

# EASTHAM, MA

---

## ADA SELF-EVALUATION & TRANSITION PLAN



**ARCHITECTURE  
+ ACCESSIBILITY**  
ONE BRIDGE ST  
NEWTON MA  
02458-1132  
KMACCESS.COM  
617.641.2802



Submitted April 19, 2022

# TABLE OF CONTENTS

---

SECTION 1: EXECUTIVE SUMMARY .....	3
SECTION 2: REGULATORY CONTEXT.....	4
SECTION 3: PROJECT METHODOLOGY .....	8
SECTION 4: FINDINGS AND RECOMMENDATIONS .....	9
SECTION 5: SUMMARY OF PUBLIC SURVEY RESPONSES.....	29
SECTION 6: SUMMARY OF RESPONSES TO DRAFT REPORT .....	30
APPENDIX.....	31
PROPERTIES LIST.....	32
EASTHAM GRIEVANCE POLICY .....	33
PUBLIC NOTICE OF ADA COMPLIANCE .....	34
SAMPLE EVENT LANGUAGE.....	35
WEBSITE ANALYSIS .....	36
INCOMPLETE ALTERNATIVE TEXT FOR IMAGES.....	36
LOW COLOR CONTRAST.....	38
LINKS TO PDFS AND WORD DOCUMENTS .....	39
Municipal Americans with Disability Act (ADA) Improvement grant .....	40
Community Development Block Grant (CDBG) .....	40
SURVEY FORMS .....	41
A. GENERAL PROCEDURES.....	41
B. NOTIFICATION.....	42
D. SERVICE ANIMALS.....	43
E. USE OF CONTRACTORS .....	43
F. TRANSPORTATION .....	44
COMPLETED SURVEYS.....	53

## SECTION 1: EXECUTIVE SUMMARY

---

The Town of Eastham has retained KMA, LLC to assist in the development of an Americans with Disabilities Act (ADA) Self-Evaluation & Transition Plan (SETP). The Town is making progress in ensuring its programs and services are accessible. It has appointed an ADA Coordinator and is developing non-discrimination policies to be shared with Town personnel. Its facilities, policies, and programs are becoming more accessible.

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

- Develop town-wide protocols for providing materials in alternate formats, providing auxiliary aids/services, and evaluating requests for reasonable accommodations.
- Develop enhanced communication regarding requesting modifications, accommodations, alternative formats, auxiliary aids and services and architectural accessibility on the Town's website, social media, print materials, and in buildings and announcements.
- Develop and disseminate protocols to ensure meetings (including Boards and Commissions), hearings, workshops, and conferences conform with the guidelines for accessible meetings.
- Provide ADA training for appropriate staff.
- Develop a Service Animal policy.
- Ensure that the Emergency Preparedness Plan specifically addresses the unique needs of individuals with disabilities.
- Engage in targeted architectural barrier removal at facilities. KMA has identified the following facilities as the highest priority for barrier removal:
  - Town Hall
  - Police Station
  - Fire Station
  - Council on Aging
  - Library
  - DPW Building
  - Recreation Dept. Office
  - Transfer Station
  - Chamber of Commerce
  - Playgrounds and Playing Fields
  - Trails
  - Public Beaches

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

## SECTION 2: REGULATORY CONTEXT

---

The Town of Eastham is in Barnstable County, on the lower Cape Cod. It shares border with the City of Wellfleet and Orleans. It is located approximately 90 miles south of Boston and its territory is traversed by state highway Route 6. The estimated population of Eastham was 4,956 in 2010.

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

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

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

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

- Designate an employee responsible for carrying out compliance activities.
- Provide notice to the public of its rights and protections under the ADA and how the entity complies with those obligations.
- Establish a grievance procedure.
- Conduct a Self-Evaluation, a comprehensive review of policies and procedures.
- Develop an ADA Transition Plan.

