

City of Norwalk



Americans with Disabilities Act Self Evaluation: Compliance & Transition Plan

Independent Living Resources
February 2013

Executive Summary:

An Americans with Disabilities Act compliance review was carried out in the City of Norwalk Connecticut from June to December 2012. Municipal programs and facilities including municipal buildings, public schools, parks, recreation, and public works facilities were surveyed and evaluated in relation to the administrative, procedural, communications, and physical accessibility requirements of ADA Title II. This report presents a compliance and transition plan, with actions recommended to strengthen compliance including the adoption of new and revised operations policies and procedures, and the implementation of a multi-year program of structural barrier-removal modifications. It is also proposed that the City adopt the findings and recommendations of its ADA Self-Evaluation and that a capital account be established to fund implementation of the plan.

C O N T E N T S

I. Introduction

II. Purpose and Scope

III. Self-Evaluation Approach and Scope

IV. General Findings

V. Organization of Compliance and Transition Plan Recommendations

Part 1: General Recommendations

Part 2: Model Policies and Procedures

Part 3: Transition Plan with Phase 1 barrier-removal priorities and summaries of building and facility access surveys

Digital Appendix:

Photo record of survey summaries of barriers and conditions

I. Introduction

“Let the shameful walls of exclusion finally come tumbling down.” (George H.W. Bush)

On July 26, 1990, on the South Lawn of the White House before the largest gathering ever to witness a signing ceremony in the history of the United States, President George Herbert Walker Bush signed the Americans With Disabilities Act (ADA) into law. The ADA has been recognized as the most far-reaching extension of civil rights protections to follow the ground-breaking Civil Rights Act of 1964, and the capstone to a revision of national disability policy, framed by Constitutional guarantees of equal protection and equal opportunity that took place over the second half of the 20th century. The forces that created contemporary disability rights law and policy can be traced from the return of wounded veterans from the battlefields of Europe and the Pacific, to the polio epidemics of the 1940s and 50s, to the closure of custodial institutions from Willow Brook to the Southbury training school, to the emergence of a political and social movement among people with disabilities, family members, advocates, and supporters in the 1960s.

The ADA passed both houses of Congress by overwhelming bi-partisan majorities, establishing broad civil-rights protections for people with all forms of disabilities: physical, sensory, cognitive, developmental, neurological, and psychological. Lifelong disabilities, sudden-onset disabilities, disabilities brought on by sudden trauma and the progress of degenerative disease, disabilities that come in the later years of a long life, visible disabilities, and invisible disabilities; the scope of the law is inclusive and universal, and its protections benefit virtually every individual and every family in the United States at some point in their lifetimes.

It is now more than 20 years since the ADA was enacted. It has been tested by time and reaffirmed by the Congress of the United States as recently as 2008 with passage of the ADA Amendments Act. It has transformed the way government and public programs operate, the way the commercial sector does business, the way public discourse

is conducted and information disseminated, and it has reshaped the “built environment,” changing the way buildings and facilities are designed, constructed, renovated, and maintained.

The United States Department of Justice published regulations implementing Title II, *Non-Discrimination on the Basis of Disability in State and Local Governmental Services*, on January 26, 1992 (at 28 CFR Part 35). The regulations were modeled on regulations, still in effect, issued in 1997 by the United States Department of Health Education and Welfare implementing Section 504 of the Rehabilitation Act. Like the 504 regulations, Title II requires covered entities to carry out a compliance evaluation and planning process: governmental entities with 50 or more employees, including the City of Norwalk, are required to carry out a *self-evaluation*, to adopt new or revised policies eliminating discriminatory practices—whether intentional or inadvertent—and to develop and implement a *transition plan* of barrier removal modifications necessary to make public programs, buildings, and facilities accessible and usable.

II. Purpose and Scope

The report presents the findings and recommendations of an Americans With Disabilities Act compliance evaluation and planning process carried out on behalf of the City from June to December 2012. The purpose of the initiative and the actions recommended in this report are to move the City towards full compliance with the requirements of ADA Title II by:

- Identifying gaps and omissions in policies and procedures, and architectural barriers limiting access to programs and services;

- Presenting recommendation for adoption by the City as its *compliance and transition plan* designed to bring the City into full compliance and to ensure that qualified persons with disabilities are able to participate in and benefit from all public programs, services, and activities.

A team of consultants carried out the evaluation under the oversight of the ADA Coordinator and ADA Committee, key departmental staff were interviewed, the documentary record of previous ADA-related activity was reviewed, a set of model policies and procedures were developed, and access surveys of municipal buildings, public schools, parks, recreation, and public works facilities were conducted.

III. Self-Evaluation Approach and Scope

The approach followed in conducting the *Self-Evaluation* is based on the *ADA Title II Action Guide*, a widely used technical assistance manual, funded by the National Institute on Disability and Rehabilitation Research of the United States Department of Education to provide guidance in ADA compliance planning.

The *ADA Title II Action Guide* organizes the compliance planning process around *5 Action Steps* required of public entities with 50 or more employees.

- #1. Appoint an ADA Coordinator with responsibility for overseeing all compliance activities.
- #2. Provide notice to the public of rights and protections under the ADA and how the entity meets its obligations.
- #3. Administer a grievance procedure providing a mechanism for prompt resolution of complaints and disputes before they escalate into complaints to federal agencies or suits in federal courts.

#4. Conduct a Self-Evaluation covering four areas:

- Employment
- Non-Discriminatory Operation of Programs and Services
- Effective Communications
- Program and Facility Accessibility

#5. Develop and carry out a Transition Plan identifying modifications needed to remove architectural and structural communications barriers in buildings and facilities.

Please note: the dual-term Compliance & Transition Plan is used in this report to cover all actions recommended to achieve compliance with the requirements of ADA Title II. The term Transition Plan, consistent with the regulatory language of Title II (see §35.150 (d)), is applied to the summary of architectural barriers and recommended barrier-removal modifications presented in Part 3.

IV. General Findings

The following summarize the general findings of the evaluation process:

- Significant progress has been made in providing access to *some* municipal programs and facilities, but the progress is uneven and inconsistent; architectural, communications, and procedural barriers remain that limit the participation of persons with disabilities—barriers that in some instances present hazards and risk of injury.
- There is a widely shared general awareness among municipal employees that the City and public schools have an obligation to make reasonable accommodations, to modify procedures, and to provide communication services and adaptive equipment when necessary to mitigate barriers and facilitate participation. However, a full range of procedures needed to cover these and other requirements of Title II is not in place, and those that are in use are not consistent across departments.
- Training has not been provided across departments on “disability etiquette,” basic procedures, and the core requirements of the ADA, but additional and more thorough training will be needed to fully prepare employees, public officials and volunteers with the skills and information needed to handle requests, provide reasonable modifications and accommodations, and to inform potential participants of the ways in which the City protects their rights to participate and benefit.
- Some departments and programs provide auxiliary communications aids when needed by participants with disabilities effecting communication, but provision of communication aids and services is not consistent across departments and programs and there are no policies and procedures to ensure that effective communication aids and services—including assistive listening systems—are provided when needed.
- Surveys of public buildings, schools and recreation, and public works facilities identified barriers and conditions that limit access and use by people with disabilities; conditions not in compliance with federal and state access codes were identified and documented in each facility surveyed including those constructed or renovated over the past decade.

V. Organization of Compliance and Transition Plan Recommendations

The Compliance and Transition Plan is presented in three parts:

Part 1: General Recommendations:

Covering an organizational framework, Committee structure, and establishment of a capital account dedicated to implementation of the Compliance and Transition Plan.

Part 2: Model policies and procedures:

New and revised policies and procedures recommended for adoption in five areas:

2.1 *General Administrative Requirements:* covering designation of an ADA Coordinator; public notice of ADA compliance; and adoption of a procedure to resolve grievances related to these requirements.

2.2 *Equal Employment Opportunity:* including a statement of commitment to the principles and practices of equal employment opportunity and a procedure for provision of reasonable job accommodations.

2.3: *Non-discriminatory Operation of Programs and Services:* covering the *general prohibitions against discrimination* including a procedure for making reasonable modifications to policies and procedures when necessary to ensure equal opportunity to participate and benefit.

2.4 *Effective Communications:* including a provision of auxiliary communications aids, services, and devices including alternatives to traditional print materials; sound amplification and assistive listening systems; sign-language interpretation, etc.

2.5 *Curb-ramp / Sidewalk Plan:* including a policy and procedure regarding installation and repair of curb-ramps, curb cuts, and sidewalks.

Part 3: Transition Plan

Priorities for barrier removal modifications to be carried out in Phase 1 of the implementation process and summaries of access survey identifying barriers and solutions for the following buildings and facilities:

1. Public Works Facilities:

- City Hall
- Police Headquarters
- Recycling Center
- Public Works Center/Water Treatment Plant
- South Norwalk Train Station
- East Norwalk Train Station
- Yankee Doodle Garage
- Imax Parking Lot
- Maritime Garage

2. Other Municipal Buildings:

- Health Building (Health Dept.)
- Norwalk Library (Library Dept.)
- South Norwalk Library (Library Dept.)
- Animal Control Building (Police Dept.)

3. Recreation & Parks:

- Calf Pasture Beach
- Shady Beach
- Veteran's Memorial Park
- Mathews Park
- Cranbury Park and Gallaher Mansion
- Flax Hill Park
- Fodor Farm

4. Public Schools:

- Brien McMahon High School
- Briggs High School
- Norwalk High School
- Ponus Ridge Middle School
- Nathan Hale Middle School
- Jefferson Magnet (Science) Elementary School
- Columbus Magnet (Social Studies) Elementary School
- Cranbury Elementary School
- Wolfpit Elementary School

Part 1: General Recommendations

The following recommendations are for a structure and process to support the implementation process. They address the establishment of an ongoing Oversight Committee, the role and capacity of the ADA Coordinator, establishment of a capital pool account to fund structural access modifications and communication technology, development of quality assurance procedures to reduce errors in the application of access codes and standards, adoption of model operational policies, and public reporting of progress of implementation of the Compliance and Transition Plan.

1. The current ADA Committee was recruited and charged with overseeing the Self-Evaluation and production of the Compliance and Transition Plan. To ensure continuity a Committee should be recruited as soon as possible with representation from key departments and community organizations, and charged with supporting and overseeing implementation of the Compliance and Transition Plan.
2. Implementation of the Compliance and Transition Plan will substantially increase the workload of the ADA Coordinator in areas including *development and management of the capital pool account, purchasing, maintenance, training and deployment of assistive listening systems and other communication technology, etc.*; the consultant recommends that as municipal resources recover from the current fiscal downturn, consideration be given to assignment of a part-time staff position to assist and support the ADA Coordinator in the implementation process.
3. Establish a cross-department capital pool account for funding of structural modifications described in the Transition Plan, managed by the ADA Coordinator with the support of the ADA Committee and department heads.
 - 3.1 Submit an initial request on the order of \$1.5–2 million to cover the first phase of implementation of the Transition Plan.
 - 3.2 Submit additional capital requests for funding of Phases 2 and 3 based on cost projections developed through cost estimating in Phase 1.

- 3.3 In collaboration with the Departments of Public Works, Recreation & Parks, and Public Schools, develop a quality assurance system to eliminate errors and omissions in the application of federal and state access standards to the design, construction, and renovation of public buildings and facilities.
4. Adopt, disseminate, and support implementation by departments of new or revised model policies presented in Part 2 of this report. Any department or program with a pre-existing policy or policies that may be preferable or more effective should be reviewed with the ADA Coordinator in relation to the compliance functions and obligations defined by Title II.
 5. Report annually to the Mayor and Common Council on progress regarding implementation of the Compliance and Transition Plan, describe benchmarks achieved, and problems or unforeseen circumstances delaying implementation.

Part 2: Model Policies and Procedures

The following are model policies recommended for adoption by the City and Public Schools Department:

1. General Administrative Requirements
2. Equal Employment Opportunity
3. Non-discriminatory Operation of Programs and Services
4. Effective Communication
5. Curb Ramps and Sidewalks

Any department or program with a pre-existing policy or procedure that the department or program believes to be preferable or more effective should review the policy or procedure with the ADA Coordinator to ensure that it covers the compliance functions and obligations defined by Title II.

Note: The City has used a public notice and a grievance procedure. The ADA Coordinator will recommend whether these procedures should be revised or replaced by the model notice or policy below.

1. General Administrative Procedures

1.1 ADA Coordinator

The official named below has been designated the ADA Title II Coordinator for the City of Norwalk and has been charged with coordinating—with support and participation from Departmental staff and administrators—implementation of the policies and procedures identified through the self-evaluation process; with the implementation of a Transition Plan to resolve and eliminate architectural barriers that limit the participation of people with disabilities in buildings and facilities where public programs are operated; and with monitoring and reporting at least annually to the Mayor, and Common Council, and made available to any member of the public on progress towards achieving full compliance.

