

Americans with Disabilities Act (ADA)

Self-Evaluation and Transition Plan

November 2024



Town of
STOUGHTON
MASSACHUSETTS

**THE EDWARD J. COLLINS, JR.
CENTER FOR PUBLIC
MANAGEMENT**

**MCCORMACK GRADUATE
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1	<i>Introduction.....</i>	4
1.1	The Americans with Disabilities Act of 1990 (ADA).....	4
1.2	Who does the ADA Protect and Why is a Transition Plan Important?	4
1.3	Guide to Using this Document.....	5
2	<i>ADA Title II Requirements Overview</i>	6
2.1	Overview	6
2.2	Program Accessibility	6
2.3	Equally Effective Communication	7
2.4	Standards for Compliance	8
2.4.1	Facility Accessibility Standards	8
2.4.2	Other Accessibility Standards.....	10
2.5	Limitations to the Town of Stoughton's Obligations	11
2.5.1	Programs Viewed in Their Entirety.....	11
2.5.2	Equivalent Facilitation	12
2.5.3	Safe Harbor.....	13
2.5.4	Undue Financial Burden/Disproportionality & Technical Infeasibility	13
2.5.5	Fundamental Alteration of a Service or Program.....	14
2.5.6	Exceptions	14
3	<i>Administrative Requirements of the ADA</i>	14
3.1	Public Notice.....	15
3.1.1	Findings	15
3.1.2	Recommendations	15
3.2	Designation of Responsible Employee/ADA Coordinator.....	15
3.2.1	Findings	16
3.2.2	Recommendations	16
3.3	Adoption of a Grievance Procedure.....	17
3.3.1	Findings	17
3.3.2	Recommendations	17
3.4	Self-Evaluation of Programs and Services & Transition Plan	18
3.4.1	Self-Evaluation Process	18
3.4.2	Transition Plan Process.....	18
4	<i>Self-Evaluation - Program, Policy & Procedure Review Summary.....</i>	19
4.1	Overview & General Town wide Findings	19
4.1.1	Facilities Planning & Construction Projects	19
4.1.2	Customer Service.....	20
4.1.3	Maintenance of Accessible Facilities	20
4.2	Service Animals.....	21
4.3	Website Accessibility	22
4.3.1	Findings	23
4.3.2	Recommendations	23

4.4 Town Department Programs and Services	24
4.4.1 Town Hall.....	24
4.4.2 Animal Control.....	30
4.4.3 Council on Aging and Youth Commission Facility.....	31
4.4.4 Recreation Center.....	31
4.4.5 Department of Public Works (DPW).....	32
4.4.6 Fire Station – 300 Freman Street.....	33
4.4.7 Fire Station – 1550 Central Street	33
4.4.8 Police Station.....	34
4.4.9 Public Library	35
4.4.10 Stoughton Public High School Auditorium	36
4.4.11 Historical Society Building	37
4.4.12 Train Depot.....	37
4.5 Outdoor Facilities.....	37
4.5.1 Parks and Trails.....	37
4.5.2 Play Areas	38
4.5.3 Athletic and Recreation Areas	39
4.5.4 Beach and Water Access	39
4.5.5 Golf Course	40
4.5.6 Social Media Audit.....	40
4.5.7 Pedestrian Facilities – Sidewalks, Crosswalks and Curb Ramps	41
5 Providing Equally Effective Communications	41
5.1 Communications with Hearing and Speech Impaired Individuals	41
5.1.1 Findings	42
5.1.2 Recommendations	42
5.2 Public Meeting Access.....	43
5.2.1 Findings	43
5.2.2 Recommendations	43
6 Department Input Summary	44
6.1 Findings	44
6.2 Recommendations	45
7 Public Engagement & Input	45
7.1 Overview	45
7.2 Public Input Survey	45
7.2.1 Methodology	46
7.2.2 Results	46
7.3 Transition Plan Public Comment	47
8 Transition Plan	48
8.1 Overview of Transition Plan	48
8.1.1 Administrative & Townwide Action Items.....	48
8.1.2 Communications, Website/Social Media & Public Meetings	50
8.1.3 Facility and Program Improvements	51
9 Appendices	55

9.1 Recommended Policy and Procedure Documents	55
9.1.1 Public Notice (Proposed)	55
9.1.2 Grievance Procedure (Proposed)	56
9.1.3 Service Animal Policy (Proposed)	57
9.2 Resources	58
9.2.1 General Resources & Guides	58
9.2.2 Grant Funding for Accessibility Projects.....	58
9.2.3 Services to Aid Communication with Hearing/Speech Impaired Individuals	60
9.2.4 Training and Technical Assistance	60
10 Attachments	62
10.1 Facilities Audits	62
10.2 Outdoor Facilities Audits	62
10.3 Self-Evaluations	62
10.4 Communications Audit	62
10.5 Public Input Survey	62
10.6 Public Comment	62

1 Introduction

1.1 The Americans with Disabilities Act of 1990 (ADA)

As a public entity, the Town of Stoughton is subject to the ADA's Title II Requirements for State and Local Government Programs and Services and is responsible for the provision of accessible programs and facilities that are available without discrimination toward people with disabilities. A fundamental tenet of Title II of the ADA is "*the principle that individuals with disabilities must be provided an equally effective opportunity to participate in or benefit from a public entity's aids, benefits, and services.*" This principle is referred to as program accessibility.

A public entity may not deny the benefits of its programs, activities, and services to individuals with disabilities because its facilities are inaccessible. A public entity's services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. This standard, known as "program accessibility," applies to all existing facilities of a public entity. Public entities, however, are not necessarily required to make each of their existing facilities accessible. The Town is required to ensure program accessibility for the programs it provides to the public; and most of these programs are based in a facility of some type.

The phrase "*when viewed in their entirety*" is important to recognize for municipalities when developing a plan to remove barriers to access. Since programs are offered across different platforms and at or in different facilities, this allows for a degree of flexibility that recognizes both the opportunities to deliver services in alternative formats or in alternative locations, but also the fiscal constraints facing a town and the feasibility of altering existing facilities. If barrier removal is too costly, physically infeasible, or would adversely impact an existing program, the municipality can be creative in how they offer the delivery of a particular service in order to achieve access for all. This is the perspective from which this evaluation and resulting plan is approached.

1.2 Who does the ADA Protect and Why is a Transition Plan Important?

ADA provides protections to any person who 1) has a physical or mental impairment that substantially limits one or more major life activities; 2) has a history or record of such an impairment; or 3) is perceived by others as having such an impairment. This is a broad definition, but it is also important to understand that the various accessibility guidelines promulgated under the ADA either as building codes, technical guidance, or best practices also enhance and expand access to *all* individuals. In addition to ADA being the law, viewing all local government service and program delivery through the lens of accessibility is good business practice.

Examples of increased access and improving services for all taxpayers abound. Parents pushing children in strollers, for example, have easier access to a facility designed to meet or exceed the minimum standards found under the ADA design guidelines. Improvements to web-based services, such as offering hybrid or remote meeting participation, made to provide access to those with mobility, hearing, or vision

impairments, also work to expand access to working parents or deployed military. Older individuals in particular benefit from facility and pedestrian improvements constructed in an accessible manner.

1.3 Guide to Using this Document

This section provides an overview of the sections of this document and where to find various information.

Section 2 – ADA Title II Requirements Overview outlines the key components the ADA mandates for the Town under Title II. It also includes a list of the various standards and, importantly, a breakdown of the limitations of the Town’s obligations.

Section 3 – Administrative requirements describe the basic elements that the Town must have in place in order to comply with the law. More specifically, these requirements provide the basic organization the Town must have in place to effectively implement accessibility policy. This section presents findings and recommendations on three basic requirements (Public Notice, Responsible Employee, and Grievance Procedure) and introduces the final requirement (Self Evaluation and Transition Plan), which follow in separate sections.

Section 4 – Self Evaluation is the review, findings, and recommendations of the programs provided by the Town. A program is inclusive of the services, resources, facilities, and other attributes of anything and everything the Town does.

Section 5 – Providing Equally Effective Communication is a subset of the Self-Evaluation. This section includes aspects of communications, including websites, publications, and public meetings.

Section 6 – Department Head Self Evaluation Summary provides a comprehensive overview of feedback from key municipal leaders regarding their operations, challenges, and priorities.

Section 7 - Public Engagement & Input includes a survey conducted at the outset of the project, the review and guidance from residents, Town leadership, and staff to develop the plan, and a final opportunity to receive public input on the final plan.

Section 8 – Transition Plan is the action plan to remove barriers, and includes short, medium, and long-term objectives. It presents policy and programmatic changes, readily achievable physical barrier removal, and longer-term capital projects. The Transition Plan is the Town’s checklist for implementation.

Section 9 – Appendices include sample policies and a list of useful resources for implementation.

Section 10 – Attachments include the reports on the data gathered (facility and website audits, survey results, departmental questionnaires, etc.).

2 ADA Title II Requirements Overview

2.1 Overview

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination based on disability. Specifically, Title II requires that:

No qualified individual with a disability shall, based on disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity (28 CFR Part 35.130 (a)).

To ensure compliance with the ADA, the Town of Stoughton contracted with The Edward J. Collins, Jr. Center for Public Management (The Collins Center) to undertake a comprehensive assessment, including self-evaluation, of its facilities, programs, and services to determine compliance with the requirements of ADA Title II. A Collins Center project team (project team), who worked in concert with KMA Architecture & Accessibility, LLC, was assigned to manage the ADA Transition Plan process. Their review, provided in this assessment, also recommends strategies that would result in a more practical, usable, and inclusive environment for members of the Stoughton community.

The assessment evaluated non-discrimination in policies, practices, and procedures for Town facilities, programs, and services, including those related to effective communication. This report summarizes the project team's findings regarding ADA Title II compliance. The information pertinent to this assessment was obtained via a questionnaire developed by The Collins Center, meetings with Town leaders, department heads, and boards, and comprehensive research. Findings illustrate the Town is responsive to ADA requests and requirements; however additional steps are needed to ensure that people with disabilities have the same opportunities to access facilities and participate in its programs and services as Stoughton residents without disabilities. Corrective action is needed to create or update written policies and procedures that would ensure the Town's compliance with applicable laws.

2.2 Program Accessibility

Title II of the ADA requires state and local governments to modify its policies, programs, and services when necessary to avoid discrimination:

A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination based on disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. (28 CFR Part 32.130 (b)(7))

The Town has several options to provide program access. 28 CFR 35.150, as well as the numerous advisories issued by the Department of Justice, outline the different ways in which a public entity can provide program access, including:

- Physical alteration of buildings and facilities.
- Offer services at alternate locations (including online) provided the alternative results in essentially the same level of service.
- Provide auxiliary aids and/or staff assistance in order to ensure essentially the same level of service.

When determining the type of modification, preference should always be given to the needs or method expressed by the individual requesting such modification unless this results in an undue financial burden or fundamentally alters the program or service. Practically speaking, the obligation under Title II does not mean that every building and facility must be accessible, but ***every program and service does.***

ADA encourages creative solutions and affords flexibility to the Town in considering the needs of those with disabilities alongside the availability of resources to address those needs. What is critical is that the Town demonstrates a continuing and proactive commitment to improving access and responding to complaints and concerns in a fair and timely manner.

The Department of Justice has broadly interpreted a “program” to include virtually every service that a local government provides. This includes not only the obvious direct services, such as police protection, garbage pickup, and recreation programming, but also sidewalks, walking trails, passive parks, events on public property, and emergency management and preparedness. It also applies to all facilities in which a program is offered.

2.3 Equally Effective Communication

Title II entities are required to ensure “effective communication” with people with disabilities. This obligation applies to all members of the public with disabilities including job applicants, program participants, and people who are seeking information about the Town’s programs, services, or activities. Specifically, Title II requires that:

A public entity shall take appropriate steps to ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others. (28 CFR Part 35.160 (a)).

The obligation to communicate effectively with people who have disabilities applies to the presentation and exchange of information in all forms including sound, print, graphics, and voice. Much of the specific language in the ADA focused on the use of auxiliary aides such as hearing aids, TTY/TDD, large print, Braille and other devices or methods. Today, however, the application of the equally effective communication requirement is also be found in the way a Town’s website, eGovernment services, social media, and remote public meeting procedures provide access to individuals of all abilities. While this has created a significant challenge and expense, in particular for smaller municipalities with limited information technology staff and resources, the significant and rapid advances in digital services also provides one of

the best opportunities to effectively modify services and programs while avoiding some costs associated with physical barrier removal.

2.4 Standards for Compliance

Objective standards are not necessarily provided in all instances, making it somewhat challenging for local governments to find clear guidance on what they “must” do to comply with the law. Where there is no official guidance included in CFR or otherwise promulgated by a state, federal or local authority, the municipality should follow best practices or the best available standard.

As an example, online and web services have no official standard other than the requirement for a government to provide equally effective communication, so the widely accepted Web Content Accessibility Guidelines (WCAG) is often used as the best practice for a municipality to follow. Other programs and services are much less clear, especially considering the broad nature of the many services provided by local government. In many local government service areas, the associations serving the professionals in these fields publish guides and primers on best practices, such as the National Recreation and Park Association (www.nrpa.org) and the Government Finance Officers Association (www.gfoa.org), and there are many additional advisories available from <https://www.access-board.gov/> and <https://www.ada.gov/>.

