

ADA Self-Evaluation and Transition Plan

For the Town of Buckland

June 2021

Prepared by the Franklin Regional Council of Governments



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Part A – Introduction

The Town of Buckland hired the Franklin Regional Council of Governments (FRCOG) to conduct a comprehensive evaluation of the Town’s compliance under Title II of the Americans with Disabilities Act (ADA), which prohibits discrimination on the basis of disability. Specifically, Title II requires that:

No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity [35 CFR Part 35.130 (a)].

Title II of the ADA applies to state and local governments, while Title III of the ADA applies to the private sector such as business and non-profit organizations.

In 2021, the Town of Buckland secured a grant from the Massachusetts Office on Disability and hired the FRCOG to conduct the ADA Self-Evaluation and prepare an ADA Transition Plan. The FRCOG assessed all Town-owned buildings and parks as well as the Town’s programs, services, and activities to determine their accessibility to people with disabilities.

Like many communities in Massachusetts, Buckland is faced with a number of aging municipal buildings and facilities that may pose obstacles to residents with disabilities. The cost and work that is required to remove these barriers and bring them into compliance can be overwhelming to smaller communities with limited financial resources like Buckland. The Town has a total population of 1,950 residents, of which 14% have a disability.¹ This ADA Self-Evaluation and accompanying Transition Plan makes this daunting task a bit easier by identifying the issues, prioritizing them, and sorting out the high cost actions from the simpler, less expensive tasks.

Title II of the ADA sets administrative requirements on state and local governments and also requires that all Town’s programs, services, and activities be accessible to people with disabilities. Part B of this document summarizes the findings regarding the administrative requirements and access to programs, activities, and services. Part C discusses the evaluation and findings of the physical facilities owned by the Town of Buckland. Part D is the ADA Transition Plan, which catalogs all accessibility issues of the Town facilities that were found during the evaluations and recommends potential solutions. These recommendations have been prioritized, given an estimated timeframe, and assigned relative costs and responsible departments.

¹ 2015-2019 American Community Survey 5-Year Estimates, US Census Bureau.

Recent Progress

Buckland has been proactive in implementing ADA improvements. These include both large and small projects. Below is a summary of some of the projects that the Town has completed to upgrade its facilities and meet ADA requirements:

- Added an elevator and accessible entrance to Town Hall;
- Renovated the library in 2010 to be fully accessible;
- Designated an ADA Coordinator and adopted Nondiscrimination and Grievance policies in 2019; and
- Created a Complete Streets Prioritization Plan in 2018 and received funding in 2019 for pedestrian infrastructure improvements with ADA compliant crossings near Town Hall.

Methodology

To conduct the ADA Self-Evaluation of the Town's programs, services, and activities, the FRCOG staff distributed checklists designed by the New England ADA Center (a project of the Institute for Human Centered Design) to all Department Heads at an all-Department staff meeting that assessed three requirements of Title II of the ADA for each Department's programs and services:²

- Effective Communication practices
- General Nondiscrimination practices
- Website accessibility

The FRCOG also used the latest 2010 ADA Standards for Accessible Design (ADAAG 2010) to evaluate all of the Town's buildings.

² Self-Evaluation Form Checklists from the New England ADA Center, <https://www.adaactionguide.org/resources#faqs>.

Part B – Evaluation of Non-Discriminatory Policies and Practices in Programs, Services, and Activities

Introduction

Title II of the ADA also places administrative requirements on local governments in addition to ensuring the accessibility of the Town's programs, activities, and services. These administrative requirements include the appointment of a Town ADA Coordinator, the creation of a public notice regarding nondiscrimination policies, and the adoption of a complaint procedure. The FRCOG staff, with the assistance of Buckland staff, evaluated the Town's compliance with these administrative requirements as well as the Town's policies related to nondiscrimination, effective communication, and website accessibility.

The findings of this evaluation are discussed in this section along with recommendations to ensure compliance with Title II of the ADA.

Analysis

The FRCOG evaluated each of Buckland's Departments and the overall Town governance with regard to accessibility requirements. Checklists from the New England ADA Center were provided to each Department Head to complete that evaluated a Department's policies related to General Nondiscrimination, Effective Communication, and Website Accessibility. The findings of these completed checklists are summarized below and recommendations are provided to ensure that people with disabilities are provided the same opportunities as others to participate in programs, services, and activities in the Town of Buckland.

1. Designation of Responsible Employer

Title II of the Americans with Disabilities Act requires that a local government designate a responsible employee to coordinate compliance with the ADA and ensure that there is a person at the Town who is knowledgeable with the many requirements of the ADA. The Town of Buckland has met this requirement by designating Heather Butler, the Town Administrator, as the ADA Coordinator.

2. Complaint Procedures

In addition to designating an ADA Coordinator, a local government is required to provide a complaint procedure that offers ways for people to file complaints alleging discrimination on the basis of disability with regard to employment or in the provision of services, activities, and programs. The Town of Buckland has met this obligation with an approved Complaint Procedure. See Appendix A for copy of Complaint Procedure.

3. Notice

Title II also requires that a local government provide public notice of the provisions of the ADA to members of the public that may participate in the Town's program, services, and activities. The Town of Buckland has met this obligation with an approved Notice that is posted at Town Hall and on the town's website. See Appendix A for copy of Public Notice.

4. Effective Communication

Under Title II of the Americans with Disabilities Act, the Town must communicate effectively with people who may have hearing, vision, or speech disabilities. To do so, this may require Buckland to provide auxiliary aids and services to meet its responsibility of effective communication. This may include, but is not limited to: providing sign language interpreters, Computer-Assisted-Real-time-Translation (CART), written materials for persons who are deaf or have difficulty hearing, Braille or large print information in digital format for people who are blind or have difficulty seeing.