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

### APPLICABLE REGULATIONS

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

- PL101-336: 1990 Americans with Disabilities Act (ADA). This is the federal civil rights

statute whose first purpose is:

...To provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities. (42 USC 12101. Sec.2(b))

- 28 CFR Part 35, Title II: Nondiscrimination on the Basis of Disability in State and Local Government Services (as amended by the final rule published on September 15, 2010). These are the U.S. Department of Justice's regulations implementing the ADA, as required in 42 USC 12101, Sec.204(a))
- 29 USC 794: Section 504 of the 1973 Rehabilitation Act (504)
- 521 CMR: The Rules and Regulations of the Massachusetts Architectural Access Board. (1977, 1987, 1990, 1992, 1996, 1998, 2006)

## ADA AND 504 BARRIER REMOVAL REQUIREMENTS

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

1. Program Access: requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from a public entity's programs and services. The ADA requires that public entities provide physical and communication access to each program service or activity. The Town must identify and correct policies and practices that have the effect of discriminating against individuals with disabilities.
2. Alterations: Any alterations that are performed must conform to the 2010 ADA Standards.<sup>1</sup> Alterations may trigger an obligation to perform additional barrier removal outside the planned scope of work. The ADA accessible path of travel requirement states: "When alterations are made to a primary function area that affect the usability of that area, alterations to provide an accessible path of travel to the altered area must also be made unless the cost is disproportionate." Further, the Town is required to maintain its existing facilities to ensure continued, unfettered, and uninterrupted access to persons with disabilities.

## PROGRAM ACCESS

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

The ADA's Section 202 Discrimination states:

... no qualified individual with a disability shall, by reason of such disability, be

---

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

excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.

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

28 CFR 35.149 states:

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

28 CFR 35.150 states:

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

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

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

## **METHODS OF PROVIDING PROGRAM ACCESS**

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

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

From an architectural standpoint, this requirement does not mean that every building must be accessible. However, every program must be accessible. When choosing a method of providing

program access, the Town is required to give priority to the one which results in the most integrated setting possible and is most appropriate to encourage interaction among all users.

### **LIMITATIONS ON OBLIGATION TO PROVIDE PROGRAM ACCESS**

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

### **SCHEDULE FOR PROGRAM ACCESS COMPLIANCE**

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

28 CFR 35.150 sets a time period for ADA compliance stating:

*"Where structural changes in facilities are undertaken to comply with the obligations established under this section, such changes shall be made within three years of January 26, 1992, but in any event as expeditiously as possible."*

## SECTION 3: PROJECT METHODOLOGY

---

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

1. A virtual kick-off meeting and training was held with representatives from Town departments on March 17, 2021 to discuss project goals and methodology. At the meeting, KMA introduced the broad non-discrimination provisions of the ADA and the ADA Self-Evaluation process, and subsequently distributed three surveys for the Town to complete:
  - a. Administrative Survey addressing Town-wide policies and procedures
  - b. Department Surveys
  - c. Employment Survey
2. KMA completed program access audits of 22 Town buildings, athletic fields, playgrounds, and recreation facilities. Audit findings are included in the Appendix of this report.
3. An online accessibility survey was created to gather public input.
4. A review of the completed surveys, other policy documents received from the Town, and the Town's website was performed. [See Section 5]
5. KMA developed a DRAFT ADA Self Evaluation & Transition Plan to be reviewed by the Town. The DRAFT report was developed to summarize the ADA Title II requirements and KMA's primary findings and recommendations. It was submitted to the Town on June 30, 2021.
6. The final Self Evaluation & Transition Plan was completed on April 19, 2022.

## SECTION 4: FINDINGS AND RECOMMENDATIONS

---

Below is a narrative summary of the self-assessment by principal location and department or function within each location observed, followed by recommendations to increase accessibility. This information also can be found in table format in the *Findings and Recommendations* and *Audit Reports* sections of the Appendix. Department Survey responses can be found in the *Department Survey Response* section of the Appendix as well.

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

Accounting	Library
Administration	Management Information Systems
Assessing	Planning
Building	Police
Cape Light Compact	Public Works
Eastham Government Access TV	Recreation & Beach
Conservation	Senior Center
Finance	Town Clerk
Fire	Town Moderator
Health	Treasurer/Collector
Human Resources	

KMA reviewed the surveys submitted by the following departments:

Accounting	Library
Administration	Planning
Assessing	Police
Building	Public Works
Conservation	Recreation & Beach
Eastham Government Access TV	Town Clerk
Finance	Treasurer/Collector
Fire	
Health	

According to the list of properties included in the Supplemental Information to the original Request for Proposals dated February 9, 2021, Eastham provides municipal programs and services at 22 locations. See *Appendix* for the complete list of properties.