A list of resources that can assist the Town in improving accessibility can be found in Appendix 9.2

2.4.1 Facility Accessibility Standards

While there are myriad ways services can be made more accessible, the role of the physical facility in which a program is delivered is arguably the most important and one for which clear and objective standards are available and must be adhered to.

Depending on when construction was completed, different standards may apply, and there are both federal accessibility standards, state building codes, and a specialized state accessibility code. These standards are voluminous, comprehensive, and very complex, and include numerous exemptions for historic buildings and specialized spaces. The relevant standards for Town facilities include:

- 2010 ADA Standards for Accessible Design – For projects started on or before March 15, 2012, these standards apply. The 2010 Standards combine the requirements, including scope, of 28 CFR 35.151 with the 2004 ADA Accessibility Guidelines (ADAAG), which in addition to further scoping guidance, include the technical specifications that must be followed. While these standards apply to all new construction after March 15, 2012, there are also detailed explanations of how and when alterations to an existing building may require bringing other elements of a facility into compliance with the revised standards regardless of the date of original construction. These can be viewed at: <https://www.ada.gov/law-and-regs/design-standards/2010-stds/>

- It should be noted that, following the latest updates to the International Building Code and Residential Building Codes published by the International Codes Council, the standards are 99% identical to the 2010 Standards, with only minor variations, with respect to accessibility.
- One important aspect of the 2010 Standards was the inclusion of guidelines for many recreation facilities. As these were not addressed under the 1991 Standards, the 2010 Standards are the enforceable standards for such facilities and no safe harbor is permitted.

1991 ADA Standards for Accessible Design – Published on July 26, 1991, these standards should be used for evaluating buildings where construction started on or before March 14, 2012. They may be viewed at: https://www.ada.gov/1991ADASTANDARDS_index.htm

- Code of Massachusetts Regulations Title 521 (521 CMR) – 521 CMR is the specialized building code for accessibility in Massachusetts and applies to all construction in the Commonwealth. While not as comprehensive as the 2010 Standards, the specific requirements under 521 CMR are more stringent and are considered additional requirements on top of the federal guidelines. They may be viewed at: <https://www.mass.gov/law-library/521-cmr>

For the purpose of conducting assessments of Town facilities and to simplify the identification and removal of barrier to access, the Stoughton Transition Plan recognizes the following facts and assumptions:

- There is an affirmative obligation to remove barriers to access under the ADA, but not under 521 CMR. For this reason, facility audits are conducted using the relevant ADA standard. New construction and remedial projects to remove barriers should comply with the 2010 Standards and 521 CMR.
- Unless a facility was, beyond any doubt, constructed and remained unaltered prior to March 14, 2012, audits were conducted using the 2010 Standards. Without having a thorough review (and documentation) of all past projects, plans and costs, it is difficult to establish whether or not a facility is provided safe harbor from the 2010 Standards. It is also important to note that most of the fundamental components of the 1991 Standards were left in place for the 2010 Standards, so there is a likelihood that significant non-compliance with 2010 Standards means non-compliance with 1991 Standards. Further, efforts to mitigate a barrier to access if performed concurrent to other alterations under the 1991 Standards may trigger a requirement to comply with the 2010 Standards. Since the intent of the Town is to err on the side of increased access, it is reasonable to audit using the 2010 Standards.

2.4.2 Other Accessibility Standards

2.4.2.1 Outdoor Developed Areas

In 2013, the U.S. Access Board issued guidelines for certain outdoor recreation and developed areas. These provisions, which cover trails, picnic and camping facilities, viewing areas, and beach access routes, have no legal effect on local governments subject to the DOJ's ADA regulations, but are considered advisory and best practice to provide accessibility to all public lands. The full guidelines can be found here: <https://www.access-board.gov/aba/guides/chapter-10-outdoor/>.

The Town should use these guidelines for developing outdoor spaces not specifically addressed in the 2010 Standards. However, caution should be used when attempting to follow these guidelines for access routes instead of accessible routes as defined in the 2010 Standards and should check with the DOJ or the Massachusetts Architectural Access Board if questions arise in altering existing facilities or undertaking new construction projects. Of course, any requirements of 521 CMR must be followed with new construction.

2.4.2.2 Website Content Accessibility Guidelines (WCAG)

There are no official standards for web content guidelines; instead, the general guidance to provide equally effective communication has been interpreted to mean that entities subject to Title II should follow the best practices available. For web content, the standard, and arguably universally accepted, guidelines are found in the Web Content Accessibility Guidelines. As these standards have evolved, and continue to evolve, it is important that a Town's Information Technology staff and other staff who post materials to websites, social media, and other media, stay up to date with the latest standards and advisories. The current standards are found in WCAG 2.0 here: <https://www.w3.org/WAI/standards-guidelines/wcag/>. There is a draft WCAG 2.1 and 2.2 standard as well, and it is the responsibility of the Town to stay abreast of changing content guidelines as technology rapidly changes.

2.4.2.3 Public Rights-of-Way Accessibility Guidelines (PROWAG)

The Architectural and Transportation Barriers Compliance Board (Access Board) recently issued its final rule that provides minimum guidelines for the accessibility of pedestrian facilities in the public right-of-way effective September 2023. These guidelines, once adopted by the US Departments of Justice and Transportation, will ensure that facilities used by pedestrians, such as sidewalks and crosswalks, constructed or altered in the public right-of-way by federal, state, and local governments are readily accessible to and usable by pedestrians with disabilities. When the guidelines are adopted, with or without modifications, as accessibility standards in regulations issued by other Federal agencies implementing the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and the Architectural Barriers Act, compliance with those enforceable accessibility standards is mandatory.

The purpose of these guidelines is to ensure that pedestrian facilities located in the public right-of-way are readily accessible to and usable by pedestrians with disabilities. Despite on-going efforts to improve access, pedestrians with disabilities throughout the United States continue to face major challenges in public rights-of-way because many sidewalks, crosswalks, and other pedestrian facilities are inaccessible. Equal access to pedestrian facilities is of particular importance because pedestrian travel is the principal means of independent transportation for many persons with disabilities.

Key accessible features of pedestrian facilities specified in these guidelines include pedestrian sidewalks, alternate and/or temporary sidewalks to accommodate for a construction zone or other closure, signals and signal heads, cross walks, curb ramps, transit stops and shelters, on-street nonresidential parking, and more.

As of this writing, the final PROWAG standards are not enforceable. However, the Town is encouraged to begin studying the final rule as issued by the US Access Board and plan for incorporating into design and construction standards, as they are still considered best practice and will be adopted with or without modification. The USDOT has included adopting PROWAG into its regulations in 2024.

PROWAG may be viewed here: <https://www.access-board.gov/prowag/>.

MassDOT has developed certain standards, and a useful guide titled Municipal Resource Guide for Walkability. This guide may be viewed here:

https://www.mass.gov/files/documents/2018/09/17/MunicipalResourcesGuideForWalkability_2018-08-24.pdf.

2.5 Limitations to the Town of Stoughton's Obligations

While the Town is committed to ensuring access for all residents and visitors, it is important to understand the Town has limited resources with which to address accessibility issues and competing priorities. Town leaders are obligated to work towards improving accessibility; but the public must also recognize that it takes time, money, and Town Meeting buy-in to implement change. The Town has a number of tools at its disposal to help weigh both the obligation to address a barrier and the manner in which it may be addressed. It is important to recognize that “perfect” is often the enemy of “good” and creative solutions can be developed that meet the needs of an individual or group even if they fall short of absolute compliance with a specific code or regulation.

2.5.1 Programs Viewed in Their Entirety

The phrase “when viewed in its entirety” refers to the Town’s ability to take into consideration other factors when evaluating program accessibility. For example, if the Town had multiple playgrounds in different locations, they could prioritize making one fully inclusive rather than meeting the minimum standards for both; in this example, the “playground program”, *when viewed in its entirety*, is accessible

and results in a more inclusive playground experience for children. The Town should also take into consideration other access issues, such as distance, populations served, transit/public transportation, and any other factors that may limit or enhance overall program access when making such determinations.

28 CFR 35.150 states:

(a) General. 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 paragraph does not -

(1) Necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities;

(2) Require a public entity to take any action that would threaten or destroy the historic significance of an historic property; or

(3) Require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens.

To read the full text of this section, please visit:

<https://www.ecfr.gov/current/title-28/chapter-I/part-35/subpart-D/section-35.150>.

In particular, 28 CFR 35.150 (b) (1) Methods provide examples of ways a program access can be achieved. This shouldn't be used as a reason not to complete readily achievable projects, but the reality is that Stoughton, like most towns, has limited resources and must balance competing needs when developing capital investment priorities. As long as the Town acts in good faith to provide program access and is diligent about documenting the reasons for not addressing existing deficiencies and the efforts made to achieve equivalent facilitation, it is working within the intent of the ADA.

2.5.2 Equivalent Facilitation

Section 103 of the 2010 Standards states:

Nothing in these requirements prevents the use of designs, products, or technologies as alternatives to those prescribed, provided they result in substantially equivalent or greater accessibility and usability.

Advisory 103 further states:

The responsibility for demonstrating equivalent facilitation in the event of a challenge rests with the covered entity. With the exception of transit facilities, which are covered by regulations issued by the

Department of Transportation, there is no process for certifying that an alternative design provides equivalent facilitation.

Equivalent Facilitation is a tool that the Town may utilize to overcome barriers to accessibility where they have a substantial and compelling reason for non-compliance. The Town should recognize the exposure to liability and consult with Town Counsel as well as state and federal authorities if any such questions arise. As with all exceptions, the decisions and supporting documentation should be maintained by the Town and the Transition Plan provides an ideal location for such information.

2.5.3 Safe Harbor

28 CFR 35.150 (b) (2) (i) allows for an element-by-element “safe harbor” exception for elements within facilities that have not been altered on or after March 15, 2012, provided they were compliant with the 1991 Standards when constructed. Generally speaking, this applies only to those elements for which the 1991 Standards provided guidance, such as operable control mounting height of 54” versus the 2010 standard of 48”. It does not apply to elements for which no standard was included in 1991, such as play areas, meaning those areas are required to be brought up to current standards (programmatically or physically). Further, once the Town alters an element for any reason other than achieving ADA compliance, such as restriping a parking lot or remodeling a bathroom, it loses safe harbor protection. In other words, if it was compliant with the 1991 Standards and those standards changed, it does not have to be corrected unless and until an alteration occurs.

In general, safe harbor arguments are difficult to make for minor, and easy to fix, barriers to access. The Town has an ongoing obligation to address barriers and improve facility access and should take every opportunity to correct existing deficiencies to 2010 Standards *to the maximum extent possible*.

2.5.4 Undue Financial Burden/Disproportionality & Technical Infeasibility

28 CFR s36.401 subpart D details exceptions for situations where providing access would be structurally impractical, technically infeasible or create an undue financial burden where the cost of full compliance is disproportionate to the total cost of the project. The section is very specific in making such determinations and the actual text should be consulted by the Town if considering making such an argument. There are two important considerations that must be considered.

- First, it is the responsibility of the Town to determine, through design and analysis, and document any such decision to remain fully or partially non-compliant. The Transition Plan is an important mechanism to document such determinations.
- Second, the Town is obligated to ensure that alterations are performed to provide the maximum amount of accessibility possible up to the limits of disproportionality or technical infeasibility. Some of the deficiencies noted in the Facilities Self-Evaluation in Section 9.1 could be addressed by the

Town documenting the reason for non-compliance under this section, but there is a significant risk with relying on such exceptions and the courts have not viewed such arguments favorably.

2.5.5 Fundamental Alteration of a Service or Program

28 C.F.R. § 35.130(b)(7) states:

"A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity."

The Town should use caution when deciding not to modify a program, service, or policy due to this guidance, and should do so only after consultation with Town Counsel or other authority. Such determinations should be documented in the Transition Plan. The full text of this section can be found here:

[https://www.ecfr.gov/current/title-28/chapter-I/part-35/subpart-B/section-35.130#p-35.130\(b\)\(7\)](https://www.ecfr.gov/current/title-28/chapter-I/part-35/subpart-B/section-35.130#p-35.130(b)(7))

As with all reasoning behind intentional non-compliance, the decision process and supporting evidence should be carefully documented and preserved.

2.5.6 Exceptions

Section 203 of the 2010 Standards provides a number of specific exceptions to compliance with the design requirements. An important subsection is 203.9, which provides exceptions (and advisories) for employee work areas.

The full text can be found here:

<https://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards.htm#pgfId-1010074>

3 Administrative Requirements of the ADA

Title II requires the Town of Stoughton to complete the following administrative actions:

- Provide a Public Notice
- Designate an ADA Coordinator / Responsible Employee
- Adopt a Grievance Procedure
- Conduct a Self-Evaluation of Programs & Services
- Develop a Transition Plan, which will provide an actionable and realistic plan to remove barriers to access including an implementation timeline

3.1 Public Notice

Title II of the ADA requires that public entities notify participants of its non-discrimination policies:

A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part. (28 CFR Part 35.106)

3.1.1 Findings

As determined by researching the Town website and social media as well as via an interview with the Town's ADA Coordinator, Stoughton does not presently have a Public Notice adopted or posted physically at buildings, on the Town website, or on social media.