Town of Buckland Department Heads completed checklists from the New England ADA Center that evaluated each department's practices and policies regarding their knowledge and ability to provide effective communication for their programs, services, and activities to allow equal participation for persons with disabilities. The completed checklists show that Town staff are willing to comply with Title II, but do not know how to do so in all elements of practice. In particular, most staff members do not know:

- how to go about arranging for different types of auxiliary aids and services to provide for effective communication when needed (particular for those people who are deaf or hard of hearing and those that are blind or visually impaired);
- if there is a policy or procedure for handling requests for auxiliary aids; or
- what the procedure is for determining when the provision of an auxiliary aid or service is an undue financial or administrative burden.

Appendix B provides a summary of the answers to the checklist's questions regarding effective communication practices.

To ensure that Town staff comply with Title II, it is recommended that Buckland develop and distribute clear procedures for employees as to how to arrange for auxiliary aids and services. A written informational handout on Effective Communication Procedures will help staff understand their responsibilities and clarify what to do in the event a person needs assistance with communication.

During the COVID-19 Pandemic, the Town of Buckland had been conducting much of its municipal business virtually. The Town uses Zoom as its video conferencing platform. Zoom has many accessible features and meets almost all website-related Section 508 and WCAG 2.1 AA accessibility recommendations. Zoom also has various options that can be enabled to allow features such as closed captioning directly or through third parties. However, employing these features takes some practice and training. As Buckland continues to use either this or other video conferencing platforms, it will be very important that staff be trained on the software's accessibility features to ensure effective communication.

5. Reasonable Modifications of Policies, Practices, and Procedures

Title II of the ADA also requires that local governments ensure that people with disabilities have an equal opportunity to participate in the services, programs, and activities that the Town provides. This may require that the Town of Buckland provide "reasonable modifications" to policies and practices to allow equal participation. When applying to Town staff, this requirement may include modifying work schedules; job restructuring; and making facilities used by employees readily accessible to an employee with a disability. When applying to members of the public to be able to participate in a program, service, or activity, this requirement may include allowing service animals in locations where animals are not typically permitted; allowing the use of motorized devices in places where they are not allowed; or providing assistance with application completion.

The results of the completed checklists from the Town's Department Heads show that with respect to the general nondiscrimination requirements of Title II, Buckland staff members are very willing to comply and have a good, general understanding of the many responsibilities and requirements that they have as a local government. However, there are topics with which Department staff could be more familiar. For example, some departments do not know that they are supposed to require assurances from contractors to fulfill Title II requirements. Appendix B provides a summary of the answers to the checklist's questions regarding general nondiscrimination practices.

A written and distributed summary of nondiscrimination policies will help staff ensure that all participants have the opportunity for equal participation.

6. Website Accessibility

Title II of the Americans with Disabilities Act requires that local governments ensure that, when viewed in their entirety, the programs, services, and activities offered are equally available to people with disabilities. Websites of a local government are considered to be a “program” and should be accessible to the standards of the Web Content Accessibility Guidelines 2.1 AA or Section 508 Standards.

To evaluate the Town of Buckland’s websites, a checklist was sent to each Department that maintained its own website or had website administrative privileges. The completed checklists show that the staff members who have administrative rights are not aware of website accessibility standards and were not sure if the webpages have been updated and tested for compliance with the latest standards. They would like a policy to clarify this and to help make sure that future content is accessible.

Buckland should develop a written policy stating that the Town websites should be accessible to ensure that existing and future staff members who have website administrative privileges maintain the accessibility of the website. In addition, staff should be provided guidance about the requirements of the Web Content Accessibility Guidelines 2.0 AA. It would also be very helpful to the Town if people with disabilities who use screen reading software and other assistive technology periodically evaluate the website.

The FRCOG assessed the main Town of Buckland Website (<https://www.town.buckland.ma.us/>) in the free Web Accessibility Evaluation Tool (WAVE), which evaluates web content for accessibility under the Web Content Accessibility Guidelines. The results show that there are a few major errors on the website and are mostly related to the contrast and size of fonts against backgrounds (specifically, the Town Calendar was flagged as difficult to read). There are also other warnings and alerts that could prevent or hinder visually-impaired individuals from fully accessing the Town’s website. Fortunately, many can be easily fixed with simple actions, such as changing the color of backgrounds or providing alternative text for images.

Part C – Evaluation of Facilities and Infrastructure

Introduction

FRCOG staff evaluated the following Town-owned buildings and facilities for this ADA Self-Evaluation between February and May 2021 according to the 2010 ADA Standards:

Buildings and Facilities owned by the Town of Buckland and Evaluated by FRCOG

- Buckland Museum
- Buckland Recreation Area
- Cricket Field
- Public Library
- Highway Garage
- Police Station
- Town Hall
- Transfer Station
- Wastewater Treatment Plant

Analysis of Building Accessibility

Buckland’s Town-owned buildings range in levels of accessibility. For this report, the FRCOG has assigned categories of “functional accessibility” to each building for ease of reference.

These categories are:

- **Accessible** – the facility is fully accessible to a wheeled mobility device user or person with mobility challenges;
- **Mostly Accessible** – A wheeled device user or person with mobility challenges can enter the facility, access the primary function within the facility, and access the bathroom;
- **Moderately Accessible** – A wheeled device user or person with mobility challenges can enter the facility, access the primary function within that facility, but cannot use the bathroom;
- **Minimally Accessible** – A wheeled device user or person with mobility challenges can only enter the facility, but cannot access the primary function or the bathroom;
- **Inaccessible** – A physical barrier exists that would prevent a wheeled device user from entering the facility.

