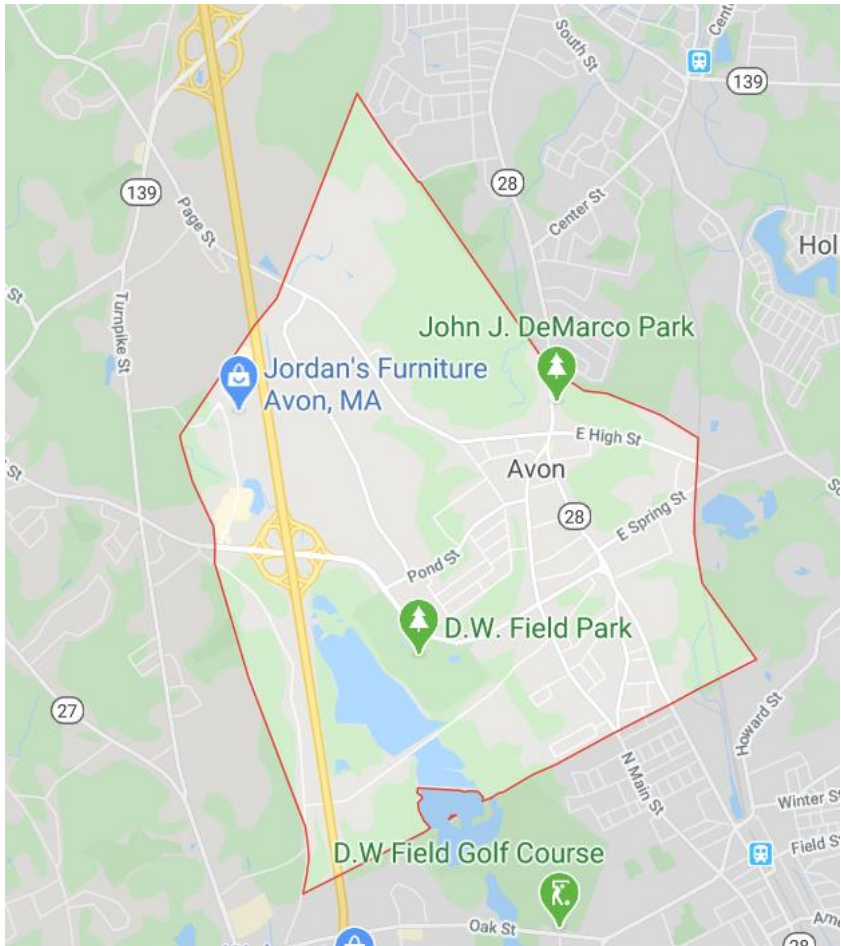


AVON, MA

ADA/504 SELF-EVALUATION & TRANSITION PLAN



**ARCHITECTURE
+ ACCESSIBILITY**
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October 7, 2020

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SECTION 1: EXECUTIVE SUMMARY

The Town of Avon has retained KMA, LLC to assist in the development of an Americans with Disabilities Act (ADA) Self-Evaluation & Transition Plan (SETP). The Town is making progress in ensuring its programs and services are accessible; it is in the process of developing a grievance policy, has appointed an ADA Coordinator, is developing procedures to assure Town activities are held in accessible locations, is drafting a public notice of ADA compliance, and is drafting a process for responding to requests for reasonable modifications. Its facilities, policies, and programs are becoming more accessible.

The Self-Evaluation process did identify some areas where improvement could be made in the delivery of accessible programs and services. Recommendations to address these areas include:

- Develop town-wide protocols for providing materials in alternate formats, providing auxiliary aids/services, and evaluating requests for reasonable accommodations.
- Develop enhanced communication regarding requesting modifications, accommodations, alternative formats, auxiliary aids and services and architectural accessibility on the Town's website, social media, print materials, and in buildings and announcements.
- Develop and disseminate protocols to ensure meetings (including Boards and Commissions), hearings, workshops, and conferences conform with the guidelines for accessible meetings.
- Provide ADA training for appropriate staff.
- Develop a Service Animal policy.
- Ensure that the Emergency Preparedness Plan specifically addresses the unique needs of individuals with disabilities.
- Review all Town documents for stigmatizing language (i.e. the use of the word "handicapped").
- Perform a more comprehensive review of the Town's employment practices for accessibility requirements. Ensure any accessibility policies that are currently being developed are included in the Employee Manual.
- Provide alternative means of contacting Town employees (i.e. email or TTY number).
- Perform a comprehensive review of the plans for accessibility compliance for the Fire Station and Library projects that are currently undergoing a renovation.
- Engage in targeted architectural barrier removal at facilities. KMA has identified the following facilities as the highest priority for barrier removal:
 - Library
 - Fire Station
 - Police Station

- Town Hall
- Civic Center and Council on Aging
- Schools
- Athletic Facilities
- Parks
- Playgrounds

This Self-Evaluation & Transition Plan will assist the Town in its ongoing effort to ensure equitable access for all its citizens. Recommendations contained in Section 4 reflect the regulatory obligations established in 28 CFR Part 35 as well as public input.

SECTION 2: REGULATORY CONTEXT

The Town of Avon is located at the eastern edge of Norfolk County. It shares a border with the City of Brockton and Stoughton. It is located approximately 17 miles south of Boston and 27 miles northeast of Providence, Rhode Island. Its territory is traversed by two highways: Route 24 and Route 28. The estimated population of Avon is 4,400.

Like all municipalities, the Town has a regulatory obligation to ensure that it does not discriminate against individuals with disabilities in the provision of municipal programs and services. The Americans with Disabilities Act (ADA) does not necessarily require that all the Town's facilities are fully accessible. Rather it requires that all the Town's programs and services, "when viewed in their entirety" are accessible. The Town is required to perform a Self-Evaluation to determine what barriers exist to their programs and services, and to develop and implement a plan to remove those barriers.

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

- Individuals who have a physical or mental impairment that substantially limits one or more major life activities;
- Individuals with a record of such an impairment; and
- Individuals regarded as having such an impairment.

The broad prohibition against disability-based discrimination requires that all Town programs and services be accessible to individuals with disabilities. The ADA requires a public entity to take five administrative action steps:

- Designate an employee responsible for carrying out compliance activities.
- Provide notice to the public of its rights and protections under the ADA and how the entity complies with those obligations.
- Establish a grievance procedure.

- Conduct a Self-Evaluation, a comprehensive review of policies and procedures.
- Develop an ADA Transition Plan.

Thus, the Town must assess specific services, policies, and practices, and address the removal of physical barriers and/or the revision of policies and procedures, to ensure compliance with the applicable ADA and Section 504 regulations, and with all provisions of the Massachusetts Code of Regulations (521 CMR). Massachusetts State law further requires that the Town apply the more stringent of the above standards to achieve accessibility.

APPLICABLE REGULATIONS

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

- PL101-336: 1990 Americans with Disabilities Act (ADA). This is the federal civil rights statute whose first purpose is:
“...To provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” (42 USC 12101. Sec.2(b))
- 28 CFR Part 35, Title II: Nondiscrimination on the Basis of Disability in State and Local Government Services (as amended by the final rule published on September 15, 2010). These are the U.S. Department of Justice’s regulations implementing the ADA, as required in 42 USC 12101, Sec.204(a))
- 29 USC 794: Section 504 of the 1973 Rehabilitation Act (504)
- 521 CMR: The Rules and Regulations of the Massachusetts Architectural Access Board. (1977, 1987, 1990, 1992, 1996, 1998, 2006)

ADA AND 504 BARRIER REMOVAL REQUIREMENTS

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

1. Program Access: requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from a public entity’s programs and services. The ADA requires that public entities provide physical and communication access to each program service or activity. The Town must identify and correct policies and practices that have the effect of discriminating against individuals with disabilities.
2. Alterations: Any alterations that are performed must conform to the 2010 ADA Standards.¹ Alterations may trigger an obligation to perform additional barrier removal outside the planned scope of work. The ADA accessible path of travel requirement states: “When alterations are made to a primary function area that affect the usability of that area, alterations to provide an accessible path of travel to the altered area must also

¹ And 521 CMR: *The Rules and Regulations of the Massachusetts Architectural Access Board* (MAAB).

be made unless the cost is disproportionate.” Further, the Town is required to maintain its existing facilities to ensure continued, unfettered, and uninterrupted access to persons with disabilities.

PROGRAM ACCESS

The Town’s fundamental obligation is to ensure that individuals with disabilities are afforded an equally effective opportunity to participate in, or benefit from, all its programs and services, subject only to the limitations of fundamental alteration and/or undue burden. Therefore, the Town must implement policy changes, if necessary, so that persons with disabilities can have full access. Further, the Town must continue to make changes to prevent discrimination and continually work to increase accessibility.

The ADA’s Section 202 Discrimination states:

“... no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.”

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

28 CFR 35.149 states:

“... no otherwise qualified individual with a disability shall, because a public entity’s facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.”

28 CFR 35.150 states:

“A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.”

This statutory and regulatory language above describes what is known as “program access” – a situation in which all programs are readily accessible to, and usable by, qualified persons with disabilities. In addition, qualified students with disabilities must be provided with equal services in as integrated a setting as possible, and the setting that is most appropriate to encourage interaction among all users. The determination of what is an equal and integrated setting is made on a case-by-case basis. What is appropriate for one person with a specific impairment may not be useful or appropriate for another person with the same impairment.

Failure to provide “program access” is an illegal act of discrimination under Title II of the ADA. The Town must identify and correct policies and practices that have the effect of discriminating against individuals with disabilities. The law provides public entities with some flexibility in how this standard can be met. Both structural and nonstructural methods of providing “program access” can be used.

METHODS OF PROVIDING PROGRAM ACCESS

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

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

From an architectural standpoint, this requirement does not mean that every building must be accessible. However, every program must be accessible. When choosing a method of providing program access, the Town is required to give priority to the one which results in the most integrated setting possible and is most appropriate to encourage interaction among all users.

LIMITATIONS ON OBLIGATION TO PROVIDE PROGRAM ACCESS

The ADA's regulations specify certain clear limitations on a public entity's obligation to provide program access. An entity is not required to perform an action that poses an undue financial or administrative burden or constitutes a fundamental alteration. The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee and must be accompanied by a written statement of the reasons for reaching that conclusion. The threshold for an action constituting an undue burden is a high one for state and local government entities. If it is determined that barrier removal will result in such an alteration or burdens, the Town must still, "take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity."

SCHEDULE FOR PROGRAM ACCESS COMPLIANCE

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

SECTION 3: PROJECT METHODOLOGY

The Town of Avon retained the services of KMA to perform an accessibility assessment of its programs, services, and facilities. To date, KMA has performed the following tasks:

1. A virtual kick-off meeting and training was held with representatives from town departments on May 6, 2020 to discuss project goals and methodology. At the meeting, KMA introduced the broad non-discrimination provisions of the ADA and the ADA Self-Evaluation process, and subsequently distributed three surveys for the Town to complete:
 - a. Administrative Survey addressing Town-wide policies and procedures
 - b. Department Surveys
 - c. Employment Survey
2. KMA completed program access audits of 20 Town buildings, athletic fields, playgrounds, recreation facilities, and polling locations. Audit findings are included in the Appendix of this report.
3. An online accessibility survey was created to gather public input.
4. A review of the completed surveys, other policy documents received from the Town, and the Town's website was performed. [See Section 5]
5. KMA developed a DRAFT ADA Self Evaluation & Transition Plan to be reviewed by the Town and posted on the Town's website to solicit public review and input. The DRAFT report was developed to summarize the ADA Title II requirements and KMA's primary findings and recommendations. It was submitted to the Town on 7.30.2020.
6. KMA incorporated the comments to the DRAFT Report into a Final Report that was to the Town of Avon on 10.07.2020.

SECTION 4: FINDINGS & RECOMMENDATIONS

The proper implementation of the recommendations in this section will require a thorough understanding of federal and state accessibility requirements.

A. FINDINGS REGARDING PROGRAMS, SERVICES, and OPERATIONS

Based on the information from the Town's website, completed survey responses, and discussions with staff, KMA finds that the Town has made progress in meeting its ADA obligations not to discriminate based on disability. Following are specific findings and recommendations.

According to the town's website, Avon provides municipal programs and services through the following departments:

Animal Control	Assessors	Avon Public Library
Building Department	Department of Public Works	Electrical Inspector
Fire Department	Health	Highway Division - DPW
Housing Authority	Human Resources/ Selectboard	Library Trustees
Parking Clerk	Parks & Recreation	Plumbing & Gas Inspector
Police Department	Recycling & Trash Collection	School District
Town Accountant	Town Administrator	Town Clerk
Town Moderator	Treasurer/ Collector	Veteran's Services
Water Division - DPW		

KMA reviewed the worksheets submitted by the following departments:

Avon Public Library	Building Department	Fire Department
Health	Human Resources/ Selectboard	Parks & Recreation
School District	Town Accountant	Town Administrator
Town Clerk	Treasurer/ Collector	

Animal Control

According to the Town's website, the Avon Animal Control Department shares an Animal Control Officer with the Town of Holbrook. The Department deals with cats, dogs and sick or injured wildlife. They do not respond to nuisance wildlife calls. The Animal Control Department did not respond to the SETP Department Survey.

Assessors

According to the Town's website, the Avon Assessors Department is made up of elected officials that are required to value all property in their community annually at full market value. Their office is located at Town Hall. The Assessors Department did not respond to the SETP Department Survey.

Avon Public Library

The Avon Public Library provides an extensive circulating collection covering a wide variety of topics, in print, non-print, and electronic formats. The collection promotes browsing with an environment conducive to both formal and independent learning. Special programs and materials support and promote basic literacy, curriculum objectives, general information, and lifelong learning needs. Programs and events are held for children, teens and adults. There are six public computers with reference databases and Internet access (available in-house and remotely) giving patrons further access for their informational, educational, cultural and recreational pursuits. Services include loaning both physical and digital library materials, providing informational, educational, and recreational programming for all ages. The Library is located at 280 West Main Street. Survey responses indicate significant architectural barriers at the Library and that there have been complaints about the difficulty accessing the downstairs bathrooms, the ramp into the community room, and the long walk at the front door. Survey responses indicate that Library personnel have received training in the Town's nondiscrimination policy as well as how to communicate with people with disabilities. However, personnel are not aware of the Town's policies/ procedures for responding to reasonable accommodation or auxiliary aid requests, how to provide outreach in a manner that is accessible, or an emergency preparedness plan that addresses the needs of individuals with disabilities. The Library also notes that they do not have access to text-to-voice on computers, print enlargers, or silencing headphones. The Library is currently undergoing a renovation to address access to the bathroom on the main floor and the ramp at the community room. Please see our findings in the Structural section of this report for more information regarding the physical accessibility of the Library.

Building Department

The Building Department oversees permitting and inspectional services. Their services are located at Town Hall and at buildings throughout the Town. Survey responses indicate that while the Building Department personnel have received training in effective communication with people with disabilities, they have not been trained in the Town's policy of nondiscrimination, they are not aware of the Town's policies/ procedures for responding to reasonable accommodation or auxiliary aid requests, or how to provide outreach in a manner that is accessible. The Building Department notes that there are some barriers within Town Hall, such as accessible counter heights, doorknobs, tactile signage, and audio/ visual assistance.

Department of Public Works

The DPW is made up of 9 employees that are responsible for Town drinking water Town streets, parks playgrounds, and Town buildings. According to the Town's website, the Department of Public Works is "...responsible for the operation and maintenance of the Town's infrastructure in the areas of streets, sidewalks, storm drains, sanitary sewers, snow and ice operations, as well as Town owned buildings, land and cemeteries. The Department of Public Works is also responsible for the treatment, quality control and distribution of public drinking water. The Department of Public Works is committed to providing our citizens with water that meets or surpasses all state and federal drinking water standards..." Their office is located at Town Hall and the DPW Garage.