3.1.2 Recommendations

The Town should draft and approve a Public Notice and create internal policies to require staff to ensure it remains posted and up to date within the next 60 days, on the Town website and physically at municipal facilities.

To ensure comprehensive accessibility, the Town should initiate several steps. The Public Notice, including contact details for the ADA Coordinator, must be drafted, approved by Town leadership, and prominently displayed in public buildings, on the Town website, and via social media. It should also be integrated into all distributed materials. Additionally, the Town should contemplate establishing a dedicated email account for accessibility-related matters, ensuring prompt forwarding to relevant personnel. A designated webpage consolidating the public notice, grievance procedure, and ADA Coordinator's contact information should be easily accessible from the main Town landing page, offering various contact options.

See Appendix 9.1.1 for a Proposed Public Notice.

3.2 Designation of Responsible Employee/ADA Coordinator

Title II requires a public entity to designate an employee to be responsible for ensuring compliance. Title II provides little specific guidance for implementing this requirement, but the primary role of the designated employee, also called the ADA Coordinator, is to make sure the Town is compliant with the requirements.

A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph. (28 CFR Part 35.107 (a)).

While an ADA Coordinator needs to understand and enforce accessibility building codes; that is only a part of their duties. The programmatic aspect of the ADA is equally important, and with the rapid growth of e-Government services, the role now requires an understanding of the full spectrum of local government service delivery in order to help develop practical solutions to accessibility barriers and leverage the available technology and resources. It is often the case that the physical solution to an architectural barrier is often the most expensive and takes the longest to achieve. An effective ADA Coordinator will understand how to achieve a satisfactory resolution to ensure program access by researching best practices, attending training, and communicating with impacted individuals.

3.2.1 Findings

The Stoughton Building Commissioner is currently identified as the Town's ADA Coordinator. Currently, the ADA Coordinator's contact information is not displayed in public buildings, on the Town website, and/or via social media.

3.2.2 Recommendations

The ADA Coordinator's role should be formalized to include addressing accommodation requests, managing the Grievance Procedure, and conducting regular inspections to uphold accessibility. The ADA Coordinator's involvement in construction, programmatic, and communication initiatives is crucial to ensuring accessibility. Specifically, within 60 days, Town leadership should:

- Develop, approve, and post a Public Notice including the ADA Coordinator's contact information and means to request accommodation. (See *Public Notice 3.1 above*)
- Update the Building Commissioner's job description to reflect the duties of the ADA Coordinator role, including responsibilities to stay up to date on ADA issues, respond to and document grievances, and/or protocol for requests for accommodation; and to act as the official liaison for the ADA Commission.
- Require the ADA Coordinator to pursue training to gain knowledge and understand the responsibility around all Title II requirements, including programmatic and effective communication standards.
- Establish a dedicated email account for accessibility-related matters, ensuring prompt forwarding to relevant personnel. A designated webpage consolidating the Public Notice, Grievance Procedure, and ADA Coordinator's contact information should be easily accessible from the main Town landing page, offering various contact options.

3.3 Adoption of a Grievance Procedure

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

A public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by this part. (28 CFR Part 35.107 (b))

3.3.1 Findings

The Town does not presently have a Grievance Procedure posted physically in Town buildings, on the Town website, webpages, and/or social media.

3.3.2 Recommendations

The Town should draft and post a Grievance Procedure within 60 days to ensure all residents have equal access to Town facilities, programs, and services. Key elements that should be included are:

- Name and contact information (phone, address, and email) of the ADA Coordinator and/or designated employee to whom a complaint should be addressed.
- How a grievance can be submitted, to include multiple options (written, by phone, in-person, email, etc.) as well as an offer to help in any format accessible to the complainant.
- Process by which a grievance will be reviewed and addressed, including progressive steps should the issue not be resolved to the satisfaction of the complainant.
- Maximum time for each step in the process.
- Requirements for documenting the complaint, including correspondence and any actions taken, including retention requirements of at least three years, or as required under Massachusetts records retention laws.

Once drafted and approved, the Grievance Procedure should be distributed to department heads, posted physically in municipal buildings, and online. Where applicable in online postings and social media, the Public Notice should link to the Grievance Procedure. The Town should also add an Accessibility icon or link on the main landing page, as well as in the footer of all subpages that link to a single page containing the Public Notice, Grievance Procedure, and link to contact the ADA Coordinator.

A sample Grievance Procedure can be found in Appendix 9.1.2.

3.4 Self-Evaluation of Programs and Services & Transition Plan

The final administrative requirements under Title II require the Town to 1) conduct a *self-evaluation* of its programs, policies, and facilities, and 2) develop a *transition plan* to improve access over a reasonable period of time and within the resources available.

3.4.1 Self-Evaluation Process

The project team presented an overview of the SETP process at a kick-off meeting onsite with Town staff. A questionnaire was then distributed to all department heads that was designed to collect an inventory of programs/services provided by that department. The inventory gathered data on major “bundles” of services that share commonality in the resources they rely on, the individuals or groups they serve, and the general manner in which the service is delivered.

The questionnaire included a series of questions regarding effective communication, including alternative format documents and materials format requests such as large print, braille, and TTY. Additional questions were asked regarding core programs and services including location, type of program or service provided, whether the program or service is online, and whether reasonable accommodation is made for patrons with disabilities.

In addition to the questionnaire, the project team also completed the following steps in partnership with the Town:

- Evaluated existing policy and procedure documents.
- Held meetings and interviews with key staff.
- Conducted thorough site visits and facilities audits.
- Audited the Town’s website and communications.
- Collected public input through an online survey, also available in hard copy and alternative format upon request.

3.4.2 Transition Plan Process

The findings of the Self-Evaluation and developing a final Transition Plan on how best to address them is a multi-step process. It should be understood that the self-evaluation and resulting transition plan is a living document and will take additional work by Town leadership and staff to revise and update over time.

The intent of the Transition Plan is to provide the foundation from which the Town can address the organizational/institutional issues that have been identified and develop internal processes to further refine the SETP and align with existing processes, plans, and activities. The document includes:

- Summary tables of the administrative, program/policy/procedure, communications, and facilities deficiencies and barriers.
- Detailed audit reports (as appendices) for all facilities, outdoor/recreational sites, and website.
- Recommendations for remedial actions to address deficiencies, with a focus on the administrative and organizational issues critical to long-term success.

As a key component of this project, it is recommended that Town leadership, the ADA Coordinator, Disability Commission, staff, boards, commissions, and committees work collaboratively to further develop the short, medium, and long-range plan based on relative ease of barrier removal, available resources, priorities, and severity of the non-compliance. A recommended workflow for this step includes:

- Address Title II Administrative Requirement recommendations (Short-term – within 60 days).
- Develop medium/long-term organizational strategy for addressing recommendations on ADA Coordinator.
- Develop a process for regular monitoring and updating of status of Transition Plan.
- Develop funding and prioritization strategies.
- Develop priority plan for programmatic modifications, including identifying and completing training for staff (medium-term – within 12 months).
- Develop priority plan for readily achievable physical barrier removals that can be completed in-house or at minimal cost (medium-term – within 12 months).
- Develop priority capital investment strategy for major projects as part of overall capital planning process and incorporate into the Town's long-term Capital Improvement Plan (CIP).

To be successful, the Town's approach should be realistic, holistic, and pragmatic and focus on driving change in practices and procedures rather than focusing on individual projects.

4 Self-Evaluation - Program, Policy & Procedure Review Summary

4.1 Overview & General Town wide Findings

The findings and recommendations in this section apply across all Town departments.

4.1.1 Facilities Planning & Construction Projects

As noted in Section 3.2 the Building Commissioner also serves as the ADA Coordinator. As a component of the ADA Coordinator responsibilities, the Building Commissioner should be involved from the beginning of all construction project planning and have regular input into project scopes. This includes projects for which permits are not issued or required, such as minor repairs and renovations, to ensure that any opportunities to improve access are taken.

4.1.1.1 Recommendations

List of detailed recommendations:

- The ADA Coordinator be consulted on all Town building projects to ensure that scopes properly consider access issues. Where applicable, this should be done by modifying processes and policies.
- The ADA Coordinator should be provided with a new digital 2' level, door pressure gauges, and tape measures. Facilities maintenance personnel should be similarly equipped.
- On all inspections of public projects, the ADA Coordinator must be required to conduct thorough inspections of all accessibility elements. Where outside consultants are responsible for inspections or project management, modifications to procurement processes should consider additional requirements to ensure elements are thoroughly checked.

4.1.2 Customer Service

Questionnaire responses indicated that staff across all departments take active informal measures to provide ADA-compliant customer service. Staff noted they work with customers or employees to accommodate their needs to the best of their ability, though most accommodations are not written in a policy or standard operating procedure.

4.1.2.1 Recommendations

Current staff practices of accommodating individual requests should be memorialized in standard operating procedures and policies as applicable and appropriate. As a best practice, the Town should integrate training on the ADA and its requirements into standard staff professional development programming. The U.S. Access Board offers a variety of self-guided training programs that can be found here: <https://www.access-board.gov/webinars/>.

4.1.3 Maintenance of Accessible Facilities

In addition to providing programmatic access, the Town is obligated to maintain all accessible facilities in working order. Exceptions are provided for temporary disruptions. The ADA Technical Assistance Manual II-3.10000 contains the following language regarding the maintenance of accessible features:

Maintenance of Accessible Features. Public entities must maintain in working order equipment and features of facilities that are required to provide ready access to individuals with disabilities. Isolated or temporary interruptions in access due to maintenance and repair of accessible features are not prohibited.

Where a public entity must provide an accessible route, the route must remain accessible and not blocked by obstacles such as furniture, filing cabinets, or potted plants. An isolated instance of placement of an object on an accessible route, however, would not be a violation, if the object is promptly removed. Similarly, accessible doors must be unlocked when the public entity is open for business.

Mechanical failures in equipment such as elevators or automatic doors will occur from time to time. The obligation to ensure that facilities are readily accessible to and usable by individuals with disabilities would be violated if repairs are not made promptly or if improper or inadequate maintenance causes repeated and persistent failures.

4.1.3.1 Recommendations

The following actions should be taken to ensure ongoing facility maintenance and operation ensures access for individuals with disabilities:

- Audit and correct facility features that are not ADA-compliant, which are necessary to ensure access to individuals with disabilities, including sidewalks, parking spaces, signage, ramps, bathroom fixtures, customer-service counter heights, and more, as recommended in Attachment 10.1 and 10.2
- Conduct staff training on placement of furniture, trash cans, and other items so as not to obstruct accessible routes, clear floor space, and maneuvering clearances.
- Conduct regular inspections and testing of assistive listening devices.
- If outsourced, contracts for maintenance of facilities and rights-of-way should be modified to specifically require accessible routes, clear floor spaces, and maneuvering spaces be kept clear. For example, janitorial contractors should be instructed not to place trash cans within latch-side clearance of bathroom doors or in knee space under accessible counter. For right-of-way mowing and vegetation control, contractors should ensure limbs are kept trimmed above 80" and weeds between sidewalk slabs and at ramps be removed.
- Require ADA Coordinator to conduct periodic inspections at all facilities for compliance.

4.2 Service Animals

It is important for Stoughton to have a Townwide clear policy on service animals, as their use has grown substantially in the last decade. There is presently no Townwide policy providing guidance, so it is recommended that one be adopted. The Stoughton Public Library does have a posted Service Animal Policy, which is available via the Town and library website, which was approved by the Library Board of Trustees in March 2023. <https://www.stoughton.org/DocumentCenter/View/1669/Service-Animal-Policy-PDF?bidId=>

A sample Townwide policy can be found in Appendix 9.1.3. A suitable policy should clearly define what is and is not a service animal, limitations, handler responsibilities and under what circumstances a service animal can be removed or prohibited.

4.3 Website Accessibility

Websites are considered a public program/service and must meet Title II requirements as well as Web Content Standards of Accessibility. Websites are also a key component of providing equally effective communication. Poorly designed websites can create unnecessary barriers for people with disabilities. Many people with disabilities use assistive technology that enables them to use computers. Some assistive technology involves separate computer programs or devices such as screen readers, text enlargement software, and computer programs that enable people to control the computer with their voice. Other assistive technology is built into computer operating systems. For example, basic accessibility features in computer operating systems enable some people with low vision to see computer displays by simply adjusting color schemes, contrast settings, and font sizes. Operating systems enable people with limited manual dexterity to move the mouse pointer using keystrokes instead of a standard mouse.

Websites should comply with Web Content Accessibility Guidelines WCAG 2.0 Level AA standards. These standards, while not included in the ADA or under current CFR guidelines, are universally accepted as the best available and most appropriate standard for web content guidelines.

