



## Town of Sudbury, Massachusetts

### PART A – Executive Summary

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## Introduction

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

The building facility survey set includes five (5) public schools and 14 public buildings – including one (1) police station, three (3) fire stations, one (1) library, two (2) DPW facilities, two (2) historic buildings, one (1) transfer station and four (4) municipal buildings. The outdoor facility set includes 11 recreation facilities. The accessibility survey includes all the spaces where the Town offers programs, services and activities to members of the public.

IHCD has submitted separate reports for each facility that was surveyed. To assist in prioritizing accessibility improvements to ensure compliance with the ADA Title II, each of the facility reports include an overview that identifies the most substantial accessibility issues and order of magnitude cost estimates for corrective action. Additionally, a detailed catalog that supplements the ADA Self-Evaluation narrative overview is also included. The catalog provides element-by-element photos of compliance issues, location and measurements – when applicable – at each assessed facility accompanied by recommendations and cost estimates for each accessibility issue.

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

Together, the ADA Self-Evaluation and ADA Transition Plan will enable the Town to make substantial progress in meeting its ADA responsibilities. The recommendations for corrective

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

With the *PART B – Evaluation of Non-discriminatory Policies & Practices in Programs, Services & Activities* report, IHCD has provided a complete assessment of Sudbury’s policies, practices and procedures. The ADA administrative requirements help ensure that the needs of people with disabilities are addressed in all services, programs and activities that the Town operates.

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

- The Town of Sudbury has hired a consultant (IHCD) to undertake its ADA self-evaluation (as basis for the Town’s Transition Plan).
- The Town of Sudbury has an ADA Coordinator in place.
- The Town’s Employee Handbook mentions equal opportunity.

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

Many key facilities are generally usable by people with disabilities but are not in full compliance with current accessibility requirements. The Flynn Building, for instance, provides access to many programs and can be accessed by most people because the building features a largely accessible entrance and has accessible routes through the building. Yet some of the key areas, such as the large meeting room, have accessibility issues. This meeting room is lacking an assistive listening system. In addition, two (2) service counters in the building lack a

compliant 36-inch high portion, a key component to access some of the services provided by the Town. The Goodnow Library is another example of a facility that provides access to most programs, however the facility lacks accessible work surfaces in six (6) areas and the Sara Sherman Now Lab lacks a sink with knee and toe clearance. Both of the aforementioned facilities lack fully accessible toilet rooms, which many individuals with mobility disabilities require.

The Town may comply with the requirements of Title II of the ADA through means such as reassignment of programs or services to accessible buildings or delivery of services at alternate accessible sites. The Town may also comply with the requirements by renovation or alteration of existing facilities and/or construction of new facilities, or any other methods that result in making the Town's services, programs or activities readily accessible to and usable by individuals with disabilities. Note that a public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with its Title II obligations.

In choosing among available methods for meeting the requirements of the ADA, the Town of Sudbury shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

In order to comply with the program accessibility obligations, the Town of Sudbury should consider:

1. Relocation of its programs, services and activities within a current facility.

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

2. Relocation of its programs, services and activities to another facility.

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

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

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

integrated seating possible.

Note that any corrective actions needed to ensure program accessibility must comply with the requirements of the 2010 ADA Standards and/or 521 CMR.

Furthermore, when completing alterations/renovations, keep in mind that an alteration that decreases the accessibility of a building below the requirements for new construction at the time of the alteration is prohibited.

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

- How to provide the program in the most integrated setting appropriate;
- The locations where the activities are offered;
- Which facilities are accessible and to what extent.

**Key Recommendations for Municipal Facilities:**

- Ensure there is an accessible route from all arrival points to those areas in the building where public programs, services and activities are provided. For example, the Hosmer House lacks an accessible route to the entrance, Town Hall lacks an accessible route into the meeting hall due to a noncompliant ramp and the Transfer Station lacks an accessible route to the service window.
- If parking is provided, ensure fully accessible parking spaces are provided. There are issues with accessible parking at multiple locations such as lack of or noncompliant accessible parking spaces, access aisles and signs. For example, Town Hall lacks a van-accessible parking space. The Fairbank Community Center has slopes greater than allowed at accessible parking spaces, lacks a van accessible parking space in the northeast parking lot and accessible parking signs are located lower than allowed.
- Ensure that fully accessible toilet rooms are provided in the building. Where it is technically infeasible to provide accessible multi-user toilet rooms, provide an accessible single-user toilet room in the same area as the existing multi-user toilet rooms.
- Ensure that where programs, services or activities are offered there is a sufficient number of accessible features (accessible counters, accessible work surfaces, etc.). For example, service counters are not compliant at the Fairbank Community Center, Town Hall and the

Flynn Building.

- If audible communication is integral to the use of the space, provide a compliant assistive listening system. This should be a priority at the Police Station meeting room and the large meeting room in the Flynn Building.
- Ensure that those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities are maintained in operable working condition (e.g., elevators or automatic door openers). For example the doors to the platform lift at the Loring Parsonage do not remain open for 20 seconds minimum.

#### **Key Recommendations for Public Schools:**

- Ensure that fully accessible toilet rooms are provided in each building. As mentioned before, where it is technically infeasible to provide accessible multi-user toilet rooms, provide an accessible single-user toilet room in the same area as the existing multi-user toilet rooms.  
If there is a toilet room in unique rooms such as a nurse's office, ensure that a fully accessible toilet room is provided. This includes maintaining the clear floor space at all fixtures free of any storage.
- Ensure that accessible sinks (with knee and toe clearance) are provided in at least one classroom per grade, if a sink or sinks are provided in those rooms. If accessible sinks are already provided, ensure they have insulated pipes.
- Ensure accessible work surfaces are provided in at least one classroom per grade. Furthermore, ensure that specialized classrooms (e.g., labs, art rooms etc.) have accessible work surfaces.
- Ensure that all elements in the classrooms are within reach range (e.g., emergency showers, first aid kits and dispensers).
- If audible communication is integral to the use of a space, provide a compliant assistive listening system.

#### **Key Recommendations for Outdoor Facilities:**

- Ensure there is an accessible route to all elements in the park/outdoor space (baseball fields, basketball courts, playgrounds, picnic areas, toilet facilities, etc.). For example, the following diagram shows proposed accessible routes between elements at Featherland Park with yellow and blue lines:



- Ensure there is a clear floor space adjacent to the bench at team seating areas and spectator seating areas at the baseball fields, basketball courts, etc.:
- Ensure that accessible routes are provided to and around playgrounds; in addition, ensure that an impact-attenuating accessible route is provided in the play area to all play components including at the new playground that is being installed at the Loring School.

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

- Provide an accessible route to at least one bench in each distinct area of each park.
- Ensure that at least 5% but no less than one of amenities such as picnic tables are accessible.