The following table places each building or facility into one of these categories:

Accessible	Mostly Accessible	Moderately Accessible	Minimally Accessible	Inaccessible
Buckland Public Library	Town Hall		Buckland Recreation Area	Buckland Museum
Highway Garage	Police Station			Cricket Field
				Transfer Station
				Wastewater Treatment Plant

The above assessment rates each building’s accessibility based on the ability of people with disabilities to access the programs, services, and activities that are offered within those buildings. However, it should be noted that many Town buildings have areas within them that are not accessible at all (ex. basements or staff-only storage areas). Making these spaces accessible according to the 2010 ADA Standards may be structurally difficult and/or practically infeasible. Despite these potential obstacles, this accompanying Transition Plan identifies

issues within these spaces and recommends ways to improve accessibility in ways that may be feasible – at least for users who do not require wheeled mobility devices – while acknowledging the inaccessibility these spaces pose for some persons with disabilities.

An important caveat to this rating system is that it primarily evaluates the Town facilities from a member of the public’s perspective, not necessarily from the perspective of an employee who must work in these facilities and access non-public spaces on a regular basis. However, all of the deficiencies in the buildings with respect to the 2010 ADA Guidelines have been noted in the ADA Transition Plan that is included in this Report.

Summary of Building Evaluation Findings

Accessible Buildings

Buckland Public Library

The Library was completely renovated in 2010 and meets all current ADA regulations and is fully accessible to both the public and staff.

Highway Garage

The Highway Garage was newly constructed in 2019 and meets all current ADA regulations and is fully accessible to both the public and staff.

Mostly Accessible Buildings

Police Station

The Police Station is considered mostly accessible because a user can enter, access its primary function, and use the bathroom. To become fully accessible would require minor changes that include lowering the height of the service counter; replacing door knobs; and repainting the ADA accessible parking space.

Town Hall

The Town Hall is rated as mostly accessible because users can enter the building, access its primary functions, and use the bathrooms. However, there are some minor issues that make accessing some of the building’s functions difficult due: to height of transaction counters; lack of maneuvering space at doorways; and issues with wayfinding signage. The rear accessible entrance’ door is heavy to open and would greatly benefit from an automatic door opener for easier accessibility. Aside from the automatic door opener, most of the issues are relatively inexpensive and easy to correct.

Minimally Accessible Buildings

Buckland Recreation Area

The Buckland Recreation Area is rated as minimally accessible because users may be able to enter some of the facilities at the site, but have difficulty accessing the amenities and/or using the bathroom. The primary reason for this rating is the lack of connecting accessible routes to the many amenities, such as the playground, recreation office, basketball court, and baseball field. While users may be able to drive close to these amenities, they may have difficulty getting to them from any parking area. The exception is the pavilion, which is connected by a new sidewalk from the parking lot. However, the pavilion has issues with the bathroom that may prevent people with disabilities from using it.

Inaccessible Buildings/Facilities

Buckland Museum

The Buckland Museum is a historic building and as a result has many accessibility issues. Correcting the issues should be done within the context of the historical nature of the building. The primary problems are the lack of an accessible route connecting parking to the entrance of the building and the presence of stairs at the entrance – users cannot get near the building, nor enter the building if they use a wheeled mobility device. In addition to the lack of a restroom on the site, the only way to access the basement and 2nd floor are via a staircase.

Cricket Field

Cricket Field is considered inaccessible because the only formal parking is located on a steep hill above the field with no easy way for a person in a wheeled mobility device to travel to the field. There are also no accessible paths to connect to the various amenities, such as the bleachers or concession stand.

Transfer Station

The Transfer Station is rated as inaccessible because users may have difficulty accessing the primary function of the site and would need assistance for some of the functions, such as reaching the recycling and waste areas. Replacing the stairs to these areas with ramps would move the Transfer Station to the Moderately Accessible category.

Wastewater Treatment Plant

The Wastewater Treatment Plant is rated as inaccessible because users in wheeled mobility devices cannot enter the building due to the presence of steps.

Program Accessibility

There are several programs in Buckland that may be inaccessible to individuals with disabilities, although for some there could be accommodations made to allow access.

Recreational programs offered at the Buckland Recreation Area and Cricket Field are not currently accessible due to the lack of connecting paths to many of the amenities. While the pavilion at the Recreation Area does have a connecting path, it does not have bathrooms that are accessible. Mohawk Trail Regional School in Buckland could be an alternative location for sports or other outdoor events/programming, although it is not owned by the Town of Buckland.

The Transfer Station is not accessible, but staff can assist users with their trash disposal at this time.

The Wastewater Treatment Plant is not accessible, but staff could conduct meetings at accessible locations such as the town hall or offer virtual tours to the public.

Part D – ADA Transition Plan

The ADA Transition Plan for Buckland catalogs every issue that the FRCOG staff discovered during the Self-Evaluation of the Town’s buildings and facilities between February and May 2021. The Transition Plan recommends solutions to bring these identified issues into compliance with the 2010 ADA Guidelines and then prioritizes them, provides relative costs, estimates a feasible timeframe of implementation, and assigns the issue to the appropriate implementing department. In addition, the majority of issues have been documented with photographs, which can be found in Appendix C.

The following categories were used for the Transition Plan’s prioritization:

- 1) **Priorities:** High
Medium
Low

- 2) **Timeframe:** Short (0-4 years)
Medium (5-9 years)
Long (10+ years)
Ongoing

- 3) **Cost:** \$\$\$\$ (Major capital project)
\$\$\$
\$\$
\$ (Maintenance costs)

Issues were assigned a “High” priority if they:

- Made it difficult and/or prevented a person with a disability to enter a room in which a service is provided;
- Made it difficult and/or prevented a person with a disability to use the bathroom facilities; or
- Made it difficult and/or prevented a person with a disability to access an important civic site as a pedestrian on a sidewalk.