- Level A is the minimum level of conformance with the fewest requirements. A couple of examples of Level A requirements are that all non-text components such as images include an alternative text component and that captions are provided for all prerecorded audio content
- Level AA compliance must satisfy all the Level A requirements and offer additional criteria such as providing captions for all live broadcasted audio content
- Level AAA satisfies all Level A and Level AA criteria as well as offer additional requirements such as providing sign language interpretation for all prerecorded audio content

Website accessibility also extends to social media platforms that are used by a public entity to deliver information and notices to the public. Content and information created and shared via social media by a public entity is required to comply with WCAG 2.0 Level AA requirements. Level AA requirements include all minimum standards of Level A as well. It is the responsibility of the public entity to design accessible content that will be shared via a social media platform.

To assess the Town's progress in meeting these website standards, a manual accessibility audit of the Town of Stoughton's website was performed to evaluate content against current WCAG requirements. Manual accessibility audits have the major advantage of being the most thorough type of auditing. After completion of the audit, a report was created containing an assessment of a municipality's assets along with issues that need to be addressed. For every unique issue listed, instructions or examples were

provided to show precisely how to make the website accessible. It is important to note that accessibility is an ongoing process.

4.3.1 Findings

The Stoughton municipal website exhibits notable strengths as well as a few areas for improvement. An asset is the site's intuitive layout, characterized by uniform and straightforward toolbar navigations, making it easily comprehensible for users. The accessibility of all links through keyboard, mouse, or touchscreen interaction increases the site's user-friendly design. Furthermore, the implementation of the "Quick Links" feature facilitates seamless navigation for first-time visitors seeking commonly accessed departments. A notable strength are notifications that inform users when they are being redirected to an external website.

The language used throughout the site is succinct and written at an appropriate comprehension level. Files are systematically named and well-organized, contributing to the overall accessibility of information. The website has a mobile-friendly design, ensuring proper formatting and functionality on smartphones. Notably, all headings adhere to color contrast guidelines, meeting the recommended ratio of at least 4.5:1. This commitment to clarity and accessibility enhances the user experience and aligns with established standards.

4.3.2 Recommendations

Stoughton's municipal site could improve upon many of its accessibility features, specifically in compliance with American Disability Act (ADA) regulations. To better serve users who are reliant on-screen readers or assistive technologies, alternative text should be added to all images or flyers. The presence of scanned image PDFs impedes text search functionality for those using screen readers, thus hindering content accessibility. The Town should consider adding bookmarks to sizable files which will facilitate streamlined navigation for users seeking specific points of interest. These adjustments align with ADA guidelines and contribute to a more inclusive online environment.

It is recommended that the Town consistently incorporate online fillable forms in lieu of downloadable PDFs and Word documents. Stoughton's Application for Abatement is a good model for this. Enabling users to submit information directly through the website, rather than resorting to the traditional method of printing and mailing forms, not only fosters environmental sustainability by reducing paper usage and postage costs but also enhances user engagement by eliminating logistical inconveniences associated with traditional methods. This approach aligns with modern digital practices, providing a more efficient and user-friendly experience for constituents.

The Town of Stoughton adeptly disseminates information through clear and concise language on all of their social media platforms. Areas for enhancement include the addition of alternative text for images to improve accessibility. Moreover, it is recommended that the department be transparent about media limitations when sharing external content, and refrain from conveying vital information solely through

static graphics unless accompanied by a textual representation. These refinements will contribute to a more inclusive and informative social media presence, aligning with best practices for accessibility and communication standards.

The full website accessibility audit is available in Attachment 10.4.

4.4 Town Department Programs and Services

Department recommendations are grouped by the facility in which they are primarily located. A summary of each facility is presented to give a general overview of the facility barriers that may impact the accessibility of the specific programs and services provided by the department and inform any recommendations for modifications. If the department has a corresponding web presence, the audit for the site is included in the section below.

4.4.1 Town Hall

Located at 10 Pearl Street, the Stoughton Town Hall houses many of the Town government offices and is open to the public. It presents many barriers to accessibility including:

- Accessible parking spaces have excessive slopes and signage that is too low. One van space has an access aisle that is too narrow.
- Inaccessible entrances lack signage directing to the accessible entrance.
- There is no accessible route from the public right-of-way to the front entrance.
- The exterior ramp leading to the front entrance has excessive slopes and has a small intermediate landing.
- Counters are too high.
- The toilet rooms have accessible elements that are not mounted in the correct locations.

The full audit of Town Hall is included in Attachment 10.1. Due to the high traffic and intensity of use at Town Hall, the project team recommends that all items identified in the report be addressed within two years. Priority mitigation should include prioritizing parking and accessible routes to the front entrance, including the exterior ramp, due to their high visibility within one year.

Departments located in the Town Hall, which were audited for potential accessibility barriers to programs and services as well as web pages/social media sites are listed below:

4.4.1.1 Accounting

No digital barriers to accessibility were noted.

4.4.1.2 Assessing

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
 - [Request for Certified Abutters List, Change of Address Form](#)
- Meeting agendas are posted as image-based scans. If a stamped or signed version is required, it is recommended to post both the scanned copy and HTML version with text noting the hand-written additions or notes to ensure both documents contain the same information. Examples of the non-accessible documents can be found here:
 - [Board of Assessors Agenda](#)

4.4.1.3 Building

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
 - [Abandoned Property Registration Form](#)
 - [Application for Certificate of Inspection](#)
 - [Confidential Complaint Form](#)
 - [Application for Permit to Demolish](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
 - [Basement Conversion Guidelines](#)
 - [Building Application Fee Schedule](#)
 - [Building Permit Packet](#)
 - [Fee Schedule for Periodic Inspection](#)

4.4.1.4 Conservation

The following barriers to digital accessibility were noted:

- Flyer is lacking alternative text. Any flyer posted as a photo should be accompanied by a version of that text in writing.
- [Household Hazardous Waste Collection Day](#)
- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
 - [Public Request Letter](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
 - [Wetlands Bylaws](#)

- Meeting agendas are posted as image-based scans. If a stamped or signed version is required, it is recommended to post both the scanned copy and HTML version with text noting the hand-written additions or notes to ensure both documents contain the same information. Examples of the non-accessible documents can be found here:
- [Conservation Commission Agenda](#)

4.4.1.5 Engineering / GIS

The following barriers to digital accessibility were noted:

- Flyer is lacking alternative text. Any flyer posted as a photo should be accompanied by a version of that text in writing.
- [Bicycle Sharrows](#)
- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
 - [Foundation Test Pit Application](#)
 - [Minor Building Permit Application](#)
 - [Stormwater Test Pit Application](#)
 - [Trench Permit](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
 - [Public Hearing Notice](#)
 - The following internal links are broken and need updating:
 - [Sewer Permit Application](#)
 - [Sewer Fee Schedule](#)

4.4.1.6 Health

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
 - [Recreational Camp License Application](#)
 - [Disposal Works Installer Permit](#)
 - [Dumpster Permit](#)
 - [Food Establishment Permit](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
 - [Variance Application](#)
- Meeting agendas are posted as image-based scans. If a stamped or signed version is required, it is recommended to post both the scanned copy and HTML version with text

noting the hand-written additions or notes to ensure both documents contain the same information. Examples of the non-accessible documents can be found here:

- [Board of Health Agenda](#)

4.4.1.7 Human Resources

The following barriers to digital accessibility were noted:

- Flyer is lacking alternative text. Any flyer posted as a photo should be accompanied by a version of that text in writing.
- [Public Safety Wellness Program](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
 - [Firefighters Agreement](#)
 - [Library MOA](#)
 - [Job Description](#)

4.4.1.8 Procurement

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
 - [Certificate of Compliance Form](#)
 - [Owner/Operator Certification](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
 - [Bid Announcements](#)
 - [Bid Response Lists](#)

4.4.1.9 Economic Development

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
 - [Film Information Form](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
 - [Notice of Filing and Public Hearing](#)
 - [Business and Permitting Guide](#)
 - [Billboard Use Policy](#)

- The following external link is broken and needs updating:
- [energyCENTS](#)

4.4.1.10 Planning

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
- [Application for Approval of Preliminary Plan](#)
- [Sign Application](#)
- [Site Plan Application](#)
- [Special Permit Application](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
- [Central Business District Study](#)
- Meeting agendas are posted as image-based scans. If a stamped or signed version is required, it is recommended to post both the scanned copy and HTML version with text noting the hand-written additions or notes to ensure both documents contain the same information. Examples of the non-accessible documents can be found here:
- [Planning Board Agenda](#)

4.4.1.11 Public Health Association / Visiting Nurses

The following barriers to digital accessibility were noted:

- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
- [Notice of Privacy Practices](#)
- [Public Health Notice – West Nile Virus](#)

4.4.1.12 Town Manager

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
- [Senior Tax Relief Application](#)
- [Claim for Damages Form](#)
- [Application for Employment](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:

- [Tax Certification Attestation](#)
- [Annual Town Report 2020](#)
- [Approved Contractors](#)
- [Town of Stoughton Policies](#)

4.4.1.13 Town Clerk

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
 - [Dog License Form](#)
 - [Birth Certificate Request Form](#)
 - [Public Records Request Form](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
 - [Instructions for Write In / Sticker Campaign](#)
 - [Peddlers License Rules](#)
 - [Election Results](#)
 - [Warrant Article Petition](#)

Evaluation and Recommendations on Elections:

The Town has eight precincts where registered voters go to vote. Precinct locations are available on the Town website, via the Town Clerk's web page, at

<https://www.stoughton.org/DocumentCenter/View/646/Voting-Precinct-Addresses-PDF>. Voting application and registration information is also posted on the Town Clerks' page via fillable PDF at <https://www.stoughton.org/351/Voting-Information>. The precinct location facilities were not a part of this audit; however, the Town should consider a school facility review prioritizing the buildings where voting and other municipal activities occur to ensure accessibility for all residents.

Currently, voters do have access to mail-in absentee ballots and early voting. Staff have a history of accommodating individuals with disabilities but the practices are not formalized. There is no information on accommodations, or how to request them, on the Town Clerk's website. The Town Clerk should formalize the process for requesting voting accommodation and post it visibly on the Town Clerk's webpage under elections.

4.4.1.14 Treasurer / Collector

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
- [Municipal Lien Request](#)

4.4.1.15 Veterans' Services

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
- [Banner Application](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
- [Chapter 115 Checklist](#)
- The following internal links are broken and need updating:
- [Disability Compensation](#)
- [VA Claims Appeal](#)

4.4.1.16 Zoning Board of Appeals

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
- [Application to the Zoning Board of Appeal](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
- [Amendment of Rules](#)
- [Sign by Law](#)
- Meeting agendas are posted as image-based scans. If a stamped or signed version is required, it is recommended to post both the scanned copy and HTML version with text noting the hand-written additions or notes to ensure both documents contain the same information. Examples of the non-accessible documents can be found here:
- [Zoning Board of Appeals Agenda](#)

4.4.2 Animal Control

Located at 499 West Street, the Animal Control facility presents several barriers to accessibility including:

- Accessible parking is not provided on the site.
- There is no accessible route to the building entrance.
- The building interior lacks multiple accessible spaces and elements.

The full audit of the Animal Control facility is included in Attachment 9.1. Due to the moderate traffic of the Animal Control, the project team recommends mitigating all the exterior barriers identified in the audit report, including parking and walkway to entrance within two years. Priority mitigation should include developing a policy for the Animal Control Office to provide assistance to the public within an accessible location directly outside of the building within six months.

No digital barriers to accessibility were noted.

4.4.3 Council on Aging and Youth Commission Facility

Located at 110 Rockland Street, the Council on Aging and Youth Commission facility, which offers numerous programs and services to residents, presents several barriers to accessibility including:

- Accessible parking spaces have excessive slopes and signage that is too low.
- The walkway between parking and the main entrance have excessive slopes. The push button of the automatic door opener and pull station are located on a ramp.
- The toilet rooms have accessible elements that are not mounted in the correct locations.
- Community room lacks accessible seating and have multiple elements that are too high. The exit door lacks the maneuvering clearance on the push side.

The full audit of the Council on Aging is included in Attachment 10.1. Due to the high traffic and intensity of use at this complex, the project team recommends that all items identified in the report be addressed within two years. Priority mitigation should include prioritizing parking and accessible routes to the main entrance, including the exterior ramp, due to their high visibility within one year.

The following barriers to digital accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
- [Permission Slip](#)
- Meeting agendas are posted as image-based scans. If a stamped or signed version is required, it is recommended to post both the scanned copy and HTML version with text noting the hand-written additions or notes to ensure both documents contain the same information. Examples of the non-accessible documents can be found here:
- [Council on Aging Agenda](#)

4.4.4 Recreation Center

Located at 15 Pleasant Street, the Recreation Center, which offers numerous programs and services to residents, presents several barriers to accessibility including:

- Accessible parking spaces have excessive slopes and signage that is too low. The access aisle is too narrow.
- The inaccessible entrance lacks signage directing to the accessible entrance.
- The exterior ramp leading to the rear entrance has excessive slopes, lacks continuous handrails on both sides, and lacks handrail extensions.
- The rear entrance lacks the required door maneuvering clearance and has a malfunctioning automatic door opener.
- The single-user toilet room has a few accessible elements that are not mounted in the correct locations.

The full audit of the Recreation Center is included in Attachment 10.1. Due to the high traffic and intensity of use at this complex, the project team recommends that all items identified in the report be addressed within two years. Priority mitigation should include prioritizing parking and accessible routes to the rear entrance, including the exterior ramp, due to their high visibility within one year.

