) Contact with the public? Yes No	Yes				Yes		rarely	Yes

**TOWN OF STAFFORD**  
**ADA Self-Evaluation Respondents**  
p.4 of 4



**Part I. Services, Activity & Program Background**

1) Name of Person completing evaluation  
Title Tom Finch  
Phone Fire Marshal  
860.490.4434  
Fax 860.684.6358  
Email [tfinchstafford@cox.net](mailto:tfinchstafford@cox.net)

2) Primary Location of Service, Activity or Program  
Street Address 27 A Willington Ave.  
Town Stafford  
State CT  
Zip Code 6076

3) Number of employees in dept/program  
1-5 1-5  
6-10  
11-30  
31-50

4) Issue licenses, permits, certifications?  
Yes Yes  
No No

5) Contact with the public?  
Yes Yes  
No No



[illegible]



ADA responses continued, p. 3 of 14													
Assess	Clerk	Civil	Family	Fire	Health	Public	Probate	Select	Small	Treasurer	WPCA	DPW	Zoning
1.1 If YES, can caller bypass menu to talk to a person?													
	no		no										
2. TTY/TDD?													
	no	no	no	no	no	no	no	no			no	no	
2.1 If YES, is there a dedicated phone line?													
				no									
2.2 What is the TTY/TDD number?													
2.3 Where is number listed?													
Brochure or other distributed written material													
Public phone directory													
Recorded message													
Website													
Other													
2.4 Does # have an answering machine - 24 hr service?													
				Yes									
2.5 Staff trained in on how to use TTY/TDD?													
				Yes									
2.5a If YES, describe training													
				comment									
2.5b Frequency of training?													
At orientation													
On request													
Semi-annually													
Annually													
Other													

111



**ADA responses continued, p. 5 of 14**

## 7.1 Do videos, movies, etc have audio narration?

Yes

20

8. Do you use exhibits or interpretive displays?

Yes

2

8.1 If YES, in what format(s)?

**Written**

## Audio

Graphic/Pictorial

Other

## 9. Are alternative

make

with di-

## Alternative formats

Audiotape

Enlarged print

Braille

Computer disk

Website

Email

Other

## Auxiliary Aids

## Sign language interpreter

## Assistive listening devices

## Real-time captioning

## Readers

Call in/sp.

Assistant (translating, etc.)

Other

[illegible]

ADA responses continued, p. 6 of 14	Civil	Family	Fire	EC-105	EC-106	EC-107	EC-108	EC-109	EC-110	EC-111	EC-112	EC-113	EC-114	EC-115	EC-116	EC-117	EC-118	EC-119	EC-120	EC-121	EC-122	EC-123	EC-124	EC-125	EC-126	EC-127	EC-128	EC-129	EC-130	EC-131	EC-132	EC-133	EC-134	EC-135	EC-136	EC-137	EC-138	EC-139	EC-140	EC-141	EC-142	EC-143	EC-144	EC-145	EC-146	EC-147	EC-148	EC-149	EC-150	EC-151	EC-152	EC-153	EC-154	EC-155	EC-156	EC-157	EC-158	EC-159	EC-160	EC-161	EC-162	EC-163	EC-164	EC-165	EC-166	EC-167	EC-168	EC-169	EC-170	EC-171	EC-172	EC-173	EC-174	EC-175	EC-176	EC-177	EC-178	EC-179	EC-180	EC-181	EC-182	EC-183	EC-184	EC-185	EC-186	EC-187	EC-188	EC-189	EC-190	EC-191	EC-192	EC-193	EC-194	EC-195	EC-196	EC-197	EC-198	EC-199	EC-200	EC-201	EC-202	EC-203	EC-204	EC-205	EC-206	EC-207	EC-208	EC-209	EC-210	EC-211	EC-212	EC-213	EC-214	EC-215	EC-216	EC-217	EC-218	EC-219	EC-220	EC-221	EC-222	EC-223	EC-224	EC-225	EC-226	EC-227	EC-228	EC-229	EC-230	EC-231	EC-232	EC-233	EC-234	EC-235	EC-236	EC-237	EC-238	EC-239	EC-240	EC-241	EC-242	EC-243	EC-244	EC-245	EC-246	EC-247	EC-248	EC-249	EC-250	EC-251	EC-252	EC-253	EC-254	EC-255	EC-256	EC-257	EC-258	EC-259	EC-260	EC-261	EC-262	EC-263	EC-264	EC-265	EC-266	EC-267	EC-268	EC-269	EC-270	EC-271	EC-272	EC-273	EC-274	EC-275	EC-276	EC-277	EC-278	EC-279	EC-280	EC-281	EC-282	EC-283	EC-284	EC-285	EC-286	EC-287	EC-288	EC-289	EC-290	EC-291	EC-292	EC-293	EC-294	EC-295	EC-296	EC-297	EC-298	EC-299	EC-300	EC-301	EC-302	EC-303	EC-304	EC-305	EC-306	EC-307	EC-308	EC-309	EC-310	EC-311	EC-312	EC-313	EC-314	EC-315	EC-316	EC-317	EC-318	EC-319	EC-320	EC-321	EC-322	EC-323	EC-324	EC-325	EC-326	EC-327	EC-328	EC-329	EC-330	EC-331	EC-332	EC-333	EC-334	EC-335	EC-336	EC-337	EC-338	EC-339	EC-340	EC-341	EC-342	EC-343	EC-344	EC-345	EC-346	EC-347	EC-348	EC-349	EC-350	EC-351	EC-352	EC-353	EC-354	EC-355	EC-356	EC-357	EC-358	EC-359	EC-360	EC-361	EC-362	EC-363	EC-364	EC-365	EC-366	EC-367	EC-368	EC-369	EC-370	EC-371	EC-372	EC-373	EC-374	EC-375	EC-376	EC-377	EC-378	EC-379	EC-380	EC-381	EC-382	EC-383	EC-384	EC-385	EC-386	EC-387	EC-388	EC-389	EC-390	EC-391	EC-392	EC-393	EC-394	EC-395	EC-396	EC-397	EC-398	EC-399	EC-400	EC-401	EC-402	EC-403	EC-404	EC-405	EC-406	EC-407	EC-408	EC-409	EC-410	EC-411	EC-412	EC-413	EC-414	EC-415	EC-416	EC-417	EC-418	EC-419	EC-420	EC-421	EC-422	EC-423	EC-424	EC-425	EC-426	EC-427	EC-428	EC-429	EC-430	EC-431	EC-432	EC-433	EC-434	EC-435	EC-436	EC-437	EC-438	EC-439	EC-440	EC-441	EC-442	EC-443	EC-444	EC-445	EC-446	EC-447	EC-448	EC-449	EC-450	EC-451	EC-452	EC-453	EC-454	EC-455	EC-456	EC-457	EC-458	EC-459	EC-460	EC-461	EC-462	EC-463	EC-464	EC-465	EC-466	EC-467	EC-468	EC-469	EC-470	EC-471	EC-472</
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City	Dept.	Library	Probate	Select	Cities	Treasurer	DPW	Zoning
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[illegible]