Buckland ADA Self-Evaluation & Transition Plan

Buckland Recreation Area (66 Ashfield Road)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
Accessible Routes	Sidewalks/Paths		There are no sidewalks or paths to the basketball courts, playground, baseball field, recreation center.	0	Install a stable, smooth accessible path to each of these items from the parking areas.	High	Short	\$\$\$	Recreation Committee
Rec Center Office	Ramp	4639	Ramp to entrance of recreation center building does not have ADA compliant handrails.		Replace existing handrails with ones that are ADA compliant.	High	Short	\$\$\$	Recreation Committee
Parking									
	Accessible Parking		There is no parking designated as accessible at any of the parking areas.	0	Designate at least 1 space as accessible with paint and signage that is 8' wide with a 5' wide aisle.	High	Short	\$\$	Recreation Committee
Access to Goods and Services									
Playground	Accessible Route	121220	Surface is covered in mulch making access difficult.		Make sure that ground surface complies with current <i>ASTM Standard Specification for Determination of Accessibility of Surface Systems Under and Around Playground Equipment</i> .	Medium	Medium	\$\$\$	Recreation Committee
Pavilion	Bathroom Doors	4632	Door knobs to pavilion bathrooms are turn type, which are difficult to operate for individuals with disabilities.		Replace with lever-style door fixtures.	High	Short	\$\$	Recreation Committee
	Signage	4632	Bathrooms do not have visually contrasting, tactile signs.		Install visually contrasting, tactile signs for the bathrooms on latch-side of doors.	High	Short	\$\$	Recreation Committee
	Bathrooms	114254	Toilets do not have rear grab bars.	0	Install rear grab bars for all toilets that are 36" wide and at least 33" high.	High	Short	\$\$	Recreation Committee
Rec Center Office	Signage	4632	Bathrooms do not have visually contrasting, tactile signs indicating which is ADA bathroom.		Install visually contrasting, tactile signs for the bathrooms on latch-side of doors.	High	Short	\$\$	Recreation Committee
	Accessible Bathroom Door	4647	Door does not self-close.		Install or repair closer on door so that it self-closes.	High	Short	\$	Recreation Committee
	Bathroom Sink	4648	Exposed pipes under the sink.		Install covers around pipes to protect against contact.	Medium	Medium	\$\$	Recreation Committee

Buckland ADA Self-Evaluation & Transition Plan

Cricket Field (Conway Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
	Accessible Route		There is no path connecting the parking lot to the bleachers, concession stand, or benches.		Create a smooth, path from parking to amenities.	High	Medium	\$\$\$	Recreation Committee
Parking									
Parking	Accessible Parking		There are no parking spaces designated as accessible.	0	Designate 1 space as accessible that is 8' wide with a 5' wide aisle on the lower level near the field. The current parking area is up a hill that is too steep to be accessible.	High	Short	\$\$	Recreation Committee
Access to Goods and Services									
	Benches	115330	Benches do not have backs for support.		Replace benches with back support.	Low	Long	\$\$	Recreation Committee
	Bleachers	115328	Bleachers are in poor condition and are difficult to navigate.		Update bleachers with ones that are more accessible (ex. have handrails)	Low	Long	\$\$\$\$	Recreation Committee

Buckland ADA Self-Evaluation & Transition Plan

Highway Garage (Sears Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
Parking	Accessible Parking	1978	There are no parking spaces designated as accessible.	0	Designate 1 space as accessible that is 8' wide with a 5' wide aisle.	High	Short	\$	Town Administrator
Access to Goods and Services									
	Signage		There is no ADA signage for the various rooms.	0	Install signage with visually contrasting/tactile lettering and braille on the wall on latch side of door no higher than 60".	Low	Long	\$\$	Town Administrator
Breakroom	Sink	4616	Sink does not have toe or knee clearance positioned for a forward approach.	0	Provide a sink with toe and knee clearance of 17"-25" for a forward approach.	Low	Long	\$\$	Town Administrator

Buckland ADA Self-Evaluation & Transition Plan

Library (30 Upper Street)

Location	Floor	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking										
Parking		Signage	4662	Sign indicating accessible parking is too low.	45"	Increase height of sign to a minimum of 60" from ground.	Medium	Short	\$\$	Town Administrator
Bicycle Parking		Accessible Route	4665	Bike racks are not located on an accessible route.		Ensure bike racks are connected to an accessible route via a smooth, stable pathway.	Medium	Short	\$\$	Town Administrator
Access to Goods and Services										
Kitchen		Refrigerator	4726	Refrigerator opens on wall side.		Rehang door so that it opens towards the room and not the wall.	Low	Long	\$	Town Administrator

Buckland ADA Self-Evaluation & Transition Plan

Buckland Museum (20 Upper Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
Parking	Accessible Parking	4662	There is no designated accessible parking	0	Create 1 ADA space with paint and a signage.	Medium	Short	\$\$	Town Administrator
	Accessible Route	4654	There is no accessible route to entrance or picnic tables.		Create an accessible route via a smooth, stable pathway from ADA parking to entrance and picnic table.	Medium	Short	\$\$	Town Administrator
Access to Goods and Services									
Main Entrance	Stairs	4656	Building is only accessible via 3 steps and handrail is not up to code.		Install a ramp to main entrance.	Medium	Long	\$\$\$	Town Administrator
	Doorway	4656	Door hardware are turn knobs that cannot be operated with a closed fist.		Replace door hardware with ones that can be operable with one hand and not require tight grasping, pinching, or twisting of the wrist.	Low	Long	\$\$	Town Administrator
Entire Building	Bathroom		There are no bathroom facilities on the premises.		Install an accessible bathroom.	Medium	Long	\$\$\$\$	Town Administrator
	Accessible Route	4704	Not all pathways are wide enough for maneuvering.		Ensure that furniture is a clear path that is a minimum 36" wide.	Medium	Medium	\$	Town Administrator
First Floor	Thresholds	4709	Thresholds are 1" high.	3"	Install beveled threshold so that the height does not exceed 1/4" in height.	Low	Long	\$	Town Administrator
Second Floor	Accessible Route	4711	This floor is only accessible via steep staircase.		Install an elevator or lift to this floor.	Low	Long	\$\$\$\$	Town Administrator
Basement	Accessible Route	4701	This floor is only accessible via steep staircase.		Install an elevator or lift to this floor.	Low	Long	\$\$\$\$	Town Administrator