The Stoughton Recreation Department has its own external website, <https://stoughtonma.myrec.com>, which was audited for digital accessibility. The following barriers to accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
 - [Recreation Field Permit Request](#)
 - [Blue Hills Rental Equipment Form](#)
 - [Glen Echo Park Permit Request Form](#)
- The following internal link is broken and needs updating:
 - [Volunteer Application](#)
- Alerting users when they will be leaving the Town website systems helps those using assistive devices keep track of webpage navigation. The following links should inform the reader that they are being directed to an external site:
 - [National Recreation and Park Association](#)

4.4.5 Department of Public Works (DPW)

Located at 950 Central Street, the DPW facility presents several barriers to accessibility including:

- Accessible parking is not provided on the site.
- The entrance has a non-compliant threshold and lacks maneuvering clearance on the push side.
- Counters are too high and are located on a ramp.

The full audit of the DPW facility is included in Attachment 10.1. Due to the moderate traffic at the DPW facility, the project team recommends that all items identified in the report be addressed within two years. Priority mitigation should include prioritizing parking and the counters within one year.

The following barriers to digital accessibility were noted:

- Flyer is lacking alternative text. Any flyer posted as a photo should be accompanied by a version of that text in writing.
- [Textile Recycling](#)
- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
 - [BackFlow Preventer Inspection Form](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
 - [Composting Brochure](#)
 - [What is Compostable sheet](#)
 - [Water and Sewer Abatement Policy](#)
- The following external links are broken and need updating:
 - [Indoor Water Conservation](#)
 - [Outdoor Water Conservation](#)

4.4.6 Fire Station – 300 Freman Street

Located at 300 Freman Street, the fire station presents several barriers to accessibility including:

- There is no accessible route into the building or the apparatus bays, memorial, flagpole, doorbell and emergency phone due to a curb and excessive slopes.
- The single-user toilet room has multiple non-compliant elements and is obstructed by the fire truck.

The full audit of the fire station is included in Attachment 10.1 . According to staff at this property, the building will undergo a major renovation later this year with the intent of making this a more public-facing building. The project team recommends mitigating all the barriers identified in the audit report during the renovation.

4.4.7 Fire Station – 1550 Central Street

Located at 1550 Central Street, the fire station presents several barriers to accessibility including:

- The van parking space has signage that is too low and an access aisle that is too narrow.

- The entrance has a non-compliant threshold, and the emergency phone is obstructed by a planter.
- The reception counter is too high.
- The toilet rooms have a few accessible elements that are not mounted in the correct locations.

The full audit of the fire station is included in Attachment 10.1. Due to the moderate traffic of the Fire Station, the project team recommends that all items identified in the report be addressed within two years. Priority mitigation should include prioritizing parking, the entrance, the counter, and toilet rooms within one year.

The Stoughton Fire Department has its own external website, <https://www.stoughtonfire.org/>, which was audited for digital accessibility. The following barriers to accessibility were noted:

- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
- [Lock Box Order Form](#)
- Alerting users when they will be leaving the Town website systems helps those using assistive devices keep track of webpage navigation. The following links should inform the reader that they are being directed to an external site:
- [Fire Safety Lesson Plans](#)
- [City Hall Systems](#)

4.4.8 Police Station

Located at 26 Rose Street, the Stoughton Police Station presents several barriers to accessibility including:

- Accessible parking spaces have excessive slopes and signage that is too low.
- The inaccessible entrance lacks signage directing to the accessible entrance.
- There is no accessible route from the public right-of-way to the public entrance.
- The walkway between parking and accessible entrance has abrupt changes in level, excessive slopes, and protruding objects.
- The walkway between parking and the employee entrance has excessive slopes and is not treated as a ramp.
- The single-user toilet room in the lobby has accessible elements that are not mounted in the correct locations.
- The interrogation room lacks accessible seating.
- In detention areas, one of each type of cell (male, female, and juvenile) lacks an ADA-compliant sink/toilet combination and the shower room does not meet the dimensional requirements.

The full audit of the Police Station is included in Attachment 10.1. Due to the high traffic and intensity of use at this complex, the project team recommends that all items identified in the report be addressed within two years. Priority mitigation, within one year, should include:

- Prioritizing parking, accessible routes to the public entrance, the single-user toilet room, and detention cells and shower room, due to their high visibility.
- To resolve the lack of an accessible route from the public right-of-way to the public entrance, consider building an accessible ramp from the sidewalk along Rose Street (starting near the bottom of the stairs) and connecting either:
 - The covered, sloped walkway on the right side of the public entrance (this solution would require altering the concrete retaining wall and the building sign mounted on it).
 - The covered porch on the left side of the public entrance (this solution would require altering the guardrail).

The Stoughton Police Department has its own external website, <https://stoughtonpolice.com/>, which was audited for digital accessibility. The following barriers to accessibility were noted:

- Some photos are lacking captions or alternative text:
- [Motorcycle Unit](#)
- Some documents are not available in a format accessible with a screen reader as they are scanned or low resolution, including the following documents:
 - [Re-accreditation Letter](#)
- The following internal links are broken and need updating:
 - [Stoughton Public Library](#)
 - [Dog License Information](#)
 - [Emergency Management](#)
- Alerting users when they will be leaving the Town website systems helps those using assistive devices keep track of webpage navigation. The following links should inform the reader that they are being directed to an external site:
 - [People Magazine Article](#)
 - [Domestic Violence Programs](#)
 - [Federal Trade Commission](#)

4.4.9 Public Library

Located at 84 Park Street, the Stoughton Public Library, which offers numerous programs and services to residents, presents relatively minor barriers to accessibility including:

- Accessible parking spaces have signage that is too low. One van space has an access aisle that is too narrow.

- The toilet rooms have a few accessible elements that are not mounted in the correct locations.

The full audit of the Stoughton Public Library is included in Attachment 10.1. Due to the high traffic and intensity of use at this complex, the project team recommends that all items identified in the report be addressed within one year. Priority mitigation should include prioritizing parking, drop box, and work surfaces, due to their high visibility within six months.

The following barriers to digital accessibility were noted:

- Flyer is lacking alternative text. Any flyer posted as a photo should be accompanied by a version of that text in writing.
- [Stoughton Public Library](#)
- Forms should be posted as fillable forms. Examples of forms that should be redesigned as fillable forms include:
 - [Material Reconsideration Request Form](#)
 - [Art Loan Form](#)
 - [Art Gift Agreement](#)

4.4.10 Stoughton Public High School Auditorium

Located at 232 Pearl Street, the Stoughton Public High School Auditorium, which has high traffic and is used for municipal public meetings, presents several barriers to accessibility including:

- The sloped walkway between parking spaces and the front entrance has excessive slopes.
- The intercom and the push button of the automatic door opener at the front entrance are too high.
- The Auditorium has a slope walkway with excessive slopes and is not treated as a ramp and a ramp with excessive slopes. Further, the required number of aisle seats (with no armrests or removable/folding armrests on the aisle side) is not provided and wheelchair spaces are not dispersed vertically (front-to-back) at varying distances from the stage.
- The toilet rooms have a few accessible elements that are not mounted in the correct locations.

The full audit of the Stoughton Public High School Auditorium is included in Attachment 10.1. Due to the high traffic and intensity of use of the auditorium, the project team recommends that all items identified in the report be addressed within two years. Priority mitigation should include finding an alternate accessible meeting location for Town functions within six months.

4.4.11 Historical Society Building

Located at 6 Park Street, the Stoughton Historical Society building presents several barriers to accessibility including:

- The stair handrails lack the required extensions and continuous handrails on both sides.
- There is no accessible route into and throughout the building due to stairs.
- The building interior lacks multiple accessible spaces and elements, including toilet rooms.

The building is locked; however, it is used at least once a week by the members of the Historical Society. Therefore, the project team recommends providing an alternative accessible meeting location for the inaccessible offices within six months. If an alternative location is used, information on its location and the process for requesting its use must be disseminated. The full audit of the Historical Society Building is included in Attachment 10.1.

4.4.12 Train Depot

Located at 45 Wyman, the Train Depot is a former train station that was transferred to the Town and is designated as a historic building. It presents several barriers to accessibility including:

- No accessible route to and within the building.
- Building interior lacks multiple accessible spaces and elements, including toilet rooms.

The project team recommends that the building remain closed to the public until it is fully accessible on a timeline to be determined by the Town via capital planning. The full audit of the historic train depot is included in Attachment 10.1.

4.5 Outdoor Facilities

4.5.1 Parks and Trails

The Stoughton Outdoor Facilities Audit included the following parks and trails: Faxon Park, Halloran Park, and Glenn Echo Park and trails. The project team did not observe any fully accessible parks in Stoughton.

The following are the findings of three partially accessible parks:

- Faxon Park has multiple site amenities (park benches and trash cans), memorials, and a gazebo that are not located on an accessible route.
- Halloran Park has non-compliant accessible parking at the west end of the site and multiple segments of walkway throughout the park with excessive slopes.
- Glen Echo Park has designated parking spaces with excessive slopes and signs that are too high, walkways leading to picnic tables and a portable toilet with excessive slopes, and multiple site

amenities (picnic tables, trash cans, dog waste bag receptacle) that are not located on an accessible route.

The project team also did not observe any accessible trails in Town. The Glen Echo Park hiking trail looping between the parking lot, the boat launch ramp, and through the woods is paved with gravel, which is not accessible.

Remediation recommendations include:

- Improve accessible parking and walkway at parks within the next two years. Prioritize facilities with the highest use.
- Review the programs offered at Town parks and identifying site amenities that must be located on an accessible route within the next two years. Prioritize facilities with the highest use.
- Since only one trail was identified as part of this review, review whether there are any other trails provided in the Town for accessibility.

The full audit of Stoughton's parks and trails is located in Attachment 10.2.

4.5.2 Play Areas

The Stoughton Outdoor Facilities Audit included the following play areas: Levitz playground and Lessa Memorial Playground. The project team observed one fully accessible playground, Levitz Playground, which is located directly behind Richard L. Wilkins Elementary School, and one mostly accessible playground at Halloran Park. The playground at Bradley Lessa Memorial Playground lacks accessible parking, is not located on an accessible route, and lacks a stable/firm/slip-resistant play surface.

Priority remediation recommendations include:

- Mitigate all the barriers identified at the Bradley Lessa Memorial Playground within the next two years, as it is the only playground located in that area of the Town.
- Ensure that alterations to Bradley Lessa Memorial Playground duplicate the compliant work achieved at Levitz Playground and Halloran Park
- Ensure modifications to the existing play area and associated areas (seating and walkways leading to trails outside of the property) are done in compliance with the 2010 ADA Standards, as well at 521 CMR.

The full audit of Stoughton's play areas is located in Attachment 10.2.

4.5.3 Athletic and Recreation Areas

The Stoughton Outdoor Facilities Audit included the following athletic and recreation areas: John W. Denison Recreational Complex and the basketball court and bocce courts at Halloran Park.

The project team did not observe any fully accessible athletic/recreational facilities at the John W. Denison Recreational Complex. Athletic/recreational facilities lacked accessible parking, accessible routes, and accessible seating. No dedicated parking for public use is available at this facility, except for parking serving the schools after the school day, some at a considerable distance from the complex. The only other athletic/recreational areas observed in the Town of Stoughton were the basketball court and the bocce court at Halloran Park. While the basketball court was located on an accessible route, the bocce court was not.

Priority remediation recommendations include:

- Due to the high traffic of the athletic/recreational facilities, provide accessible facilities within the next 5 years. At least one of each type of facility (e.g. baseball field, softball field, basketball court, etc.) should be made accessible, with priority going to those with the highest use.
- Ensure that any modifications to existing sports fields, site amenities (batting cages, benches, etc.), and exterior toilet rooms are done in compliance with the 2010 ADA Standards, as well as 521 CMR.
- In addition to the fully accessible parking spaces serving the High School, some of which are approximately 1,000 feet away from the southern entry to the Recreational Complex, provide designated accessible parking spaces at multiple locations around the Recreational Complex, most specifically at Richard L. Wilkins Elementary School and O'Donnell Middle School.
- Explore additional designated accessible parking spaces at other locations at Halloran Park.
- Prior to the next season opening, review the Town's portable toilet plans. Provide an accessible portable toilet at each location where they are provided and/or at each location where there are inaccessible toilet facilities. Ensure the accessible portable toilet is located on an accessible route.

The full audit of Stoughton's athletic and recreation areas is located in Attachment 10.2.

4.5.4 Beach and Water Access

The Stoughton Outdoor Facilities Audit included the following beach and water access areas: Ames Pond Beach and Glen Echo Park Boat launch.

The project team did not observe any fully accessible beaches or water access points in Town. Ames Pond Beach, the only of this type of outdoor facility in Town, lacked accessible parking and accessible routes to the water. Glen Echo Pak has the only boat launch ramp in Town, which is not accessible.

Priority remediation recommendations include:

- Within the next 6 months, the Town should purchase a beach wheelchair for resident use and advertise the availability of the wheelchair on the Town website and in physical locations (i.e. at Town Hall). Ensure staff is informed and aware of how to handle requests regarding the beach wheelchair.
- Within the next two years, the Town should provide an accessible boat launch ramp for launching and retrieving trailered boats and other watercraft to and from the water.