### Accounting Department

The accounting office oversees accounts payable, grants, capital projects, budgets, and maintains the general ledger for the Town of Eastham. They are in Town Hall.

The accounting survey was completed by Teena Tilton, the Town Accountant. Survey responses indicate that the Accounting Department personnel have received training in the Town's policy of nondiscrimination. However, they have not received training in responding to reasonable modification or auxiliary aid requests, in how to effectively communicate with people with

disabilities, or using the Massachusetts Relay Service to make and receive calls.

*Recommendation: KMA recommends developing and providing guidance on requests for reasonable modifications for all Town departments and new hires to ensure that everyone is aware of how to appropriately respond to requests within the next year. This policy should include criteria for determining whether a modification would fundamentally alter the nature of the program or a protocol, and it should ensure that all requests are reviewed by the ADA Coordinator. Some examples of how to develop this guidance can be found on the [eoc.gov](http://eoc.gov) website.*

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

*KMA also recommends providing training to appropriate personnel in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls. KMA recommends implementing these changes within the next year.*

#### Administration Department

The Administration Department's mission is to provide procurement oversight, project management, and support for other town departments. Some of the services provided by the Department are meeting coordination, board/committee support, public posting and development of public documents and facilitation of public meetings. Currently all programs and services are located virtually (Town website, zoom, email, social media, and US mail). They are in Town Hall.

The administration survey was completed by Shana Brogan, the Projects & Procurement Director. Survey responses indicate that the Administration Department personnel have received training in the Town's policies/procedures for responding to reasonable accommodations. However, they have not received training in the Town's policy of nondiscrimination, in responding to auxiliary aid requests, communicating with people with disabilities, or using the Massachusetts Relay Service to make and receive calls. Where documents are provided, department survey responses indicate that notification is not provided indicating documents can be requested in alternative formats.

*Recommendation: KMA recommends ensuring all departments are included in a recurring training on the Town's policy of nondiscrimination within the next six months. KMA also recommends providing training to appropriate personnel in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls, and how to respond to requests for auxiliary aids and services. KMA recommends implementing these changes within the next year.*

*Additionally, KMA recommends assessing the needs of the community for alternative formats. Based on the assessment, establish the appropriate vendors or protocols so that documents in alternative formats can be provided in a timely manner, for example: taped texts, audio recordings, Braille materials and large print materials. Include notification regarding the availability of alternative formats on the Town website. KMA recommends implementing these changes within the next year.*

#### Assessing Department

The Assessing Department provides valuation and inspection of real estate, personal property, and vehicle and boat excise. Some of the services they provide are abatements, exemptions, valuation, and inspection of real estate. According to survey responses they also provide exemptions for people with paraplegia and blind persons. They are in Town Hall.

The assessing survey was completed by Belinda Eyestone, the Principal Assessor. Survey responses indicate that the Assessing Department personnel have not received training in the Town's policy of nondiscrimination and the Town's policies/procedures for responding to reasonable accommodations, to auxiliary aid requests, and communications, in how to effectively communicate with people with disabilities, or in using the Massachusetts Relay Service to make and receive calls.

*Recommendation: KMA recommends providing training to appropriate personnel in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls, and how to respond to requests for reasonable modifications, and auxiliary aids and services. KMA also recommends KMA recommends implementing these changes within the next year.*

#### Building Department

The Building Department provides a process for development and construction permitting, including the review, issuance, inspection, documentation, confirmation, and reporting of these construction activities. They also provide building permits and bylaw enforcement. They are in Town Hall.

The building survey was completed by Paul Lagg, the Director of Community Development. Survey responses indicate that the Building Department personnel have received training in the Town's policy of nondiscrimination and in how to respond to requests for reasonable modifications. However, they have not received training in how to respond to requests for auxiliary aids and services, in how to effectively communicate with people with disabilities, or using the Massachusetts Relay Service to make and receive calls. Responses indicate the Department does not have access to appropriate auxiliary aids and services.

*Recommendation: KMA recommends providing training to appropriate personnel in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls, and how to respond to requests for auxiliary aids and services.*

#### Cape Light Compact Department

The Cape Light Compact Department is an energy services organization operated by the 21 towns on Cape Cod and Martha's Vineyard and Dukes County. It was formed in 1997 to "advance the interests of consumers in the newly restructured electric industry. According to the Town's website, the Compact has taken a comprehensive approach that includes developing a "Community Choice Power Supply Program" that will reduce the cost of generation supply for customers; development an energy efficiency program that will provide enhanced benefits and a related comprehensive education program that will assist with market transition; and representing the interests of consumers before the legislature, the Department, and other agencies. They are located at 3195 Main St, Barnstable, MA.