Buckland ADA Self-Evaluation & Transition Plan

Police Station (69 Conway Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
Front Parking	Accessible Parking	4599	Paint is peeling from accessible space and is missing sign.		Repaint ADA space to make clear its designation as accessible. Install a sign that is at least 60" high.	High	Short	\$	Town Administrator
Access to Goods and Services									
	Doorways	4684	Door hardware are turn knobs that cannot be operated with a closed fist.		Replace door hardware with ones that can be operable with one hand and not require tight grasping, pinching, or twisting of the wrist.	Low	Long	\$\$	Town Administrator
Accessible Bathroom	Toilet	4689	Flush control is on the wrong side of the toilet.		Relocate flush control to the open side of the toilet.	Medium	Medium	\$\$	Town Administrator
Front Office	Service Desk	4679	Service desk is too high.	41"	Lower service desk or a 36" long portion of desk to a height of no more than 36" high.	Low	Long	\$\$	Town Administrator

Buckland ADA Self-Evaluation & Transition Plan

Town Hall (17 State Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
Accessible Entrance	Doorway	4480	Interior door to accessible entrance is difficult and heavy to open.	0	Install an automatic door opener for exterior door.	High	Short	\$\$\$	Town Administrator
Accessible Entrance	Signage	4484	Signage indicating accessible entrance is not tactile.		Install signage with visually contrasting/tactile lettering and braille on the wall on latch side of door no higher than 60".	High	Short	\$	Town Administrator
Access to Goods and Services									
Ground Floor Bathroom	Accessible Toilet	4488	Flush control is on the wrong side of the toilet.		Relocate flush control to the open side of the toilet.	Medium	Medium	\$\$	Town Administrator
Treasurer	Signage	4518	Signage is not affixed to the wall and is too low.		Install signage with visually contrasting/tactile lettering and braille on the wall on latch side of door no higher than 60".	High	Short	\$	Town Administrator
Accountant	Signage	4513	Signage is not posted to the latch side of the door and is too low.		Install signage with visually contrasting/tactile lettering and braille on the wall on latch side of door no higher than 60".	High	Short	\$	Town Administrator
Shared Office	Doorway	4521	Not enough room on push side of door latch for maneuvering due to shelf.	3"	Relocate furniture so that there is a minimum of 12" to latch side of door to puh open.	Low	Short	\$	Town Administrator
Town Clerk	Doorway	4535	Not enough room on push side of door latch for maneuvering due to desk.	1"	Relocate furniture so that there is a minimum of 12" to latch side of door to push open.	Low	Short	\$	Town Administrator
Administrative Assistant	Doorway	4542	Not enough room on push side of door latch for maneuvering due to shelving.	3"	Relocate shelving so that there is a minimum of 12" to latch side of door to push open.	Low	Short	\$	Town Administrator
Men's 2nd Floor Bathroom	Accessible Toilet	4567	Flush control is on the wrong side of the toilet.		Relocate flush control to the open side of the toilet.	Medium	Medium	\$\$	Town Administrator
	Doorway		Door does not self-close.		Install or repair closer on door so that it self-closes.	High	Short	\$	Town Administrator
Select Board	Signage	4570	Signage is not posted to the latch side of the door and is not tactile.		Install signage with visually contrasting/tactile lettering and braille on the wall on latch side of door no higher than 60".	High	Short	\$	Town Administrator

Buckland ADA Self-Evaluation & Transition Plan

Transfer Station (Hodgen Road)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
Parking	Accessible Parking		There are no parking spaces designated as accessible.	0	Designate 1 space as accessible that is 8' wide with a 5' wide aisle.	High	Short	\$	Town Administrator
Access to Goods and Services									
	Accessible Route	4627	There are only stairs to access dumpsters.		Replace stairs with ramps that are at least 36" wide, a slope that does not exceed 8.33%, and a 60" x 60" landing space for turning.	High	Medium	\$\$\$	Town Administrator

Buckland ADA Self-Evaluation & Transition Plan

Waster Water Treatment Facility (16 Gardner Falls Rd)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
Main Entrance	Door	4589	There is a gap of 1.5" between concrete and pavement and a height of 2" to threshold of door.	3"	Fill gap to create a smooth surface and transition to doorway so that the threshold does not exceed 1/4" in height.	High	Short	\$	Town Administrator
Parking									
Parking	Accessible Parking	4587	There are no designated ADA spaces.		Create 1 ADA space with paint and a signage near the entrance.	Medium	Medium	\$\$	Town Administrator

Appendix A

Buckland's Notice of Nondiscrimination and Complaint Procedure

TOWN OF BUCKLAND
MASSACHUSETTS



ADA Coordinator Designation Form

ADA Coordinator Name: Heather Butler

Name of City/Town Department that ADA Coordinator Works: Town of Buckland

Job Title: Town Administrator

E-Mail: twadmin@town.buckland.ma.us

Phone: 413 625-6330 ext 5

Mailing Address: 17 State Street, Shelburne Falls, MA 01370

Date Appointed: June 30, 2019

Is This Appointment: Permanent OR Acting Does this ADA Coordinator report directly to the appointing authority? Position is permanent.