The full audit of Stoughton's beach and water access areas is located in Attachment 10.2.

4.5.5 Golf Course

The Stoughton Outdoor Facilities Audit included one golf course, which is the Cedar Hill Golf Course. At the Cedar Hill Golf Course, the project team observed accessible parking with excessive slopes; signage that is too low; and a walkway to the building entrance and golf course also with excessive slopes.

Priority remediation recommendations include:

- Due to the high traffic of Cedar Hill Golf Course, mitigate all the barriers identified in the audit report within the next two years. Prioritize parking and accessible routes to the front entrance, including the exterior ramp, entrance and toilet rooms, due to their high visibility.

The full audit of Cedar Hill Golf Course is located in Attachment 10.2.

4.5.6 Social Media Audit

The [Stoughton Town Manager's Facebook page](#) was audited for accessibility and ADA compliance. All interactive elements on the page, such as buttons, links, and forms, can be accessed and operated using only a keyboard. For all uploaded content, the color contrast between the text and background meets the WCAG (Web Content Accessibility Guidelines) standards.

The following barriers to accessibility were noted:

- All images and flyers are lacking alternative text. Any pictures that contain words should be accompanied by a version of that text in writing.
- [Key to the Town presentation](#)
- [Early Voting Dates](#)

- Videos do not contain an option to enable closed captioning:
- [Stoughton Facebook Videos](#)
- When the Town shares other pages' content, they should note any ADA accessibility barriers.

4.5.7 Pedestrian Facilities – Sidewalks, Crosswalks and Curb Ramps

Pedestrian facilities present a unique challenge. At present, there are no enforceable standards promulgated under the ADA for pedestrian facilities such as sidewalks and crosswalks outside of those contained within a site, or a property boundary. This means that local and state regulations are the primary guidance for these types of facilities. Various court interpretations and DOJ issued guidance generally state that in the absence of official standards, a jurisdiction shall use the best available guidance, which is generally considered the Public Rights of Way Accessibility Guidelines (PROWAG), more fully described in Section 2.4.2.3. The U.S. Access Board released proposed guidelines in 2011 and issued the standards as a final rule in 2023. The DOT has announced its intention to issue their final rule in 2024, and the DOJ is likely to follow suit shortly thereafter.

Many municipalities have either adopted PROWAG as their standard, or largely incorporated the construction details and standards in their own Design and Construction Manuals, effectively making PROWAG to applicable required standard. This has not happened in Massachusetts, nor in most municipalities. With an aging road network, and extremely challenging right of way widths on most streets, following the PROWAG standards is very difficult.

5 Providing Equally Effective Communications

The ADA requires that Title II entities (state and local governments) communicate effectively with people who have communication disabilities. The goal is to ensure that communication with people with these disabilities is as effective as communication with people without disabilities.

5.1 Communications with Hearing and Speech Impaired Individuals

The Town is required to provide and/or facilitate the use of auxiliary aids to individuals with hearing and speech impairments. The decision about what auxiliary aid is appropriate should evolve from a consultation between the ADA Coordinator, or designee, and individuals requesting accommodation. In many cases, more than one type of auxiliary aid or service may make effective communication possible. While consultation is always strongly encouraged to achieve effective communication, all public entities are required to give primary consideration to the requests of individuals with disabilities. The Effective Communication obligation does not require the Town to take any action that would result in a fundamental alteration in its services, programs, or activities or that would impose an undue financial and administrative burden.

5.1.1 Findings

The Town does not presently have a standard policy regarding Effective Communication or how to accommodate a request for accommodation. Staff informally address issues as they arise but would benefit from having a standard policy and procedures to follow. Questionnaire responses indicated a need for training and tools to equip staff to effectively communicate with hearing impaired individuals. Most departments indicated staff were not aware of how to request the service of a qualified interpreter, convert documents to Braille, or make other communication accommodation. Additionally, the Town website, program literature, and announcements do not mention the availability of auxiliary aids, TTY, or other effective communication materials or assistance.

5.1.2 Recommendations

The ADA Coordinator should develop clear procedures/policy for staff to address requests for auxiliary aids, translation, ASL, and other communications accommodations. This should be a written policy on Effective Communication and employee training so staff across all departments understand their responsibility and have clarity about what services are available.

Sample of Effective Communication Statement and Request for Accommodation:

“The Town of Stoughton is committed to the full participation of people with disabilities. Any person with a disability who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in the Town’s programs, services, activities, and committee meetings, should contact the office of the ADA Coordinator as soon as possible but no later than 48 hours before the scheduled event.” (*if the Town needs 2 or 3 weeks or longer to ensure an interpreter, then it must be clearly stated).*

Other recommendations include:

- Distribute the Effective Communication Notice/Policy to all department heads and publish on the Town’s website home page.
- Develop a roster of ASL translators and vendors that can be engaged to provide translation.
- Conduct regular inspections and testing of auxiliary listening devices available at Town facilities.
- Provide training to staff on how to use TTY/TDD, and in general, how to interact and communicate with individuals with hearing or speech impairments.

Section 9.2.3 contains links to services to aid in communication with hearing and speech impaired individuals.

5.2 Public Meeting Access

Equal access to public meetings is critical to ensuring participation and representation in Town government. Like most municipalities in Massachusetts, Stoughton has many boards, commissions, and committees, all of which must abide by public meeting laws including regarding access, posting of agendas and minutes, and making available materials used and presented in these meetings. All these different components of a public meeting must be fully accessible to individuals with disabilities.

5.2.1 Findings

Public meeting access was mentioned during the public input process. Several deficiencies were noted during the evaluation, including:

- Not all meetings are recorded and archived.
- Survey-takers reported that captioning is not available for some hybrid meetings, and that in-person meetings outside of Town Hall do not have listening devices.
- Some agendas posted did not contain information on how to request accommodations. For example: [Board of Assessors Agenda](#), [Board of Health Agenda](#).

With the changes during the pandemic, virtual access to meetings increased dramatically, providing alternative ways to attend other than in-person. A few of Stoughton's Board and Committee meetings have returned to in-person only, decreasing accessibility to patrons who may be unable to attend in-person: [Cultural Council](#), [Energy & Sustainability Committee](#)

5.2.2 Recommendations

While the facilities' issues noted in the audits for the various meeting spaces should be remedied, the Town should also look at making reasonable modifications to public meetings to allow all individuals to attend. The Town's experiences during the COVID-19 pandemic also provide opportunities to continue fully remote and hybrid meeting formats that will not only increase participation but offer cost-effective ways to improve accessibility. Other specific recommendations include:

- Develop a policy requiring all agendas, minutes, and materials to be posted in an accessible format.
- Offer hybrid meetings for all public meetings, or at least, those that occur in facilities that have barriers to access. This may require adoption of a remote policy by the Select Board.
- Include a notice on meeting agendas regarding the availability of reasonable accommodations for all public meetings, including contact information and procedures to request such assistance.
- Where the only venue for a large meeting is an inaccessible site, utilize temporary materials, such as mats, portable ramps, additional accessible parking

signs/markings, and other purpose-built solutions to improve accessibility to the maximum extent feasible. Provide notice offering guidance on how best to access such resources.

5.2.2.1 Town Meeting

Town Meeting, as the legislative body of the Town, presents unique challenges for ensuring accessibility due to the State legislative requirement for participation to be in-person. The Stoughton Town Meeting is typically held at the Stoughton High School Auditorium. Numerous accessibility issues that should be addressed before the next Town Meeting are included in Attachment 10.1.

6 Department Input Summary

6.1 Findings

Fifteen departments completed the Stoughton Self-Evaluation form. The questionnaire included a series of questions regarding effective communication, including alternative format documents and materials and format requests such as large print, braille, and TTY. Additional questions were asked regarding core programs and services including location, type of program or service provided, whether the program or service is online, and whether reasonable accommodations are made for patrons with disabilities.

Data suggests that few departments have received any form of ADA-related training. Only one to two respondents each noted they have undergone training such as an overview of the ADA law and accessibility, how to provide services to the sight-impaired and blind, how to provide services to the hearing-impaired or deaf, how to provide services to the mobility-impaired, how to provide services to residents with cognitive or behavioral health problems, or ADA and employee rights. On average, Department Heads rank their staff's knowledge and ability to offer accommodations to the public as 6 out of 10.

Municipal employees offer ADA accommodations to patrons in several flexible ways depending on the need. Staff members are willing to go out of their way, such as meeting residents in parking lots, offering home visits, or assisting with elevator use. Employees also indicated they assess individual accommodation needs and work to fulfil them, like by reading information aloud or those with visual impairments or writing for those unable to do so. When needed, staff make appropriate referrals or collaborate with other departments (such as social workers or disability commissions) to ensure proper support. Some offices use hearing devices or TTY systems, while others rely on simple methods like speaking louder or using intercom systems.

The data suggests ADA accommodations are not always written as a policy or standard operating procedure. Three departments use tools when designing communications, such as an in-app accessibility checker and alternative text for images. Only one department indicated they received an accessibility-

related grievance or complaint in the last twelve months. Overall, the varied accommodations demonstrate a commitment to making public services accessible to all.

For a complete list of self-evaluation responses, please see Attachment 10.3.

6.2 Recommendations

There are several recommendations the Town of Stoughton could adopt to enhance ADA accessibility in their departments:

- Provide training for staff on ADA requirements and disability awareness. Training should cover how to provide accommodations and interact respectfully with patrons with different abilities. As ADA laws and best practices evolve, offer periodic refresher courses to all employees.
- Ensure public-facing services include assistive tools such as captioning services, TTY, and accessible websites compatible with screen readers.
- Put ADA accommodation policies in writing, clearly outlining how patrons can request accommodations. Ensure this policy is easily accessible online and in physical locations. Develop standard operating procedures that detail how staff should respond to different accessibility requests (e.g., handling requests for assistive technology, physical accommodations, or interpreters).

7 Public Engagement & Input

7.1 Overview

ADA requires public participation to be a part of the transition plan process and implementation.

Per 28 C.F.R. § 35.150(d)(1), the Town “. . . shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments.”

Accordingly, the public was provided opportunities to provide input toward the content and development of the Stoughton ADA Transition Plan as well as review and comment on the Transition Plan itself. Specific efforts were made to inform residents and local or regional disability organizations regarding the opportunity to provide feedback including a Public Input Survey and an opportunity for Transition Plan public comment.

7.2 Public Input Survey

A Public Input Survey is an important component of the Town’s process to develop a Self-Evaluation and Transition Plan. The Survey is a valuable tool to inform the Town’s planning team as they work to gather data and identify any barriers to access for individuals with disabilities at Town facilities or within the

programs and services it currently offers. Specifically, gathering public feedback is valuable to develop a practical, effective, achievable, and ADA-compliant Self Evaluation and Transition Plan for the Town by helping to identify areas of primary concern for individuals with disabilities, their caregivers, and families.

7.2.1 Methodology

A survey was launched to gather information to assist the project team in identifying any barriers to access for individuals with disabilities at Town buildings or within the programs and services it currently offers. The survey was open from May 2, 2024, to June 8, 2024, and garnered 36 responses. The survey, which was distributed to community members, organizations representing people with disabilities, and Town staff, was designed to improve public input efforts in identifying physical and programmatic barriers that may affect the accessibility of Town facilities, programs, and services.

This questionnaire was conducted on a non-scientific basis and may not represent the views or behaviors of the entire Stoughton population. As this questionnaire was voluntary, respondents who self-selected to participate may hold different characteristics or opinions compared to those who did not participate.

The survey included a comprehensive range of questions regarding respondents' usage of and access to Town facilities, programs, and services. It was specifically designed to elicit public opinion regarding information important to assess how respondents state the Town is currently providing accessibility and identify areas where current barriers may exist. For a complete list of survey questions, and responses, please see Attachment 10.5.

It is important to remember that while all efforts were made to encourage feedback, the results are not necessarily inclusive of all individuals in the community who may have a disability. Readers should not equate the respondent pool as representative of the number of residents who have a disability.

7.2.2 Results

Of the survey participants, 97% of them live in the Town of Stoughton. The most common age bracket among survey-takers is between 56 and 75. Forty-two percent of survey-takers indicated they themselves had an experience, or know someone who had an experience, where a Town facility, communication, service, or program was inaccessible.

The most common types of devices used by individuals with disabilities include a wheelchair, mobility scooter or walker, and an auxiliary aid for hearing impairment. Twenty-eight percent of survey-takers indicated they or an individual for which they are the caregiver has had an issue accessing a Town **facility** due to a disability or physical limitation. The facility that had the most frequent barriers to access is the Council on Aging building at 110 Rockland Street, specifically regarding the bathroom doors not being ADA accessible. However, eight other facilities were identified as having an access issue for at least one resident.

A smaller percentage of survey-takers indicated they or an individual for which they are the caregiver has had an issue accessing a Town **program or service** due to a disability or physical limitation. Departments which offered inaccessible programing to at least one respondent include Animal Control, Cedar Hill Golf Course, Department of Public Works, Disabilities Commission, Library, Select Board, and the Treasurer/Collector. The most common reason citizens were unable to access the programs or services were due to physical barriers to access, such as a lack of wheelchair access, incorrect counter height, or a lack of accessible parking.