The DPW Department left many survey responses blank. Survey responses indicate that personnel have not received training in the Town's policy of nondiscrimination, and they are not aware nor have they received training in the Town's policies/ procedures for responding to reasonable accommodation or auxiliary aid requests, communicating with people with disabilities, or providing outreach in a manner that is accessible.

Electrical Inspector

According to the Town's website, the Electrical Inspector oversees permitting and inspectional services for electrical projects within the Town. They are located out of Town Hall. The Electrical Inspector did not respond to the SETP Department Survey.

Fire Department

The Fire Department provides ambulance services, permits, and fire protection services to the community. The Fire Department is located at 150 Main Street and services all properties throughout the Town. Survey responses indicate that the Fire Department personnel have received training in the Town's policy of nondiscrimination. They have not received training in the Town's protocols for responding to requests for reasonable accommodations, but they indicate that they have received training for responding to reasonable accommodation or auxiliary aid requests, and communicating with people with disabilities. Responses indicate that the Department does provide outreach, but materials do not include a statement of nondiscrimination and they are not aware of how to request alternative formats or auxiliary aids for their outreach in a timely manner. The department notes that they do not have an emergency preparedness plan that addresses the needs of individuals with disabilities. The department also notes that the building entrance is not accessible due to the steps. The Fire Station is currently undergoing a renovation. Please see our findings in the Structural section of this report for more information regarding the physical accessibility of the Fire Station.

Health Department

According to the Town's website, the Board is made up of elected members who volunteer their time to ensure compliance with federal, state and local regulations that maintain the safety of public health and the environment through field work, inspections, approval and permitting of regulated activities, public education and policy setting. The Board of Health provides coalition coordination, prevention resources, training for community members, health promotion campaigns, input to local boards for best practices on policy changes that affect substance use (tobacco, marijuana and alcohol), data collection and dissemination for prevention, and coordination of services for residents to promote healthy activity. The Board of Health functions out of Avon Public Buildings such as the school, the Library, the COA, the Town Hall, and local businesses. The Board's survey responses indicate that personnel have received training in the Town's nondiscrimination policy and the Town's policies/ procedures for responding to reasonable accommodation or auxiliary aid requests. Survey responses also indicate that the Board's personnel have not received training in the Massachusetts Relay Service, their methods of outreach do not alert recipients how to request auxiliary aids and services or alternative formats, and the Board does not have access to the appropriate auxiliary aids and services.

Highway Division – DPW

According to the Town's website, the Highway Division of the DPW is primarily responsible for maintaining, and constructing all of Avon's roadways, sidewalks and associated Town properties. They are also responsible for assisting with the Memorial Day parade and Town elections. Their office is located at Town Hall and the DPW Garage and functions under the DPW.

Housing Authority

Limited information is provided on the Town's website regarding the responsibilities of the Avon Housing Authority. They are located at 1 Fellowship Circle and did not respond to the SETP Department Survey.

Human Resources/ Board of Selectmen

According to the survey responses, the Board of Selectmen are the Chief Executive Officers for the Town and the Human Resources Department handles all personnel matters for the Town. They provide alcohol licensing, Class I, II, III licenses, livery licenses, Common Victualler licenses, entertainment licenses, Street Opening Permits, Temporary Sign Permits, notary services, Gift Acceptance Requests, Employment Applications, interviews, and pre-employment screening services. The Board of Selectmen meet at the Selectmen's Office is located at Town Hall, the Mary McDermott Meeting Room at Town Hall, or in front offices such as the Town Clerk's Office. Survey responses indicate that the Board of Selectmen personnel have not received training in the Town's policy of nondiscrimination, and they are not aware nor have they received training in the Town's policies/ procedures for responding to reasonable accommodation or auxiliary aid requests, communicating with people with disabilities, or providing outreach in a manner that is accessible. They do indicate that they are aware of an emergency preparedness plan that addresses the needs for individuals with disabilities. Survey responses also indicate that the doors to Town Hall are not automatic, the ramp is "not to code for handicap accessibility", and there is no accessible ramp to the Mary McDermott Meeting Room.

Responses to the Human Resources survey indicate that the Department has not fully reviewed its policies/ procedures to assure that they do not discriminate against people with disabilities. Additionally, not all staff that conduct interviews have received training in nondiscrimination, policies/ procedures for reasonable accommodations have not been developed or disseminated, the personnel manual is not available in alternative formats and does not include a statement of non-discrimination/ instructions for filing a grievance/ instruction on how to request a reasonable accommodation, and the Town does not have a procedure for responding to requests for reasonable accommodations.

Library Trustees

According to the Town's website, the Avon Library Trustees represent citizen control and governance of the library.

Parking Clerk

According to the Town's website, the Avon Parking Clerk oversees parking violations within the Town. They are located at 150 Main Street and functions under the Police Department.

Parks and Recreation

The Town's Parks and Recreation Department is responsible for all playgrounds, fields and youth programs for the town. They provide a summer program, a teen program, field permits (baseball/soccer), and family movie night services to the residents of Avon. Survey responses indicate that personnel have not received training in the Town's policy of nondiscrimination, and they are not aware nor have they received training in the Town's policies/ procedures for responding to reasonable accommodation or auxiliary aid requests, communicating with people with disabilities, or providing outreach in a manner that is accessible. Locations for their programs include the Avon Civic Center, the Ralph D Butler playground/field, and the Noonan Field/Miller Tracy playground. Survey responses also indicate inaccessible play structures and restrooms at the facilities used by the Department.

Plumbing & Gas Inspector

According to the Town's website, the Avon Plumbing and Gas Inspector oversees all plumbing and gas inspections in Town. They are located at Town Hall. The Plumbing and Gas Inspector did not respond to the SETP Department Survey.

Police Department

According to the Town's website, the Avon Police Department provides typical police functions to the residents of Avon. They also manage anonymous drug tips, oversee a firearms licensing process (temporary), produce public records for the Town, and vacation home checks. The Police Department is also developing an Autism Awareness program. The Police Station is located at 86 Fagan Drive. The Police Department did not respond to the SETP Department Survey.

Recycling & Trash Collection

According to the Town's website, the Recycling and Trash Collection Department oversees all of the Town's recycling and trash collection. They also manage a composting site and bulk item collections. The Department is located at Town Hall and functions under the Board of Health.

School District

The Avon School District is made up of 140 employees and roughly 725 students. It provides educational services to the residents of Avon. The School District is located at the Avon Middle High School, the Ralph D. Butler Elementary School, and the Central Administration Office. The District's survey responses indicate that personnel have received training in the Town's nondiscrimination policy and the Town's policies/ procedures for responding to reasonable

accommodation or auxiliary aid requests. Survey responses also indicate that the District's outreach methods include a statement of nondiscrimination and the District has an emergency preparedness plan that addresses the needs of individuals with disabilities. The District indicates that personnel have not received training in the Massachusetts Relay Service. Please see our findings in the Structural section of this report for more information regarding the physical accessibility of the schools in the Town.

Town Accountant

The Town Accountant processes financial data for the Town. Survey responses indicate that they do not provide services to the residents of Avon. Survey responses indicate that personnel have not received training in the Town's policy of nondiscrimination, and they are not aware nor have they received training in the Town's policies/ procedures for responding to reasonable accommodation or auxiliary aid requests, communicating with people with disabilities, or providing outreach in a manner that is accessible. The Town Accountant notes that they have only been with the Town since January 2020.

Town Administrator

According to the Town's website, the Town Administrator is the Chief Administrative Officer for the Town. The Town Administrator is appointed by the Board of Selectmen and is responsible for all day to day operations of the Town that are under their authority. The Town has appointed Gregory Enos as the Town Administrator. Gregory Enos also serves as the Town's ADA Coordinator. The Town Administrator's Office is located at Town Hall. Survey responses indicate that the Town is currently working on developing several ADA policies and procedures.

Town Clerk

The Town Clerk is the Vital Record Holder who facilitates "elections, dog licensing, public record requests, OML- meeting notices, agendas, minutes, Facebook, and the website. They provide licensing, permits, elections, notarization, vital records requests, DBAs, and recycle tickets." Services are provided at the town clerk counter in Town Hall, the Mary McDermott room for polling place, and the Avon Middle High School auditorium for town meetings. The Town Clerk has received a complaint regarding signage for accessibility into the polling place to which signage was subsequently provided. A majority of the survey responses were left blank. KMA recommends reviewing the Town's accessibility policies and procedures with this department. The Town Clerk also notes that doors at their meeting/ polling locations do not have auto openers and there is no ramp directly to the polling place. They also notes that there are accessibility issues in the public bathroom.

Town Moderator

The Town Moderator is involved in Town meetings. They are located at Town Hall and did not respond to the SETP Department Survey due to a medical condition.

Treasurer/ Collector Department

The Treasurer/ Collector Department is responsible for facilitating the collection of municipal

taxes, payroll, and HR functions. Their services include the collection of taxes, employee new hire, payroll, and HR functions. They are located at Town Hall. Survey responses indicate that personnel have not received training in the Town's policy of nondiscrimination, and while they are they have received training in the Town's policies/ procedures for responding to reasonable accommodation or auxiliary aid requests and in communicating with people with disabilities they are not aware of how to fully implement the policies/ procedures. Additionally, the Department notes that their methods of outreach do not provide notices of nondiscrimination. The Department also notes that the tax collector counter may be too high for accessibility.

Veteran's Services

According to the Town's website, the Veteran's Services Department provides advice and assistance to veterans on things such as State and Federal benefits, healthcare, military records, and headstones/ markers. They are located at Town Hall and did not respond to the SETP Department Survey.

Water Division - DPW

According to the Town's website, the Water Division Department of the DPW "...supplies and distributes potable drinking water to the residents and businesses located within Avon. The Water Division oversees both public and private water construction activities that connect to our municipal water supply. We operate and maintain 42 miles of water main, 457 fire hydrants, two water storage standpipes, eight pumping stations, three water treatment plants, one water filtration plant and one garage facility..." The Water Division also oversees all water meter readings/ installations and provides emergency water repair support. The Department is located at Town Hall and functions under the DPW.

Finding 1: ADA Coordinator. The Town has appointed Gregory Enos, the Town Administrator, to fulfill the responsibility of an ADA Coordinator and indicates that training has been completed with Jeff Dougan and the state for the community access monitor program.

Recommendation 1: KMA recommends Gregory Enos complete the ADA training offered by the National Association of ADA Coordinators:

<https://www.adacoordinator.org/page/Training>.

Finding 2: Grievance Policy & Procedure. The Town is in the process of adopting a Grievance Policy and Procedure to resolve disability related complaints (see DRAFT in Appendix).

Recommendation 2:

- The Grievance Policy should be posted in conspicuous locations in all Town buildings and distributed to all department heads.
- The ADA Coordinator is not listed on the Grievance Policy. Their name and contact information should be provided.

Finding 3: Surcharges. In the response to the Administrative Survey, the Town notes that surcharges are not imposed to recover the cost of accommodations, effective communication services, or accessibility features.

Recommendation 3: None.

Finding 4: Meetings at Accessible Locations. The Administrative Survey responses note that procedures are being finalized to assure meetings, hearings, workshops, and conferences are held in accessible locations.

Recommendation 4: The Town should develop written protocols for accessible meetings and distribute to all departments, boards and commissions. Helpful documents on how to write such protocols can be found on the mass.gov website. See:

<https://blog.mass.gov/mod/access/5-ways-to-improve-event-accessibility/> and
<https://www.mass.gov/files/documents/2016/07/uy/planning-for-accessible-events.pdf>

Finding 5: Licensing/ Certification: Town licenses or certifications (i.e. liquor, restaurant, etc.) have not had the application process thoroughly reviewed to ensure qualified persons with disabilities are not screened out.

Recommendation 5: Provide department training to ensure all Town licenses/ certifications provide equal access to persons with disabilities.

Finding 6: Service Animal Policy. The Town does not have a written policy regarding service animals in municipal facilities.

Recommendation 6: Develop a written Service Animal policy and post it in Town facilities and on the website.

Finding 7: Public Notice. KMA reviewed the Town's DRAFT Public Notice of ADA Compliance (see sample in Appendix).

Recommendation 7:

- Provide the name and contact information for the ADA Coordinator on the Public Notice.
- Develop an abbreviated form of the Notice to be included in program announcements, etc.
- Ensure the Notice includes information on how to request reasonable modifications to programs and states that the Town has grievance procedure
- Ensure the Notice is visibly posted in public spaces of municipal facilities, in publications and digital media, including:
 - a. Building entrances/ lobbies, bulletin boards, and gathering places
 - b. Home page of the Town's website and other pages where information about disability services, public events and facility accessibility is displayed
 - c. Employee handbooks and manuals
 - d. Event posters, flyers, program brochures, and announcements
 - e. Program announcements (in abbreviated form)

Finding 8: Staff Training on Town's Policy of Nondiscrimination. The Administration Survey responses indicate that Town personnel have received training in the Town's policy of nondiscrimination. However, department survey responses indicate that personnel have not received such a training.

Recommendation 8: Ensure all departments are included in a recurring training on the Town's policy of nondiscrimination.

Findings 9: Reasonable Modifications of Policies. The Town is developing a process for responding to requests for modifications to policies or practices for people with disabilities to participate. Currently they are responding in an ad hoc manner. The Town has not provided training in how to respond to requests for reasonable modifications. Additionally, responses to the department self-evaluation surveys indicate that personnel do not have a clear understanding of the Town's ADA policy.

Recommendation 9: Develop and provide guidance on requests for reasonable modifications for all Town departments and new hires to ensure that everyone is aware of how to appropriately respond to requests. This policy should include criteria for determining whether a modification would fundamentally alter the nature of the program or a protocol, and it should ensure that all requests are reviewed by the Town Administrator/ ADA Coordinator. Some examples of how to develop this guidance can be found on the eeoc.gov website. See: <https://www.eeoc.gov/policy/docs/accommodation.html>.

Finding 10: Auxiliary Aids and Services. Responses to the surveys indicate the need to establish the capacity across all Town departments to provide auxiliary aids and services and then to disseminate information about their availability.

Recommendation 10:

- Assess the needs of the community for auxiliary aids and services. Based on the assessment, establish the appropriate vendors and contractual agreements so that aids and services can be provided in a timely manner, for example:
 - TTY or telephone relay service
 - ASL interpreters
 - Assistive listening systems
- Ensure appropriate departments are aware of their obligations to inform the public regarding the availability of Auxiliary Aids for persons who are deaf or hard of hearing and people who are blind or have limited sight.
- Establish department wide guidance regarding the specific Town communications requiring notice of the availability of Auxiliary Aids (e.g. meeting announcements, events, conferences, etc.). See <https://nationaldisabilitynavigator.org/ndnrc-materials/disability-guide/auxiliary-aids-and-services/>

Finding 11: Alternative Formats. Where Town documents are provided, notification is not provided that documents can be requested in alternative formats. For examples, see the policy documents at <https://www.avon-ma.gov/files/sodium-information>.

Recommendation 11: Assess the needs of the community for alternative formats. Based on the assessment, establish the appropriate vendors or protocols so that documents in alternative formats can be provided in a timely manner, for example: taped texts, audio recordings, Braille materials and large print materials. Include notification regarding the availability of alternative formats on the Town website.

Finding 12: Contact Information. Where phone numbers are provided as a means of contacting the municipality, an alternative means of communication (e.g. TTY number or email) is not consistently provided. For example: <https://www.avon-ma.gov/treasurer-collector>

Recommendation 12. Where telephone numbers are provided as a means of contact also include email addresses or link to MA Relay. Include alternate means of communication on all directories, pamphlets, brochures, etc. This can include email addresses or numbers of telephone relay numbers.

Finding 13: Training. Submitted department worksheets indicated a need for training of front-line Town personnel in several aspects of accessible program delivery.

Recommendation 13. Provide training to appropriate personnel in the following:

- The Town's nondiscrimination policy.
- How to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls.
- How to respond to requests for reasonable modifications, auxiliary aids and services and documents in alternative formats.