The Cape Light Compact Department did not submit responses to the SETP Department Survey.

#### Eastham Government Access TV (Channel 18) Department

According to the Town's website, the Eastham Government Access Cable Television Channel is intended to provide information to Eastham citizens about issues, services, programs, activities, and events involving local government. The mission of the Government Access TV is to manage the Channel 18 Comcast and live streaming and coordinate all video needs for the town, including recording and posting Boards and committees meetings, coordinating, and hosting virtual meetings, providing A/V technical services to all departments, and producing informational videos and PSA's. The master control is in Town Hall and secondary multi-cam setups are located at the library and at any other town location that hosts a town sponsored gathering.

The Channel 18 survey was completed by Michael Caliri, the Video Services Coordinator. Survey responses indicate that the Channel 18 Department personnel have received training in the Town's policy of nondiscrimination, in the Town's policies/procedures for responding to reasonable modifications and auxiliary aid and services requests, and in the Town's available resources for providing auxiliary aids. However, they have not received training in how to effectively communicate with people with disabilities or using the Massachusetts Relay Service to make and receive calls. Responses indicate that closed captioning, communication access real-time translation and audio headsets are provided upon request.

*Recommendation: KMA recommends providing training to appropriate personnel in how to communicate with people with disabilities and how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls. KMA recommends implementing these changes within the next year.*

#### Conservation Department

According to the Town's website, the Conservation Department focuses on protecting inland wetlands and coastal areas such as: marshes, dunes, coastal banks, beaches, streams, swamps, and other wildlife habitat areas. The Conservation Commission applies and enforces the state and local wetlands protection regulations through the review and permitting of certain activities in or within the buffer zone to these areas. They also manage and oversee the town's designated conservation lands. They are in Town Hall.

The conservation survey was completed by Charles Katuska, the Conservation Agent. Survey

responses indicate that the Conservation Department personnel have not received training in the Town's policy of nondiscrimination, in the Town's policies/procedures for responding to auxiliary aid requests, in the Town's available resources for providing auxiliary aids, in how to effectively communicate with people with disabilities or using the Massachusetts Relay Service to make and receive calls. Where documents are provided, department survey responses indicate that notification is not provided indicating documents can be requested in alternative formats nor do they currently have a Public Notice of ADA Compliance.

*Recommendation: KMA recommends providing training to appropriate personnel in the Town's nondiscrimination policy, how to respond to requests for reasonable modifications, auxiliary aids and services, and documents in alternative formats, and how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls. KMA recommends implementing these changes within the next year.*

*KMA also recommends developing a Public Notice (see Appendix for examples) and ensuring the Notice is visibly posted at Town buildings, on the Town website homepage, and in the Employee Handbook. Additionally, KMA recommends developing a policy to ensure the Public Notice is consistently provided on all Departmental literature. KMA recommends implementing these changes within the next six months.*

#### Finance Department

According to the Town's website, the mission of the Finance Department is to safeguard the assets of the Town of Eastham and to effectively plan for future financial needs to benefit its citizens. It supports fiscal stewardship goals through accurate planning, ongoing financial review, and the timely provision of meaningful financial information in support of efficient Town management. They are in Town Hall.

The finance survey was completed by Rich Bienvenue, the Assistant Town Administrator and Finance Director. Survey responses indicate that the Finance Department personnel have not received training in the Town's policy of nondiscrimination, in the Town's policies/procedures for responding to reasonable modifications and auxiliary aid requests, in how to effectively communicate with people with disabilities or using the Massachusetts Relay Service to make and receive calls. Responses indicate the Finance Department does not have access to appropriate auxiliary aids and services.