There were no reports to residents having problems accessing **written** Town communications; however, participants indicated they have experienced trouble accessing Town meetings, Select Board meetings, and other board or task force meetings. More specifically, residents cited the lack of audio or closed captioning as the reason they are unable to participate.

Five individuals in the survey have made a request to the Town of Stoughton for an accommodation related to a disability, and most of those requests have remained unresolved. Additionally, 82% of survey respondents indicated they do not know who at the Town a member of the public can contact to make a request for an accommodation, state a grievance, or more generally offer input related to accessibility to programs, services, or facilities. The open-ended comments from the survey largely center on the need for improved sidewalks, more parking spaces for individuals with disabilities, and calls to install automatic doors in public facilities.

7.3 Transition Plan Public Comment

A draft of the Stoughton ADA SETP was available for public comment October - November 2024, via a public posting asking for community feedback on the Town website. The ADA SETP draft and recommendations were also presented at the Select Board Public Meeting on Tuesday, November 19.

While public comment was minimal with three public comments received, concerns were brought forward regarding facility and programmatic accessibility barriers at numerous municipal facilities. These included the Stoughton Public Library, Senior Center, Police Station, Fire Station, Golf Course, Train Depot, Lucas Clapp Building / Historical Society, and public schools. A need for sidewalk repair and improvements were also noted. The Chair of the Stoughton Disability Commission provided a letter, commending Town leadership for embarking on this project and a commitment to partner with the Town to correct identified barriers. Public comments are available for review in Attachment 10.6.

8 Transition Plan

8.1 Overview of Transition Plan

Recommendations made in the previous sections are summarized in this section as the Transition Plan. The initial timeline is presented as a recommendation based on observed inaccessibility of programs, ease of barrier removal, existing plans, available resources, and processes to implement changes. Since most of the physical modifications will require the authorization of appropriations or grants, most of these recommended action items are realistically one year or more out. Administrative and policy/procedure actions that do not require significant approval or development processes have shorter timelines.

8.1.1 Administrative & Townwide Action Items

Action Item	Ref.	Timeline	Status/Notes
Draft and approve a Public Notice and create internal policies to require staff to ensure it remains posted and up to date.	3.1.2	60 days	
Formalize role of ADA Coordinator and have it adopted by the Select Board. The Town should provide the ADA Coordinator with training opportunities and appropriate resources to carry out this role.	3.2.2	60 days	
Draft / Update job description to support role of the ADA Coordinator including responsibilities to stay up to date on ADA issues and respond to/document grievances and protocol for requests for accommodation. The job description should also include skills/training standards on ADA-specific standards and best practices.	3.2.2	60 days	
Integrate ADA Coordinator contact information into all distributed materials including the Public Notice and Grievance Procedure.	3.2.2	60 days	
Post the ADA Coordinator contact information physically in municipal buildings, on the Town website, web pages, and social media.	3.2.2	60 days	
Establish a dedicated email account for accessibility-related matters and develop a designated webpage consolidating the Public Notice, Grievance Procedure, and ADA Coordinator's contact information easily visible on the Town website.	3.2.2	60 days	

Action Item	Ref.	Timeline	Status/Notes
Draft and post a Grievance Procedure within to ensure all residents have equal access to Town facilities, programs, and services.	3.3.2	60 days	
Distribute Grievance Procedure to department heads and post physically in municipal buildings and online. The Public Notice should link to the Grievance Procedure.	3.3.2	60 days	
Complete Self-Evaluation	3.4.1	N/A	In process
Adopt Transition Plan (including public comment)	3.4.2	3-4 months	
Create an accessibility web page with links on all subpages/sites.	3.1.2	6-9 months	
Integrate Public Notice into all Town and departmental web pages, print materials, and social media feeds.	3.1.2	6-9 months	
Develop employee training program and standards on ADA and accessibility awareness.	4.1.2.1	1 year	
Create standard internal policies and procedures for addressing requests for accommodation.	4.1.2.1	1 year	
Develop program for routine inspections of facilities and testing of any specialized assistance devices.	4.1.3.1	6 months	
Conduct an initial employee training event or requirement on maintenance of accessible features and set schedule for periodic training; integrate into onboarding materials for new employees.	4.1.3.1	6-9 months	
Ensure maintenance of accessible features is specifically addressed in all contracts for services and construction projects as appropriate.	4.1.3.1	3 years	Allows for expiration of any multi-year contracts.

8.1.2 Communications, Website/Social Media & Public Meetings

Action Item	Ref.	Timeline	Status
Develop an Effective Communications Notice/Policy and distribute it to Departments and website for posting.	5.1.2	6 months	
Develop a roster of ASL translators, alternative format vendors (braille) and ensure it is kept up to date if needed.	5.1.2	6 months	
Develop a standard policy/procedure and employee training on use of TTY/TDD and communication with hearing and speech impaired individuals.	5.1.2	6 months	
Develop a schedule and procedure for testing any assistive or auxiliary listening devices.	5.1.2	6 months	
Create a separate landing page for accessibility with the Public Notice and contact information for the ADA Coordinator, link to Grievance Procedure, and links to resources.	5.2.2	6 months	
Develop a policy requiring all agendas, minutes, and materials to be posted in an accessible format. While most meetings are posted as scans, certain boards post the Clerk-received document in a fully accessible format.	5.2.2	6 months	
Offer hybrid meetings for all public meetings, or at least, those that occur in facilities that have barriers to access. This may require adoption of a remote policy by the Select Board if it has not already been done.	5.2.2	1 year	
Include a notice regarding the availability of reasonable accommodations for all public meetings, including contact information and procedures to request such assistance.	5.2.2	6 months	
For a large meeting at an inaccessible site, utilize temporary materials, such as mats, portable ramps, additional accessible parking signs/markings, and other purpose-built solutions to improve accessibility. Provide notice offering guidance on how best to access the site and request assistance.	5.2.2	Ongoing	

8.1.3 Facility and Program Improvements

Offered in the following table are those items identified as high priority and as having the most beneficial impact on accessibility at identified facilities. The Town should also recognize that any of the improvements below may trigger the need for further mitigation under 521 CMR or be best performed as part of a larger scope. Prior to beginning any project in the list below, staff should also consult Attachment 10.1 Facilities Audit and Attachment 10.2. Outdoor Facilities Audit for a full listing of recommended accessibility improvements.

Action Item	Ref.	Timeline	Status
Town Hall			
Prioritize parking and accessible routes to the front entrance, including the exterior ramp	4.4.1	1 year	
Due to the high traffic of Town Hall, mitigate all barriers identified in the audit report	4.4.1	2 years	
Council on Aging / Youth Commission Facility			
Prioritize parking and accessible routes to the front entrance, including the exterior ramp	4.4.3	1 year	
Due to the high traffic of the COA, mitigate all barriers identified in the audit report	4.4.3	2 years	
Recreation Center			
Prioritize parking and accessible routes to the rear entrance, including the exterior ramp	4.4.4	1 year	
Due to the high traffic of the Recreation Center, mitigate all barriers identified in the audit report	4.4.4	2 years	
Department of Public Works (DPW)			
Prioritize parking and the counters	4.4.5	1 year	
Due to the moderate traffic of the DPW, mitigate all barriers identified in the audit report	4.4.5	2 years	
Fire Station – 1550 Central Street			
Prioritize parking, the entrance, the counter, and toilet rooms	4.4.7	1 year	
Due to the moderate traffic of this Fire Station, mitigate all the barriers identified in the audit report	4.4.7	2 years	

Action Item	Ref.	Timeline	Status
Fire Station – 300 Freman Street			
The building will undergo a major renovation later this year with the intent of making this a more public-facing building. Mitigate all barriers identified in the audit report during the renovation.	4.4.6	TBD	
Police Station			
Prioritize parking, accessible routes to the public entrance, the single-user toilet room, and detention cells and shower room, due to their high visibility	4.4.8	1 year	
To resolve the lack of an accessible route from the public right-of-way to the public entrance, consider building an accessible ramp from the sidewalk along Rose Street	4.4.8	1 year	
Due to the high traffic of the Police Station, mitigate all barriers identified in the audit report	4.4.8	2 years	
Animal Control			
Develop a policy for the Animal Control Office to provide assistance to the public within an accessible location directly outside of the building	4.4.2	6 months	
Due to the moderate traffic of the Animal Control, mitigate all the exterior barriers identified in the audit report, including parking and walkway to entrance	4.4.2	2 years	
Public Library			
Prioritize parking, drop box, and work surfaces, due to their high visibility	4.4.9	6 months	
High School Auditorium			
Find an alternate accessible meeting location for Town functions until accessibility barriers are remediated		6 months	
Historical Society Building			
Provide an alternative accessible meeting location for the inaccessible offices. If an alternative location is used, information on its location and the process for requesting its use must be disseminated	4.4.10	6 months	
Train Depot			
Continue to maintain the building as closed to the public until it becomes fully accessible	4.4.12	TBD	

Action Item	Ref.	Timeline	Status
Parks & Trails			
Improve accessible parking and walkway at parks within the next two years / Prioritize facilities with the highest use	4.5.1	2 years	
Review programs offered at Town parks and identify site amenities that must be located on an accessible route / Prioritize facilities with the highest use	4.5.1	2 years	
Since only one trial was reviewed as a part of this plan's scope, review whether there are any other trails provided in the Town of Stoughton. Review the trail inventory for accessibility compliance	4.5.1	1 year	
Play Areas			
Mitigate all barriers identified at the Bradley Lessa Memorial Playground, as it is the only playground located in that area of the Town	4.5.2	2 years	
Ensure that alterations to Bradley Lessa Memorial Playground duplicate the compliant work achieved at Levitz Playground and Halloran Park and that any modifications to the existing play area and associated areas (seating and walkways leading to trails outside of the property) are done in compliance with the 2010 ADA Standards, as well at 521 CMR	4.5.2	2 years	
Athletic & Recreation Areas			
Provide accessible facilities with at least one of each type of facility (e.g. baseball field, softball field, basketball court, etc.) to be made accessible, with priority going to those with the highest use	4.5.3	5 years	
Ensure that any modifications to existing sports fields, site amenities (batting cages, benches, etc.), and exterior toilet rooms are done in compliance with the 2010 ADA Standards, as well at 521 CMR.			

Action Item	Ref.	Timeline	Status
In addition to the fully accessible parking spaces serving the High School, some of which are approximately 1,000 feet away from the southern entry to the Recreational Complex, provide designated accessible parking spaces at multiple locations around the Recreational Complex, most specifically at Richard L. Wilkins Elementary School and O'Donnell Middle School. Explore additional designated accessible parking spaces at other locations at Halloran Park	4.5.3	5 years	
Prior to the next season opening, KMA recommends reviewing the Town's portable toilet plans. Provide an accessible portable toilet at each location where they are provided and/or at each location where there are inaccessible toilet facilities. Ensure the accessible portable toilet is located on an accessible route.	4.5.3	5 years	
Beach & Water Access			
Purchase a beach wheelchair for resident use. Advertise the availability of the wheelchair on the Town's website and in physical locations. Ensure staff is informed and aware of how to handle requests regarding the beach wheelchair	4.5.4	6 months	
Provide an accessible boat launch ramp for launching and retrieving trailered boats and other watercraft to and from the water	4.5.4	2 years	
Golf Course			
Mitigate all barriers identified in the audit report within the next two years. Prioritize parking and accessible routes to the front entrance, including the exterior ramp, entrance and toilet rooms, due to their high visibility	4.5.4	2 years	

9 Appendices

9.1 Recommended Policy and Procedure Documents

9.1.1 Public Notice (Proposed)

The Town of Stoughton does not discriminate based on disability in its services, programs, or activities.

Employment: The Town of Stoughton does not discriminate based on disability in its hiring or employment practices and complies with the ADA Title I employment regulations.

Effective Communication: The Town of Stoughton will, upon request, provide auxiliary aids and services leading to effective communication for people with disabilities, including qualified sign language interpreters, assistive listening devices, documents in Braille, and other ways of making communications accessible to people who have speech, hearing, or vision impairments.

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

Requests: To request an auxiliary aid or service for effective communication, or a modification of policies or procedures contact the ADA Coordinator (listed below) as soon as possible, preferably 14 days before the activity or event.

Complaints: A grievance procedure is available to resolve complaints. <LINK TO GRIEVANCE PROCEDURE>

For complaints, comments, or concerns, please contact:

Jack Erickson, ADA Coordinator
Town Hall, 10 Pearl Street
Stoughton, MA 02072
Phone: 781-344-6070
Email: jerickson@stoughton-ma.gov

Upon request, this notice is available in alternative formats such as large print or Braille.

NOTE: This notice can be inclusive of the Grievance Procedure, but this is not required.

9.1.2 Grievance Procedure (Proposed)

Americans with Disabilities Act Grievance Procedure (Full Version)

This grievance procedure is established to meet the requirements of the ADA. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the Town of Stoughton.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number, email address of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

The complaint should be submitted as soon as possible, preferably within 60 calendar days of the alleged violation to:

Jack Erickson, ADA Coordinator
Town Hall, 10 Pearl Street
Stoughton, MA 02072
Phone: 781-344-6070
Email: jerickson@stoughton-ma.gov

Within 15 calendar days after receipt of the complaint, the ADA Coordinator will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the ADA Coordinator will respond in writing, and where appropriate, in a format that is accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the Town and offer options for substantive resolution of the complaint. If the response by the ADA Coordinator does not satisfactorily resolve the issue, the complainant may appeal the decision within 15 calendar days after receipt of the response to the Town Manager or designee.