Are the ADA Coordinator Duties Full-Time OR Part-Time Direct Supervisor (Name and Title): Full time

Appointing Authority Signature:

Title: Select Board Chair

Date: Oct. 5, 2020

ADA Coordinator Signature:

Date: Oct. 5, 2020

A copy of this form has been emailed to: The Massachusetts Office On Disability, mod-info@state.ma.us

17 STATE STREET - BUCKLAND • SHELBURNE FALLS, MA • 01370
PHONE: (413) 625-6330 • FAX: (413) 625-8570

Town of Buckland ADA Statement from Personnel Policy of January 31, 2020

5.2 *Non-Discrimination*

The Town recognizes the right of individuals to work and advance on the basis of merit, ability, and potential without regard to age, sex, marital status, race, color, creed, national origin, disability, veteran status, military status, or sexual orientation. Non-discrimination and equal opportunity are the policy of the Town in all of its employment programs and activities.

The Town is also committed to taking affirmative measures to ensure equal opportunity in the areas of recruitment, hiring, promotion, demotion or transfer, layoff or termination, rates of compensation, in-service training programs, and all other terms and conditions of employment. The town is committed to fostering and encouraging a workplace comprised of individuals of diverse backgrounds, age, sex, marital status, race, color, creed, national origin, disability, veteran status, military status, and sexual orientation.

Based on this understanding, the Town shall:

Recruit, hire and promote in all job classifications without regard to age, sex, marital status, race, color, creed, national origin, disability, veteran status, military status, or sexual orientation.

Make decisions about employment so as to encourage the development of a diverse workforce.

Ensure that employment and promotion decisions are made in accordance with the principles of equal opportunity but imposing only valid, job-related requirements for employment and promotional opportunities.

Ensure that all other personnel actions such as compensation, benefits, transfers, layoff, recall, training, and social and recreational programs will be administered without regard to age, sex, marital status, race, color, creed, national origin, disability, veteran status, military status, or sexual orientation.

Prohibit any kind of harassment based on age, sex, marital status, race, color, creed, national origin, disability, veteran status, military status, or sexual orientation.

No retaliatory action against those persons who file complaints of discrimination or against individuals who cooperate in such investigations will be tolerated. Violation of this policy will lead to appropriate disciplinary action up to and including termination from Town service.

Anyone who feels that he or she has been discriminated against by the Town on the basis of age, sex, marital status, race, color, creed, national origin, disability, veteran status, military status, or sexual orientation in employment practices may file a grievance in accordance with the procedures described in Section 5.4 of this Policy.

5.4 *Americans with Disabilities Act*

All Town employees shall comply with requirements of the regulations contained in the Americans with Disabilities Act of 1990.

The Town will not discriminate against people with disabilities in any employment practices or in terms, conditions or privileges of employment, including, but not limited to: application, testing, hiring, assignment, evaluation, disciplinary action, training, promotion, medical examination, layoff/recall, termination, compensation, leaves or benefits.

The Town has and will continue to establish occupational qualifications for each position, including the education, skills, and work experience required, and the physical, mental and environmental standards necessary for job performance, health, and safety. Such standards are job-related and consistent with business necessity.

The Town will provide reasonable accommodation to the known physical or mental limitations of a qualified applicant or employee unless such accommodation will impose undue hardship on the Town.

Heather Butler

Section 11 - GRIEVANCE/HEARING PROCEDURES

11.00 Grievance

As used in this section, the word "grievance" shall be construed to mean a dispute between an employee and the Town of Buckland over the administration of any component of this Personnel Policy, with the exception of Section 9 - Disciplinary Action since the town charter provides for resolution of those matters.

11.01 An employee shall follow the procedures delineated beneath the appropriate designation of either non-exempt or exempt, depending upon their basis of pay.

11.10 Non-Exempt Employees

11.11 Step 1: The employee shall first notify the department head in writing of the nature and facts of the grievance within three (3) working days of the occurrence.

11.12 The department head shall determine a resolution of the grievance and communicate it to the employee within three (3) working days of the initial notification.

11.13 Step 2: If the grievance is not settled at Step 1, the employee shall submit such grievance in writing to the town manager or appointing authority within five (5) working days.

11.14 Step 3: The town manager or appointing authority shall, within five (5) working days of the date of receipt of the grievance, call a hearing to review the nature and facts of the grievance.

11.15 At such hearing, the town manager or appointing authority may request the attendance of the employee, the employee's authorized representative, if any, the department head and anyone else involved in, or with knowledge of the grievance.

11.16 Within ten (10) working days following such hearing the town manager or appointing authority shall render a decision in writing to all concerned. Such decisions are final and without further procedural appeal.

Note: To ensure the rights of a fair hearing for all town employees, those non-exempt employees who report directly to the town manager shall be able to use the procedure delineated for exempt employees.

11.20 Exempt Employees

11.21 Step 1: The employee shall first notify the town manager or appointing authority in writing of the nature and facts of the grievance within three (3) working days of the occurrence.

11.22 The town manager or appointing authority shall make and return the town's resolution regarding the complaint in writing within three (3) working days after receiving such notification.

11.23 Step 2: If the resolution of the matter determined by the town manager or appointing authority is not satisfactory to the employee, the employee shall submit such complaint in writing to the Personnel Board within five (5) days of receipt of the written resolution.