Findings 14: Title III Entities Using Town Facilities. The Town's policies on the reservation and use of Town Facilities do not include information on the obligation of the Title III Entity (i.e. sports leagues, theater groups, fundraisers) to facilitate the participation of persons with disabilities. For example, see https://www.avon-ma.gov/sites/g/files/vyhlif271/f/uploads/2019field_permit_requesta.pdf

Recommendation 14: Develop language to be included in Town rental agreements that ensure Title III entities of their obligations to facilitate the participation of persons with disabilities.

Findings 15: Use of Contractors. There is a statement of nondiscrimination included in the contract language that stating that the contractor is obligated to follow Federal, state, and local requirements prohibiting discrimination in employment for “mental or physical handicap.” Administration Survey responses indicate that additional steps are necessary to ensure Town contractors are fully aware of the obligations under the ADA.

Recommendation 15:

- Develop language to be included in Town contracts that alerts contractors of their obligations to facilitate the participation of persons with disabilities in programs and activities the contractor operates on behalf of Avon. This should extend beyond just employment measures. The Town should also develop materials for contractors explaining the Title II obligations they inherit when contracting with the Town.
- Modify the contract language so it does not include stigmatizing language. See Finding 17 for more information.

Finding 16: Transportation. The Town’s Council on Aging provides transportation services and is currently working on developing procedures for responding to requests from persons with disabilities. The Council on Aging van is maintained by the Brockton Area Transit and its drivers trained by the Brockton Area Transit.

Recommendation 16: Work with the Council on Aging to ensure a policy is developed to respond to requests from persons with disabilities who use the van service. This policy should include procedures for providing the schedule and route in an accessible format. Additionally, the contractors associated with the Council on Aging van should follow the Recommendations in Finding 15, above.

Finding 17: Documents & Publication. Town documents/ announcements appear to use stigmatizing language (e.g. “handicapped”). For example, see the Town’s Employment Application form and the contractor form.

Recommendation 17: Ensure the Town’s policy on nondiscrimination includes information on patronizing or stigmatizing language and/or images. “People-first” or “person-first” language is a way of describing disability that involves putting the word “person” or “people” before the word “disability” or the name of a disability, rather than placing the disability first and using it as an adjective. Some examples of people-first language might include saying “person with a disability,” “woman with cerebral palsy,” and “man with an intellectual disability.” The purpose of people-first language is to promote the idea that someone’s disability label is just a disability label—not the defining characteristic of the entire individual. Many guides on disability language and etiquette may likely emphasize using person-first language, except, perhaps, when discussing certain disability cultural groups that explicitly describe themselves with disability-first language. Thus, while it is generally a safe bet to use people-first language, there are members of certain disability groups in the US who prefer *not* to use it, such as the American Deaf community and a number of Autistic people/ Autistics. The basic reason behind members of these groups’ dislike for the application of people-first language to themselves is that they consider their disabilities to be inseparable parts of who they

are. Using person-first language, some also argue, makes the disability into something negative, which can and should be separated from the person.

Finding 18: Website. Generally, the Town of Avon's website is substantially accessible and can be made more user friendly with small modifications. However, there is little information on the website regarding access to programs and services for people with disabilities. See Appendix for more in depth technical analysis.

Recommendation 18:

- Modify the Town's website per the suggestions found in the web analysis section of this report (in the Appendix). Suggested modifications include: increased color contrast, clarifying linked text descriptions and file types, ensuring PDF documents are accessible, and including more consistent headers.
- Include an accessibility page that includes more information regarding access to programs and services for people with disabilities. Information on the accessibility of facilities, information on the Town's accessibility policies (nondiscrimination, service animal, grievance procedure) communication materials, and the process for requesting accommodations or auxiliary aids/services would be helpful.
- Include how to request an accommodation in all meeting announcements posted to the Town's website.
- As the Town budget and schedule allows, redesign the website to fully conform with Section 508 of the Rehabilitation Act and W3C-WAI's WCAG 2.0

Finding 19: Emergency Preparedness. A formal emergency preparedness plan was not provided for review. The Police Department did not fill out a Department Survey.

Recommendation 19.

- Ensure a formal emergency preparedness plan is developed that includes:
 - Training for first responders in effective communication with people with disabilities.
 - Provisions to ensure that equal access to safe egress is provided for any visitor, member of the community or employee, including additional assistance if required to effectively evacuate and/or shelter them during an emergency.
 - Protocols and signage for such issues as:
 - Fire exits signage and maneuvering space;
 - Safe wait areas;
 - Evacuation Maps;
 - Locations of fire exits and safe wait areas serving each municipal space; and
 - Public and employee orientation to the Town 's emergency evacuation procedures.
- Review the Police Department's policies/ procedures and ensure recurring training is provided for all officers/ emergency personnel on how to communicate with members of the community with disabilities.

- The Police Department website notes that an Autism Awareness program is being developed. Ensure this program is thoroughly reviewed so that it does not discriminate against people with disabilities. Additionally, a process for requesting the registration form in alternative formats is not available.

Finding 20: Employment. A review of the Employment Survey responses indicates that the Town's employment practices, procedures, and personnel have not been thoroughly reviewed for accessibility. An employee manual was not provided for review. The Town has hired an outside firm to revise job descriptions and organize the HR personnel files.

Recommendation 20.

- Review all of the employment policies/ procedures to ensure they do not discriminate against individuals with disabilities. KMA recommends updating the personnel manual to reflect the findings of the review.
- Ensure the hired HR Firm follows the obligations for contractors noted in Finding 15.
- Ensure all staff who conduct interviews have received ADA training.
- Develop formal policies/procedures relative to requests for reasonable accommodations.
- Ensure the Town's Personnel Manual will be available in alternate formats and will include information on how to request reasonable modifications.
- Develop a procedure for responding to requests for a reasonable accommodation by an applicant or employee. KMA recommends including a copy of the Grievance Procedure in the Personnel Manual and on the Town's employment web page.

B. STRUCTURAL FINDINGS

KMA audited the following buildings:

Avon Middle-High School	Fire Station
Avon Public School Administration Office	Library
Butler Elementary School	Police Station
Civic Center + Council for Aging	Town Hall
DPW Garage	

In addition, KMA audited the following exterior areas:

Avon Middle-High School	DW Park
Bartlett Street	Fagan Drive / Crowley
Butler Elementary School	Moses Curtis

Cemetery	Pharmacy Park
DeMarco Park	Tracy-Miller

The Town has made progress removing structural barriers to programs in its facilities. Below is a table identifying the principal architectural barriers identified, recommended mitigations, and a draft implementation schedule. The information below is ordered chronologically by priority. For example, in the Buildings section the Library is listed first as it appears to be a highly visible and highly trafficked building. The issues listed in the Principal Barriers section for the Library are also listed with the highest priority items at the top.

Finding 1: Buildings.

Building	Principal Barrier(s)	Recommendation(s)	Schedule
Public Library	The Library is currently undergoing a renovation to address accessibility issues. A preliminary review of the plans revealed some areas that do not conform to the requirements of the 2010 ADA Standards.	In the immediate future, KMA recommends performing a more comprehensive review of the renovation drawings for accessibility requirements. KMA also strongly recommends reviewing for the requirements of the local accessibility code, 521 CMR, as part of this review.	1 Month
	The parking area lacks a van accessible space.		
	Accessible parking spaces lack access aisles and have slopes >2%.	Designate an alternative accessible employee area on the main floor for use at request of employees. Ensure all programs offered in the employee areas on the lower floors are capable of being provided in this space. If an alternative location is used, information on its location and the process for requesting its use must be disseminated.	6 Months
	The curb ramp serving the accessible parking has running slopes >8.3%.		
	The community room is not on an accessible route. This is being addressed by the renovation, but there were some issues of non-compliance identified in the drawings.		1 Year
	The toilet rooms at the community room lack the required footprint for an accessible bathroom. This is being addressed by the renovation, but there were some issues of non-compliance identified in the drawings.	Due to the high traffic of the Library and the fact that it is currently undergoing a renovation, KMA recommends mitigating all the barriers identified in the audit report.	
	Accessible tables/ workstations are not provided.		

	<p>The patio slider door threshold is too high.</p> <p>The TV in the community area protrudes into the circulation space.</p> <p>The lower level is not located on an accessible route and lacks an accessible toilet room. KMA understands this floor is for employees only.</p>		
Fire Station	<p>The fire station is currently under construction. A preliminary review of the plans revealed some areas that do not conform to the requirements of the 2010 ADA Standards.</p>	<p>In the immediate future, KMA recommends performing a more comprehensive review of the renovation drawings for accessibility requirements. KMA also strongly recommends reviewing for the requirements of the local accessibility code, 521 CMR, as part of this review.</p>	1 Month
Police Station	<p>The entry stairs lack handrails.</p> <p>The drinking fountains protrude into the circulation space.</p> <p>The door thresholds are not beveled at maximum 1:2.</p> <p>The booking area phone is too high.</p> <p>The accessible jail cell lacks a visual alarm.</p> <p>The door to the employee bathroom lacks maneuvering clearances.</p> <p>The employee locker room shower thresholds are too high, and the shower controls are not mounted in the correct locations.</p> <p>The employee locker room accessible toilet stalls are too small, and they lack door maneuvering clearances and visual alarms.</p> <p>The urinal in the employee locker room is located in a deep alcove that is not wide enough.</p> <p>The employee mail receptacles and</p>	<p>Due to the high traffic of the Police Station and the fact that it recently underwent a major renovation, KMA recommends mitigating all the barriers identified in the audit report. Since the mitigations noted in the audit report for the areas accessed by the public are relatively small KMA recommends mitigating them in the more immediate future.</p> <p>KMA recommends mitigating barriers to employee common use spaces identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as Town budget permits.</p>	1 Year

	<p>phone are too high.</p> <p>The TV in the employee training room protrudes into the circulation space.</p>		
Town Hall	<p>The parking serving Town Hall lacks a van accessible space and the signage is mounted too low.</p> <p>The counters are mounted too high and protrude into the circulation space.</p> <p>Permanent rooms and spaces lack the required tactile/ braille signage.</p> <p>Door hardware required tight grasping and twisting of the wrist to operate.</p> <p>The toilet rooms serving the community room have mirrors mounted too high, incorrect toilet CLs, and lack the required grab bars.</p> <p>The toilet rooms serving the multipurpose room lack the required footprint for an accessible bathroom.</p> <p>The hallway door to the multipurpose room lacks a level landing.</p> <p>The TV and AED box protrude into the circulation space.</p> <p>The AED box controls are mounted too high.</p> <p>Accessible tables are not provided in the Selectmen's Board Room.</p> <p>The employee toilet rooms lack the required footprint for an accessible bathroom.</p> <p>The employee kitchen area sink is too high and lacks the required knee/ toe clearance for a forward approach.</p> <p>If the exit doors serve as an</p>	<p>Due to the high traffic of Town Hall, KMA recommends mitigating all the barriers identified in the audit report.</p> <p>KMA recommends prioritizing the exterior parking to its high visibility.</p> <p>In the more immediate future:</p> <ul style="list-style-type: none"> • Modify the service counters • Install tactile/ braille signage • Replace the door hardware • Designate the toilet rooms as unisex and modify at least one to be fully accessible. Ensure the information on the accessible toilet room is disseminated to employees and the public. • Designate an alternative accessible meeting area for the multipurpose room. Ensure all programs offered in the multipurpose room are capable of being provided in this space. If an alternative location is used, information on its location and the process for requesting its use must be disseminated. • Provide an accessible table in the Selectmen's Board Room. • Develop an emergency egress plan that addresses the needs for individuals with disabilities and accounts for the potential architectural barriers at the exit doors. 	<p>2 Years</p> <p>1 Year</p> <p>6 Months</p>

	emergency accessible means of egress, they lack the required clear width and maneuvering clearances.		
Civic Center & Council on Aging	<p>Accessible parking is not provided.</p> <p>The ramp and walkways to the Council on Aging have cross slopes >2%.</p> <p>The entry doors lack a level landing and the thresholds are too high.</p> <p>The toilet rooms in the Civic Center, the recreation room, and the Council on Aging lack the required footprint for an accessible bathroom.</p> <p>Accessible elements in one of the Council on Aging toilet rooms are not mounted in the correct locations and the entry door lacks maneuvering clearances.</p> <p>The Council on Aging kitchen lacks the required clearances between opposing elements. Additionally, some controls are not within an accessible reach range and the sink lacks the required knee/ toe clearance for a forward approach.</p> <p>The Civic Center lacks an accessible desk.</p> <p>The employee toilet room in the Council on Aging lacks the required footprint for an accessible bathroom.</p> <p>The Council on Aging employee offices have door hardware that requires tight grasping and twisting of the wrist to operate.</p> <p>If the exit door is an emergency accessible means of egress it lacks the required clear width and maneuvering clearances.</p>	<p>Due to the high traffic of the Civic Center and Council on Aging, KMA recommends mitigating all the barriers identified in the audit report.</p> <p>KMA recommends prioritizing the exterior parking, ramp, and door landings to their high visibility.</p> <p>In the more immediate future:</p> <ul style="list-style-type: none"> • Designate the toilet rooms as unisex and modify at least one per building to be fully accessible. Ensure the information on the accessible toilet room is disseminated to employees and the public. • Develop a policy to have employees assist residents with the use of the kitchen in the Council on Aging to be utilized until a renovation occurs. Ensure the information on the policy is disseminated to employees and the public. • Provide an accessible desk in the Civic Center. • Develop an emergency egress plan that addresses the needs for individuals with disabilities and accounts for the potential architectural barriers at the exit doors. 	<p>3 Years</p> <p>2 Years</p> <p>1 Year</p>
Avon Middle-High School	The accessible route from the parking has running slopes >5%,	Due to the high traffic at AMHS for Town meetings and the fact that	4 Years

(AMHS)	<p>cross slopes >2%, and changes in level.</p> <p>The entry ramp lacks edge protection.</p> <p>The intercoms are too high.</p> <p>The toilet room thresholds are too high.</p> <p>The toilet room grab bars are not mounted in the correct locations.</p> <p>The toilet room coat hooks are too high.</p> <p>The accessible toilet centerlines are not 16"-18".</p> <p>The toilet paper dispensers are not mounted 7"-9" from the front edge of the toilet.</p> <p>Some of the bathroom dispensers are not mounted in the correct location and protrude into the circulation space.</p> <p>The drinking fountains protrude into the circulation route and are mounted too low.</p> <p>Some of the doors lack the required push side maneuvering clearances within 8" of the face of the door.</p> <p>The auditorium lacks the minimum number of required accessible seating spaces.</p> <p>The cafeteria and library lack accessible seating.</p> <p>There are no accessible desks/works stations in the classrooms.</p> <p>Locker controls and shelves are not accessible.</p> <p>The locker rooms lack accessible showers and benches.</p> <p>The kitchen classroom oven controls are too high.</p>	<p>this building also serves the student population of the Town, KMA recommends mitigating all the barriers identified in the audit report.</p> <p>KMA recommends prioritizing the exterior parking, exterior accessible route and the ramp due to their high visibility.</p> <p>In the more immediate future, address the areas used for Town Meetings:</p> <ul style="list-style-type: none"> • Lower the intercoms • Modify the toilet rooms used for Town events. Ensure the information on the accessible toilet rooms are disseminated to employees and the public. • Modify any drinking fountains along the routes used for Town events. • Provide the minimum required number of accessible seats in the auditorium. 	<p>2 Years</p> <p>1 Year</p>
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	<p>The accessible route from the parking has running slopes >5%, cross slopes >2%, and a curb ramp with excessive slopes.</p> <p>Faculty bathrooms have accessible elements that are not mounted in the correct locations and furniture obstructing the required clearances.</p>		
Butler Elementary School	<p>Accessible parking is not provided.</p> <p>The curb ramp at the parking area has running slopes >8.3%.</p> <p>The route from the parking to the entrance has cross slopes >2%.</p> <p>The interior and exterior ramps have running slopes >8.3%, lack the required handrails, and lack edge protection.</p> <p>The main entry doors lack maneuvering clearances.</p> <p>Permanent rooms and spaces lack tactile/ braille signage.</p> <p>Door hardware required tight grasping and twisting to operate.</p> <p>Two of the multiuser toilet rooms lack the required footprint for an accessible bathroom.</p> <p>Accessible elements in the multiuser toilet rooms are not mounted in the correct locations.</p> <p>One of the multiuser toilet rooms lacks and ambulatory stall.</p> <p>Some doors lack maneuvering clearances.</p> <p>Drinking fountains protrude into the circulation space.</p> <p>Classroom sinks are mounted too high.</p> <p>There are no accessible desks/ works stations in the classrooms.</p>	<p>Due to the fact that this building serves the student population of the Town, KMA recommends mitigating all the barriers identified in the audit report.</p> <p>KMA recommends prioritizing the exterior parking, the curb ramp, and the exterior accessible route due to their high visibility.</p>	<p>6 Years</p> <p>2 Years</p>