	call	comment	comment	comment
Y				

[illegible][illegible]

	Yes	Yes	Yes	Yes
133	no	no	no	no
134	no	no	no	no
135	no	no	no	no
136	no	no	no	no
137	no	no	no	no
138	no	no	no	no
139	no	no	no	no
140	no	no	no	no
141	no	no	no	no
142	no	no	no	no
143	no	no	no	no
144	no	no	no	no
145	no	no	no	no
146	no	no	no	no
147	no	no	no	no
148	no	no	no	no
149	no	no	no	no
150	no	no	no	no
151	no	no	no	no
152	no	no	no	no
153	no	no	no	no
154	no	no	no	no
155	no	no	no	no
156	no	no	no	no
157	no	no	no	no
158	no	no	no	no
159	no	no	no	no
160	no	no	no	no
161	no	no	no	no
162	no	no	no	no
163	no	no	no	no
164	no	no	no	no
165	no	no	no	no
166	no	no	no	no
167	no	no	no	no
168	no	no	no	no
169	no	no	no	no
170	no	no	no	no
171	no	no	no	no
172	no	no	no	no
173	no	no	no	no
174	no	no	no	no
175	no	no	no	no
176	no	no	no	no
177	no	no	no	no
178	no	no	no	no
179	no	no	no	no
180	no	no	no	no
181	no	no	no	no
182	no	no	no	no
183	no	no	no	no
184	no	no	no	no
185	no	no	no	no
186	no	no	no	no
187	no	no	no	no
188	no	no	no	no
189	no	no	no	no
190	no	no	no	no
191	no	no	no	no
192	no	no	no	no
193	no	no	no	no
194	no	no	no	no
195	no	no	no	no
196	no	no	no	no
197	no	no	no	no
198	no	no	no	no
199	no	no	no	no
200	no	no	no	no
201	no	no	no	no
202	no	no	no	no
203	no	no	no	no
204	no	no	no	no
205	no	no	no	no
206	no	no	no	no
207	no	no	no	no
208	no	no	no	no
209	no	no	no	no
210	no	no	no	no
211	no	no	no	no
212	no	no	no	no
213	no	no	no	no
214	no	no	no	no
215	no	no	no	no
216	no	no	no	no
217	no	no	no	no
218	no	no	no	no
219	no	no	no	no
220	no	no	no	no
221	no	no	no	no
222	no	no	no	no
223	no	no	no	no
224	no	no	no	no

	N/A
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[illegible][illegible][illegible]

	N/A	>	>	>	
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[illegible]

	X	:
	y	

[illegible]

			X		
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[illegible][illegible][illegible]

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[illegible][illegible][illegible]

								N/A
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[illegible]

	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Yes							
no							

[illegible]