Within 15 calendar days after receipt of the appeal, the Town Manager or designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Town Manager or designee will respond in writing, and, where appropriate, in a format that is accessible to the complainant, with a final resolution of the complaint.

Americans with Disabilities Act Grievance Procedure (Short Version)

Complaints concerning discrimination on the basis of disability by the Town of Stoughton may be sent to Jack Erickson, ADA Coordinator, Town Hall, 10 Pearl Street, Stoughton, MA 02072, phone 781-344-6070, email jerickson@stoughton-ma.gov, who will contact the complainant within 15 calendar days after receipt of the complaint to discuss the complaint and will respond in writing within 15 days of the discussion.

9.1.3 Service Animal Policy (Proposed)

The Town of Stoughton complies with the Americans with Disabilities Act and the Rehabilitation Act of 1973, Section 504, which states, “No otherwise qualified person with a disability in the United States...shall, solely on the basis of a disability, be denied access to, or the benefits of, or be subjected to discrimination under any program or activity provided by any institution receiving federal assistance.” The Town of Stoughton intends to provide the broadest possible access to service animals in all public areas.

The U.S. Department of Justice has issued regulations effective March 15, 2011 (28 CFR 36.302), limiting the types of animals that qualify as “service animals” for purposes of the Americans with Disabilities Act (ADA). According to these regulations, “Service animal means any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. Other species of animals, whether wild or domestic, trained, or untrained, are not service animals for the purposes of this definition. The work or tasks performed by a service animal must be directly related to the individual's disability. Examples of work or tasks include, but are not limited to, assisting individuals who are blind or have low vision with navigation and other tasks, alerting individuals who are deaf or hard of hearing to the presence of people or sounds, providing non-violent protection or rescue work, pulling a wheelchair, assisting an individual during a seizure, alerting individuals to the presence of allergens, retrieving items such as medicine or the telephone, providing physical support and assistance with balance and stability to individuals with mobility disabilities, and helping persons with psychiatric and neurological disabilities by preventing or interrupting impulsive or destructive behaviors. The crime deterrent effects of an animal's presence and the provision of emotional support, well-being, comfort, or companionship do not constitute work or tasks for the purposes of this definition.” Section 36.302(c)(9) also identifies miniature horses as service animals. Other species of animals, wild or domestic, do not qualify as “service animals”. Therapy or emotional support animals are not considered to be service animals.

The Town of Stoughton is not responsible for the care or supervision of the service animal. Below are the policy guidelines for the Town:

- A service animal is permitted to accompany the individual with a disability to most areas within Town facilities where members of the public are normally allowed to go.
- Some areas are not safe for service animals; therefore, these areas may exclude service animals. Water treatment facilities and/or areas that require protective clothing may exclude service animals. This denial or granting of admission to an area will be made based on the nature of the machinery and/or on the nature of the work performed.
- An individual with a service animal may not be segregated from other members of the public.
- A service animal may be removed from a facility if that animal poses a direct threat to the health or safety of others.
- A service animal may be removed from a facility if that animal's behavior is out of control and the handler does not take effective control or if the service animal is not housebroken.
- If a service animal is removed from a facility, the individual with a disability will be given the option of continued participation, with assistance, within the facility.
- The service animal must be clean, in good health, with current rabies vaccination.
- All service animals must be always on a leash or under control of the handler.

9.2 Resources

9.2.1 General Resources & Guides

There are several resources available to assist the Town with the implementation of their Transition Plan and to ensure it meets its obligations to its residents.

ADA Action Guide for State and Local Governments: <https://www.adaactionguide.org>

ADA Checklist for Existing Facilities: <https://www.adachecklist.org>

ADA Checklist for Polling Places: <https://www.ada.gov/votingchecklist.htm>

Solution for Five Common ADA Access Problems at Polling Places:
https://www.ada.gov/ada_voting/voting_solutions_ta/polling_place_solutions.htm

Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities - <http://www.ada.gov/emergencyprepguide.htm>

FEMA Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters http://www.fema.gov/pdf/about/odic/fnss_guidance.pdf

Job Accommodation Network: <http://www.askjan.org>

Website: [Understanding WCAG 2.0: A guide to understanding and implementing Web Content Accessibility Guidelines 2.0](#)

9.2.2 Grant Funding for Accessibility Projects

Massachusetts Community Development Block Grant Program (CDBG)

CDBG is a federally funded, competitive grant program designed to help small cities and towns meet a broad range of community development needs. Eligible projects include but are not limited to housing rehabilitation or development, micro-enterprise or other business assistance, infrastructure, community/public facilities, public social services, planning, removal of architectural barriers to allow access by persons with disabilities, and down or area revitalization. More information about the program can be found here:

<https://www.mass.gov/service-details/community-development-block-grant-cdbg>

Massachusetts Municipal ADA Improvement Grant Program

The Massachusetts Office on Disability (MOD) administers the Municipal ADA Improvement Grant program. This funding is aimed at supporting capital improvements to improve programmatic access and/or removing barriers encountered by people with disabilities. Project grants of up to \$250,000 are available. There are also planning grants to assist communities in creating or updating a Self-Evaluation and/or Transition Plan. More information about the program can be found here:

<https://www.mass.gov/municipal-americans-with-disabilities-act-grant>

Massachusetts Cultural Facilities Fund

The Massachusetts Cultural Council and Mass Development provides cultural organizations, including Municipalities that own cultural facilities that are at least 50,000 square feet, with grant funding to support three project types: Feasibility and Technical Assistance grants; Systems Replacement Plan Grants; and Capital grants. Feasibility and Technical Assistance grants of up to \$50,000 are available for costs and expenses related to overall planning and feasibility for a project. Systems replacement plan grants of up to \$7,000 are available to support the development of a capital needs assessment of a building and its mechanical system. Capital grants ranging from \$250,000-\$675,000 are available for acquisition, design, construction, repair, renovation, rehabilitation, or other capital improvements. For a municipality to be eligible to apply for this funding, it must demonstrate that 50% or more of the facility is used for arts, humanities, or interpretative science programming. All grant programs require a 1-1 match. More information about the program can be found here:

<http://www.massculturalcouncil.org/facilities/facilities.htm>

Complete Streets Funding Program

A Complete Street is one that provides safe and accessible options for all travel modes - walking, biking, transit, and vehicles – for people of all ages and abilities. MassDOT provides funding to municipalities for technical assistance to analyze their community needs and develop a Complete Streets Prioritization Plan, and funding for construction of Complete Streets infrastructure projects. Also inherent in the development of a Complete Street is meeting the most current accessibility guidelines outlined by the Americans with Disabilities Act (ADA) and the Massachusetts Architectural Access Board (AAB), which are upheld by Code of Massachusetts Regulations 521 (521 CMR). MassDOT has allocated \$12.5 million for the first two years, 2016 and 2017. Future funding will be based on the availability of funds and the interest and success of the program. More information about the program can be found here:

<https://www.mass.gov/complete-streets-funding-program>

Community Transit Grant Program

MassDOT administers the Community Transit Grant Program which is the annual competitive grant program to distribute Federal Transit Administration Section 5310: Enhanced Mobility of Seniors & Individuals with Disabilities funds, and State Mobility Assistance Program funds. This grant program provides funding to assist with mobility management activities, the purchase of capital equipment, and operational costs to meet the mobility needs of seniors, defined as those 65 and older and individuals with disabilities of any age. State Mobility Assistance Program (MAP) funds are to assist in the provision of transportation services to seniors and persons with disabilities. MAP funding is exclusively used for the purchase of eligible vehicles, and most often as a State financial match to federally funded capital vehicle purchases. More information about the program can be found here:

<https://www.mass.gov/community-transit-grant-program>

9.2.3 Services to Aid Communication with Hearing/Speech Impaired Individuals

MassRelay Service

The Massachusetts Department of Mental Health operates the MassRelay service. This service is provided 24 hours, seven days a week, 365 days a year and enables people who are deaf, hard of hearing, late deafening, or speech disabled to communicate with hearing people over regular phone lines. A Relay Operator will complete your call, dialing the party you wish to contact and then stay on the line to relay messages electronically via a TTY or verbally to people who can hear. Dial 711 in Massachusetts or 1-800-439-0183 from anywhere else.

Massachusetts Commission for the Deaf & Hard of Hearing (MCDHH) Statewide Interpreter/CART Referral Service

The MCDHH provides statewide interpreter and Communication Access Realtime Translation (CART) referral services. It provides referral services for sign language, spoken English, oral, tactile and close vision interpreting for Deaf and Deaf-Blind individuals, as well as making referral to freelance CART providers for services. They also provide an After-hours Emergency Interpreter Service, an Interpreter Screening service, Interpreter and CART provider trainings, case management, and technical assistance. More information can be found here:

<https://www.mass.gov/orgs/massachusetts-commission-for-the-deaf-and-hard-of-hearing>

9.2.4 Training and Technical Assistance

Massachusetts Commission Against Discrimination (MCAD)

MCAD provides discrimination prevention training to the public and for workplaces. Training sessions range from two hours to four days in length, depending on the topics covered. They also offer Equal Employment Opportunity Certifications for individuals who currently provide, or seek to provide, employment discrimination prevention training, conduct internal discrimination complaint investigations and/or respond to accommodation requests. For more information visit their website at:

<https://www.mass.gov/training-and-outreach>

Massachusetts Office on Disability (MOD)

MOD's mission is to "bring about full and equal participation of people with disabilities in all aspects of life...in a manner that fosters dignity and self-determination. They have four areas of focus: 1) Providing Training; 2) Advocacy; 3) Monitoring; and 4) Resources. MOD provides training to various entities in a variety of formats on all topics related to the state and federal civil rights laws that govern disability discrimination. Topics may include but are not limited to: ADA, Fair Housing Act, Section 504 of the Rehabilitation Act, M.G.L. Chs. 151b and 272, Service Animals, Vocational Rehabilitation and Independent Living Services and Programs, and Architectural Access Regulations. MOD also provides architectural review/site visits, either through plan review or on-site visits to ensure compliance with the various building requirements specific to persons with disabilities. Training and Architectural Review/Site Visits can be requested at:

<https://www.mass.gov/orgs/massachusetts-office-on-disability>

ADA Coordinator Certification Program

The ADA Coordinator Training Certification Program is offered by the University of Missouri and the Great Plain ADA Center Classes are offered online and through trainings offered at various conferences the University hosts. Following the successful completion of the program, the participant will have the knowledge base essential to performing the role of an ADA Coordinator. Course and certification requirements can be found on their website:

<http://www.adacoordinator.org/?page=About>

National ADA Symposium

This premier, national four-day event includes more than eighty breakout sessions on every aspect of ADA. It is a project of the ADA National Network and is organized and run by the Great Plains ADA Center. For more information about the Symposium visit:

<http://www.adasymposium.org/>

New England ADA Center

The New England ADA Center is one of 10 regional ADA Centers comprising the ADA National Network. They provide information, guidance and training on ADA tailored to meet the needs of business, government and individuals at local, regional and national levels. Their website has a clearing house of ADA training topics that are no cost web-based courses in addition to publications and best practices resources. Their website can be found at:

<https://www.newenglandada.org/>

10 Attachments

The following Attachments are presented as separate documents and are summarized in this section. These documents are used to inform the overall self-evaluation and transition plan and are provided as informational only.

10.1 Facilities Audits

Facilities audit reports provide a photo-captioned report on each facility owned and operated by the Town. The photo-captioned reports are intended to be used by Town staff in identifying and rectifying specific accessibility code non-compliance.

10.2 Outdoor Facilities Audits

Outdoor facilities audit reports provide a photo-captioned report on each outdoor facility owned and operated by the Town. The photo-captioned reports are intended to be used by Town staff in identifying and rectifying specific accessibility code non-compliance. The outdoor facility audits include parks, playgrounds, trailheads, and other outdoor elements.

10.3 Self-Evaluations

The Town's departmental core programs and services, as determined by questionnaire responses, communication with staff, and website research, are used to inform the facilities audits by establishing the context under which the various services or programs are provided in a particular facility.

10.4 Communications Audit

A website accessibility audit is performed by an accessibility professional who meticulously evaluates digital assets against the current Web Content Accessibility Guidelines (WCAG). The Web Content Accessibility Guidelines are part of a series of web accessibility guidelines published by the Web Accessibility Initiative of the World Wide Web Consortium, the main international standards organization for the Internet. The WCAG standard has been tried and tested and is under routine development by accessibility experts, making it a reliable standard.

10.5 Public Input Survey

Note that the survey results are provided by a third party, and all of the graphs and tables are images and thus are not fully accessible. The text is accessible with most screen readers. For details on the survey data, please see Section 6.2.2 for narrative detailing the results in an accessible form.

10.6 Public Comment

Comments received during the public comment period October – November 2024 are listed in this attachment.