	<p>An accessible route is not provided to the cafeteria stage.</p> <p>The nurse's office lacks an accessible bathroom.</p> <p>Staff bathrooms lack the required footprint for an accessible bathroom and accessible elements are not mounted in the correct locations.</p>		
Avon Public School Admin Office	<p>Accessible parking is not provided.</p> <p>Inaccessible entrances lack directional signage.</p> <p>One of the entry ramps has running slopes >8.3%.</p> <p>One of the entry ramps lacks a level landing, has a change in level >0.25", and lacks the required handrails/ handrail extensions.</p> <p>Entry thresholds are >0.5" tall.</p> <p>An accessible toilet room is not provided in the building.</p> <p>Accessible door hardware is not provided.</p> <p>Door hardware required tight grasping and twisting to operate.</p> <p>The reception counter is too high.</p> <p>The door to the superintendent's office lacks maneuvering clearances.</p> <p>Doors to interior offices lack maneuvering clearances.</p>	<p>Due to the moderate traffic at the Avon Public School Administration Office, KMA recommends mitigating all the barriers identified in the audit report.</p> <p>KMA recommends prioritizing the areas open to the public.</p>	7 Years

DPW Garage	<p>Accessible employee parking is not provided.</p> <p>The employee toilets rooms are not accessible.</p>	<p>Due to the relatively low traffic of this building and no public access, KMA recommends mitigating barriers identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as Town budget permits.</p>	8 Years
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Finding 2: Athletic Facilities. KMA did not observe any fully accessible athletic facilities in the Town of Avon. KMA reviewed the Avon Middle-High School baseball field, the Bartlett Street courts, the fields at Butler Elementary School, and the fields at Fagan Drive/ Crowley Park. Athletic facilities lacked accessible routes, accessible parking, accessible seating, and accessible gates.

Recommendation 2A: Due to the intensive use of the Avon athletic facilities, KMA recommends providing accessible athletic facilities within the next five years. At least one of each type of athletic facility (e.g. baseball field, tennis court, basketball court, track etc.) should be made accessible, with priority going to those with the highest use.

Recommendation 2B: KMA did not observe any portable toilets at the athletic facilities. If provided, ensure at least one accessible portable toilet serving each athletic facility will be installed and designated as unisex. Ensure the accessible portable toilet is located on an accessible route.

Finding 3: Play Areas. KMA did not observe any fully accessible play areas in the Town of Avon. KMA reviewed the playground at Butler Elementary School and the Tracy Miller Playground. The play areas lacked an accessible route, an accessible play surface, accessible play features, accessible seating, and accessible parking spaces.

Recommendation 3: Provide at least one fully accessible playground within the next five years with priority going to the one with the highest use. KMA has been informed that the Town plans to modify the Butler School playground. Ensure any modifications to existing play areas are done in compliance with the 2010 ADA Standards. Information regarding the accessible playgrounds should be disseminated to residents and available on the Town website. For information on accessible play area requirements please see: <https://www.access-board.gov/attachments/article/1369/play-guide.pdf>.

Finding 4: Trails. KMA did not observe any fully accessible trails in the Town of Avon. KMA reviewed the trails at DW Park and the DeMarco Park Trails. They lacked accessible parking spaces and an accessible route to the trailhead.

Recommendation 4: Since this is the only trail operated by the Town, KMA recommends mitigating all the barriers identified in the audit report within the next five years.

Finding 5: Parks. KMA observed DeMarco Park, Moses Curtis Memorial Park, and Pharmacy Park. When provided, they lacked accessible parking, accessible routes to amenity features, and accessible seating.

Recommendation 5: KMA recommends mitigating all the barriers identified in at least one park within the next five years with priority going to the park that has the highest use/traffic.

Finding 6: Sidewalks. KMA did not observe sidewalks as part of the scope of this project. However, there were several public comments expressing concerns for sidewalks within Town.

Recommendation 6: KMA recommends ensuring any planned/ future sidewalk renovations are carefully monitored to ensure they fully conform to the requirements of the 2010 ADA Standards.

SECTION 5: SUMMARY OF PUBLIC SURVEY RESPONSES

KMA developed an online public comment survey to get input from citizens of the Town of Avon regarding their ideas and concerns about the accessibility of the Town programs and facilities. The survey was made up of five questions that ranged from asking about the ease of use of Town facilities/buildings to whether residents understand where to go to request an accommodation. The survey was distributed on the Town's email, website, and social media pages. KMA received 54 online responses. The focus of the responses was on the physical/structural accessibility of the Town. The principal issues raised in the survey responses include:

1. Comments to the survey acknowledge a general need for the Town to make accessibility improvements.
2. Parks are not accessible.
3. The Library is difficult to access.
4. The Town's website is difficult to use.
5. Many of the respondents do not know how to request Town materials in an alternate format or how to request an accommodation.
6. The Town lacks sidewalks, especially at North Main Street.
7. Some residents have had difficulty getting information on a Town service, program, or event.

Survey Responses:

1. **Question:** Are there Town buildings/facilities (building structures, parks, playgrounds, trails, docks, recycling centers, etc.) that you have had difficulty using?

Responses: 8 yes/ 46 no

Comments:

- We have not had a chance to use anything but the parks trail as the driving into the WDFields is not yet letting vehicles in.
- Parks are often not open
- The hours/days if the Recycling Center needs to be expanded to a longer period. Buying tickets should be done at the Recycling site too, not only at the Town Hall.
- DeMarco Park is great but paved paths, lighting and picnic tables would be nice for Avon residents only. Areas for 6 -9 graders to hang outside
- Public Library is difficult to access.
- Butler school parking lot
- DeMarco Park

2. Question: Have you ever had difficulty getting information about a Town program, service, or event?

Responses: 12 yes/ 42 no

Comments:

- Sometimes it feels like you have to be "in the know" . I do get email updates now, but facebook would be helpful, too, imo
- I am disabled and under the age of 60 and was told by the COA that I did not qualify for any of their services due to my age. I do not believe that is fair or maybe even legal.
- notices in the mail come too late.
- In the past the Town has closed spontaneously and did not put away messages on their phone. Every employee who has a phone line should put an away message on their email and voice mail so that residents know they are unavailable that day and when that person will be available again.
- Your website is not user friendly. It is confusing and difficult to find information.
- In the past the town hasn't fully utilized the website to provide easy to access information. I believe it's getting better, but improving the functionality and ease of access of the website would be appreciated.
- Wish summer camp info/registration came out sooner for planning purposes. Obviously this year is different but in the future i would rather keep my money in avon then sending out of town for childcare.
- Park & Recreation should share information with the main town departments so that news of things that are going on gets spread to the parents quicker we also need to opt in and use technology for signing up for lots of upcoming events they plan on having
- Sometimes the info is vague or confusing

3. Question: Do you know how to request Town materials in alternate formats (for example, large print or Braille)?

Responses: 9 yes/ 45 no

4. Question: Do you know how to request an accommodation (for example, ASL

interpreters or assistive listening systems) for Town services and events?

Responses: 6 yes/ 48 no

5. Question: Any other comments about accessibility?

Comments:

- I haven't needed an accommodation and thus I have not had any reason to look for information regarding how to request either an accommodation or alternative format documents
- Hello, I have a suggestion about the streets lighting not bright enough. The street lights are not bright enough. Would it an energy savings to switch these old street lights to LED lights? Other town already installed LED lights in the streets, like Randolph switched then years ago. It is also a safety issue. Thank you
- Please adhere to state minimums. Lower my taxes please.
- I dont know how to request for 3 and 4, but im sure If I needed those I could find someone in the town office to direct me to the correct place
- closing fridays at 1pm is not convenient. I get in the summer but not year round
- Closing early of Town Hall on Friday should be looked at with the possibility of maintaining normal hours with a skeleton staff to accommodate the residents, not to give civil servants a longer weekend.
- The pavement on North Main Street before the town line is terrible. How anyone would comfortably get a wheelchair or any other assistance device on those horrible sidewalks is beyond me.
- It seems that there is plenty of room for a dog park and walking / dog park in the area along Fagan drive
- The streets and vacant lots are a real eyesore in comparison to neighboring towns/cities - Randolph, Holbrook, Stoughton and Braintree. There are main thoroughfares that look like trash ridden overgrown neglected lots. The transition from N Main to E Main is an embarrassment! Broken sidewalks poorly tended vacant lots unattractive median poor signage inappropriate traffic lights for an exit off of Rt 24 the lost is endless. We pay ample taxes so I'm not sure why those dollars aren't being used to improve the town.
- To visit Demarco Park for events, some may need to park a distance away due to its' main st. location. Could be difficult for old or injured. True of other parks also due to town's small size.

SECTION 6: SUMMARY OF DRAFT REPORT RESPONSES

KMA submitted a DRAFT SETP report to the Town of Avon on 07.30.2020. The DRAFT report was submitted to Town Departments for review. KMA received the following in response to our DRAFT Report:

- Email Comments from Gregory Enos 08.06.2020
- Email Comments from Chief Jeffery Bukunt 08.06.2020
- The DPW Department submitted a Department Survey on 08.06.2020
- Email Comments from Gregory Enos 09.02.2020
- Email Comments from the ACG Group 09.09.2020
- Email Comments from Gregory Enos & Mike Carter 09.15.2020

KMA made several updates to the reports based on the clarifications provided in these responses. For example, we updated some of the Department descriptions to better reflect who oversees them. Additionally, there were two areas identified in the responses that required KMA to go back and review. These areas were the DeMarco Park Trails and the shared parking area at Town Hall, the COA, and the Civic Center. We have updated the reports to reflect the findings of the subsequent site visit and email conversations with the Town.

APPENDIX

AVON GRIEVANCE POLICY

SAMPLE PUBLIC NOTICE OF ADA COMPLIANCE

SAMPLE EVENT LANGUAGE

WEBSITE ANALYSIS

FUNDING RESOURCES

SURVEY FORMS

Administration

Departments

Employment

Public

COMPLETED SURVEYS

DEPARTMENT SURVEY RESPONSE TABLE

ACCESS AUDIT REPORTS

AVON GRIEVANCE POLICY

BOARD OF SELECTMEN
Steven P. Rose, Chairman,
Robert F. Brady, Jr., Clerk
Eric S. Beckerman, Associate

Gregory S. Enos
TOWN ADMINISTRATOR

Town of Avon
Massachusetts

Town Offices
Buckley Center 02322
(508) 588-0414
FAX (508) 559-0209



GRIEVANCE PROCEDURE UNDER THE AMERICANS WITH DISABILITIES ACT

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

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

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to: "The Office of the Town Administrator, 65 E. Main Street, Avon Massachusetts, 02322."

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

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

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

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

DRAFT

SAMPLE PUBLIC NOTICE OF ADA COMPLIANCE

Long

Americans with Disabilities Act

(Name of Public Entity) does not discriminate on the basis of disability in its services, programs, or activities.

Employment: (Name of Public Entity) does not discriminate on the basis of disability in its hiring or employment practices and complies with the ADA title I employment regulations.

Effective Communication: (Name of Public Entity) 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: (Name of Public Entity) 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 (Name of Public Entity) 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 (ADA Coordinator name and contact information) as soon as possible, preferably XX days before the activity or event.

Complaints: Send complaints to (ADA Coordinator name and contact information).

Short

Americans with Disabilities Act

The (Name of Public Entity) does not discriminate on the basis of disability in its programs, services, activities and employment practices.

If you need auxiliary aids and services for effective communication (such as a sign language interpreter, an assistive listening device or print material in digital format) or reasonable modification to programs, services or activities contact the ADA Coordinator as soon as possible, preferably XX days before the activity or event.

A grievance procedure is available to resolve complaints.

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

(ADA Coordinator name and contact information)

SAMPLE EVENT LANGUAGE

For additional information or to request accommodations to participate in this meeting (event) contact (###) ###-#### or MA Relay 711 or email AppropriatePerson@address.org. Meeting materials in alternate formats can be made available upon request. Notification 72 hours prior to the meeting will allow the Town to make reasonable arrangements to ensure accessibility to this meeting. Note, the (meeting location) is an accessible facility.

WEBSITE ANALYSIS

KMA, LLC conducted a cursory review of the Town of Avon's website (<https://www.avon-ma.gov/>) in order to help identify any significant and recurring accessibility and usability problems. The basis for the review was the guidance from Section 508 of the Rehabilitation Act and W3C-WAI's WCAG 2.0.

KMA utilized WebAim's WAVE Toolbar, and The Paciello Group's Colour Contrast Analyzer (CCA) and ARC Toolkit to review the Town's web site.

Generally, the Town of Avon's website is substantially accessible and can be made more user friendly with small modifications.

Suggested modifications include:

- Increased color contrast (ex: search bar);
- Link text that clearly describes the destination or function of the text. Avoid link text such as "read more";
- Links to PDF documents should indicate the file type;
- Ensure that PDF documents are accessible,
- Inclusion of first and third level headers: Due to the amount of information presented on the website, the addition of consistent headers would allow users of screen readers and other assistive technology to navigate web pages by structure.

FUNDING RESOURCES

Municipal Americans with Disability Act (ADA) Improvement grant

The Massachusetts Office of Disability (MOD) offers a project grant, the [Municipal Americans with Disability Act \(ADA\) Improvement grant](#), for cities and municipalities that have an SETP in place; this grant can be used for the removal of architectural barriers or barriers to communication.

Project examples include but are not limited to increasing both physical access and programmatic access through the addition of features such as: ramps, elevators, power lifts and Limited Use/Limited Application (LULAs), signage, communication access devices, curb cuts, and/or any other features that are designed to improve architectural access/or programmatic access.

Note: Municipalities must be members, or willing to become members, of the State's [Community Compact Cabinet](#) (CCC) to apply for project grants. Municipalities that have selected the "[Public Accessibility Best Practice](#)" option will increase their grant score. By selecting the "Public Accessibility Best practice" option, municipalities commit to completing an Americans with Disabilities Act (ADA) Self-Evaluation and Develop a Transition Plan or to strive for the [Universal Participation](#) (UP) designation from the Mass Cultural Council, which aims to increase accessibility at cultural facilities.

Grant [application](#) (online) opens in August and closes in October. Grants are awarded or denied in December.

Community Development Block Grant (CDBG)

Community Block Grants are available to municipalities with fewer than 50,000 residents who do not receive Community Development Block Grant (CDBG) funds directly from the federal Department of Housing and Urban Development (HUD). Communities can apply for funds to cover a variety of projects that include the removal of architectural barriers to allow access by persons with disabilities. A community that applies for an architectural barrier removal grant must complete a grant application that delineates a SETP or a Memo of Understanding that is co-signed by the Department of Housing and Development and the Department of Justice. The community must also state that it will complete an SETP within five years of the signing.

Grant [application](#) (online) opens in December and closes in March. Applicants must register with the State of Massachusetts CDBG Grant Management System.