1.2 Public Notice of ADA Compliance

The following model notice can be adopted to fulfill this requirement.

Recommended actions:

- Adopt and disseminate the following Public Notice of ADA Compliance.
- Post the notice in prominent locations in all City buildings and facilities.
- Include copies of the Public Notice in documents, reports, and publications as appropriate.
- Include short forms of the Public Notice in announcements, brochures, job postings, advertisements, and other publications.

Americans with Disabilities Act of 1990

The City of Norwalk is committed to the full participation of persons with disabilities in public programs, services, activities, and on the City's workforce.

Questions, concerns, or complaints should be brought to the attention of the ADA Coordinator:

Adam D. Bovilsky, Director
Human Relations and Fair Rent Department
City of Norwalk
125 East Avenue, Room 125
Norwalk, CT 06856-5125
203-854-7989
abovilsky@norwalkct.org

Individuals with disabilities needing accommodations, assistance, or communication aids to participate in programs and services or in the pre-employment process are encouraged to make their needs known to the ADA Coordinator.

All inquiries and requests are treated with strict confidentiality.

1.3 ADA Grievance Procedure

This Grievance Procedure is established to meet the requirements of Title II of the Americans with Disabilities Act. Disabled individuals or their authorized representatives who believe that they have been discriminated against on

the basis of disability in employment or the provision of services, activities, programs, or benefits are encouraged to use the procedure to bring their complaints to the attention of the City of Norwalk.

Complaints should be submitted in writing or on audio recording to the ADA Coordinator and should include the name, address, and phone number of the person bringing the complaint (or their authorized representative); a description of the incident or action, the place and date of its occurrence, the name of person or persons who witnessed or were adversely affected, and the name of any employee or representative of the City of Norwalk involved.

Assistance in filing complaints, such as personal interviews or audio recordings, will be provided upon request as needed by the ADA Coordinator. The complaint should be submitted to the ADA Coordinator as soon as possible within 30 calendar days of the incident or action.

Adam D. Bovilsky, Director
Human Relations and Fair Rent Department
City of Norwalk
125 East Avenue, Room 125
Norwalk, CT 06856-5125
203-854-7989
abovilsky@norwalkct.org

Within 15 calendar days of receipt of the complaint, the ADA Coordinator will meet with the complainant to clarify the facts of the incident and discuss possible resolutions. Within 15 calendar days after the meeting, the ADA Coordinator will respond in writing or an alternate format preferred by the complainant if needed for effective communication. The response will explain the position of the City of Norwalk and present options for substantive resolution of the complaint.

If the ADA Coordinator's response does not satisfactorily resolve the issue, the complainant may appeal the Coordinator's decision within 15 calendar days of its receipt to the ADA Appeals Committee. Within 15 calendar days of receipt of the appeal, the ADA Appeals Committee will meet with the complainant to further clarify the complaint and discuss possible resolutions. Within 15 calendar days of the meeting a response will be presented in writing or alternate format with a

final resolution of the complaint.

The ADA Appeals Committee will consist of the Director of Personnel, Director of Finance, and Corporation Counsel or his designee. Appeals to the ADA Appeals Committee should be directed to:

Director Of Personnel
City of Norwalk
125 East Avenue, Room 123
Norwalk, CT 06856-5125
203-854-7716

All complaints received by the ADA Coordinator, appeals to the ADA Appeals Committee, and responses/resolutions will be kept on file for at least three years.

1.4 Undue Burden, Undue Hardship, and Fundamental Alterations

In any circumstance when a requested accommodation, modification, or other action in fulfillment of obligations under Title II, in the opinion of the ADA Coordinator or senior program or departmental administrators, may involve an undue financial or administrative burden or hardship, or a fundamental alteration to a program, the Coordinator will refer the request to the ADA Appeals Committee for a final decision and will assist the ADA Appeals Committee in documenting the reason for acceptance or denial of any such request.

2. Equal Employment Opportunity

Title II of the ADA requires that public entities include equal employment opportunity requirements of Title I in the self-evaluation process. Regulations implementing Title I promulgated by the Equal Employment Opportunity Commission require that *otherwise qualified* persons with disabilities be afforded equal opportunity in the pre-employment process, the performance of essential job functions, and the enjoyment of all other benefits and privileges of employment. A qualified person with a disability is one who has the requisite experience, education, training, and skills and is able to perform the essential functions of the position with or without reasonable accommodation. Covered entities have an obligation to

provide reasonable accommodations unless doing so would impose an undue financial or administrative hardship.

2.1 Equal Employment Opportunity Policy

It is the policy of the City of Norwalk that no otherwise qualified individual with a disability shall, solely by reason of his/her disability, be excluded from employment or employment-related benefits. Employment, hiring, and advancement will be based on the employee or applicant's ability to perform essential functions of a position.

2.2 Reasonable Accommodation Policy

Reasonable accommodation will be made for an otherwise qualified applicant or employee with a disability, unless the accommodation imposes an undue financial or administrative hardship on the operation of programs.

Notice of the availability of reasonable accommodations will be included in job postings and advertisements. Applicants with disabilities may request accommodations during interviews and other pre-employment functions if necessary to ensure that the applicant has equal opportunity to secure employment with the City.

During the pre-employment process, the City will make no written or verbal inquiry regarding the existence, cause, extent, or impact of any disabling condition.

Applicants will be informed at the initial pre-employment interview that the City does not discriminate on the basis of disability and that requests for reasonable accommodations should be made following receipt of a conditional offer of employment, preferably at a post-offer meeting.

Persons with disabilities employed by the City of Norwalk are encouraged to request reasonable accommodation at any time when accommodation becomes necessary to the employee's performance of essential functions of their position or to the enjoyment of other benefits of employment.

Requests for reasonable accommodations should be presented verbally or in writing to the employee's immediate supervisor or to the ADA Coordinator. The request should include a description of the nature and purpose of the accommodation. Assistance will be provided to any employee requiring assistance in

identifying an appropriate accommodation or in documenting the reasons why the accommodation is needed.

A decision will be made within 10 business days of the submission of a reasonable accommodation request accompanied by any supporting documentation needed by the City to evaluate the request. The effectiveness of the accommodation and the need for changes or additions to the accommodation will be assessed during the first month of the employee's use of the accommodation.

All reasonable accommodation requests and documentation, discussions, decisions, and other matters, including the results of medical examinations and/drug tests relative to an employee's status as a person with a disability, will be kept confidential. All documentation will be maintained in secure files to the extent permitted by law.

If assistance is needed in designing a reasonable accommodation, the City—with the approval of the candidate or employee requesting the accommodation—will consult the Regional ADA Technical Assistance Center, the Job Accommodations Network administered by the President's Committee on Employment of Persons with Disabilities, and other individuals and organizations with expertise in the employment of persons with disabilities.

The ADA Appeals Committee, in consultation with the ADA Coordinator, will make the final decision concerning requested accommodations that may represent undue financial or administrative hardships.

Applicants and employees have the right to appeal the denial of any accommodation request using the ADA Grievance Procedure.

3. Non-Discriminatory Operations

The purpose of the policies in this section is to eliminate barriers to participation by persons with disabilities including, if necessary, through the provision of *reasonable modifications* to policies and procedures. *The reasonable modification requirement* is similar to *reasonable accommodations* in employment.

The purpose of the model policies that follow is to eliminate inadvertent forms of discrimination and to establish a problem-solving mechanism to eliminate operational barriers to full participation by persons with disabilities. The City is not obligated to undertake actions that would impose an undue financial or administrative burden or would result in a fundamental alteration to the nature of the program, service, or activity being conducted.

3.1 Equal Opportunity Policy

No qualified person with a disability will be denied the benefits of or be excluded from participation in any program, service, or activity.

Programs, services, and activities will not be operated in a manner that has the effect of:

1. Denying a qualified individual with a disability the opportunity to participate in or benefit from a benefit, service, or volunteer activity.
2. Denying a qualified individual with a disability the opportunity to participate in, or benefit from, any aid, benefit, service or volunteer activity that is not equal to that afforded to others.

3.2 Reasonable Modification Policy

Reasonable modifications to policies and procedures will be provided to an otherwise qualified person with a disability who requests such modification, unless the requested modification would impose an undue burden or require a fundamental alteration to the program.

Requests for reasonable modifications should be made to staff operating the program or to the ADA Coordinator. The request can be presented verbally or in writing. The ADA Coordinator will be responsible for ensuring that requests are responded to appropriately and in a timely fashion.

Final decisions regarding requests for reasonable modifications that in the opinion the ADA Coordinator may represent an undue burden or fundamental alteration will be made by the ADA Appeals Committee in a timely fashion and, except in extraordinary circumstances, in no longer than 10 working days after their submission. A person seeking to contest the denial of a requested modification is encouraged to use the Grievance Procedure.

3.3 Eligibility and Safety Requirements Policy

Programs will not impose eligibility or safety standards or requirements that prohibit or limit the participation of qualified individuals with disabilities. This policy does not prohibit standards that are necessary and essential to the operation of programs.

3.4 Assurance Regarding Surcharges

No surcharges (charges in addition to those paid by all program participants) will be imposed on persons with disabilities, their family members, or organizations representing them for the provision of reasonable accommodations or modifications, auxiliary aids and services, removal of architectural barriers, or any other costs associated with the participation of persons with disabilities in public programs.

3.5 Integrated Services Policy

All programs, services, and activities including all public meetings will be conducted in the most integrated and accessible setting possible.

3.6 Contracting Policies

The City will ensure that individuals with disabilities and organizations employing or associated with disabled persons will have equal opportunity to secure service and procurement contracts.

No contracts for goods or services will be executed with individuals or organizations that are known to discriminate against persons with disabilities.

3.7 Significant Assistance Policy

Programs that receive significant financial or in-kind assistance from the City are required to operate in a manner that is not discriminatory towards persons with disabilities. Organizations receiving assistance from the City will be informed of this policy. The ADA Coordinator will investigate allegations of discrimination towards persons with disabilities that may have occurred, and will take steps to end the discriminatory practice or to terminate assistance.

4. Effective Communication

Title II requires public entities to provide auxiliary communications aids and services to eligible persons with disabilities limiting vision, hearing, or speech. Auxiliary aids and services must be provided to the extent necessary to support equal participation in the exchange of information and communication integral to a program or activity, unless doing so would result in an undue financial or administrative burden or in a fundamental alteration to the program, service, or activity.

4.1 Effective Communications Policy

Auxiliary aids and services will be provided to ensure effective communication for persons with disabilities limiting their vision, hearing, or speech. Persons with communications disabilities or their authorized representatives will have the opportunity to request the auxiliary communications aid or service that they prefer and the requested aid or service will be given primary consideration and will be provided unless an effective alternative means of communication is available, or unless providing the preferred aid or service would impose an undue burden or fundamental alteration.

Requests for auxiliary aids or services should be made verbally or in writing to departmental or program staff or the ADA Coordinator. Unless otherwise specified, the City asks that requests to be made at least 10 days in advance of the occasion on which the communications support will be needed. Reasonable effort will be made to respond on shorter notice.

The person requesting the service will be notified as soon as possible if the program or department is unable to meet their request and will be offered an effective alternative.

It is the responsibility of the ADA Coordinator to oversee implementation of effective communication policies and procedures.

4.2 Alternative Format Policy and Procedures

It is the policy of the City of Norwalk that all documents, publications, and materials used to disseminate information to its citizens be made available to persons with disabilities who need them in alternate formats.

The following procedures have been established to respond to requests for alternative formats including large print, audio recording, Braille, and CDs or DVDs, in a timely fashion. Three weeks advance notice is usually

necessary for the preparation of Braille materials. Reasonable efforts will be made to respond on shorter notice.

Large print, short audio recordings, and CDs or DVDs will be prepared by staff persons who have been identified by the ADA Coordinator and trained in the necessary skills and procedures. Preparation of long audio recordings will be purchased through an outside vendor.

The procedure for requesting alternate formats is:

1. The person making the request should identify the materials desired and specify his/her preferred alternate format to the ADA Coordinator or City Clerk either verbally or in writing 10 working days in advance of the event or activity for which the material is needed. Reasonable effort will be made to meet requests made less than 10 days before an event or activity.
2. The materials will be provided in the requested format at no charge.
3. Primary consideration will be given to the format preferred by the person making the request, and the City will decide whether to provide the preferred format or an effective alternative format.
4. If a request cannot be met, the person making the request will be informed as soon as possible but at least two days in advance of the event or activity.
5. The ADA Appeals Committee, in consultation with the ADA Coordinator, will make final decisions regarding any request that may represent an undue financial or administrative burden.