- 11.24 Step 3:** The Personnel Board shall call a hearing to review the nature and facts of the complaint within fourteen (14) days of receipt of the written notification from the employee.
- 11.25** The Personnel Board may call the employee, the employee's representative, if any, the town manager or appointing authority, or any other person involved in the matter to attend the hearing.
- 11.26** Within fourteen (14) days after the hearing, the Personnel Board shall render a decision in writing to all concerned. Such decisions shall be advisory to the town manager. Should the town manager decide not to comply with the decision of the Personnel Board, the town manager shall provide in writing reasons for his decision and file a copy with the town clerk.
- 11.30 Grievance Procedure for Discrimination**
As outlined in the town's Affirmative Action Plan for Employment the following procedure may be utilized by any employee who believes that said employee has been discriminated against on the basis of race, sex, color, handicap, religion, national origin, national ancestry, or age through the action of a department head, supervisor or other employee:
- 11.31 Step 1:** Present the grievance in writing to the town manager/affirmative action officer.
- 11.32** If the affirmative action officer does not resolve the grievance within a reasonable period of time (five (5) days shall be considered a reasonable period of time) the employee may request a formal hearing before the affirmative action officer to be held within fifteen (15) days of the request.
- 11.33 Step 2:** The employee may appeal the outcome of the hearing to the Personnel Board who shall within twenty (20) working days of the notice of appeal investigate the complaint and determine the basis and validity of the complaint.
- 11.34** If the Personnel Board determines that the grievance is valid, it shall implement necessary administrative actions to enforce policies.
- 11.35** The affirmative action officer shall explain to any aggrieved person the rights of the person under appropriate state and federal law.
- 11.40 Grievance Procedure for Sexual Harassment**
The procedure for handling allegations of sexual harassment is delineated in Section 5.40 as part of the town's policy on sexual harassment.

Appendix B

Summary of responses by Buckland Department Heads regarding ADA Policy Requirements

Effective Communication Checklists

General Nondiscrimination Checklists

Website Checklists

Buckland ADA Self-Evaluation

Effective Communication Checklist		Total Responses	
		Yes	No
1)	Does the public entity know how to provide the following for people who are deaf or hard of hearing?		
	a. Sign language, oral, and cued speech interpreters	1	5
	b. Video remote interpreting (VRI) services		6
	c. Computer-assisted real-time transcription (CART) services		6
	d. Assistive listening devices		6
	e. Open and closed captioning of videos		6
	f. Real time captioning of television programs	1	5
	g. Other		2
2)	Does the public entity know how to provide documents in the following formats for people how are blind or visually impaired and others with print disabilities?		
	a. Braille		6
	b. Large print	1	5
	c. Audio recordings		6
	d. Accessible electronic formats that can be accessed by screen reading software (plain text or html)	1	5
	e. Screen reader software installed on a computer that is used by the public (ie. library)		6
	f. Magnification software installed on a computer that is used by the public (ie. computer lab)		6
	g. Optical readers		6
h. Other		2	
3)	Does the public entity have a policy or procedure to handle requests for auxiliary aids and services?		5
4)	Are employees and officials aware of the public entity's obligation to provide auxiliary aids and services?		6
5)	Do employees and officials know how to arrange for auxiliary aids and services? Arrangements could be made directly or through the ADA coordinator or another staff person.	2	4
6)	Does the public entity give primary consideration to the person with a disability when determining what type of auxiliary aid or service to provide?	2	4
7)	Are employees and officials aware that it is inappropriate to request that family members and friends of people who are deaf serve as sign language interpreters, except in emergencies or if the individual wants the family member or friend to interpret and it's appropriate to do so?	4	2
8)	Are employees and officials aware that a companion of a program participant has a right to auxiliary aids and services if the companion has a communication disability and is an appropriate person with whom the public entity should or would communicate?	4	1
9)	Are captions and audio description provided on videos and television programs the public entity produces and videos on its website?	2	2
10)	Does the public entity have a policy or procedure for determining if an auxiliary aid or service would be an undue financial and administrative burden?	2	4

Buckland ADA Self-Evaluation

Effective Communication Checklist		Total Responses	
	Questions	Yes	No
11)	Do employees and officials know 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?	3	3
12)	Where telephones are available to the public for making outgoing calls, such as in hospital waiting rooms, are TTYs available for people with hearing and speech disabilities?	2	2
13)	Do telephone emergency services, including 911, provide direct access to people who use TTYs and computer modems?	1	1

Buckland ADA Self-Evaluation

General Nondiscrimination Checklist		Total Responses	
		Yes	No
1)	Do policies, practices and procedures provide an equal opportunity for people with disabilities to participate in services, programs and activities; that is, do policies not discriminate against people on the basis of disability?	4	2
2)	Are there circumstances in which the participation of a person with a disability would be excluded or restricted?	2	4
3)	If yes, are the exclusions or restrictions necessary to the operation of the program or to the safety of other participants?	2	2
4)	Are there separate services, programs or activities for people with disabilities or a class of people with disabilities?	3	4
5)	Do all employees who contract with outside agencies, organizations or businesses know that the public entity's obligations apply whether the public entity provides the service, program or activity directly or contracts for it?	3	2
6)	Does the public entity notify each contractor of its responsibilities for providing contracted services in a nondiscriminatory manner?	1	4
7)	Does the public entity require assurances from contractors of their fulfillment of Title II requirements?	1	4
8)	Are there procedures to ensure that contractors provide the services, programs and activities in a nondiscriminatory manner consistent with the Title II requirements?		2
9)	Are employees and officials aware that the public entity is obligated to make a reasonable modification in policies, practices, or procedures if the modification is necessary for a person with a disability to participate?	5	1
10)	Are employees and officials aware that:		
	a. The public entity must allow service animals to accompany people with disabilities in all areas where people without service animals are allowed to go?	6	
	b. Only two questions may be asked: (1) Is the dog a service animal required because of a disability? and (2) What work or task has the dog been trained to perform?	5	1
	c. The public entity may not ask about a person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task?	5	1
	d. A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken and, in these circumstances employees must offer the person with the disability the opportunity to obtain goods or services without the animal's presence?	5	1
	e. The public entity must permit a miniature horse to accompany a person with a disability where reasonable?	4	2
11)	Are employees and officials aware that:		
	a. People with mobility disabilities may use wheelchairs, scooters and manually-powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities in any areas open to pedestrian use?	6	