[CDBG Technical Assistance Guide for Architectural Barrier Removal](#)

SURVEY FORMS

A. ADMINISTRATION

Town of Avon MA

ADA Self Evaluation & Transition Plan: Administration Survey

Name of Individual filling out this form:

Position:

Phone:

Email:

Policy/Procedure	Yes	No	N/A	Comments
A. GENERAL PROCEDURES				
1. Has an employee been appointed to coordinate the public entity's ADA obligations - ADA Coordinator? (Required if 50 or more employees.).				Name and title
a. ADA Coordinator has received ADA training.				Please provide date of last training
2. A Grievance Policy and Procedure has been adopted to resolve disability related complaints? The policy includes the name and contact information of the employee responsible for receiving and processing discrimination complaints. _				Please attach
a. The Grievance Policy is posted in conspicuous locations in all Town buildings.				Name and contact info
b. The Grievance Policy has been distributed to all department heads, boards and commissions.				
3. Surcharges are not imposed to recover the cost of accommodations, effective communications services or accessibility features.				

4. Procedures are established to assure meetings (including Boards and Commissions), hearings, workshops, and conferences, are held in accessible locations.				Please describe
5. List any licenses or certifications issued by the Town (liquor, restaurant, etc.) and indicate whether the application process has been reviewed to ensure that qualified persons with disabilities are not screened out:				
a.				
b.				
c.				
d.				
B. NOTIFICATION				
2. Public Notice of ADA compliance has been developed and is visibly posted in public spaces of municipal facilities, in publications and digital media including:				Please attach
a. Building entrances/lobbies, bulletin boards and gathering places				
b. Home page of the Town's website and other pages where information about disability services, public events and facility accessibility is displayed				
c. Employee handbooks and manuals				
d. Event posters, flyers, program brochures and announcements				
e. Program announcements (in abbreviated form)				
3. Appropriate staff have received training regarding:				Please describe how this is accomplished.

a. the Town's policy of nondiscrimination,				
b. how to respond to requests for reasonable modifications,				
c. their roles and responsibilities in providing auxiliary communication aids and services,				
d. the available resources for providing auxiliary aids and services,				
e. effective communication with people with disabilities.				
f. Use of the Massachusetts Relay Service to make and receive calls.				
C. REASONABLE MODIFICATIONS OF POLICIES				
1. The Town has a process for responding to requests for modifications to policies or practices if the modification is necessary for a person with a disability to participate?				
a. The process includes criteria for determining whether a modification would fundamentally alter the nature of the program.				

D. SERVICE ANIMALS				
1. The Town has a written policy regarding service animals in municipal facilities.				Please attach
E. USE OF CONTRACTORS				
1. The Town has included language in its contracts to ensure that contractors are aware of their obligations to facilitate the participation of persons with disabilities in programs and activities the contractor operates on behalf of the Town.				Please attach sample language
2. The Town has developed a procedure to disseminate information about ADA requirements to contractors.				Please describe how this is accomplished.
F. TRANSPORTATION				
1. The Town provides or contracts for transportation services. (If the answer is no, skip the rest of this section)				
2. The Town or contractor has procedures for responding to requests from persons with disabilities to provide schedule and route materials in a timely manner in an accessible form.				
3. The Town or contractors have procedures to provide information with no delay nor additional cost to persons with disabilities.				
4. The Town or contractor provides training and testing to assure employees are fully qualified to serve passengers with disabilities.				
5. The Town or contractor has a policy that requires regular and frequent checks of lifts, as well as other access-related equipment or vehicles.				
G. COMMUNICATIONS				

1. There is a policy requiring and implementing procedures for making Auxiliary Aids and Services available to persons who are deaf or hard of hearing and people who are blind or have limited sight.				
a. All program announcements include information about how to request an auxiliary aid or service.				
b. Sound amplification and assistive listening systems are available and maintained in assembly/meeting spaces and performance areas.				
c. The Town has a procedure to ensure that qualified interpreters are provided in an expeditious manner when requested in advance at meetings, hearings, interviews, conferences or public appearances by Town officials.				
2. The Town has the resources necessary to provide materials in alternative (to traditional print) formats including large print, audio and/or scanned material for use with screen readers,				Please describe how this is accomplished.
3. Where phone numbers are provided as a means of contacting the municipality, an alternative means of communication (e.g. TTY number or email) is also provided.				
a. TDD numbers or telephone relay numbers been added to all The Town directories, pamphlets, brochures, letterhead, etc.				

H. DOCUMENTS AND PUBLICATION				
1. The Town has reviewed public documents to eliminate patronizing or stigmatizing language and images.				
I. WEBSITE				
2. Is there a policy regarding the accessibility of the Town's webpages, that is, in compliance with the W3C Web Content Accessibility Guidelines (WCAG) 2.0 or Section 508 Standards?				
3. Are the staff and contractors who are responsible for webpage and content development aware of the policy and knowledgeable about these standards?				
4. Has the website been tested for compliance with either of these standards?				
a. If yes, have people with disabilities who use screen reading software and other assistive technology participated in the evaluation?				
J. EMERGENCY EVACUATION				
1. Municipal alerts and emergency warnings are sent in multiple formats?				
2. Emergency evacuation procedures from buildings address the needs of individuals with disabilities.				Please attach a copy of the section of your emergency preparedness plan that addresses individuals with disabilities
3. Emergency personnel are trained in effective communication with people with disabilities.				

If you have any questions, please contact: Katie Denis, kdenis@kmaccess.com

B. DEPARTMENT

Note: this survey was also made available online.

Town of Avon MA

ADA Self Evaluation & Transition Plan: Department Survey

Department Name:

Department Contact Person:

Phone:

Email:

1. Please provide a brief description of your department:

2. Please provide a list of the programs/ services your department provides to residents of the Town (licensing, permits, youth soccer, notarization, etc.).

3. Please provide a list of the locations where the programs/ services noted in Question 3 are located.

4. What, if any, do you think may be barriers (architectural, operational, etc.) for individuals with disabilities to access your programs/services?

5. Have you ever received feedback that one of your programs was difficult to access by an individual(s) with a disability? If yes, please describe:

6. Do you charge any user fees related to providing accessibility to you programs? If yes, please describe:

7. Do you offer any separate services, programs or activities for people with disabilities? If yes, please describe:

Note: if there is insufficient space for your response, please add additional sheets.

Service/ Program	Yes	No	N/A	Comment
8. Have department personnel received training in: <ul style="list-style-type: none"> a. the Town's policy of nondiscrimination, b. protocols for responding to requests for reasonable modifications, c. providing auxiliary communication aids and services, d. available resources for providing auxiliary aids and services, e. effective communication with people with disabilities. f. Use of the Massachusetts Relay Service to make and receive calls. 				
9. What methods of outreach do you use to communicate with the people who live in Town and visitors (emails, social media, brochures, print materials, letters, etc.)?				
10. Do your methods of outreach (see #7) alert recipients on how to request auxiliary aids/services and/or materials in alternate formats?				
11. Do materials or literature about your programs and services include a notice about non-discrimination?				
12. If requested, do you have the resources necessary to provide print materials in alternate formats in a timely manner?				
13. If they are requested, do you have access to appropriate auxiliary aids and services (ASL interpreters, assistive listening systems, etc.)?				
14. Does the emergency preparedness plan for your facilities address the needs of individuals with disabilities?				If yes, please describe.

If you have any questions, please contact: Katie Denis, kdenis@kmaccess.com

C. EMPLOYMENT

Town of Avon MA

ADA Self Evaluation & Transition Plan: Employment Survey

Name of Individual filling out this form:

Position:

Phone:

Email:

EMPLOYMENT				
Policy/ Procedure	Yes	No	N/A	Comments
1. The Town has reviewed the following areas to assure that it does not discriminate against persons with disabilities:				Where possible, please attach examples of forms.
• Recruitment advertising				
• Application form.				
• Job descriptions to distinguish between essential functions and marginal functions				
• Leaves of absence, sick leave, or any other leave				
• Medical examinations				
• Protocol is in place to ensure personnel files are managed so that information identifying disability is contained in a separate file.				
• Training programs, both in-house and outside opportunities				
• Performance evaluation forms				
2. Staff who conduct interviews have received ADA training.				

3. Policies/procedures relative to requests for reasonable accommodations have been developed.				
a. Policies/procedures have been communicated to all department heads				
4. The Town's Personnel Manual is available in alternate formats.				
5. The Town's Personnel Manual contains:				
• a Statement of Nondiscrimination or Equal Opportunity				
• Instructions regarding filing a grievance				
• Instructions regarding requesting a reasonable accommodation.				
6. The Town has a procedure for responding to requests for a reasonable accommodation by an applicant or employee.				

If you have any questions, please contact: Katie Denis, kdenis@kmaccess.com

D. PUBLIC

Note: this survey was also made available online.

Town of Avon MA

ADA Self Evaluation & Transition Plan: Public Survey

To ensure all Town programs and services are accessible to residents and visitors who have disabilities, the Town has retained KMA to perform an assessment and develop a strategic accessibility plan. Public input is essential. We would like to hear your ideas and concerns regarding the accessibility of Town programs and facilities. Below are 5 questions:

1. Are there Town buildings/facilities (building structures, parks, playgrounds, trails, docks, recycling centers, etc.) that you have had difficulty using? If yes, please describe.

2. Have you ever had difficulty getting information about a Town program, service or event? If yes, please describe.

3. Do you know how to request Town materials in alternate formats (for example, large print or Braille)?

4. Do you know how to request an accommodation (for example, ASL interpreters or assistive listening systems) for Town services and events?

5. Any other comments about accessibility?

Note: if there is insufficient space for your response, please add additional sheets.

DEPARTMENT SURVEY RESPONSE TABLE

KMA developed this table based on the Department responses to the survey. See attached *Avon Department Survey Response Table* document.

ACCESS AUDIT REPORTS

The audit reports have been completed in accordance with the ASTM Standard Guide for Property Condition Assessments: Baseline Property Condition Assessment Process. KMA's audits were not comprehensive. In some cases, a representative sample of certain areas and elements (such as thresholds or other common-use spaces) were audited, and recommendations were developed based on observed patterns of compliance.

For each instance of non-compliance, the Report provides standard recommendation for barrier mitigation. Because the audit does not account for structural and other factors that may have a significant impact on the feasibility of standard mitigation strategies, it is assumed that further design study will be performed to determine a specific approach to mitigation. In most cases, there will be additional, alternative approaches for mitigation from the standard mitigation presented in the report. Construction costs for standard mitigations, including unit costs, are estimated costs provided for budget planning purposes only and do not represent actual construction costs. Factors that will influence actual construction costs include the specific approach to mitigation contemplated, structural and other factors not identified during the audit, and the local market.

See attached:

Avon SETP_Buildings_10.07.2020

Avon SETP_Exterior Areas_10.07.2020

COMPLETED SURVEYS

See attached:

Avon Admin Survey

Avon Employment Survey

All other survey responses are reflected in the *Avon Department Survey Response Table* document or Section 5 of the report.

AVON BUILDING AUDITS

KMA audited the following buildings:

Avon Middle-High School
Avon Public School Administration Office
Butler Elementary School
Civic Center + Council for Aging
DPW Garage
Fire Station
Library
Police Station
Town Hall



AVON MIDDLE-HIGH SCHOOL





AUDITED ON: MAY 20, 2020








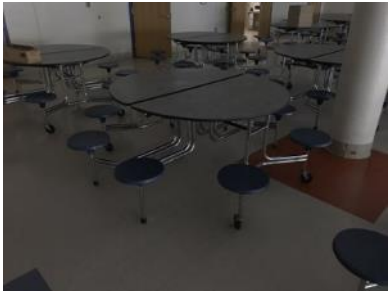
Avon Middle-High School is located at 287 West Main Street. The site consists of a middle / high school and baseball field. There is surface parking with four designated accessible parking spaces serving the main entrance and one serving the baseball field in the rear of the building. The school consists of students in Grades 7-12.





AVON MIDDLE-HIGH SCHOOL





#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Front Parking Lot The van accessible parking space lacks signage indicating it is van accessible.		Install a van accessible parking sign. Unit Cost: \$100 ea. Quantity: 1	\$100
2.	Accessible Route from Parking Lot The transition from the ramp to the pavement is not flush and has abrupt changes in level. The crosswalk has a cross-slope >2%, @ 5%. The walkway has a cross-slope >2%, @ 4.2%.		Rebuild the curb ramp. Unit Cost: \$1,250 ea. Quantity: 1 Regrade the crosswalk. Unit Cost: \$25/SF Est. Quantity: 150 SF Regrade the walkway. Unit Cost: \$25/SF Est. Quantity: 300 SF	\$12,500


3.	Main Entrance Ramp The ramp lacks edge protection.		Install a handrail <4" above the ramp run. Unit Cost: \$50/LF Est. Quantity: 30 LF	\$1,500
4.	Intercoms The intercom controls are mounted >48" AFF, @ 48.5" AFF and 52" AFF.		Relocate the intercoms. Unit Cost: \$250 ea. Quantity: 2	\$500
5.	Parking near Baseball Field The slope of the curb ramp leading to the building is >8.3%, @ 11.9%		Rebuild the curb ramp. Unit Cost: \$1,250 ea. Quantity: 1	\$1,250
6.	Accessible Route from Baseball Field The walkway has a cross-slope >2%, @ 2.9%. The walkway has a running slope >5%, @ 11%.		Regrade the walkway. Unit Cost: \$25/SF Est. Quantity: 350 SF	\$8,750


7.	<p>Recessed Doors</p> <p>Some doors lack the required minimum 12" of maneuvering clearance on the latch push side within 8" of the face of the door, due to the 14" recess.</p> <p><i>Note: these doors have both a latch and a closer.</i></p>		<p>Install an automatic door opener.</p> <p>Unit Cost: \$2,500 Est. Quantity: 6</p>	\$15,000
8.	<p>Lockers</p> <p>Locker controls require tight grasping, pinching, and/or twisting of the wrist to operate.</p> <p>Shelves within lockers are not mounted 40"-48" AFF, @ 52" AFF.</p>		<p>Provide 5%, but no fewer than one, of accessible lockers in each cluster.</p> <p>Unit Cost: \$500 Est. Quantity: 15</p>	\$7,500
9.	<p>Drinking Fountains</p> <p>The knee clearance at all drinking fountains is <27" AFF, @ 26.5" AFF.</p> <p>Some drinking fountains protrude >4" into the circulation space, @ 18".</p>		<p>Relocate the drinking fountain to a location where it is not a protruding object and provides the required knee clearance.</p> <p>Unit Cost: \$1,500 ea. Est. Quantity: 4</p>	\$6,000

10.	Classroom Desks All classrooms have desks and computer stations that lack the required knee clearance for a forward approach.		Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 30	\$7,500
11.	Kitchen Classroom 231 The oven controls are >48" AFF, @ 59" AFF.		Lower the oven. Unit Cost: \$3,000 ea. Quantity: 1	\$3,000
12.	Cafeteria The dining tables lack the required knee clearance for a forward approach.		Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 2	\$500

13.	Library The knee clearance at the table is <27" AFF, @ 25.5" AFF.		Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 1	\$250
14.	Auditorium The required number of accessible wheelchair spaces is not provided. In a facility with 500 seats, six wheelchair spaces are required and only four are provided. The wheelchair spaces are not dispersed horizontally.		Provide wheelchair spaces with companion seats dispersed both horizontally and vertically throughout the auditorium. Further design study required. Unit Cost: \$5,000 Quantity: 1	\$5,000
15.	Toilet Room Thresholds All toilet room thresholds are >0.5" AFF, @ 1" AFF.		Replace the threshold. Unit Cost: \$250 ea. Est. Quantity: 14	\$3,500
16.	Side Grab Bars All side grab bars extend <54" from the rear wall, @ 49" or less.		Install a 42" min. side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Est. Quantity: 14	\$700