4.3 Sign Language Interpreter Services Policy

It is the policy of the City of Norwalk that sign language interpreters will be provided upon request to any person needing interpreter services in order to participate in any meeting, program, or activity of the City. Requests should generally be made at least 20 working days in advance of the scheduled event or meeting, but reasonable effort will be made to meet requests made on shorter notice. Requests should be made either verbally or in writing to the ADA Coordinator.

Within one business day of receipt of the request, the ADA Coordinator will contact a vendor for interpreter services.

The City will maintain a list of names and phone numbers of at least three qualified sign language interpreters. If an interpreter cannot be scheduled, the ADA Coordinator will offer an alternative effective form of communication or postpone the meeting or event until an interpreter is available.

4.4 Assistive Listening Device Policy

It is the policy of the City of Norwalk that adequate sound amplification—microphones with loudspeakers and assistive listening systems—will be available at public meetings and other public activities and events to ensure that persons with hearing limitations are able to fully participate.

Assistive listening devices will be provided upon request to persons needing such devices to participate in programs, services, and activities.

Any person needing assistive listening technology to participate in a public program can request the service or device verbally or in writing to the ADA Coordinator at least four days before the scheduled event or activity. The ADA Coordinator will arrange for the equipment to be tested to ensure that it is in proper working order and will, if necessary, instruct City employees or representatives in its use.

4.5 TV Captioning Policy

It is the policy of the City of Norwalk to ensure that televisions used in City programs have the capacity to display closed-captioning and that staff is trained in the use of captioning devices.

4.6 Video Captioning Policy

It is the policy of the City of Norwalk that whenever pre-recorded video is purchased or rented for use in City sponsored programs or activities, captioned versions of video, when such captioning is available, will be ordered to ensure that presentations are accessible to all individuals with disabilities.

5. Curb Ramps/Curb Cuts and Sidewalks

5.1 Curb Ramp/Curb Cut and Sidewalk Policy

Interested parties are encouraged to report non-compliant (NC) or deteriorated curb ramps, curb cuts, and adjacent walkways that present a barrier or hazard to persons with disabilities to the Norwalk Customer Service Center. In accordance with Norwalk City Code, adjacent property owners are responsible for the condition of the sidewalks that border their properties.

The Norwalk Customer Service Center will create a record of such reports and will notify adjoining property owners of conditions that require immediate attention. Further enforcement efforts will be taken by the Director of Public Works, in consultation with the ADA Coordinator, in cases where the barrier or hazard creates an imminent danger to persons with disabilities and is within the control of the owner of the premises.

The Department of Public Works, during routine permit application inspections, will evaluate the condition of sidewalks adjoining the pertinent properties and execute existing authorities to direct repairs where appropriate.

The Department of Public Works will ensure that compliant curb ramps and curb cuts are constructed when:

1. The City is replacing or constructing sidewalks as part of its Pavement Management Program.
2. The City is constructing, repairing, or replacing sidewalks as stand-alone projects.
3. Developers are constructing roadways and sidewalks as part of a subdivision, a development, or a redevelopment.
4. Property owners are undertaking major renovations or replacement of buildings and associated properties.
5. Adjacent property owners are municipal buildings or contain municipal programs.

Persons with disabilities, members of their families, and/or other authorized representatives may request installation of curb ramps/cuts on public walkways necessary to create access routes from the private residences occupied by persons with disabilities to public walkways. Requests will be evaluated by the DPW and ADA Coordinator and assigned a rank in the order of priority and will be addressed unless to do so would impose an undue financial or administrative burden.

Part 3: Transition Plan

The recommendations and priorities in this section describe a systematic plan for removal of architectural barriers in buildings and facilities. The goal is to achieve citywide compliance with the program accessibility standard that defines the level of accessibility required in existing buildings and facilities. Access surveys identified errors and omissions in recently constructed and renovated buildings and facilities. These are documented in the summaries that follow and indicate the need to improve design and construction quality assurance and review procedures, and to strengthen oversight of design and construction work carried out on behalf of the City.

Title II: Program Accessibility Requirement

Under Title II of the ADA it is discriminatory for people with disabilities to be denied the opportunity to participate in programs, services, and activities because facilities are inaccessible or unusable. Entities of state and local government including the City of Norwalk have been required since the effective date of the Title II regulations—January 26, 1992—to identify barriers in existing buildings and facilities that deny access to or limit the participation of people with disabilities. This does not mean that every building and facility constructed or renovated prior to the effective date of the Title II regulations must be retrofitted to a new-construction standard of accessibility. Rather, barriers must be removed to the extent necessary to achieve compliance with the *program accessibility standard*. Under this standard, programs, *when viewed in their entirety*, must be made readily accessible and usable. The required level of accessibility is one that is sufficient to enable persons with disabilities to participate fully on an equal basis, and to benefit as do other participants from the programs, services, and activities operated in public buildings and facilities. Application of the program accessibility standard allows resources to be strategically targeted to the removal of barriers and non-compliant conditions that have a real functional impact.

All buildings designed and constructed after the effective date of the Title II regulations are required to meet the new construction standard of accessibility, with the federal standard (UFAS or ADAAG) setting the baseline to which any more stringent state standards are added.

Employee-only areas in pre-existing buildings and facilities are not covered in a transition plan but are addressed on an individual basis as *reasonable job accommodations* subject to the requirements of Title I of the ADA and regulations promulgated and enforced by the Equal Employment Opportunity Commission.

In carrying out a transition plan, barriers can be removed either by structural means including modifications, additions, or new construction; or by nonstructural means such as moving programs from inaccessible to accessible spaces permanently or when needed. Staff assistance and technology can also be used to overcome barriers, as long as the solution provides equal benefit and does not have the effect of diminishing the social integration of people with disabilities. Non-structural solutions are sometimes undertaken as interim measures until financial resources become available to carry out permanent structural solutions.

Regulations implementing Title II were published by the United States Department of Justice in January 1992. Non-structural barrier removal solutions were to be identified and carried out within one year, and structural solutions over a period of three years. Additional time was allowable if it could be demonstrated that carrying out structural barrier removal solutions would impose an undue financial or administrative burden.

Please note:

1. A procedure for making decisions regarding *undue burden* is included in the model policies in Part 2 above.
2. A procedure is included in the model policies for implementation of a plan of *curb-cut, curb-ramp and sidewalk maintenance*, repair and installation including installation of curb ramps when requested to improve access for individuals or households.

Buildings and Facilities Surveyed:

Summaries of barriers and potential solutions are presented in four groups:

1. Public Works
2. Other Municipal Buildings
3. Recreation & Parks
4. Public Schools

1. Public Works:

- City Hall
- Police Headquarters
- Recycling Center
- Public Works Center/Water Treatment Plant
- South Norwalk Train Station
- East Norwalk Train Station
- Yankee Doodle Garage
- Imax Parking Lot
- Maritime Garage

2. Other Municipal Buildings:

- Health Building (Health Dept.)
- Norwalk Library (Library Dept.)
- South Norwalk Library (Library Dept.)
- Animal Control Building (Police Dept.)

3. Recreation & Parks:

- Calf Pasture Beach
- Shady Beach
- Veteran's Memorial Park
- Mathews Park
- Cranbury Park and Gallaher Mansion
- Flax Hill Park
- Fodor Farm

4. Public Schools:

- Brien McMahon High School
- Briggs High School
- Norwalk High School
- Ponus Ridge Middle School
- Nathan Hale Middle School
- Jefferson Magnet (Science) Elementary School
- Columbus Magnet (Social Studies) Elementary School
- Cranbury Elementary School
- Wolfpit Elementary School

Individual building and facility survey summaries display information in 5 columns:

Column 1: ID number for the barrier and solution

Column 2: ADA Accessibility Guideline Reference

Column 3: Description of the barrier/non-code compliant condition

Column 4: Recommended solution

Column 5: Solutions are designated C, if cost will be included in a capital budget request, and O if covered under an operating budget

A small number of high-cost items are designated UDB (undue burden), indicating that the cost of a structural solution may exceed resources available over a 5-10 year period.

All assignments are preliminary and are to be reviewed and revised by the ADA Coordinator and Committee as plans are developed and costs are estimated.

Phase 1 Capital Request:

The following high-priority barrier-removal solutions are recommended for inclusion in the first capital request. Priority has been given to issues of safety.

#1 Deteriorated Curb Ramps

#2 Overhead Protruding Objects

#3 Emergency Egress

#4 Primary Access Routes and Facility Entrances

#5 Access Routes to Programs or Activities

#6 Stairs with Open Risers or Non-Compliant Handrails

#7 Restroom/Toilet Stalls

#8 Wheelchair and Companion Seating

#9 New Curb Ramps

In addition to these structural modifications, it is recommended that the first Capital Request include funds for two planning studies (cost estimating and Brien McMahon Campus Master Plan), and for three assistive listening systems.

In addition to the modifications designated “C” in the summaries, access modifications potentially covered by operating budgets are shaded gray and designated “O” in the budget column.

The ADA Coordinator will assume overall responsibility for implementation of the Transition Plan. In consultation with the ADA Committee, he will be responsible for requesting funds needed to carry out the plan, and for scheduling and monitoring barrier removal modifications as funds are allocated for that purpose.

#1 Deteriorated Curb Ramps: repair reconstruct or install curb ramps

- a) Animal Control
- b) Yankee Doodle Garage (x2)
- c) Wolfpit Elementary
- d) Columbus Elementary (x2)
- e) Mathews Park (near visitors center)
- f) Police Headquarters

#2 Overhead Protruding Objects: install cane detectable warnings

- a) Norwalk High: auditorium lobby stairway
- b) Brien McMahon High School: front walkway

#3 Emergency Egress:

- a) City Hall: clarify upgrade emergency egress procedures, install handrails at emergency egress from stage
- b) Ponus Ridge Middle School: upgrade at least three egress routes
- c) Wolfpit Elementary School: repair deteriorated wood ramp at rear of gym
- d) Briggs High School: upgrade emergency egresses
- e) Norwalk Library: clear and maintain areas of refuge assistance
- f) Norwalk High School: clear plywood ramp from egress corridor

#4 Primary Access Routes and Facility Entrances:

- a) Health Building: establish procedures to use entrance at lower level and elevator to main level
- b) City Hall Concert Hall: construct direct access route
- c) Jefferson: upgrade exterior access route to main entrance
- d) Columbus Magnet Elementary School: upgrade accessible entrance and primary building entrance
- e) Cranbury Park: construct access route to Great Lawn restrooms

- f) Ponus Ridge Middle School: upgrade entrance ramp and install handrails on entrance stairs
- g) Norwalk Library: access route from parking to entrance
- h) Norwalk High School: Upgrade access route and wood ramps to swimming pool
- i) Public Works Center/Water Treatment: repair walk and threshold from parking to entrance

#5 Access Routes to Programs or Activities:

- a) City Hall: upgrade access routes on building periphery including walkway to Health Building
- b) Brien McMahon High School: construct access routes connecting building to athletic facilities
- c) Veteran's Memorial Park: install ramps to restrooms
- d) Cranbury Park: construct access route to restrooms
- e) Flax Hill Park: construct access routes to ball field, basketball courts, and play area
- f) Fodor Farm: access routes to garden plots
- g) Columbus Magnet Elementary School: construct access route from building to play area
- h) Norwalk High School: construct access route to courtyard (used for music performances)
- i) Briggs High School: construct access route connecting building directly to health clinic

#6 Stairs: Open Risers or Non-Compliant Handrails:

- a) Public Works Center-Water Treatment: enclose entrance stair risers and install compliant handrails
- b) Brien McMahon High School: enclose risers at stadium, upgrade center handrails on main staircases, upgrade handrails to auditorium stage
- c) Ponus Ridge Middle School: remove temporary stairs from auditorium; upgrade stairs to stage and egress stairs
- d) Yankee Doodle Garage: upgrade handrails on stairs in elevator core
- e) South Norwalk Train Station: upgrade handrails to café, ticket counter, and platform

#7 Restroom / Toilet Stalls:

- a) Health Department Building: renovate larger restroom for full accessibility
- b) Brien McMahon High School: modify toilets by lowering rims (at least two for each gender on each floor)
- c) Animal Control: install grab bar in restroom
- d) Briggs High School: upgrade unisex, Girls' and Boys', and Health Suite restrooms
- e) Columbus Magnet Elementary School: upgrade at least one adult accessible restroom
- f) Ponus Ridge Middle School: upgrade Health Suite restroom; upgrade one adult unisex restroom
- g) City Hall: upgrade stall hardware in restrooms

#8 Wheelchair and Companion Seating:

- a) City Hall: install additional wheelchair accessible seating in Concert Hall
- b) Brien McMahon High School: install dispersed wheelchair seating
- c) Norwalk High School: install dispersed wheelchair seating

#9 New Curb Ramps: funding for construction of 20 additional curb ramps in accord with the following recommended curb ramp policy

Group 1. Public Works

- 1.1 City Hall (Public Works)
- 1.2 Police Headquarters (Public Works)
- 1.3 Recycling Center
- 1.4 Public Works Center/Water Treatment Plant
- 1.5 South Norwalk Train Station
- 1.6 East Norwalk Train Station
- 1.7 Yankee Doodle Garage
- 1.8 Imax Parking Lot
- 1.9 Maritime Garage

1.1 City Hall:

The former High School, extensively renovated in 1988, houses the offices of the Mayor and Common Council, City Departments and the Public Schools Department. Two public meeting spaces, the Concert Hall and the Community Room are used at times when the main the building entrance is closed.