# ADA responses continued, p. 8 of 14

Assess	Clerk	Civil	Family	Fire	Health	Public	Probate	Select	Small	Treasurer	WPCA	DBW	Zoning
Call in/speaker phone capacity				x	x								
Assistant (translating, etc.)				fax					x				
Other													
10.3a If YES, is there a different process for requesting aids at meetings than there is for requesting aids for programs and services?													
Yes	N/A												
No				no	no			no	no		no		
10.3a.1 If YES, explain differences													
11. How does your service, activity or program pay for costs incurred from accommodations for people with disabilities (ie. Interpreters, aids, materials)?			comment								N/A	unknown	
Fees from participants with disabilities													
Fees from all participants					x								
Specific budget line item													
Included in general budget		x		x					x				
Other		grants					state						
D. Modification of Policies, Procedures & Practices													
1. Does your service, activity or program allow a person to request modifications to program policies, procedures or practices to accommodate a disability?													
Yes	N/A		Yes	Yes		Yes	Yes	Yes	Yes		Yes		
No		no			no								
1.1 If YES, describe procedure for requesting and providing modifications	home visit			home visit		Home deliv	verbal		verbal		comment		

**ADA responses continued, p. 9 of 14**

**1.1a Is the procedure documented in written form?**

Yes

20

1.2 Do you notify the public that they may request such modifications when needed?

Yes

$$\frac{1}{2}$$

1.2a If YES, what does the notice include?

**Notice of right to non-discrimination**

## Notice of right to reasonable modifications of Ps

Info on how to request a modification

Phone number to call to request a mod.

TT/TTY/TDD number to call to request

A from to request a mod.

An address at which to make a request in person

Contact info of an advocate/ombudsperson

Other

1.2b How is the public notified that they may request mod. if needed?

Verbal explanation at time

Posted notice in program office

Brochure or other distributed writing

Recorded message

Website

Other

### 1.3 Avg length of time for an approval?

 $\leq 1$  hr

1-24 hrs

25-72 hrs

73 hrs-1 week

&gt; 1 week

[illegible]

## ADA responses continued, p. 10 of 14

#### 1.4 How are staff (esp. front-line staff) informed about how to handle requests for modifications?

Word-of-mouth/experience

Employee handbook

Other documented procedure

## Training

Other

### 1.5 Frequency of mod. requests?

0%

1-10 times a yr

11-25 times a yr

26-50 times a yr

>50 times a yr

1.6 In the last year, has your service, activity or program modified a policy, procedure or practice for a person with a:

## Psychiatric disability

Learning or cognitive disability

### Speech impairment

Hearing impairment

## Visual impairment

### Mobility impairment

Immune disorder/disease

1.6a Give examples of mod for each "yes" above

1.7 Do you provide alternatives to persons whose request for mod is denied?

Yes

 $3 - \frac{1}{2}$





ADA responses continued, p.14 of 14													
Assess	Clerk	Civil Prepare	Family Serv	Fire Dept	Health Dept	Public Library	Probate	Selected	Small Cities	Treasurer	WPCA		Zoning
											DPW	DPW	
N/A													
	x	x					x						
							x						
											x		
				alarm			comment	website	comment				
			Yes	Yes		Yes	Yes	Yes	Yes		Yes		
		no			no								
?	?												

Town of Stafford, ADA Transition Plan 2008

## **Appendix E: Sample ADA Grievance Procedure/Policy**

## **SAMPLE ADA Grievance Procedure**

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

The Complaint should be in writing and contain information about the alleged discrimination such as name, address, telephone number of the complainant and location, date and description of the problems (incident(s) of discrimination). Alternative means of filing complaints, such as personal interviews or a tape recording of the complainant, will be made available for person with disabilities, upon request. Similarly, alternative formats of this Grievance Procedure, including **LARGE TYPE COPIES**, will be made available upon request.

The complaint should be submitted by the aggrieved party and/or her/his designee as soon as possible, but no later than 60 calendar days after the alleged violation occurred. The complaint should be submitted to:

Allen Bacchiochi, First Selectman  
as ADA Compliance Coordinator  
Warren Memorial Town Hall  
One Main Street  
Stafford Springs, Connecticut 06076  
Telephone: (860) 684-1777  
Facsimile: (860) 684 1785  
Email: [staffordtownhall@staffordct.org](mailto:staffordtownhall@staffordct.org)

Within fifteen (15) calendar days after receipt of the complaints, the ADA Compliance Coordinator (or a designee) will meet with the complainant to discuss the complaint and possible resolutions. Within fifteen (15) calendar days after the meeting, the ADA Compliance Coordinator 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 Town's position and offer options or a course of action for the substantive resolution of the complaint.

If the response by the ADA Compliance Coordinator does not satisfactorily resolve the matter, the complainant and/or her/his designee may appeal the decision of the ADA Compliance Coordinator within fifteen (15) calendar days after receipt of the Town's response to the Board of Selectmen.

Within fifteen (15) calendar days after receipt of the appeal, the Board of Selectmen will meet the complainant to discuss the complaint and possible resolutions. Within fifteen (15) calendar days after this meeting, the Board of Selectmen will respond in writing, and where appropriate, in a format accessible to the complainant, with the final resolution of the complaint. All written complaints received by the ADA Compliance Coordinator, appeals to the Board of Selectmen and all responses from such parties, and related records and documents, will be retained by the Town for a minimum of three (3) years.

---

Allen Bacchiochi, First Selectman

MONTH, DAY, YEAR  
Date