17.	Sanitary Napkin Dispensers <p>The sanitary napkin dispenser controls are mounted >48" AFF, @ 52" AFF.</p> <p>The sanitary napkin dispenser protrudes >4" into the circulation space, @ 7".</p>		<p>Relocate the sanitary napkin dispenser to a location where it is not a protruding object and is mounted no higher than 48" AFF.</p> <p>Unit Cost: \$50 Est. Quantity: 7</p>	\$350
18.	Coat Hooks <p>Most coat hooks are mounted >48" AFF, @ 54"-60" AFF.</p>		<p>Install a coat hook mounted no higher than 48" AFF.</p> <p>Unit Cost: \$50 ea. Est. Quantity: 10</p>	\$500
19.	Faculty Toilet Room near Teacher's Lounge <p>The knee clearance at the sink is <27" AFF, @ 26.5" AFF.</p>		<p>Raise the sink to provide the required knee/toe clearances.</p> <p>Unit Cost: \$750 ea. Quantity: 1</p>	\$750
20.	Faculty Toilet Rooms near Classroom 131 <p>The toilet centerline is not 16"-18" from the side wall, @ 18.5".</p> <p>The clearance between the toilet side wall and the sink is <60", @ 56".</p> <p>The cabinet obstructs the required clearance at the toilet.</p>		<p>Reposition the toilet.</p> <p>Unit Cost: \$1,500 ea. Quantity: 2</p> <p>Relocate the sink.</p> <p>Unit Cost: \$3,000 ea. Quantity: 2</p> <p>Remove the cabinet.</p> <p>Unit Cost: \$50 Quantity: 2</p>	\$9,100

21.	<p>Boys' & Girls' Multiuser Toilet Rooms</p> <p>The toilet lacks a rear grab bar.</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 18.5".</p> <p>The toilet paper dispensers are not located 7"-9" from the front of the toilet, @ 16".</p>		<p>Install a 36" min. rear grab bar, located 6" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 8</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 8</p> <p>Relocate the toilet paper dispensers. Unit Cost: \$50 ea. Quantity: 8</p>	\$12,800
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22.	<p>Locker Rooms</p> <p>The roll-in shower is less than 30" x 60", @ 37" x 48".</p> <p>The toilet centerline is not 16"-18" from the side wall, @ 18.5".</p> <p>The benches lack back support.</p> <p>The soap dispenser is mounted >46" AFF over a reach >10" deep, @ 52" AFF (boys' only).</p>	   	<p>Rebuild the existing shower. Further design study required. Unit Cost: \$5,000 ea. Quantity: 2</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 2</p> <p>Provide an accessible bench in each type of locker room. See ADA-903. Unit Cost: \$500 Quantity: 4</p> <p>Relocate the soap dispenser. Unit Cost: \$50 ea. Quantity: 1</p>	\$15,050
<p>TOTAL FOR AVON MIDDLE-HIGH SCHOOL:</p>				\$112,100



AVON PUBLIC SCHOOL ADMINISTRATION OFFICE



AUDITED ON: MAY 20, 2020






The Avon Public School Administration Office is located behind Butler Elementary School at 1 Patrick Clark Drive. The site consists of two identical modular structures, one serving as Administration & Business Services and the other as the Superintendent's Office. Parking is available in the nearby lot and is reserved for staff only.

AVON PUBLIC SCHOOL ADMINISTRATION OFFICE

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Parking Designated accessible parking is not provided.		Relocate / restripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated signs and access aisles. Unit Cost: \$300 ea. Quantity: 2 (1 space + 1 aisle)	\$600
2.	Inaccessible Entrances The secondary entrances lack directional signage to the accessible entrances. If these entrances are employee only, they may not be required to comply. KMA requires more information on the intended users.		Provide directional signage to the accessible entry. Unit Cost: \$100 ea. Quantity: 2	\$200

3.	<p>Exterior Ramps</p> <p>One ramp has running slopes >8.3%, @ 12.7%.</p> <p>One ramp lacks a level landing at the bottom, @ 2.7%.</p> <p>The transition from one ramp to the walkway is not flush and has abrupt changes in level >0.25".</p> <p>The handrails are not mounted 34"-38" to the top of the gripping surface, @ 21".</p> <p>The handrails do not extend horizontally above the landing 12" minimum beyond the bottom of ramp runs.</p>		<p>Rebuild the ramp and add the required handrails. Unit Cost: \$15,000 ea. Quantity: 1</p> <p>Re-surface the ramp landing. Unit Cost: \$1,000 ea. Quantity: 1</p> <p>Replace the transition. Unit Cost: \$100 ea. Quantity: 1</p>	\$22,100
4.	<p>Entrance to Superintendent's Office</p> <p>The door maneuvering clearance is <18" on the latch pull-side for a forward approach, @ 3" due to the ramp railing.</p>		<p>Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 1</p>	\$2,500

5.	Entrance Thresholds The threshold is >0.5" AFF, @ 1.5".		Replace the threshold. Unit Cost: \$250 ea. Quantity: 2	\$500
6.	Interior Routes to Toilet Rooms The accessible routes to the toilet rooms are <32" wide, @ 31".		Enlarge the opening. Additional study required. Unit Cost: \$5,000 ea. Quantity: 2	\$10,000
7.	Single-User Toilet Rooms The bathroom lacks the required footprint and accessible elements for an accessible toilet room. The doors provide <32" clear width, @ 28".		Additional study required. Unit Cost: \$5,000 ea. Quantity: 2	\$10,000
8.	Doorknobs The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.		Replace the door hardware with lever type. Unit Cost: \$300 ea. Est. Quantity: 10	\$3,000

9.	Reception Counter The counter is >36" AFF, @ 41" AFF.		Lower a 36" portion of the counter to 36" AFF max. Unit Cost: \$750 ea. Quantity: 1	\$750
10.	Interior Route to Offices The door maneuvering clearance is <18" on the latch pull-side for a forward approach, @ 12". The door maneuvering clearance is <18" on the latch pull-side for a forward approach, @ 2" due to the filing cabinet.		Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 1 Relocate the filing cabinet. Unit Cost: \$50 ea. Quantity: 1	\$2,550
TOTAL FOR AVON PUBLIC SCHOOL ADMINISTRATION OFFICE:				\$52,200

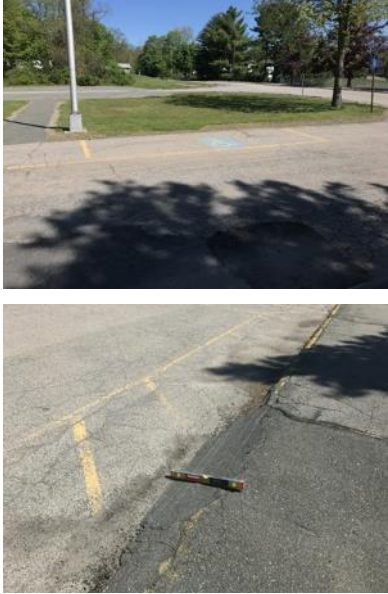

BUTLER ELEMENTARY SCHOOL



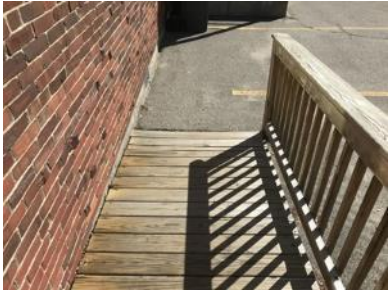

AUDITED ON: MAY 20, 2020






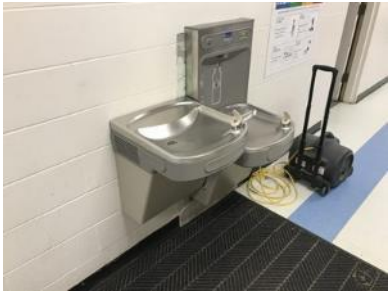



Butler Elementary School is located at 1 Patrick Clark Drive. The site consists of an elementary school with a playground and playing field. There is surface parking, including three designated accessible parking spaces serving the main entrance and one serving the rear entrance near the Avon Public School Administration Offices. The school serves children in preschool through 6th grade.

BUTLER ELEMENTARY SCHOOL


#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<p>Front Parking Lot</p> <p>Designated accessible parking is not provided.</p> <p><i>Note: The existing parallel parking spaces designated with the International Symbol of Accessibility do not meet the dimensional requirements for an accessible parking space.</i></p> <p>The slope of the curb ramp is >8.3%, @ 19%.</p>		<p>Relocate / restripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated signs and access aisles. Unit Cost: \$300 ea. Quantity: 3 (2 spaces + 1 aisle)</p> <p>Rebuild the curb ramp. Unit Cost: \$1,250 ea. Quantity: 2</p>	\$3,400
2.	<p>Walkway to Main Entrance</p> <p>The accessible route from the accessible parking to the main entrance has cross slopes >2%, @ 3.1%.</p>		<p>Regrade the walkway. Unit Cost: \$25/SF Est. Quantity: 500 SF</p>	\$12,500


3.	Main Entrance The doors in a series have <48" between the door swings, @ 28".		Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 2	\$5,000
4.	Rear Parking Lot The designated accessible parking space lacks an access aisle and the required signage.		Relocate / restripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated signs and access aisles. Unit Cost: \$300 ea. Quantity: 2 (1 space + 1 aisle)	\$600
5.	Rear Entrance Ramp The ramp has running slopes >8.3%, @ 10%. The ramp lacks handrails on both sides.		Rebuild the ramp. Unit Cost: \$15,000 ea. Quantity: 1	\$15,000
6.	Ramp to Modular Addition The ramp has running slopes >8.3%, @ 9.5%. The ramp lacks edge protection. The handrails are not mounted 34"-38" AFF, @ 39" AFF.		Rebuild the ramp. Unit Cost: \$15,000 ea. Quantity: 1	\$15,000

7.	Signage <p>There is no tactile/Braille signage mounted on the latch side of the door at permanent rooms and spaces.</p>		<p>Install tactile/Braille signage on the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 ea. Est. Quantity: 35</p>	\$3,500
8.	Doorknobs <p>Most door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p>		<p>Replace the door hardware with lever type. Unit Cost: \$300 ea. Est. Quantity: 30</p>	\$9,000
9.	Door Maneuvering Clearance <p>Some door maneuvering clearances are <18" on the latch pull-side for a forward approach, @ 2" due to walls or shelves.</p>		<p>Install an automatic door opener. Unit Cost: \$2,500 ea. Est. Quantity: 3</p> <p>Relocate the shelves. Unit Cost: \$50 Est. Quantity: 5</p>	\$7,750

10.	Drinking Fountains The drinking fountain protrudes >4" into the circulation space, @ 18".		Relocate the drinking fountain to a location where it is not a protruding object and provides the required knee clearance. Unit Cost: \$1,500 ea. Est. Quantity: 3	\$4,500
11.	Interior Ramp The ramp has running slopes >8.3%, @ 11.3%. The ramp lacks edge protection. The handrails do not extend the full length of the ramp and lack the required extensions.		Rebuild the ramp. Unit Cost: \$15,000 ea. Quantity: 1	\$15,000
12.	Classroom Sinks Some classroom sinks are >34" AFF, @ 36.5" AFF.		Lower the sink to 34" AFF max. Unit Cost: \$3,000 ea. Est. Quantity: 3	\$9,000
13.	Classroom Children's Desks All children's desks have knee clearance <24" AFF, @ 19"-21" AFF.		Provide at least one desk, and no less than 5% of the total number of desks, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 25	\$6,250

14.	Cafeteria Stage An accessible route is not provided to the stage.		Provide an accessible route to the stage. Additional study required. Unit Cost: \$7,500 Quantity: 1	\$7,500
15.	Cafeteria Servery The pull side door maneuvering clearance is <48" perpendicular to the doorway for a latch side approach, @ 46".		Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 1	\$2,500
16.	Nurse's Office The bathroom lacks the required footprint and accessible elements for an accessible toilet room. The door provides <32" clear width, @ 28".		Additional study required. Unit Cost: \$5,000 ea. Quantity: 1	\$5,000

<p>17.</p>	<p>Girls' & Boys' Multiuser Toilet Rooms</p> <p>Two bathrooms lack the required footprint and accessible elements for an accessible toilet room.</p> <p>The rear grab bars are not mounted 18"-27" AFF due to the toilet tank.</p> <p>One flush valve is not located on the open side of the toilet.</p> <p>One coat hook is >48" AFF, @ 54" AFF.</p> <p>One toilet paper dispenser is mounted <12" above the side grab bar.</p> <p>One toilet room has six or more toilets and/or urinals but does not provide an ambulatory stall.</p>		<p>Additional study required. Unit Cost: \$10,000 ea. Quantity: 2</p> <p>Replace the toilet with a model that has a smaller tank to accommodate a rear wall grab bar. Unit Cost: \$1,500 ea. Quantity: 2</p> <p>Lower the rear wall grab bars. Unit Cost: \$50 ea. Quantity: 2</p> <p>Reposition the flush valve or install an automatic flush control. Unit Cost: \$1,000 ea. Quantity: 1</p> <p>Install a coat hook mounted no higher than 48" AFF. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the toilet paper dispensers. Unit Cost: \$50 ea. Quantity: 1</p> <p>Provide an ambulatory stall. Unit Cost: \$1,000 ea. Quantity: 1</p>	<p>\$25,200</p>
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18.	<p>Staff Single-User Toilet Rooms</p> <p>Three bathrooms lack the required footprint and accessible elements for an accessible toilet room.</p> <p>One door provides <32" clear width, @ 27".</p> <p>The rear and side grab bars are not mounted 33"-36" AFF, @ 37" AFF.</p> <p>The toilet paper dispenser is not located 7"-9" from the front of the toilet, @ 16".</p> <p>The paper towel dispenser is >48" AFF, @ 52" AFF.</p>		<p>Additional study required. Unit Cost: \$5,000 ea. Quantity: 3</p> <p>Reposition the rear and side grab bars. Unit Cost: \$50 ea. Quantity: 2</p> <p>Relocate the toilet paper dispensers. Unit Cost: \$50 ea. Quantity: 1</p> <p>Relocate the paper towel dispensers. Unit Cost: \$50 ea. Quantity: 1</p>	\$15,200
TOTAL FOR BUTLER ELEMENTARY SCHOOL:				\$146,700


CIVIC CENTER + COUNCIL FOR AGING




AUDITED ON: MAY 20, 2020

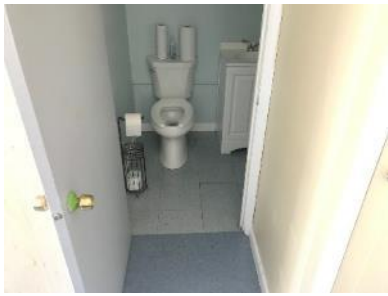





The building containing the Civic Center and Council for Aging is located at 65 E. Main Street. The facility consists of two separate spaces, one for the Civic Center and one for the Council for Aging. There is surface parking with two designated accessible parking spaces serving the building.