ID #	ADAAG	Barrier / Non-Compliant Condition	Potential Solution	Budget
1.1.1 Photo	502.2 502.4	<u>Parking:</u> 2 HP parking spaces in the lot on the south side have NC access aisles and on side slopes > 3%.	Relocate spaces to level section of parking lot.	O
1.1.2	502.2 502.4	No van accessible spaces	Install at least one van accessible space	O
1.1.3 Photo	403.1 403.4	<u>Walkways:</u> Path of travel on east side of building interrupted by curbs	Install curb ramps	C
1.1.4	402.0	Emergency egress routes (except at main entrance) not connected to exterior walks	Upgrade and extend egress routes	C
1.1.5	402.0	No access routes to Health Building or Malmquist Field	Construct walks and curb cuts	C
1.1.6	701.1 703.0	<u>Signage:</u> Inadequate interior and exterior way-finding signage	Install interior and exterior way-finding and informational signage	C

1.1.7	701.1 703.0	Inadequate signage re emergency egress and evacuation procedures	Clarify emergency procedures and install informational signage	O
1.1.8		<u>Lobby:</u> No directory of access services and resources	Install directory of access features	C
1.1.9 Photo	308.2- 308.3	Information phone at customer service center not in reach range	Install phone in accessible position	O
1.1.10		<u>Elevators:</u> No audible signals	(Not required for retrofit)	
1.1.11 Photo	603.0- 603.4 605.0	<u>Restrooms:</u> Accessible restrooms on all floors have some NC features (mirrors, pipe insulation, stall latches, coat hooks, towel dispensers, etc.)	Upgrade and maintain access features in restrooms	O
1.1.12	603.0 604.3	1st floor Men's Room has NC accessible stall and inadequate space for expansion	Install signage at stall door re larger stalls at 2 nd and 3 rd floor restrooms	O
1.1.13 Photo	404.2.4.	<u>Human Relations Office:</u> Entrance door with NC latch side clearance	Install automatic door opener or relocate office	O
1.1.14 Photo	402.0	<u>Community Room:</u> Movable coat rack and chair stacks intrude on access and egress route	Maintain 36" inch wide clear path of travel	O

1.1.15	305.5 308	Placement of refrigerator in corner of kitchen blocks door opening more than 90 degrees	Reposition refrigerator	O
1.1.16	402.0	<u>Concert Hall:</u> No access route to entrance lobby (at rear of hall)	Continue use of main City Hall lobby as access route	C
1.1.17	701.1 703.0	No exterior signage indicating route to accessible entrance (at rear of hall)	Install way-finding signage indicating that access route is through the main City Hall lobby (noted above)	C
1.1.18 Photo	603.0- 606.0	<u>Entrance lobby:</u> Restrooms not accessible and no basic access features – door, sink and stall hardware, grab-bars in narrow stalls	Upgrade restrooms providing accessible door and sink hardware and equipping at least one stall with grab bars	C
1.1.19 Photo	505.0	NC handrails on stairs to balcony	Install compliant handrails	C
1.1.20	402.0	<u>Egress Routes:</u> No accessible emergency egress route from the Concert Hall stage	Design and construct accessible emergency egress route	C
1.1.21 Photo	505.0	Stairs on emergency egress route have NC handrail on one side only	Install compliant handrails	C

1.1.22 Photo	402.0	Emergency egress from wheelchair seating at front of auditorium not connected to walkways on building periphery	Extend egress routes to adjacent walkways	C
1.1.23 Photo	802.0 221.1	<u>Auditorium Seating:</u> Inadequate wheelchair seating, only two spaces at the front of the hall (spaces at rear not on access route as aisle slope increases to greater than 8.3%).	Install additional wheelchair seating spaces in dispersed locations	C
1.1.24 Photo	802.4 221.4	No aisle seats with armrests that raise	Install seats with raise-able arm-rests	C
1.1.25 Photo	505.0	No handrails on outer aisle side walls	Install handrails	C
1.1.26 Photo	303.3	<u>Dressing Room:</u> Unbevelled threshold at entrance door	Bevel threshold	C
1.1.27 Photo		Sink intrudes on latch side clearance	Reposition sink or install power door opener	C
1.1.28 Photo	604.3	Toilet center line 14" from side wall	Reposition toilet	C

1.1.29 Photo	603.0	Non-accessible shower stall: <ul style="list-style-type: none"> • No grab bars • Shower head not adjustable • No fold-down seat • NC placement of control 	Upgrade shower stall	C
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1.2 Police Headquarters:

The recently constructed building is close to fully accessible and incorporates a number of superior design elements. Parking spaces and access route from parking to building entrance need upgrade.

ID #	ADAAG	Barrier / Non-Compliant Condition	Potential Solution	Budget
1.2.1 Photo	502.2 502.4	Accessible parking spaces not on level surface (slope around storm drain)	Relocate spaces to level area	O
1.2.2	502.2 502.4	No van accessible space	Provide one van accessible space	O
1.2.3 Photo	405.2 406.0- 406.4	Access route from parking to building entrance interrupted by a curb	Construct curb cut	C
1.2.4	505.0	Handrail on stairs to community room on one side only	Install second handrail	C

1.2.5 Photo	603.0	No grab bar on side wall of toilet	Install grab bar	C
1.2.6 Photo	608.0	NC shower stall	Upgrade shower stall	C

1.3 Recycling Center

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
1.3.1 Photos	402.1- 402.2	Steep slopes and cross slopes, tight spaces and heavy traffic	Provide staff assistance	O
		No accessible spaces or access routes	Install signage re staff assistance	O

1.4 Public Works Center and Water Treatment Plant

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
1.4.1	405.0- 405.8	<u>Access Route:</u> Walk from HP parking to building entrance interrupted by vertical rises of 1 ½ to 2" on pathway and at entrance	Ramp or bevel vertical transitions	M

		threshold.		
1.4.2 Photo	504.3	<u>Stairs:</u> Open risers from lobby to 2 nd floor and NC handrails	Modify and enclose risers and install handrails	C
1.4.3	404.1	<u>Men's and Women's Restrooms:</u> NC door widths (< 30" clear opening)	Widen restroom doorways	C
1.4.4	504.3	<u>Water treatment tour route:</u> Metal stairs with open risers.	Modify risers on tour route	C

1.5 South Norwalk Train Station

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
1.5.1 Photo	405.0-405.8	<u>Exterior access route parking to platforms (controlled by Metro North):</u> Steep NC ramp to platform (slope 12.4%), NC handrails	Inform Metro North (Contact CT Office of Protection and Advocacy)	--
1.5.2 Photo	405.0-405.8	<u>Interior route to elevator:</u> Ramp on route to elevator with no handrails Slope exceeds 8.3% (8.3%— 8.8%)	Install handrails	C
1.5.3 Photo	505.0-505.10	<u>Stairs to ticket counter:</u> NC handrails (end above nose of 1 st riser)	Upgrade handrails	C

1.5.4 Photo	505.0- 505.10	<u>Stairs to platform:</u> NC handrails (end above nose of 1 st riser)	Upgrade handrails	C
1.5.5 Photo	505.0- 505.10	<u>Stairs to café:</u> Partial handrail one side only	Install handrails	C
1.5.6 Photo	226.0	<u>Station café (leased space):</u> No accessible tables	Require café to provide at least one accessible table	O
1.5.7 Photo	502.0- 502.4	<u>HP parking (track-side exterior):</u> 3 HP parking spaces w NC access aisles	Provide access aisles	O
1.5.8	502.0- 502.4	No van accessible space	Provide one van accessible space	O
1.5.9	502.0- 502.4	One space with no sign	Install sign	O
1.5.10	703.0	<u>Alarms at garage elevator:</u> No tactile signage	Install tactile signage	O

1.6 East Norwalk Train Station

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
1.6.1 Photo	405.0- 405.8	<u>Northbound Side</u> (authority of Metro North): NC ramp from parking to platform with NC handrails and steep slope (10.4% - 23.5%)	Inform Metro North (Contact CT Office of Protection and Advocacy)	--

1.6.2 Photo	405.0- 405.8	<u>Southbound Side</u> (authority of Metro North): NC ramp from parking to platform with NC handrails and steep slope (8.7% - 11.8%)	Inform Metro North (Contact CT Office of Protection and Advocacy)	--
1.6.3 Photo	405.0- 405.8	<u>Parking Lot and Station Building:</u> No access route from walks on street level to parking lot level	Construction of ramp with multiple switch backs or elevator may impose undue burden	C
1.6.4 Photo	401	No access route from parking lot to lower building level (food concession)	Install communication system to concession (provide curb-side services when more than one employee on duty)	C

1.7 Yankee Doodle Garage

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
1.7.1	502.1- 502.4	<u>Parking</u> No van accessible parking	Install van accessible parking	O
1.7.2 Photo	406.0- 406.4	<u>Curb Cuts</u> Steep slope and side slope on exterior route to payment kiosk (23%)	Reconstruct curb cut	C
1.7.3 Photo	406.0- 406.4	Steep slope and cross slope on exterior route to elevator - steep slope and cross slope (19%)	Reconstruct curb cut	C

1.7.4 Photo	406.0- 406.4	No curb ramps at Burnell Blvd. entrance.	Install curb ramps	C
1.7.5 Photo	505.0- 505.10	<u>Stairway:</u> Non-compliant handrails on stairs	Modify/install compliant handrail	C
1.7.6	308.2- 308.3.	<u>Ticket Kiosk:</u> Highest reach > 52"	Remount kiosk or construct raised platform	C
1.7.7 Photo	308.2- 308.3	<u>Elevator:</u> Controls high (49" - 60" forward reach) No tactile symbols on control No audible signals	Modify or Install new control panel and call buttons Install tactile indicators Install audible signal	C C C

1.8 Imax Parking Lot

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
1.8.1 Photo	308.2- 308.3.	<u>Payment Kiosk:</u> In weather shelter positioned for forward reach only	Modify Kiosk or raise walk at base	C
1.8.2 Photo	502.0- 502.4	No van accessible spaces	Install at least one van accessible space	O

1.9 Maritime Garage

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
1.9.1		Van accessible spaces (2) on 1st level (7' max garage entry height)	Identify and secure access spaces for high roof vans as near as possible to garage Install directional signage to nearest van accessible space	O O
1.9.2	308.2-308.3	Elevator controls within compliant reach ranges except call cancel button (65")	Rewire and install call cancel button	C

Group 2. Other Municipal Buildings

- 2.1 Health Department (Health)
- 2.2 Norwalk Library (Library)
- 2.3 South Branch Library (Library)
- 2.4 Animal Control (Police):

2.1 Health Building: (Health Department)

There is no access route from the bus stop to the building entrance and no route connecting the building to City Hall.