*Recommendation: KMA recommends providing training to appropriate personnel in the Town's nondiscrimination policy, how to respond to requests for reasonable modifications, auxiliary aids and services, and how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls. KMA recommends implementing these changes within the next year.*

#### Fire Station

The fire station is located at 2520 State Highway. It is a two-story building with a public reception area, public toilet room, and typical firehouse function areas. There is one accessible parking space provided at this facility. The principal barriers identified include:

- The accessible parking space has abrupt changes in level and signage is not mounted in the correct location.
- The curb ramp is too steep.
- The walkway is not wide enough due to the column.
- The emergency alarm protrudes into the circulation space and lacks an adjacent clear floor space due to the column.
- The entry door lacks a level landing and requires an excessive force to open.
- The single-user toilet room lacks the required signage, and the toilet paper dispenser and accessible elements are not mounted in the correct locations. Also, the door lacks maneuvering clearance.

*Recommendation: Due to the moderate traffic at the Fire Station, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years. KMA recommends prioritizing the accessible parking, accessible route, and entry due to their high visibility.*

### Fire Department

The Eastham Fire Department provides fire and EMS emergency response, fire safety education, fire alarms and carbon monoxide alarms response, motor vehicle accidents, beach / water rescues, hazardous material spills, technical rescues, boating emergencies, investigations, and citizen assists to the residents of Eastham. They also provide home inspections for people with disabilities.

The fire survey was completed by Chief Kent Farrenkopf. Survey responses indicate that the Finance Department personnel have received training in the Town's policy of nondiscrimination. However, they have not received training in the Town's policies/procedures for responding to reasonable modifications and auxiliary aids and services requests, in the Town's available resources for providing auxiliary aids, in how to effectively communicate with people with disabilities or using the Massachusetts Relay Service to make and receive calls.

*Recommendation: KMA recommends providing training to appropriate personnel in how to respond to requests for reasonable modifications, auxiliary aids and services, and how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls. KMA recommends implementing these changes within the next year.*

### Health Department

According to the Town's website, the mission of the Eastham Board of Health is to protect, promote, and sustain the Public and Environmental health of the Town of Eastham. The Board will affect its mission through the Town Health Agent and Staff and be guided by Local and State Health Regulations. They monitor and address new and changing health related issues as they occur in Eastham, and advocate for a safe environment, for the reduction of known health risks and for the application of known preventative health measures. They are in Town Hall.

The health survey was completed by Karen Chimwaza, the Community Development Assistant. Survey responses indicate that the Health Department personnel have not received training in the Town's policy of nondiscrimination and how to respond to requests for reasonable modifications,

and auxiliary aids and services.

*Recommendation: KMA recommends providing training to appropriate personnel in the Town's nondiscrimination policy, and how to respond to requests for reasonable modifications, auxiliary aids, and services. KMA recommends implementing these changes within the next year.*

#### Human Resources Department

Limited information is provided on the Town's website regarding the responsibilities of the Human Resources Department. They are in Town Hall. The Human resources Department did not submit responses to the SETP Department Survey.

#### Public Library

The Eastham Public Library is located at 190 Samoset Road. It is a two-story building constructed in 2016. The library contains stacks, toilet rooms, study areas, a meeting room, and employee areas. There are two accessible parking spaces provided at this facility. Principal barriers identified include:

- The parking area lacks a van accessible space and the accessible parking spaces have slopes >2%.
- The historic entrance lacks the required signage to the accessible entrance.
- The trash receptacle is not located on an accessible route and lacks an adjacent clear floor space.
- The outdoor table is not accessible.
- The outdoor stair lacks the required handrails.
- Accessible computer tables/workstations are not provided.
- Some doors lack the required maneuvering clearances.
- There is no "hi" drinking fountain provided.
- The AED protrudes into the circulation space.
- The multi-user toilet rooms located on the ground floor have coat hooks mounted too high, accessible elements that are not mounted in the correct locations and toilet paper dispensers that protrude into the circulation space.
- The TV in the meeting room protrudes into the circulation space.
- The stair lacks compliant handrail extensions and nosings are abrupt.
- The sink in the Program Room lacks the required knee/toe clearance for a forward approach.
- The door at the single-user toilet room lacks maneuvering clearance. Also, the toilet paper dispenser protrudes into the circulation space.

*Recommendation: Due to the high traffic of the Library, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years. In the next year, KMA recommends mitigating the exterior items flagged in the report (parking, trash, tables), providing accessible computer tables/desks in each separate location, and modifying at least one toilet room per floor to be fully accessible.*

## Library Department

The Eastham Public Library's mission is to be a safe and welcoming center for information, materials, services and programs intended to strengthen community; enhance leisure time; open access to the latest technologies and support lifelong learning. They provide typical library services including meeting rooms, programs, technology, virtual e-materials and programs. It is a gathering place for the town with the ability to offer Port in the Storm services (coffee, charging stations, heat... during storms, etc.). According to the Library Website, they provide a wide range of programs, services, and assistance for people with disabilities.