CIVIC CENTER + COUNCIL FOR AGING


#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<p>Accessible Parking</p> <p>The access aisles measure <60" wide, @ 59".</p> <p>The designated accessible parking spaces have slopes >2%, @ up to 2.6%.</p>		<p>Regrade and restripe the existing designated accessible parking spaces and their associated access aisles.</p> <p>Unit Cost: \$1,500 per space or aisle</p> <p>Quantity: 2 (1 space + 1 aisle)*</p> <p><i>*Note: KMA has been informed that the parking lot has 60 spaces and, therefore, only 3 total accessible parking spaces are required. Since there are two additional spaces in the between the buildings, one of which is a van accessible parking space (noted in the Town Hall section of this report), only one of these spaces is required to be mitigated to meet the requirements.</i></p>	\$3,000

2.	<p>Accessible Route – Senior Center</p> <p>The route from the accessible parking lacks a curb ramp.</p> <p>The ramp has cross slope >2%, @ up to 3.4%.</p> <p>The walkway has cross slope >2%, @ 4.4%.</p> <p>The doors along this route lack a level landing, @ 5.6%-6.6%.</p> <p>The entry door thresholds were >0.5" AFF, @ up to 1.125".</p>		<p>Install a curb ramp. Unit Cost: \$2,500 Quantity: 1</p> <p>Rebuild the ramp. Unit Cost: \$5,000 ea. Quantity: 1</p> <p>Regrade the walkway. Unit Cost: \$50/SF Est. Quantity: 600 SF</p> <p>Regrade the door landings. <i>Will be addressed by the regrading mitigation above.</i></p> <p>Replace the thresholds. Unit Cost: \$250 ea. Est. Quantity: 2 (at least one accessible entrance per building)</p>	\$38,000
3.	<p>Interior – Civic Center</p> <p>The desk is not accessible.</p>		<p>Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 1</p>	\$250
4.	<p>Toilet Room – Civic Center (x2)</p> <p>The room lacks the required footprint and accessible elements for an accessible toilet room.</p>		<p>Designate both toilet rooms as 'unisex' and modify one to be the designated accessible toilet room. Additional study required. Unit Cost: \$5,000 ea. Quantity: 1</p>	\$5,000

5.	Toilet Room – Recreation Room The room lacks the required footprint and accessible elements for an accessible toilet room.		Additional study required. Unit Cost: \$5,000 ea. Quantity: 1	\$5,000
6.	Entry Door – Council for Aging The door lacks a level landing, @ 4.9%. The threshold is >0.5" AFF, @ 1".		Regrade the door landing. Unit Cost: \$1,000 Quantity: 1 Replace the threshold. Unit Cost: \$250 ea. Quantity: 1	\$1,250
7.	Employee Toilet Room – Council for Aging The room lacks the required footprint and accessible elements for an accessible toilet room.		Additional study required. Unit Cost: \$5,000 ea. Quantity: 1	\$5,000

8.	<p>Accessible Toilet Room – Council for Aging</p> <p>The sign is not located on the latch side of the door.</p> <p>The sink is > 34" AFF, @ 35.5" AFF.</p> <p>The paper towel dispenser controls are > 46" AFF over a reach > 10" deep, @ 51" AFF.</p> <p>The toilet paper dispenser is not 7-9" from the front edge of the toilet.</p> <p>The toilet centerline is not 16-18" from the side wall, @ 18.5".</p> <p>The toilet lacks a rear grab bar.</p> <p>The side grab bar extends > 12" from the rear wall, @ 13".</p> <p>The door lacks the required minimum 18" of maneuvering clearance on the latch pull side for a forward approach, due to the location of the lavatory.</p>		<p>Install tactile/ Braille signage on the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 per sign Quantity: 1</p> <p>Lower the sink to max. 34" AFF. Unit Cost: \$3,000 ea. Quantity: 1</p> <p>Relocate the dispenser. Unit Cost: \$50 ea. Quantity: 2</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 1</p> <p>Install a min. 36" rear grab bar, located 6" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install a min. 42" side grab bar, located 12" from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 1</p> <p>Install an automatic door opener. Unit Cost: \$2,500 Quantity: 1</p>	\$7,300
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9.	<p>Kitchen – Council for Aging</p> <p>The sink lacks the required knee and toe clearance for a forward approach.</p> <p>There is <60” clearance between opposing elements in the U-shaped kitchen, @ 42” between the refrigerator and opposing counter.</p> <p>The range controls require reaching over the burner.</p> <p>The paper towel dispenser controls are >46” AFF over a reach >10” deep.</p>		<p>Additional study required.</p> <p>Unit Cost: \$10,000</p> <p>Quantity: 1</p>	\$10,000
10.	<p>Toilet Rooms – Council for Aging (x2)</p> <p>The room lacks the required footprint and accessible elements for an accessible toilet room.</p>		<p>Designate both toilet rooms as ‘unisex’ and modify one to be the designated accessible toilet room. Additional study required.</p> <p>Unit Cost: \$5,000 ea.</p> <p>Quantity: 1</p>	\$5,000
11.	<p>Office – Council for Aging</p> <p>The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p>	No Image	<p>Replace the door hardware with lever type.</p> <p>Unit Cost: \$300 ea.</p> <p>Quantity: 1</p>	\$300

12.	<p>Exit Door – Council for Aging</p> <p>The door provides < 32” clear width.</p> <p>The door lacks the required minimum 12” of maneuvering clearance on the latch push side of the door within 8” of the face of the door.</p> <p><i>Note: this door has both a latch and a closer.</i></p>		<p>If intended for emergency accessible egress, install an automatic door opener equipped with standby power.</p> <p>Unit Cost: \$2,500</p> <p>Quantity: 1</p>	\$2,500
TOTAL FOR CIVIC CENTER + COUNCIL FOR AGING:				\$82,850


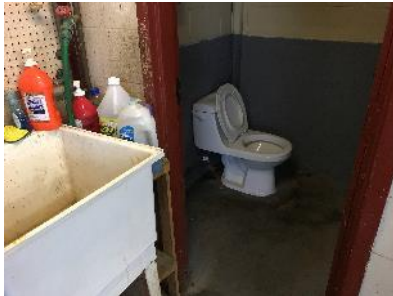
DPW GARAGE

AUDITED ON: JUNE 30, 2020



The DPW Garage is located off of East Main Street at 1 Avon Place. The site consists of a garage building that houses the Town's public works equipment and bathrooms. Parking is available and no designated accessible parking is provided.

DPW GARAGE

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Parking Designated accessible parking is not provided.		Relocate / restripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated signs and access aisles. Unit Cost: \$300 ea. Quantity: 2 (1 space + 1 aisle)	\$600
2.	Staff Toilet Rooms (x2) The toilet rooms lack the required footprint and accessible elements for an accessible toilet room.		Additional study required. Unit Cost: \$5,000 ea. Quantity: 2	\$10,000
TOTAL FOR DPW GARAGE:				\$12,700

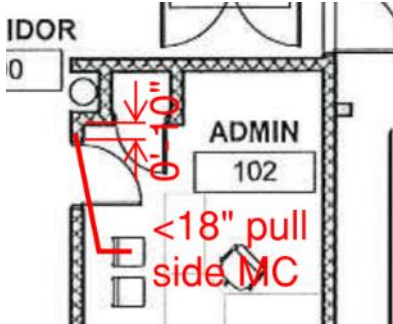
FIRE STATION

AUDITED DRAWINGS DATED APRIL 8, 2020



The Fire Station is located at 150 Main Street. The Fire Station is currently undergoing a renovation. KMA performed a limited review of selected sheets of the Issued for Construction Set dated April 8, 2020. The site consists of one building. Parking is also provided on the site with two accessible parking spaces noted at the front of the building.

FIRE STATION

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Renovation Drawings <p>The town of Avon provided KMA drawings for the in-progress renovation of the fire station. A preliminary review by KMA revealed some issues of non-compliance. For example:</p> <ul style="list-style-type: none"> Several interior doors lack the required maneuvering clearances. The accessible shower room lacks grab bars and a shower seat. The changing room lacks turning space. It is unclear whether accessible employee parking is provided. 		<p>Perform a more comprehensive review of the renovation drawings for accessibility requirements. KMA also strongly recommends reviewing for the requirements of the local accessibility code, 521 CMR, as part of this review.</p>	N/A
TOTAL FOR FIRE STATION:				N/A



LIBRARY


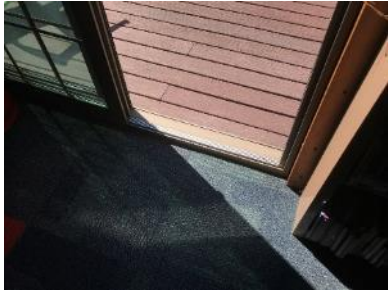
AUDITED ON: MAY 20, 2020








The Avon Public Library is located at 280 W. Main Street. The site consists of a single building with surface parking, including three designated accessible parking spaces serving the building. The Library is currently undergoing a renovation. There are plans to install a lift inside and add a new accessible toilet room.

LIBRARY

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Renovation Drawings The town of Avon provided KMA drawings for the in-progress renovation of the library. A preliminary review by KMA revealed some issues of non-compliance. For example, the entry door to the toilet room lacks the required maneuvering clearances on the pull side due to the location of the lavatory and there is a transition ramp identified at one of the entrances at the lift.	No Image	Perform a more comprehensive review of the renovation drawings for accessibility requirements. KMA also strongly recommends reviewing for the requirements of the local accessibility code, 521 CMR, as part of this review.	N/A
2.	Accessible Parking The parking lot lacks a van accessible space. The designated accessible parking spaces have slopes > 2%, @ up to 3.4%. The designated accessible parking spaces lack associated access aisles.		Regrade and restripe the existing designated accessible parking spaces and their associated access aisles, including one van space. Unit Cost: \$1,500 per space or aisle Quantity: 5 (3 spaces + 2 aisles)	\$7,500
3.	Accessible Route The slope of the curb ramp is >8.3%, @ 9.8%.		Rebuild the curb ramp. Unit Cost: \$1,250 ea. Quantity: 1	\$1,250

4.	Interior Reading Area The tables are not accessible.		Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 1	\$250
5.	Outdoor Patio The threshold is >0.5" AFF, @ 1.5" AFF.		Replace the threshold. Unit Cost: \$250 ea. Quantity: 1	\$250
6.	Community Room An accessible route is not provided to the Community Room due to stairs.	No Image	The in-progress renovation of the Library includes the addition of a lift, which will provide an accessible route from the main level to the community room. See mitigation above regarding the renovation drawings.	N/A

7.	<p>Interior – Community Area</p> <p>The table and the computer station are not accessible.</p> <p>The TV protrudes > 4" into the circulation space, @ 6".</p>	  	<p>Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance.</p> <p>Unit Cost: \$250 ea.</p> <p>Quantity: 2</p> <p>Relocate the TV.</p> <p>Unit Cost: \$250 ea.</p> <p>Quantity: 1</p>	\$750
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8.	<p>Toilet Rooms – Community Area (x2)</p> <p>The accessible route to the toilet room is <32", @ 29" at the cased opening.</p> <p>The room lacks the required footprint and accessible elements for an accessible toilet room.</p>		<p>Enlarge the opening. Additional study required. Unit Cost: \$5,000 ea. Quantity: 1</p> <p>Additional study required. Unit Cost: \$5,000 ea. Quantity: 1</p>	\$10,000
9.	<p>Lower Level</p> <p>An accessible route is not provided between the levels. KMA understands the lower level is restricted to employees only.</p> <p>The sign is not located on the latch side of the door of the accessible toilet rooms.</p>		<p>Develop a policy to ensure an accessible employee area is provided on the main level. Unit Cost: N/A</p> <p>Install tactile/ Braille signage on the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 per sign Quantity: 1</p>	\$100
TOTAL FOR LIBRARY:				\$20,100

POLICE STATION



AUDITED ON: JUNE 30, 2020




The Avon Police Station is located on Fagan Drive. The Police Station was recently constructed. The building contains a reception area, bathrooms, interrogation rooms, a conference room, jail cells, and typical police function areas. Parking, including accessible parking, is provided.

POLICE STATION

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Drop Off An accessible loading zone is not included where there is a drop-off area. <i>KMA has been informed that this area is not designed as a drop-off, it is 15 minute parking and the accessible parking at the SE corner of the building can serve the same function.</i>		N/A	N/A
2.	Entry The stairs lack the required handrails on both sides.		Install compliant handrails on both sides. Unit Cost: \$50/LF Est. Quantity: 48 LF	\$2,400
3.	Drinking Fountains The drinking fountains protrude >4" into the circulation space.		Install cane detection at the sides of the drinking fountain at maximum 27" AFF. Unit Cost: \$250 ea. Quantity: 1	\$250

4.	Employee Mail Receptacles The mail receptacles are mounted >48" AFF.	No Image	Lower the mail receptacles. Unit Cost: \$50 ea. Est. Quantity: 4	\$200
5.	Door Thresholds The door thresholds lack the required maximum 1:2 bevel, they are made up of two vertical changes in level.		Replace the threshold. Unit Cost: \$250 ea. Est. Quantity: 6	\$1,500
6.	Employee Bathroom The door maneuvering clearance is < 18" on the latch pull-side for a forward approach, @ 17" to the sink.		Install an automatic door opener. Unit Cost: \$2,500 ea. Quantity: 1	\$2,500

7.	<p>Employee Locker Rooms (Men's & Women's)</p> <p>The shower threshold is >0.5" AFF.</p> <p>The shower controls are not offset between the centerline of the fixture and the open side.</p> <p>The toilet stall with full partition walls is <66" wide, @ 60".</p> <p>The toilet stall door maneuvering clearance is <18" on the latch pull-side for a forward approach, @ 16".</p> <p>The toilet rooms lack a visual alarm.</p> <p>The urinal is located in an alcove that is >24" deep and <36" wide, @ 31" deep by 32" wide.</p>	  	<p>Replace the shower thresholds. Unit Cost: \$250 ea. Quantity: 2</p> <p>Relocate the shower controls. Unit Cost: \$500 ea. Quantity: 2</p> <p>Reconfigure the toilet stalls. Additional study required. Unit Cost: \$5,000 ea. Quantity: 2</p> <p>Install visual alarms. Unit Cost: \$500 ea. Quantity: 2</p> <p>Shorten the urinal alcove so that it is <24" deep. Unit Cost: \$1,000 ea. Quantity: 1</p>	\$13,500
8.	<p>Booking Area</p> <p>The phone is mounted >48" AFF.</p> <p><i>KMA has been informed that this phone is operated by the booking officer and not the public.</i></p> <p>The accessible jail cell lacks a visual alarm.</p>		<p>N/A</p> <p>Install a visual alarm. Unit Cost: \$500 ea. Quantity: 1</p>	\$500

9.	Employee Break Area The phone is mounted >48" AFF.	No Image	Lower the phone. Unit Cost: \$50 ea. Quantity: 1	\$50
10.	Training Room The wall-mounted television protrudes >4" into the circulation space.		Install a cane detectable object below the TV. Unit Cost: \$250 ea. Quantity: 1	\$250
TOTAL FOR POLICE STATION:				\$21,150

TOWN HALL


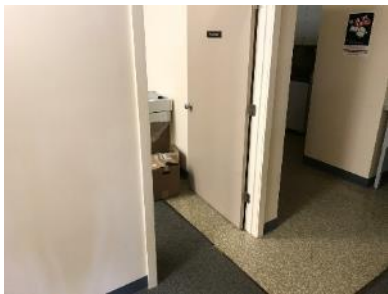
AUDITED ON: MAY 20, 2020



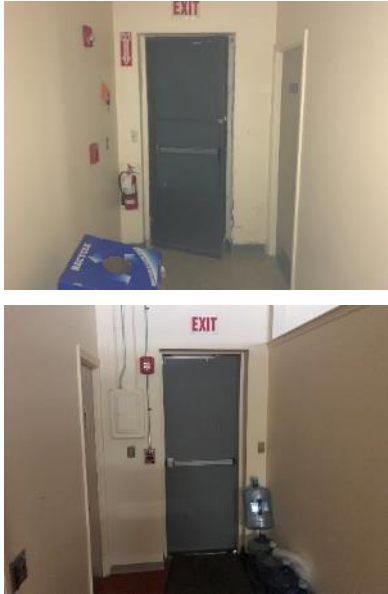





Avon Town Hall is located at 65 E. Main Street. The site consists of a single building with surface parking, including three designated accessible parking spaces. KMA understands a plan to renovate the interior of Town Hall is in development.