ID #	ADAAG	Barrier / Non-Compliant Condition	Potential Solution	Budget
2.1.1 Photo	402	No access route from bus stop on sidewalk on lower level to main entrance,	Establish and maintain access route from lower level sidewalk using entrance and elevator.	O
2.1.2 Photo	405	NC ramp: steep slope and side slopes (10.9%) with NC handrails	Reconstruct ramp	C
2.1.3	502.4	Two accessible parking spaces with side slopes >2%	Re-grade or relocate parking spaces to level section of lot	O
2.1.4 Photo		Signs for HP parking spaces are mounted low, obscured by bushes	Install signs at visible height	O
2.1.5 Photo	502.3	HP parking spaces and aisles not clearly marked	Clearly paint accessible spaces and access aisles	O

2.1.6	502.2 502.4	No van accessible parking space	Install at least one van accessible space with 8' wide access aisle on access route	O
2.1.7 Photo	308.2- 308.3	Counter in lobby 41" high with no lower section	Install lower section of counter or fold-down shelf or provide table	O
2.1.8 Photo	407.1	Elevator is not being used to provide access between lower and main levels.	Adopt procedures using elevator to connect lower level entrance with main level	O
2.1.9 Photo	505.10.1	<u>Interior Stairs:</u> NC handrails end above nose of 1 st riser	Upgrade handrails	C
2.1.10 Photo	504.5	Tread noses project 1 ³ / ₄ " and are unbeveled	Modify tread nosings	C
2.1.11 Photo	404.2.7	<u>Doors</u> NC hardware (knob handles)	Install accessible hardware	O
2.1.12 Photo	603 603.2.1 604.4 604.5	<u>Restrooms:</u> NC "accessible" restroom (too small for full access upgrade) <ul style="list-style-type: none"> • Scale and trash container intrude on limited maneuver space • Toilet seat raised by extenders to 20½" • NC floor mounted grab bar on sidewall and no rear grab bar 	Upgrade larger restroom to full accessibility	C

	603.3	<ul style="list-style-type: none"> • Mirror mounted high (50½ ") • Sink pipe not insulated • Towel dispenser mounted high (51") 		
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2.2 Norwalk Library

The original Carnegie building was constructed in 1903 and a major addition was constructed in 1981. 2nd floor restrooms are being upgraded for full accessibility.

ID #	ADAAG	Barrier / Non-Compliant Condition	Potential Solution	Budget
2.2.1 Photo	502.2 502.4	NC HP parking spaces with no van accessible space	Upgrade accessible parking installing one van accessible space	O
2.2.2 Photo	406.0- 406.4	No curb ramp and curb cut at head of access aisle	Connect parking spaces to walkway with ramps or curb cuts	O
2.2.3 Photo	302.0	NC threshold at entrance doorway (3/8" vertical)	Upgrade threshold	O
2.2.4	603- 604	Restrooms (now being upgraded)	Install signs at all restrooms with location of full accessible restrooms	C
2.2.5 Photo	604.8	NC hardware on stall doors	Install compliant latch hardware on all toilet stalls	C

2.2.6 Photo	303.0	High threshold not beveled	Bevel or replace non-compliant thresholds (at rooms 202, 203)	C
2.2.7	216.4.2	<u>Areas of Refuge Assistance:</u> No signage in corridors indicating location	Install signage	C
2.2.8 Photo	402.0	2 nd Floor Stair 1, plant obstructs communication device	Remove plant and keep space clear of obstructions	O
2.2.9 Photo	504.0	Stairs at Community Room to Administration: no tactile warning and NC hand rails	Install tactile warning and handrails	C
2.2.10 Photo	703.0	2 nd Floor Rear no signage re evacuation procedure	Install signage	C
2.2.11 Photo	505.0	Lower level main stairway: NC Handrail ends above nose of 1 st riser	Install compliant handrail	C
2.2.12 Photo	505.0	Lower level rear stairway: NC Handrail ends above nose of 1 st riser	Install compliant handrail	C
2.2.13 Photo	4.3.1	Basement level rear stairway, area of refuge assistance used for temporary storage	Clear space	O

2.2.14 Photo	306.0	Table and study stations with less than 27" (26") knee clearance: Community Room, Reading Rooms on Main and Lower Levels	Raise table and study station heights in media/fiction room	O
2.2.15 Photo	205.0	<u>Door Hardware:</u> NC hardware at Conference Room (adjacent to Children's Activity Room, Auditorium, Typist Room, Literacy Volunteer area)	Install lever door hardware	C
2.2.16 Photo	404.0	NC latch-side clearance at Children's Activity Room: blocked by bookshelves	Move shelves to provide 24" latch-side clearance	O
2.2.17	306.0	<u>Basement level:</u> Tables and computer stations 26.5" knee clearance	Raise at least one of each type of table and station to min. 27" high knee clearance (29" preferred)	O
2.2.18	308.0	No accessible catalogue station	Install accessible catalogue station	C
2.2.19 Photos	307.0	Protruding computer stations in reading rooms on 1 st floor and lower level	Install cane detectable warning	O

2.3 South Norwalk Library:

Recently renovated library is almost completely accessible.

ID #	ADAAG	Barrier / Non-Compliant Condition	Potential Solution	Budget
2.3.1	502.2 502.4	No van accessible parking space	Install parking space	O
2.3.2	603.0	<u>Restrooms:</u> No access signage at entrance doors	Install sign	O
2.3.3	404.2.9	Door weights > 5lbs	Adjust and maintain door weights at 5lbs maximum	O
2.3.4	603.0	Men's restroom: soap dispenser high (49")	Lower soap dispenser	O
2.3.5	402.1- 402.2	Two stacks with less than 36" clear width (32", 33")	Re-position stacks	O
2.3.6	8.2 4.2.4 4.32	Accessible computer station: knee space blocked by computer tower	Re-locate computer tower	O

2.4 Animal Control (Police):

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
2.4.1	502.2 502.4	HP parking space not closest to entrance	Relocate space	O
2.4.2 Photo	502.2 502.4	No van accessible space	Install van accessible space	O
2.4.3 Photo	406.0- 406.4	<u>Sidewalk to entrance ramp:</u> NC curb cut, steep slope and side slope Cross slope on walkway crossing base of ramp	Reconstruct curb cut Reconstruct sidewalk	C C
2.4.4 Photo	405.0- 405.8	<u>Ramp:</u> No level platform at base of ramp	Reconstruct walk at base of ramp <u>Interim:</u> Install raised edge.	C
2.4.5 Photos	505.0	NC handrails at entrance stairs and side entry	Install handrails	C
2.4.6 Photo	603.0	<u>Restroom:</u> NC grab bar (not mounted on horizontal) on wall side of toilet.	Install horizontal grab bar on side wall	O

Group 3. Recreation and Parks:

- 3.1 Calf Pasture Beach
- 3.2 Shady Beach
- 3.3 Veteran's Memorial Park
- 3.4 Mathews Park
- 3.5 Cranbury Park and Gallaher Mansion
- 3.6 Flax Hill Park
- 3.7 Fodor Farm

3.1 Calf Pasture Beach

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
3.1.1	406.0-406.4	No curb cut at head of HP parking space and access aisle in front of memorial	Install curb cut	C
3.1.2 Photo	206.0	Parked cars protrude over walk narrowing path of travel	Install tire stop	O
3.1.3 Photo	406.0-406.4	No curb cut at 3 HP parking spaces near boat launch, deteriorated asphalt	Install curb cut, repair asphalt	C
3.1.4 Photo	405.0-405.8	No ramp at step to memorial	Construct ramp	C

3.1.5 Photo	405.0- 405.8	No ramp at step to snack bar/restaurant concession	Construct ramp	C
3.1.6		No access route to ball field	Construct access route	C
3.1.7 Photo		<u>Pavilion 1:</u> Accessible changing room with grab bars but no transfer bench	Install transfer bench	O

3.2 Shady Beach

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
3.2.1	406.0- 406.4	Sidewalks at park entrance: curb cut on west side; none on east side.	Install curb cut	C
3.2.2 Photo	402.0	No access route from HP parking spaces to picnic tables on beach: fence opening less than 32" and steep slope (photo)	Construct access route	C
3.2.3 Photo	402.0	<u>Restrooms:</u> Concrete gutter drain intrudes on walkway	Install visible / tactile warning	O

3.2.4 Photo	405.0- 405.8	<u>Men's Room:</u> Ramp with NC handrail and slope	Modify & upgrade	C
3.2.5 Photo	402.0	No walkway to base of stairs (photo)	Construct walkway	C
3.2.6		Sink pipe not insulated	Insulate pipe	O
3.2.7 Photo	307.0	Hand dryer protrudes	Install cane detectable warning	O
3.2.8 Photo	405.0- 405.8	<u>Women's Room:</u> Ramp w NC slope and no level platform at base	Modify & upgrade	C

3.3 Veteran's Memorial Park

The park facilities are deteriorated with visible storm damage; walks at the periphery, docks, and other elements are in need of extensive repair.

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
3.3.1 Photo	502.0- 502.4	<u>Parking:</u> HP parking spaces distributed through park (locations not always closest to	Distribute HP parking spaces to each activity area with min. one van	O

		adjacent amenities and no van accessible spaces	accessible space in each area	
3.3.2 Photo	302.0	Deteriorated asphalt path on periphery with crumbling and broken asphalt	Repair deteriorated asphalt	C
3.3.3 Photo		Benches old, in disrepair and lacking armrests	Replace benches	C
3.3.4 Photo	405.0-405.8	No ramps or curb cuts on routes to restrooms	Install ramp or curb cut	C
3.3.5 Photo	403.0	Missing bricks on walks to restrooms	Replace missing bricks	O
3.3.6 3.3.7. 3.3.8	603.1-604.8	<u>Restrooms:</u> NC sink hardware Sink pipes not insulated No soap dispenser at accessible sink	Install compliant hardware Insulate sink pipes Install soap dispenser	O O O

3.3.9 Photo	235.0	<u>Boat Dock:</u> Broken and heaved asphalt on walk	Repair and upgrade	C
3.3.10 Photo	703.0	Broken and missing rails	Repair and upgrade	C
3.3.11		No information signage at boat launch	Install signage	C
3.3.12	406.0-	<u>Basketball Court:</u> NC curb cut on route to court with slope (11.2%)	Repair curb cut	C
3.3.13	406.4	No curb cut adjacent to the basketball court	Install curb cut	C
3.3.14 Photo	402.0	<u>Playground:</u> No access route to playground	Construct access route	C

3.4 Mathews Park

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
3.4.1 Photo	502.1- 502.4	<u>Parking at Visitors Center:</u> 2 NC parking spaces with NC access aisles	Upgrade spaces and access aisles including one van accessible space	O
3.4.2 Photo	406.1- 406.4	Curb cut from parking to visitor center has 2" raised edge and settled pavers	Repair raised edge on curb cut and settled pavers	C

3.4.3	703.0	<u>Restrooms:</u> Signs on door not on latch side wall (photo)	Relocate signs	O
3.4.4 Photo	226.0 902.0 305.0- 306.0	<u>Picnic Tables:</u> No wheelchair seating extensions on picnic tables	Add wheelchair seating extension	O
3.4.5 Photo	402.0 504.1- 504.6 505.5- 505.10.2	<u>Visitor Center</u> (not controlled by the City): No ramp to entrance NC stairs with six risers Protruding nosings on wooden risers NC wooden handrails	Inform visitor center of non-compliant items	--
3.4.6 Photo	302.3	NC, grate in path of travel with wide opening	Install storm compliant grate	C
3.4.7 Photo	404.2- 404.7	NC door hardware and thresholds at print and art gallery doors	Install hardware and repair threshold	--
3.4.8 Photo	405.2- 405.5, 406	NC curb ramp on walkway at Children's Museum	Inform Museum of need to repair	--

3.4.9 Photo	502.0-4	HP parking space with no curb ramps in access aisle	Inform Museum of need to repair	--
3.4.10 Photo	405.2-405.5, 406.0-406.4	No curb cuts in NC drop off area	Inform Museum of need to repair	--
3.4.11 Photo	504.6, 505	NC handrail on stairs to Children's Museum	Inform Museum of need to repair	--
3.4.12 Photo	402.0	NC walkway: stone inserts create tripping hazard	Inform Museum of need to repair	--
3.4.13 Photo	403.2, 302.1	Deteriorated walk at entrance to playground	Repair surface	O

3.5 Cranbury Park and Gallaher Mansion

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
3.5.1	226.0	<u>Pavilion:</u> Approximately 25 picnic tables, none with wheelchair seating extension	Install wheelchair seating extensions (5 tables recommended)	O

3.5.2	402.0	<u>Playground:</u> No access route to play elements (8x8 wood beams on boundary of wood-chip surface)	Construct access route	C
3.5.3 Photo	602.0	<u>Pathway to Dog Area:</u> Water fountain not accessible	Install accessible water fountain	C
3.5.4 Photo	402.0	<u>Restrooms at Great Lawn:</u> Not on access route (steep slope to raised paving stones at entrance)	Construct accessible route	C
3.5.5	703.0	Confusing signage on face of unisex restroom door	Clarify signage and relocate	O
3.5.6 Photo	603.0	Towel dispenser in men's room protrudes	Install cane detectable warning	O
3.5.7 Photo	302.0	<u>Gallaher Mansion Driveway:</u> Potholes in pavement	Repair potholes	O
3.5.8	302.3	NC storm grate in path of travel	Install tactile warning	O
3.5.9 Photo	302.0	<u>Mansion House:</u> Deteriorated surface under archway at main entrance	Repair	O

3.5.10 Photo	406.0- 406.4	Pathway on North side sun porch deteriorated surface and vertical shift	Repair and install curb cut/ramp	O
3.5.11 Photo	405.0- 405.8	Temporary ramp leading to sun porch	Upgrade or remove	O
3.5.12	402.0	<u>Carriage House Arts Center:</u> Accessible portable restroom not on access route	Construct access route	C
3.5.13 Photo	402.0	No access route from main driveway and parking	Construct access route	C
3.5.14	402.0	2 doors (under maroon awnings) not on accessible routes	Construct accessible route	C
3.5.15 Photo	402.0	<u>Gift Shoppe/Tourist Info Building:</u> No access route	Construct access route	C
3.5.16 Photo	302.0	Uneven stonework on pathway to entrance at rear (up to 1.5")	Level surface between stones	O

3.6 Flax Hill Park

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
3.6.1	402.0	Chain blocks access to fields, playgrounds, courts	Remove or replace with access gate	O
3.6.2	402.0	No access route to ball field	Construct access route	C
3.6.3 Photo	402.0	No access route to basketball courts	Construct access route	C
3.6.4	402.0	No access route to play equipment	Construct access route	C

3.7 Fodor Farm

The park is undergoing construction. Parking lot will be resurfaced and parking spaces will be designated.