Buckland ADA Self-Evaluation

General Nondiscrimination Checklist		Total Responses	
	Questions	Yes	No
	b. People with mobility disabilities may use other power-driven mobility device in any areas open to pedestrian use unless the public entity can demonstrate that the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements?	6	
	c. They may not ask about the nature and extent of the individual's disability, but may ask an individual to provide a credible assurance that the mobility device is required because of the person's disability?	4	1
12)	Are employees and officials aware that the public entity may not place a surcharge on people with disabilities to cover the costs of measures, such as the provision of auxiliary aids or program accessibility, that are required to provide nondiscriminatory treatment?	6	
13)	Are tickets for accessible seats sold during the same hours; through the same methods of purchase (by telephone, on site, through a website, or through third-party vendors); and during the same stages of sales (pre-sales, promotions, general sales, wait lists, or lotteries) as non-accessible seats?	2	
14)	If accessible seating is not available in areas of the venue with lower prices, is lower priced accessible seating available in higher priced locations?		
15)	Do venues and third-party sellers provide the same information about accessible seats as provided about non-accessible seats?		
16)	Can ticket sellers describe accessible seating in enough detail to permit the purchaser to determine if a seat meets his or her needs?		
17)	Do ticket sellers know that people purchasing a ticket for a wheelchair space may purchase up to three additional seats for their companions as close as possible to the wheelchair space and that these companion seats may include wheelchair spaces?		
18)	Do ticket sellers know that unsold accessible seats may be released and sold to members of the general public in only one of three circumstances: when all non-accessible seats have been sold (excluding luxury boxes, club boxes, suites, and seats the venue holds been sold; or when all non-accessible seats in a particular price category have been sold back when declaring a sell-out); or when all non-accessible seats in a particular seating section have been sold; or when all non-accessible seats in a particular price category have been sold?		
19)	If the venue permits patrons to give or sell their tickets to others, does the venue know that the same right must be extended to patrons with disabilities and that those tickets may be sold to someone who does not have a disability?		
20)	Do ticket sellers know that for single event tickets, venues may ask purchasers to state that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?		
21)	Do ticket sellers know that for series of events tickets, purchasers may be asked to attest in writing that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?		
22)	Is information about the public entity's accessible services, activities and facilities available to the public and to current and future program participants?		2

Buckland ADA Self-Evaluation

Website Accessibility Checklist

Website Accessibility Checklist		Total Responses	
		Yes	No
1)	Is there a policy that the public entity's webpages will be accessible, that is, in compliance with the W3C Web Content Accessibility Guidelines (WCAG) 2.0 or Section 508 Standards?	3	3
2)	Are the staff and contractors who are responsible for webpage and content development aware of the policy?	2	3
3)	Are the staff and contractors who are responsible for webpage and content development knowledgeable about these standards?	2	2
4)	Has the website been tested for compliance with either of these standards?		6
5)	If yes, have people with disabilities who use screen reading software and other assistive technology participated in the evaluation?	1	3
6)	Is there a plan for making the existing web content accessible?	1	5
7)	Is there a plan for making future web content accessible?	1	5

Appendix C

Photographs documenting issues found in the Transition Plan

BUCKLAND RECREATION AREA



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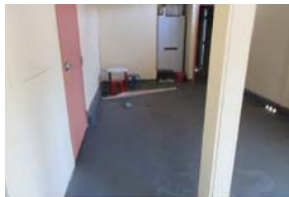
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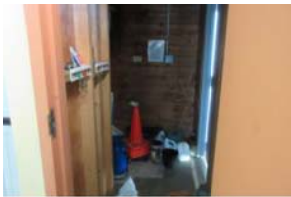
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HIGHWAY GARAGE



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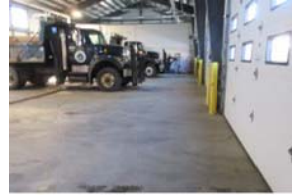
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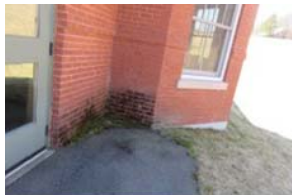
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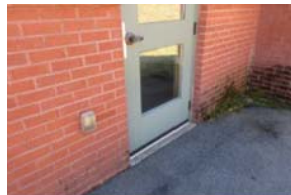
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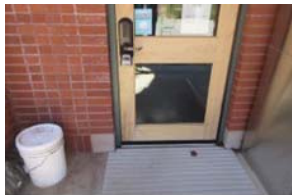
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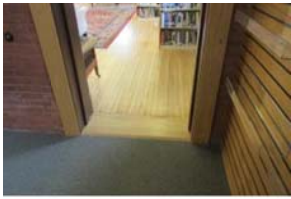


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BUCKLAND MUSEUM



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POLICE STATION



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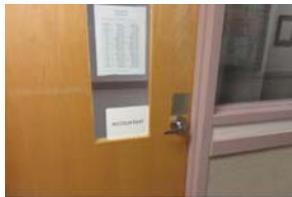
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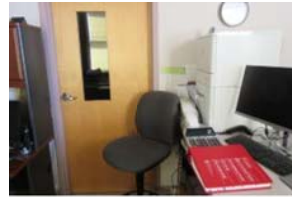
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TRANSFER STATION



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WASTE WATER TREATMENT PLANT



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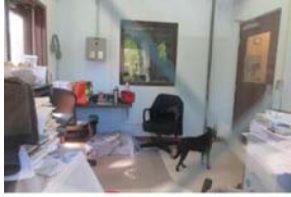
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