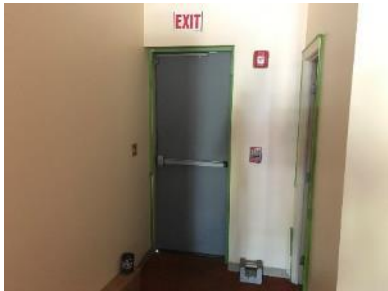
TOWN HALL


#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<p>Accessible Parking (surface lot serving Town Hall, Civic Center, & COA Building)</p> <p>The signs are mounted <60" AFF, @ 55" AFF, to the bottom of the sign.</p> <p>The van accessible parking space lacks signage indicating it is van accessible.</p> <p>The parking space closest to Town Hall has slopes >2%, @ up to 3.7% at the bottom portion of the parking space.</p>		<p>Reinstall new signs at 60" AFF minimum (including a van accessible sign), measured to the bottom of the sign. Unit Cost: \$100 ea. Quantity: 2</p> <p>Remove the accessible parking designation at the accessible parking space closest to Town Hall. KMA has been informed that the parking lot has 60 spaces and therefore only 3 total accessible parking spaces are required. Since there are two additional spaces near the COA Building (noted in the COA/ Civic Center section of this report), the total number of accessible parking spaces exceeds the minimum requirement. Unit Cost: \$100 ea. Quantity: 1</p>	\$300
2.	<p>Public Service Counters (x3)</p> <p>The counters are >36" AFF, @ 42" AFF.</p> <p>The counters protrude >4" into the circulation, @ 7".</p>		<p>Lower a 36" wide portion of the counter to 36" AFF maximum. Unit Cost: \$750 Est. Quantity: 3</p> <p>Install a cane detectable object below the counter. Unit Cost: \$250 ea. Est. Quantity: 3</p>	\$3,000

<p>3.</p>	<p>Interior Circulation Route</p> <p>The TV protrudes >4" into the circulation space, @ 9.5".</p> <p>The AED box protrudes into the circulation >4".</p> <p>The AED box controls are >48" AFF, @ 60" AFF.</p>		<p>Install a cane detectable object below the TV and AED box. Unit Cost: \$250 ea. Quantity: 2</p> <p>Lower the AED box Unit Cost: \$50 ea. Quantity: 1</p>	<p>\$550</p>
<p>4.</p>	<p>Interior - Public Office Doors</p> <p>The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p> <p>Signs are not mounted on latch-side of the doors.</p> <p>Signs lack tactile/ Braille characters.</p> <p><i>Note: These conditions were observed at the planning Board Office, Assessor's Office, Selectman's Room, (x2 hall doors), Employee Breakroom, Water Department, Board of Health, and the Archive Room.</i></p>		<p>Replace the door hardware with lever type. Unit Cost: \$300 ea. Est. Quantity: 8</p> <p>Install tactile/ Braille signage on the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 ea. Est. Quantity: 8</p>	<p>\$3,200</p>

5.	<p>Employee Kitchen Area</p> <p>The sink counter is >34" AFF, @ 36.5" AFF.</p> <p>The sink lacks the required knee and toe clearance for a forward approach.</p> <p>The paper towel dispenser controls are >46" AFF over a reach >10" deep.</p>		<p>Lower the sink to 34" AFF maximum and remove the cabinetry below to provide the required knee/ toe clearance. Unit Cost: \$3,000 ea. Quantity: 1</p> <p>Relocate the paper towel dispenser Unit Cost: \$50 ea. Quantity: 1</p>	\$3,050
6.	<p>Single-User Toilet Rooms – Employee Kitchen Area (x2)</p> <p>The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p> <p>The room lacks the required footprint and accessible elements for an accessible toilet room.</p>		<p>Designate both toilet rooms as 'unisex' and modify one to be the designated accessible toilet room. Additional study required. Unit Cost: \$5,000 ea. Quantity: 1</p>	\$5,000
7.	<p>Exit Egress Doors (x2) – Employee Areas</p> <p>The door lacks the required minimum 12" of maneuvering clearance on the latch push side of the door, due to the 9" recess.</p>		<p>Confirm whether this door is part of an accessible means of egress. Unit Cost: \$0 Quantity: -</p>	\$0

8.	<p>Single-User Toilet Rooms – Employee Breakroom (x2)</p> <p>The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p> <p>The room lacks the required footprint and accessible elements for an accessible toilet room.</p>		<p>Designate both toilet rooms as 'unisex' and modify one to be the designated accessible toilet room. Additional study required.</p> <p>Unit Cost: \$5,000 ea.</p> <p>Quantity: 1</p>	\$5,000
9.	<p>Hallway Door to Multi-Purpose Room</p> <p>The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p> <p>The door lacks a level landing, @ 6.5%.</p>		<p>Replace the door hardware with lever type.</p> <p>Unit Cost: \$300 ea.</p> <p>Quantity: 1</p> <p>Regrade the door landing.</p> <p>Unit Cost: \$1,000</p> <p>Quantity: 1</p>	\$1,300
10.	<p>Drinking Fountain - Multi-Purpose Room</p> <p>The floor lacks an accessible drinking fountain.</p> <p><i>KMA has been informed that the water fountain is inoperable and is in an area that is not open to the public.</i></p>		N/A	N/A

11.	<p>Single-User Toilet Rooms – Multi-Purpose Room (x2)</p> <p>The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p> <p>The room lacks the required footprint and accessible elements for an accessible toilet room.</p>		<p>Replace the door hardware with lever type. Unit Cost: \$300 ea. Quantity: 2</p> <p>Additional study required. Unit Cost: \$5,000 ea. Quantity: 2</p>	\$10,600
12.	<p>Exit Egress Door – Multi-Purpose Room</p> <p>The door maneuvering clearance is < 12” on the latch push-side for a forward approach, @ 0”.</p>		<p>Confirm whether this door is part of an accessible means of egress. Unit Cost: \$0 Quantity: -</p>	\$0
13.	<p>Selectman’s Board Room</p> <p>The desk and table are not accessible.</p>	No Image	<p>Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 2</p>	\$500

14.	<p>Single-User Toilet Rooms – Community Meeting Room (x2)</p> <p>The sign is not located on the latch side of the door.</p> <p>The door hardware requires tight grasping, pinching, or twisting of the wrist to operate.</p> <p>The mirror is >40” AFF, measured to the bottom of the reflective surface</p> <p>The toilet centerline is not 16-18” from the side wall.</p> <p>The toilets lack the required rear and side wall grab bars. <i>Note: floor mounted grab bars are not permitted.</i></p>		<p>Install tactile/ Braille signage on the latch side of the door. Coordinate with location and height requirements. Unit Cost: \$100 per sign Quantity: 2</p> <p>Replace the door hardware with lever type. Unit Cost: \$300 ea. Quantity: 2</p> <p>Lower the mirror. Unit Cost: \$50 ea. Quantity: 2</p> <p>Reposition the toilet. Unit Cost: \$1,500 ea. Quantity: 2</p> <p>Install a 36” min. rear grab bar, located 6” from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 2</p> <p>Install a 42” min. side grab bar, located 12” from the interior corner of the wall. Unit Cost: \$50 ea. Quantity: 2</p> <p>Remove the floor mounted grab bars. Unit Cost: \$50 ea. Quantity: 4</p>	\$4,300
<p>TOTAL FOR TOWN HALL:</p>				\$36,800

AVON EXTERIOR AREA AUDITS

KMA audited the following exterior areas:

Avon Middle-High School Playing Fields
Bartlett Street Courts
Butler Elementary School
Cemetery
DeMarco Park
DW Park
Fagan Drive / Crowley Park
Moses Curtis Memorial Park
Pharmacy Park
Tracy-Miller Playground




AVON MIDDLE-HIGH SCHOOL PLAYING FIELDS

AUDITED ON: MAY 05, 2020



Avon Middle-High School is located between Page Street and Victory Avenue. The site consists of a baseball field. One designated accessible parking space is provided.

AVON MIDDLE-HIGH SCHOOL PLAYING FIELDS



#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Accessible Parking The designated accessible parking space lacks an access aisle and the required signage.		Pave and stripe a portion of the parking lot to add an access aisle as well as their associated signs. Unit Cost: \$1,500 ea. Quantity: 2 (1 space + 1 aisle)	\$3,000
2.	Accessible Route The baseball field and the bleachers are not located on an accessible route. A wheelchair space is not provided at the bleachers. The gate lacks a level landing, @ 7.7%. The gate lacks the required minimum 10" of smooth surface along the bottom of the push side.	 	Provide an accessible route. Additional study required. Unit Cost: \$10,000 Quantity: 1 Provide an accessible space on an accessible route next to the bleachers. Unit Cost: \$25/SF Quantity: 20 SF Regrade the gate landing. Unit Cost: \$1,000 Quantity: 1 Install a kick plate that is minimum 10" tall on the bottom of the push side of the gate. Unit Cost: \$250 ea. Quantity: 1	\$11,750
TOTAL FOR AVON MIDDLE-HIGH SCHOOL PLAYING FIELDS:				\$14,750

BARTLETT STREET COURTS

AUDITED ON: MAY 05, 2020



The site is located on Bartlett Street. The site consists of two tennis courts and a parking lot. No designated accessible parking spaces are provided.

BARTLETT STREET COURTS				
#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Accessible Parking Designated accessible parking is not provided.		Stripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated signs and access aisles. Unit Cost: \$300 ea. Est. Quantity: 2 (1 space + 1 aisle)	\$600
2.	Accessible Route The gate lacks a level landing, @ 14.9%. The gate lacks the required minimum 10" of smooth surface along the bottom of the push side.		Regrade the gate landing. Unit Cost: \$1,000 Quantity: 1 Install a kick plate that is minimum 10" tall on the bottom of the push side of the gate. Unit Cost: \$250 ea. Quantity: 1	\$1,250
TOTAL FOR BARTLETT STREET COURTS:				\$1,850




BUTLER ELEMENTARY SCHOOL

AUDITED ON: MAY 05, 2020



The Butler Elementary School is located along Patrick Clark Drive. The site consists of an elementary school, surface parking, including two designated accessible parking spaces, a playground, and two sports fields. There is no accessible route from the parking to the playground or the sports fields.

BUTLER ELEMENTARY SCHOOL


#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Accessible Parking Designated accessible parking is not provided. <i>Note: The existing parallel parking spaces designated with the International Symbol of Accessibility do not meet the dimensional requirements for an accessible parking space.</i>		See mitigation and costs in the Buildings Audit Report.	--
2.	Accessible Route The playground, gazebo, and picnic tables are not located on an accessible route due to grass surfaces. The playground lacks ground level play components and an accessible route between elements.	 	Provide an accessible route. Additional study required. Unit Cost: \$20,000 Quantity: 1 Provide ground-level play components at the playground. Additional study required. Unit Cost: \$1,000 Quantity: 1	\$21,000
TOTAL FOR BUTLER ELEMENTARY SCHOOL:				\$21,000

CEMETERY

AUDITED ON: MAY 05, 2020



The cemetery is located along E Main Street. The site consists of burial plots surrounded by a stoned wall with a wrought iron entrance gate.

CEMETERY				
#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	No barriers identified. KMA has confirmed with the town there are no public elements.		N/A	N/A
TOTAL FOR CEMETERY:				N/A




DEMARCO PARK

AUDITED ON: MAY 05, 2020



DeMarco Park is located along East High Street. The site consists of an unpaved parking lot, a gazebo, and outdoor seating. There are no designated accessible parking spaces in the parking lot.

DEMARCO PARK

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Accessible Parking Designated accessible parking is not provided.		Pave and stripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as the associated access aisles. Unit Cost: \$1,500 per space or aisle Est. Quantity: 2 (1 space + 1 aisle)	\$3,000
2.	Accessible Route The gazebo, benches, and picnic tables are not located on an accessible route due to the grass. The gazebo is not located on an accessible route due to stairs. The picnic tables lack an accessible seating location.	 	Provide an accessible route to the gazebo, benches, picnic tables. Additional study required. Unit Cost: \$10,000 Quantity: 1 Build a ramp into the gazebo. Unit Cost: \$5,000 Quantity: 1 Provide at least one table, and no less than 5% of the total number of tables, that provides compliant knee and toe clearance. Unit Cost: \$250 ea. Est. Quantity: 1	\$15,250



3.	<p>Trails</p> <p>The trailhead not located on an accessible route, due to the excessive running slopes and gravel surface.</p>		<p>Provide an accessible route to the trailhead. Additional study required. Unit Cost: \$5,000 Quantity: 1</p>	\$5,000
TOTAL FOR DEMARCO PARK:				\$23,250

DW PARK

AUDITED ON: MAY 20, 2020



DW Park is located off South Street. The site consists of parking and hiking trails. No designated accessible parking spaces and no accessible routes are provided.

DW PARK				
#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Accessible Parking Designated accessible parking is not provided.		Stripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated signs and access aisles. Unit Cost: \$300 ea. Est. Quantity: 2 (1 space + 1 access aisle)	\$600
2.	Accessible Route An accessible route is not provided from the parking.		Provide an accessible route. Additional study required. Unit Cost: \$5,000 Quantity: 1	\$5,000
TOTAL FOR DW PARK:				\$5,600

FAGAN DRIVE/ CROWLEY PARK

AUDITED ON: MAY 05, 2020



The Fagan Drive/ Crowley Park is located along Hendrick Street. The site consists of several athletic fields and a paved lot. No designated accessible parking spaces are provided.

FAGAN DRIVE/ CROWLEY PARK				
#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Accessible Parking Designated accessible parking is not provided.		Stripe a portion of the parking lot to add accessible parking spaces (including at least one van space), as well as their associated signs and access aisles. Unit Cost: \$300 ea. Est. Quantity: 2 (1 space + 1 access aisle)	\$600
2.	Accessible Route The athletic fields and the bleachers are not located on an accessible route. A wheelchair space is not provided at the bleachers.		Provide an accessible route. Additional study required. Unit Cost: \$10,000 Quantity: 1 Provide an accessible space on an accessible route next to the bleachers. Unit Cost: \$25/SF Quantity: 20 SF	\$10,500



3.	Shed Structure A shed structure was identified during the audit. KMA requires more information regarding its intended use in order to assess the accessibility requirements.	No Image	N/A	N/A
TOTAL FOR FAGAN DRIVE/ CROWLEY PARK:				\$11,100

MOSES CURTIS MEMORIAL PARK

AUDITED ON: MAY 05, 2020



Moses Curtis Memorial Park is located along East High Street. The site consists of a gazebo and outdoor seating. There are no designated accessible parking spaces serving the park.

MOSES CURTIS MEMORIAL PARK				
#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	Accessible Route The benches and the description placard are not located on an accessible route.		Provide an accessible route. Additional study required. Unit Cost: \$5,000 Est. Quantity: 1	\$5,000
2.	Accessible Route The gazebo is not located on an accessible route due to stairs.		Build a ramp into the gazebo. Unit Cost: \$10,000 Quantity: 1	\$10,000
TOTAL FOR MOSES CURTIS MEMORIAL PARK:				\$15,000

PHARMACY PARK

AUDITED ON: MAY 05, 2020



Pharmacy Park is located across the street from the Avon Fire Station. It is a small greenspace with no public elements or parking.

PHARMACY PARK				
#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	No barriers identified. KMA has confirmed with the town there are no public elements.	No Image	N/A	N/A
TOTAL FOR PHARMACY PARK:				N/A

TRACY-MILLER PLAYGROUND

AUDITED ON: MAY 05, 2020



Tracy-Miller Playground is located on Page Street. The site consists of a playground and benches. There is no parking serving the playground.

TRACY-MILLER PLAYGROUND

#	Barrier Statement	Photo	Proposed Mitigation	Cost
1.	<p>Accessible Route</p> <p>The playground and the benches are not located on an accessible route.</p> <p>The playground lacks ground level play components and an accessible route between elements.</p>		<p>Provide an accessible route. Additional study required. Unit Cost: \$5,000 Quantity: 1</p> <p>Provide ground-level play components at the playground. Additional study required. Unit Cost: \$1,000 Quantity: 1</p>	\$6,000
TOTAL FOR TRACY-MILLER PLAYGROUND:				\$6,000