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
3.7.1	502.0-502.4	No HP parking spaces now marked due to construction	Provide HP parking spaces on level area close to pavilion with at least one	C

			van-accessible space	
3.7.2 Photo	402.0	No access route to gardens	Install access route	C
3.7.3	402.0	<u>Pavilion / Deck:</u> No access route from pavilion to gardening plots and sheds	Construct access routes	C
3.7.4 Photo	402.0	Steep grade at transition from unfinished parking to ramp	Re-grade (even if temporary if open to the public)	O
3.7.5 Photo	405.0- 405.8	Steep/uneven drop-off from ramp to surface of parking area	Install transition ramp or grading	O

Group 4. Public Schools

Three high schools, two middle schools, and four elementary schools were surveyed. Schools included in the survey included the lead “accessible” school or schools at each grade level, and schools offering unique educational programs: Brien McMahon and Briggs High Schools, Ponus Ridge and Nathan Hale Middle Schools, Jefferson and Columbus (Magnet) Elementary Schools. Norwalk High was partially surveyed covering the areas where two unique educational/community programs—swimming and music—are operated. Cranbury Elementary, though not designated an accessible school, was included as a facility that has a single-level design on a level site facilitating upgrading to full functional accessibility. Wolfpit Elementary School was included at the request of the Public Schools Department. It is not well designed or sited for extensive access upgrades but has non-compliant features that should be addressed to improve safety and facilitate access to polling.

- 4.1 Brien McMahon High School
- 4.2 Briggs High School
- 4.3 Norwalk High School
- 4.4 Ponus Ridge Middle School
- 4.5 Nathan Hale Middle School
- 4.6 Jefferson Magnet (Science) Elementary School
- 4.7 Columbus Magnet (Social Studies) Elementary School
- 4.8 Cranbury Elementary School
- 4.9 Wolfpit Elementary School

High Schools—Brien McMahon, Briggs, and Norwalk:

4.1 Brien McMahon High School

The building was enlarged and extensively renovated in three phases beginning with the addition of a new wing followed by a “gut renovation” of other building spaces. Interior access barriers were addressed during construction and renovation but due to errors or omissions some non-compliant conditions remain. Exterior routes connecting the building to parking and athletic fields are inadequate and incomplete.

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
4.1.1 4.1.1.1	502.0- 502.4	<u>Parking:</u> No van accessible spaces No HP parking spaces on either side of stadium seating	Install van accessible spaces Install HP parking spaces near bleachers	O O
4.1.2 Photo	402.0 402.3	<u>Walkways and Access Routes</u> No access routes from parking and walkways at front of building to baseball fields, basketball courts, football/track field, stands	Develop campus master plan Construct or upgrade pathways and curb cuts to all athletic fields and viewing areas	C
4.1.3 Photo	504.0 505.0	<i>Handrails on ramps and stairs interrupted by newel posts compliant under 2010 ADAAG but not under ANSI A117.1 used by the state of CT</i>	Upgrade handrails	C

4.1.4 Photo	405.0- 405.3	NC ramp from cafeteria patio to field level (slope > 8.3%)	Repair ramp	C
4.1.5		<i>Construction of only one ramp—is not a code violation, but adds distance between access points</i>	Install 2 nd ramp	C
4.1.6 Photo	307.0	No cane detectable warning at front of building protruding along edge of path of travel (> 27" high)	Install cane detectable warnings	O
4.1.7	402.0- 403.3 302.0	Main parking lot and walkway surfaces deteriorating and shifting at seams and paver edges (Note: pavers demand very high level of maintenance)	Maintain and repair surfaces on all access routes	C
		Athletic / Courts / Stadiums		
4.1.8 4.1.9 Photo	504.0 505.3	<u>Football / Track Seating:</u> Stairs with open risers NC handrails on all 4 stairways	Install toe plates Upgrade handrails	C C
4.1.10	703.0	No signage at accessible restrooms	Install signs	O
4.1.11 Photo		No wheelchair seating at baseball and softball fields	Construct concrete pad seating adjacent to bleachers	C
4,1,12 Photo	402.0- 402.2	No access route to baseball and softball fields	Construct access routes	C
4.1.13		No access route to tennis and	Construct access routes	C

Photo		basketball courts		
		General Building Condition		
4.1.14 Photo	403.0- 403.3	<u>Enclosed Walkway Connectors</u> Grade of walkways on 1 st and 2 nd floors exceeds 5% in places (4.8% - 5.3%); slope may increase further as buildings settle (Rail on 2 nd floor walk is NC, no rail on 1 st floor walk)	Monitor re slope increases as building settles and install handrails if necessary	C
4.1.15 Photo	405.0- 405.8	<u>Interior Ramp Connector:</u> Slopes exceed 12.3% in places	<u>Adopt design and construction standards ensuring that walks and ramps are not designed at code maximums</u>	UDB
4.1.16 Photo	505.0- 505.10	<u>NC Center Handrails (main stairways):</u> Handrails foreshortened, ending above nose of riser	Upgrade / extend handrails	C
4.1.17 Photo	603.0- 604.9	<u>Restrooms:</u> Toilet seats in accessible stalls higher than 19 (20"-20.5)	Lower toilets seats to 17"-19"	C
4.1.18 Photo	603.0- 604.9	NC towel dispensers	Provide "usable" towel dispenser at accessible sink in each restroom	O
4.1.19 Photo	305.0	<u>Science Labs:</u> NC "accessible lab stations (depth <18")	Modify one station in each lab	C

4.1.20 Photo		<u>Carpets:</u> Curled and worn edges on carpet at main entrance and other locations	Maintain, repair and replace rugs when edges curl or deteriorate	O
4.1.21	404.0	<u>Doors weights:</u> > 5lbs in multiple locations including auditorium dressing room, restrooms, science labs and classrooms)	Establish maintenance procedure re testing and adjusting door weights to max. 5lb	O
4.1.22	703.0	<u>Signage:</u> Route to elevator not clearly defined	Install way finding signage	O
4.1.23		Low contrast backlit Areas of Refuge Signs lack contrast	Install high contrast signs	O
4.1.24	404.0	<u>Electrical/Mechanical Closets:</u> Door handles not textured for hazard warning	Install textured door hardware	C
4.1.25 Photo	504.0- 505.10	<u>Auditorium</u> No handrails on stairs to stage	Install handrails	C
4.1.26		No handrails on stairs to egress	Install handrails	C
4.1.27 Photo	221.2.3	Wheelchair seating spaces not dispersed (10 in back row only)	Install dispersed wheelchair seating with companion seating	C
4.1.28	402.0- 402.2	<u>Band / Orchestra Room (#1130)</u> NC raised edge in doorway to auditorium doorway	Ramp or bevel edge	O

4.1.29	404.0	NC double leaf egress doors (each wing 26" wide) removable center bar requires key	Install compliant door (one wide leaf)	C
4.1.30	902.0	<u>Art Studio Rooms (#1125 & #1112):</u> Sink drain pipes not insulated	Insulate pipes	O
4.1.31	206.0 302.0	<u>Dark Room (room 1115):</u> NC dimensions at turns in U-shaped entrance passageway	Reconstruct	O
4.1.32	404.0	<u>Egress Door (near room 1115):</u> Double doors, each wing 26" wide, center bar removable with key.	Install compliant door	C
4.1.33	306.0	<u>Rooms 1112 & 1125:</u> Sink with un-insulated drain pipe	Insulate pipes	O
		Second Floor		
4.1.34	603.0- 604.9	<u>Boys' Restroom (#2091):</u> Sink counter high (35.5")	Lower sink and counter section	C
4.1.35 Photo 4.1.36 Photo	306.0	<u>Greenhouse:</u> NC sink NC counters / tables (no open knee space below)	Install sink Install accessible counter / table space	C C
		Ground Floor (Cafeteria)		
		<u>Dining Area:</u>		

4.1.37 Photo	307.0	No cane detectable warning on protruding counter ends and wall mounted "black box" by Boys' Restroom	Install cane detectable warnings	O
4.1.38 Photo	205.0	<u>Lecture Room (G115):</u> NC door hardware on partition wall	Install compliant hardware	O
4.1.39 Photo	307.0	No cane detectable warning on wall mounted "black box" on interior wall	Install cane detectable warning	O
4.1.40	603.0- 604.9	<u>Faculty Dining Room (G112):</u> Loose fold down grab-bar in Men's Restroom	Tighten grab-bar (include these bars in maintenance checklist)	O
		Global Studies		
4.1.41 Photo	308.0	<u>Entrance:</u> Call box outside entrance not in reach range	Relocate call box	O
4.1.42	404.0	Door weights heavy (exterior door weights standard is "reserved" - automatic openers recommended in high use areas)	Install automatic door opener	O

4.1.43		Acoustics in entrance lobby are harsh (there is no acoustic standard in access codes but baffling of sound enables hard of hearing persons to communicate more effectively)	Install baffles / sound deadening treatment on walls	O
4.1.44 Photo	302.0	<u>Multi-purpose room stage:</u> Tripping hazard at wood to tile transition	Bevel or repair transition strip	O
4.1.45 Photo	405.0	No level landing at base of ramp to corridor	Remove door and install wing walls in corridor or replace with stairs	C
4.1.46 Photo		<u>Floor mounted electrical outlets:</u> Raised, floor mounted electrical outlets allowed by code but may create tripping hazard	Installation of a cane detectable "structure" (possible wire frame)	O
4.1.47	804.0	No accessible counters or fixtures	Install accessible work station and one of each appliance	O
4.1.48 Photo	402.0	<u>Zen Garden:</u> No accessible seating area on loose gravel surfaces	Provide wheelchair accessible seating	O
4.1.49 Photo	403.0- 403.3	Deteriorated asphalt on walks with slopes > 5% (5.1 - 7%), cross slopes > 2%, and drop off at edges.	Install edge protections and handrails	O

4.1.50 Photo	403.0- 403.3	Deteriorated asphalt surface (exacerbated by sub-surface water)	Repair and improve drainage	O
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4.2 Briggs High School

70% of Briggs' students receive special education services. Described as providing an educational program for students who may benefit from a smaller setting and "more intimate" teacher/learner interactions, the school is operated as a substantially separate educational facility raising questions of educational policy in relation to the integration mandate of the ADA and related disability rights law. The physical plant at Briggs will require substantial upgrading of building systems and renovation/expansion of program spaces to bring it to a standard reasonably equivalent that of other high schools. The extent to which barriers to accessibility should be included in a transition plan and their level of priority will depend on the clarification of questions of policy and practice in relation to the "integration" and "least restrictive environment" mandates of IDEA, Section 504 and ADA.

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
4.2.1 Photo	502.0- 502.4	<u>Parking:</u> Two HP parking spaces on deteriorated asphalt	Repair asphalt	O
4.2.3		No van accessible space	Provide one van accessible space	O
4.2.4 Photo	703	NC access aisle	Install 8' wide access aisle	O
4.2.5		No signage re routes to school and health center entrances	Install signage	O
4.2.6	405.0-	<u>Routes to Health Center:</u> Stairs from main building with NC	Construct ramp and stairs	

4.2.7	405.8	handrails and no ramp		C
	502.0	Deteriorated walkway surfaces on route from parking and main building	Repair walkways	C
	302.0			
4.2.8	603.0-604.9	Only one accessible restroom – UFAS scoping requirement: one for each gender	Construct 2 nd accessible restroom	C
4.2.9 Photo	603.0-604.9	<u>Accessible Restroom:</u> NC open side grab-bar at toilet (arc of swing-out bar blocked by privacy partition)	Replace with swing down bar	O
4.2.10 Photo		Un-insulated sink pipe	Insulate pipes	O
4.2.11		No toilet paper dispenser	Install TP dispenser	O
4.2.12		Paper towel dispenser mounted high	Lower dispenser height	O
4.2.13 Photo	302.0	<u>Gym/Cafeteria:</u> Broken tiles at emergency egress doors	Repair tiles	O
4.2.14 Photo	404.0	NC door to exercise room	Install compliant door	C
4.2.15	603.0-604.9	<u>Health Suite / Nurses' Office:</u> Restroom sink, no pipe insulation	Insulate pipe	O
4.2.16	603.0-604.9	No accessible water fountain	Install accessible water fountains	C

4.2.17 Photo	306.0	<u>Science Room/Computer Lab:</u> NC Computer stations (14" – 15" depth) NC height at round tables (<27" knee clearance)	Provide accessible computer station Provide accessible table	O O
4.2.18 Photo	306.0	<u>Art Room:</u> Tables 26" high	Provide at least one accessible table	O
4.2.19	306.0	NC sinks with no knee clearance	Install compliant sink	C
4.2.20	603.0- 604.9	<u>Nursery/Daycare Area:</u> NC door width to "accessible" restroom	Install compliant door	C
4.2.21 Photo	402.0 504.0	No ramp and no railings on egress stairs	Install compliant railings and ramp	C
4.2.22 Photo	402.0 306.0	<u>Library/Computer Lab:</u> NC aisle widths at stacks	Reposition stacks	O
4.2.23 Photo		Computer station NC knee space	Provide accessible computer station	O
4.2.24		NC table	Provide one accessible table	O

4.3 Norwalk High School

Before completion of the expansion and renovation at Brien McMahon in 2006, Norwalk High had been designated the city's "accessible" high school. While Brien McMahon now serves that lead role, there are still programs at Norwalk High not available at Brien McMahon including the only public swimming pool (used for school and community programs), and music programs (both educational and for public performance) described as the best in the City. In establishing barrier removal priorities, the Public Schools Department should identify programs at

Norwalk High not available at other schools. The site survey focused on spaces and amenities serving the swimming pool and music programs; barriers observed in other areas are also noted

Note: Architectural evaluation of possible access routes from the pool to locker rooms several years ago indicated that an addition with new locker rooms would be the most feasible solution. The high cost of construction might impose an undue burden if born primarily by the Public School Department. A decision is needed regarding the value of the pool for community and school related programs.

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
4.3.1	502.0-502.4	No van accessible space	Install van accessible space	O
4.3.2 Photo	502.0-502.4	HP parking spaces at front of building not closest to primary accessible entrance	Locate at least 2 accessible parking spaces (one van acc.) close to main entrance	O
4.3.3 Photo	406.0-406.4	No access aisle at crossing to stadium	Construct access aisle / curb cut /crossing to stadium	C
4.3.4 Photo	502.0-502.4	HP parking spaces outside 'E' entrance: NC cross slope (3.5%)	Relocate space to level area	O
4.3.5 Photo	402.0-402.2	<u>Route to Pool & Science Wing:</u> Shifting at seam on walkways	Repair walkway	O

4.3.6 Photo	405.0- 405.8	Deteriorated wood ramps with non compliant slopes and handrails	Repair or replace ramps	C
4.3.7 Photo	505.0- 505.10	NC handrails on stairs	Upgrade handrails	C
4.3.8	403.0- 403.3	NC threshold at pool entrance	Ramp or bevel threshold	O
4.3.8	402.0- 402.2	<u>Swimming Pool:</u> No lift or other means of providing access to pool	Install lift	C
4.3.9 Photo	505.0- 505.10	NC handrail (flat board) on stairs to locker room	Upgrade or replace handrails	C
4.3.10		NC maneuver space on route to wheelchair seating in stands (28" from door face to stair edge)	Re-design and construct accessible seating	C
4.3.11 Photo		No handrails on stairs in viewing stands	Install handrails	C
4.3.12	402.0- 402.2	No access route from pool deck to locker room	Construct accessible route	UDB
4.3.13 Photo	307.0	<u>Auditorium lobby:</u> No cane detectable warning at exposed back of stairs	Install cane detectable warning	C
4.3.14	402.0	No access route to dressing rooms	Construct route or relocate dressing rooms	C

4.3.15	505.0	NC handrail on stairs to control booth	Install and upgrade handrails	C
4.3.16 Photo	402.0- 402.2	<u>Auditorium:</u> Steep slope 12.6 – 13.3% with no handrails on side walls	Install handrails	C
4.3.16.1		No handrails on stairs to stage	Install Handrails	C
4.3.17 4.3.18 Photo	403.0- 403.3	No designated wheelchair seating areas NC and hazardous temporary plywood structure for staging / sound controls at rear of auditorium	Install wheelchair seating in distributed locations Remove structure or make accessible	O O
4.3.19 Photo	405.0- 405.8	<u>Corridor (Auditorium to front entrance):</u> Hazardous makeshift plywood ramp with very steep slope and no handrails narrows egress route	Remove ramp	O
4.3.20 Photo		No hand-rails on stairs	Install handrails	O
4.3.21 Photo	402.0- 402.2	<u>Courtyard (used for summer concerts):</u> No access route	Construct access route	C
4.3.22 Photo	402.0- 402.2,	<u>Courtyard (raise planting beds):</u> No handrails on stairs No access route from base of ramp to raised beds	Install handrails Install pathway	C C
4.3.23	505.0-			

Photo	505.10			
4.3.24 Photo	402.0- 402.2, 405.0- 405.8	<u>Emergency Egress (Public Forum Rm.):</u> Deteriorated wood ramp with NC handrails, No landing at bottom of run No access route away from building	Reconstruct ramp and access route to nearest walkways	C
4.3.25 Photo	402.0- 402.2,	<u>“E” Entrance (Strawberry Hill Ave)</u> Route from bus drop off at street level is dangerously steep (> 20%)	Use alternate bus drop-off Install hazard warning re slope and slippery conditions	O
4.3.26 Photo	403.0- 403.3	No access route to street level		O
4.3.27 Photo	403.0- 403.3	No access route to ball-field	Construct access route	C

Middle Schools—Ponus Ridge and Nathan Hale:

Two middle schools designated as “accessible schools” were surveyed. Both have some access features, are on relatively level sites, and have upgraded elevators and areas of refuge assistance. Both can be upgraded to full functional accessibility with modest capital expenditures; neither will require extensive additional ramping but upgrading of exterior ramps, stairs, and walkways is recommended.

An incident was reported at Ponus Ridge in which a student who uses a wheelchair was on the second floor when the elevator broke down. The Fire Department determined that since the student was not in immediate danger, it was not appropriate to use emergency evacuation procedures involving lifting and carrying that might have caused injury. The student’s parents eventually carried the student down the stairs. The incident was reported to the Public Schools

Department but at the time of the survey no resolution had been communicated regarding a protocol for such non-emergency evacuation situations.

4.4 Ponus Ridge Middle School:

Three students who use power wheelchairs attend the school.

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
4.4.1	402.0-402.2	<u>Athletic Fields and Courts:</u> No access routes to ball-field, bleachers, basketball and tennis courts	Construct access routes	C
4.4.2		No access route connecting walk to Hunter Ave.	Construct access route connecting building entrance to Hunter Ave	C
4.4.3 Photo	406.0-406.4	<u>Front Walkway:</u> Deteriorated concrete with settling and gaps at curbs	Repair and maintain walk	O
4.4.4 Photo	405.0-405.8	NC handrails end before bottom of run on open side	Upgrade handrails	C
4.4.5 Photo		Drop off at lower end of run on open side	Repair ramp	C
4.4.6 Photo	505.0-505.10	<u>Entrance Stairs:</u> NC handrail (run at angle following line of ramp)	Install handrails perpendicular to run of stairs	C
4.4.6.1 Photo		No handrails at south end of entrance stairs	Install 2 nd set of handrails at south end of entrance stairs	C

4.4.7 Photo	405.0- 405.8	<u>Emergency Exit at Gym:</u> Deteriorated concrete at bottom of NC ramp	Upgrade ramp and patch concrete	O
4.4.8	402.0- 402.2	<u>Exit adjacent to elevator:</u> Egress - marked with access symbol – not on accessible route (6” step down to ground level) and no walkway to front of building	Construct ramp and accessible egress route	C
4.4.9 Photo	402.0- 402.2, 403.0- 403.3	<u>Exit at Stair #3:</u> Not on access route; no ramp at asphalt down-slope (slope 11 – 16%); tripping hazard at transition from concrete to grass	Construct ramp and accessible egress route	C
4.4.10	404.0	<u>Interior Doors:</u> NC door hardware and inadequate latch-side clearance (except door in science wing with power openers)	Install compliant door hardware and power door openers	C
4.4.11 Photo 4.4.11.1	603.0- 604.9	<u>Health Suite:</u> Restroom door swings into maneuver space NC grab bar at toilet	Reverse door swing Install grab bar	O C
4.4.12	402.0- 402.2	<u>Courtyard:</u> Sitting area not on access route	Construct access route	C
4.4.13	306.0	<u>Library:</u> Tables with NC knee clearance (25”	Provide at least one accessible table	O

		high and 9" deep)		
4.4.14 Photo	405.0- 405.8	<u>Ramp by Stair #3:</u> NC slope (8 – 8.9%)	Reconstruct ramp	C
4.4.15	402.0- 402.2	<u>Room 128A:</u> Fire blanket box protrudes into line of travel (general condition)	Install cane detectable warning or relocate	O
4.4.16 Photo	804.0	<u>Home Economics:</u> Four kitchen stations – none with accessible stove, workspace, sink, cabinet hardware etc.	Upgrade one kitchen space with access to stove, sink, counter and all appliances and equipment used by class	C
4.4.17	405.0- 405.8	<u>Modular Classrooms:</u> Exterior ramp with NC slope (from 7% – 10.1% (steep at base)	Reconstruct ramp	C
4.4.18 Photo	402.0- 402.2	Protruding wood shelf with no cane-detectable warning	Install cane detectable warning	O
4.4.19	602.0	<u>Cafeteria:</u> NC water fountain	Install accessible water fountain	C
4.4.20 Photo	404.0	<u>Social Worker Rooms:</u> Doors 28" wide	Provide accessible space for meetings as needed	O
4.4.21	603.0- 604.9	<u>Boys' Locker Rooms:</u> No accessible stall	Install accessible stall	C
4.4.22	603.0-	<u>Girls' Locker Room:</u> No accessible stall, shower or changing	Install accessible stall, shower and	C

Photo	604.9	area	changing space with transfer bench	
4.4.23	403.0-403.3	NC threshold at entrance Girl's Locker Rm.	Bevel or ramp threshold	O
4.4.24	402.0	<u>Guidance Suite:</u> Desk blocks latch-side clearance Cabinets by door block maneuver space Relocate waiting area to outer office (if space can be cleared)	Rearrange desk and other furnishing to provide maneuver space	O
4.4.25 Photo	405.0-405.8	<u>Auditorium/Stage:</u> No direct access route from auditorium to stage NC handrails on permanent stairs leading to stage and egress stairs	Install lift or ramp to stage Install handrails	C C
4.4.26	504.0-505.0	Two sets of NC temporary stairs with no handrails used by church group	Remove temporary stairs	O
4.4.27	405.8	<u>Chorus Room:</u> NC egress door Handrail on one side of stair	Install compliant door Install compliant handrail	C C
		2nd Floor		
4.4.28	603.0-604.9	<u>Boys' Rest Room</u> (at stair #2): Towel dispenser protrudes into path of travel	Install cane detectable warning	O

4.5 Nathan Hale Middle School

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
4.5.1	502.0-502.4	<u>Parking:</u> NC slope and cross slope HP parking spaces.	Relocate or re-grade	C
4.5.2 Photo	402.0-402.2, 406.0-406.4	<u>Exterior access routes:</u> No access route to athletic fields No access to tennis court No curb cut at walk at basketball court	Construct access route Construct access route Install curb cut	C
4.5.3 Photo	404.0	<u>Interior Doors:</u> NC door hardware at Main Office, psychologist, health suite, offices, and classrooms	Install compliant hardware or power door openers	C
4.5.4	404.0	Health Suite inner door NC latch-side clearance	Install power door opener	C
4.5.5	402.0-402.2	<u>Corridors:</u> Water fountains near accessible restroom protruded 9.5"	Install cane detectable warning	O
4.5.6 Photo	902.0	<u>Library:</u> No lower counter section at circulation desk	Install or add counter section	C
		<u>Cafeteria:</u>		

4.5.7	306.0	Lunchroom tables 26½” high knee clearance	Provide at least one accessible table	O
4.5.8 Photo	405.0- 405.8	<u>Auditorium:</u> Access to stage from hallway	Install lift or ramp	C
4.5.9	603.0- 604.9	<u>Girls’ & Boys’ locker rooms:</u> No accessible bathroom stalls and sinks	Install accessible stalls and sinks	C

Elementary Schools—Jefferson, Columbus, Cranbury, and Wolfpit:

Four elementary schools were included in the survey: Jefferson (Social Studies Magnet), Columbus (Science Magnet), Cranbury and Wolfpit. Columbus and Jefferson are magnet schools; Cranbury is in a site and has a building design well suited to access improvements. Wolfpit is not well configured for a full access renovation and has non-compliant elements that effect safety and limit access to a polling place.

4.6 Jefferson Elementary School—Social Studies Magnet

The school was built in 1938. Substantial access modifications have been made to the interior of the building but attention to access modifications are needed to entrances, access routes, parking, and way-finding: stairs at the main entrance have non-compliant handrails, there is no directional signage to an “accessible entrance”; the entrance nearest HP parking spaces is accessed by a seriously deteriorated wood ramp, and there is no access route connecting the building to the playground area.

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
4.6.1	402.0- 402.2, 403.0- 403.3	<u>Exterior:</u> Deteriorated concrete and asphalt on building periphery	Repair asphalt and concrete on access routes	C
		<u>Parking (at side of building):</u>		

4.6.2 Photo	502.0- 502.4	2 HP parking spaces NC access aisles and side-slope (5.7-6.9%) No van accessible space	Re-grade or relocate HP parking spaces Upgrade access aisles for one van accessible space	O O
4.6.3 Photo		<u>Main Entrance</u> No signage re location of accessible entrance	Install directional signage to accessible entrance	O
4.6.4 Photo 4.6.5 4.6.6	505.0- 505.10	Deteriorated concrete stairs NC handrails at Main Entrance No intercom	Repair stairs Install handrails Install intercom	C C C
4.6.7 Photo	05.0- 405.8	<u>Accessible Entrance:</u> Entrance near HP parking spaces accessed by a deteriorated wood ramp and stairs with NC handrails and 1" vertical drop at the base of the ramp Egress at end of 1st and 3rd grade wing is potential accessible route closer to the main entrance. (No HP parking spaces by this entrance)	Repair and upgrade ramp, stairs and handrails Evaluate all entrances and upgrade one as the "accessible entrance" (with intercom)	C C
4.6.8 Photo	402.0- 402.2	<u>Playground:</u> No direct access route NC stairs to playground with no	Construct direct access route from building	C

		adjacent ramp Circuitous route through parking lot includes locked NC gate	Upgrade access route from parking	C
4.6.9	703.4.1, 703.4.2	<u>Doors:</u> NC Signage on door-face	Install signage on side wall	O
4.6.10	603.0- 604.9	<u>Restrooms:</u> No accessible restroom for adults	Upgrade one adult restroom	O
4.6.11	308.0	<u>Boys' & Girls' gang toilet rooms:</u> Paper towel dispenser mounted high	Install dispenser within children's reach range	O
4.6.12	404.0 703.0	<u>Health suite / nurses office:</u> No lever handle, no latch side clearance, No signage at toilet room door	Install lever hardware, power door opener, and signage	C
4.6.13		<u>Social worker office:</u> Too small for access	Provide alternative meeting space when needed	O
4.6.14 Photo	505.0- 505.10	<u>Stairways:</u> Handrails don't extend at bottom of run	Upgrade handrails	C

4.6.15	226.0	<u>Lunchroom:</u> No tables with wheelchair seating space	Provide at least one accessible table	O
4.6.16	405.0-405.8	<u>Ramp at elevator:</u> No level landing at base of ramp	Modify ramp	C
4.6.17	307.0	<u>2nd floor:</u> 2nd grade area water fountain protrudes 19"	Install cane detectable warning	O

4.7 Columbus Elementary School—Science Magnet

Columbus is the largest elementary school in the system with approximately 600 students housed in two buildings. The main building was built in 1970 and houses grades K-3; a modular building houses grades 5 and 6. The school offers an enhanced science curriculum through field trips. The site is steeply sloped, limiting accessibility on the periphery of the site including street crossing to drop-off area, and on the pathway connecting the two buildings.

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
4.7.1 Photo	502.0-502.4	<u>Parking:</u> HP parking spaces on cross slopes (7-7.3%) adjacent spaces reserved for administrators are less steep (2.9-3.1%)	Re-locate to most level area	O
4.7.2 Photo	402.0-402.2, 403.0-	No access route on steeply sloped drive to parent / visitor and drop-off area across Grandview Avenue	Construct access route	C

	403.3			
4.7.3 Photo	402.0- 402.2	<u>Playground:</u> 2" lip on border (adapted swing) with no access route	Construct access route	O
4.7.4 Photo	403.0- 403.3	<u>Path to Main Entrance:</u> 5.8% slope on approach to front entrance with tripping hazards	Level transition to prevent tripping hazard	O
4.7.5 Photo	403.0- 403.3	<u>2nd grade exit ramp:</u> 6.1% - 11.3% slope no level landing at transition to sloped walk	Install level landing	C
4.7.6	703.0	<u>Signage:</u> Lack of way finding signage inside entrance and throughout building	Install compliant signs	C
4.7.7	404.0	<u>Doors (main building):</u> NC door hardware NC latch side clearance (no power door openers)	Install compliant hardware and power door opener	C
4.7.8 Photo	504.0	<u>Front Entrance Lobby stairs:</u> Nose of stair treads protrude 1" and NC handrails	Install handrails and toe plate under tread noses	C
4.7.9	603.0- 604.9	<u>Restrooms:</u> No accessible children's restrooms in main building	Provide children's restroom	C
4.7.10		No accessible adult restroom in	Upgrade one adult restroom	C

		building		
4.7.11	603.0-604.9	Accessible restrooms in modular building not modified to children's standard	Modify restrooms to children's standard	O
4.7.12	407.0	<u>Elevator:</u> Key operated small compartment and shaft with NC controls, signage etc.	Construct larger shaft and install compliant elevator	C
4.7.13	404.0	<u>K-2 classrooms:</u> Doorways 26" wide opening	Widen doorways at one classroom for each grade	C
4.7.14	603.0-604.9	<u>Health Suite / Nurse's office:</u> No latch side clearance at restroom in nurse's office	Modify door or Install power door opener	C
4.7.15	405.0-405.8	<u>Multi-Purpose Room:</u> No access to stage	Install ramp or lift	C
4.7.16	404.0	<u>3rd grade classrooms:</u> Entrance to one room narrowed to 30" by portable closet	Relocate closet	O
4.7.17	403.0-	<u>Route to Modular Classrooms:</u> Deteriorated surface on walkway	Repair walkway	C
4.7.18	403.3,	Steep slope on walkway (7.6-9.3%)	Install ramp	C
4.7.19	405.0-405.8	NC ramp with NC handrails	Repair or replace ramp	C

4.7.20	603.0-604.9	<u>Boys' & Girls' restrooms:</u> High toilets, sinks etc. (adult standard 18.5" - 18.75")	Install compliant toilets, sinks, etc. at child standard.	C

4.8 Cranbury Elementary School

The school has fewer access features—door hardware, signage, restrooms—than other elementary buildings surveyed but should be considered for upgrading because the level site and single-level design facilitate upgrading to full functional accessibility.

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
4.8.1	308.0	<u>Courtyard:</u> No access to raised planters	Construct access route	C
4.8.2 Photo	405.0-405.8	<u>Classroom egress doors (to exterior):</u> Step down at egress to most classrooms, no level platform, no ramps	Install level platforms and ramp	C
4.8.3 Photo	405.0-405.8	NC asphalt "ramp" at kindergarten	Upgrade ramp	O
		<u>Interior Doors:</u>		

4.8.4	504.0	NC hardware	Install compliant hardware	C
4.8.5	703.0	NC signage	Install compliant sign	C
4.8.6 Photo	603.0- 604.9	<u>Adult Restrooms:</u> No accessible restroom	Upgrade one faculty restroom for adult staff and visitors	C
4.8.9	603.0- 604.9	<u>Classroom Restrooms:</u> No Accessible restrooms	Upgrade one classroom restroom for each grade level	C
4.8.10	603.0- 604.9	<u>Girls'/Boys' Group Restrooms:</u> No access elements	Upgrade restrooms with stalls, toilets, grab bars, sink and dispensers	C
4.8.10 Photo	603.0- 604.9	<u>Nurses Room/Health Suite:</u> <ul style="list-style-type: none"> • NC door width (29") • NC signage • NC grab bars (24" long wall side, floor mounted open side, no bar on back wall) • No sink pipe insulation 	Upgrade restroom <ul style="list-style-type: none"> • Widen doorway • Install compliant signs • Install compliant grab bar • Install sink pipe insulation 	C
4.8.11	902.0	<u>Cafeteria:</u> No table with wheelchair accessible space	Install accessible table	O
4.8.12	205.0	<u>Stage Access:</u> NC door hardware on route to lift	Install compliant door hardware	C

4.8.13 Photo	505.0	NC handrail one side only of stairs to stage	Install compliant handrail on both sides of stairs	C
4.8.14	404.0	<u>Speech and language:</u> Desk blocks latch side clearance	Move desk	O
4.8.15 Photo	303.0	<u>Pre-school:</u> NC threshold (1.5")	Bevel or ramp threshold	O

4.9 Wolfpit Elementary School

The school is not listed as one of the system's accessible schools. Upgrading the multi-level building to full functional accessible would be costly. It is recommended that access modifications be targeted to improve safety and to improve the access route at the rear to the gym that serves as a polling place.

ID #	ADAAG	Barrier / NC Condition	Potential Solution	Budget
		Exterior		
4.9.1 Photo	403.0- 403.3	<u>Access to Main Entrance:</u> NC slope at curb cut from drive to walkway	Reconstruct lower section of walk and curb cut	O
4.9.2 Photo	406.0- 406.4	Deteriorated stone on entry breezeway	Repair or replace stonework	C
4.9.3	502.0-	<u>Rear Access Route to Gym:</u> No HP parking spaces adjacent to walk	Install HP parking space	O
4.9.4 4.9.5	502.4	Deteriorated transition to walkway	Repair and maintain walkway	O

Photo		Deteriorated NC wood ramp with NC handrail on one side only	Reconstruct or replace ramp	O
4.9.6 Photo	402.0- 402.2,	<u>Egress Routes:</u> No access routes at classroom and library egresses (step down to ground)	Install landings and ramps	C
4.9.7 Photo	405.0- 405.8	Air-conditioners protrude into edge of play area (approx. 5'4"high)	Install cane detectable warning	C
4.9.10 Photo	403.0- 403.3, 406.0- 406.4	<u>Walkway to Street:</u> Curb cut with NC slope and side slope (11.4 -12.1%) at transition of steep walkway (>7%) to parking lot	Reconstruct curb cut	C
4.9.11 4.9.12 4.9.13	404.0 309.0 308.0	<u>Admin. Office:</u> NC door hardware NC latch-side clearance No lower section of counter	Install door hardware Install power door opener Modify counter	C C C
4.9.14	308.0	<u>Library:</u> No lower section of counter at circulation desk	Modify counter	C
4.9.15	703.0	<u>Room 20a:</u> Sign with raised letters on door face	Move to left side wall	O
4.9.16	309.0	<u>General Conditions:</u> NC door hardware and signage	Install hardware and signage	C
4.9.17 Photo	504.0	NC stairs with NC handrails and protruding tread noses (half flight	Upgrade handrails and stair treads	C

	505.0	up and down to classroom wings)		
4.9.18 Photo	307.0	Gray box protrudes above fire extinguisher at top of upper level stairs	Install cane detectable warning	O
4.9.19	603.0-604.9	<u>Computer Lab:</u> Restroom with no grab bars, sink pipe not insulated	Upgrade restroom	C
4.9.20	404.0	<u>Health Suite:</u> NC latch side clearance at door to suite	Install power opener	C
	304.0	Inward opening restroom door limits maneuver space	Reverse door swing	C
4.9.21	505.0-505.10	<u>Faculty restroom (on route to Gym):</u> Door opens at edge of stair	Install rail preventing turn toward stairs	C
4.9.22	404.0	<u>Route to Playground, Garden, and Lower Playing Fields</u> NC double leaf building egress door with NC hardware	Install doors and hardware	C
4.9.23	402.0-402.2	No access route and NC gate at garden fences	Construct access route	C

4.9.24	505.0- 505.10	Site-stairs with open risers and NC handrails	Upgrade stairs	C
4.9.25	402.0- 402.2	No access route to lower fields	Construct access route	C