The library survey was completed by Debra DeJonker-Berry, the Library Director. Survey responses indicate that the Library Department personnel have received training in the Town's protocols for providing auxiliary communication, aids, and services, and how to communicate with people with disabilities. However, they have not received training in the Town's policy of nondiscrimination, in the Town's policies/procedures for responding to reasonable modifications, and in how to use the Massachusetts Relay Service to make and receive calls. According to the survey, where documents are provided, notifications are not provided indicating documents can be requested in alternative formats neither they currently have a Public Notice of ADA Compliance.

*Recommendation: KMA recommends providing training to appropriate personnel in the Town's nondiscrimination policy, in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls, and how to respond to requests for reasonable modifications, and documents in alternative formats. KMA recommends implementing these changes within the next year.*

*KMA also recommends developing a Public Notice (see Appendix for examples) and ensuring the Notice is visibly posted at Town buildings, on the Town website homepage, and in the Employee Handbook. Additionally, KMA recommends developing a policy to ensure the Public Notice is consistently provided on all Departmental literature. KMA recommends implementing these changes within the next six months.*

## Management Information Systems (MIS)

According to the Town's website, Eastham MIS provides hardware installation and support for servers, computers, networks, and the telephone system. They install, upgrade, and maintain all operating systems and network software as well as end-user application software and E-mail, Internet service and the Town's Web Page. They are in Town Hall. The MIS Department did not submit responses to the SETP Department Survey.

## Planning Department

The Planning Department mission is to coordinate and manage land use development and regulatory issues (Building, Planning and Conservation departments), as well as planning and implementing economic development and affordable housing programs. Some of the services they provide include building, electrical, and plumbing permits, sign permits, health and safety code inspections, technical assistance for construction and development projects to property

owners and contractors. They are in Town Hall.

The planning survey was completed by Paul Lagg, the Director of Community Development. Survey responses indicate that the Planning Department personnel have not received training in the Town's policy of nondiscrimination, in the Town's policies/procedures for responding to auxiliary aid requests, and reasonable modifications, in how to effectively communicate with people with disabilities or using the Massachusetts Relay Service to make and receive calls. According to the survey, where documents are provided, notifications are not provided indicating documents can be requested in alternative formats neither they currently have a Public Notice of ADA Compliance.

*Recommendation: KMA recommends providing training to appropriate personnel in the Town's nondiscrimination policy, in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls, and how to respond to requests for reasonable modifications, auxiliary aids, and services and documents in alternative formats. KMA recommends implementing these changes within the next year.*

*KMA also recommends developing a Public Notice (see Appendix for examples) and ensuring the Notice is visibly posted at Town buildings, on the Town website homepage, and in the Employee Handbook. Additionally, KMA recommends developing a policy to ensure the Public Notice is consistently provided on all Departmental literature. KMA recommends implementing these changes within the next six months.*

### Police Station

The Police Station is located at 2550 State Highway. It is a one-story building with a reception area, administrative offices, employee locker rooms, holding cells, toilet rooms, and typical police function areas. There are two accessible parking spaces provided at this facility. Principal barriers identified include:

- The van accessible parking space is not wide enough.
- Accessible parking spaces have slopes >2% and there are no designated accessible visitor parking spaces provided.
- The walkway to the main entrance has slopes >5%.
- The entry door lacks a level landing.
- Reception counter, intercom control and brochures are mounted too high.
- Single-user toilet rooms lack the required signage, have mirrors mounted too high, incorrect toilet centerlines, and toilet paper dispenser and accessible elements are not mounted in the correct locations.
- Holding cells lack accessible elements and the toe/knee clearance under the sink.

*Recommendation: KMA recommends developing a policy to ensure an accessible jail cell can be provided as needed in one of the existing men's/ women's/ juvenile cells. Ensure information on the accessible jail cell is properly disseminated within the next 6 months.*

*Due to the high traffic at the Police Station, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years. In the next year, KMA recommends*

*prioritizing mitigations in the exterior areas due to their high visibility and use and the toilet rooms. Where policies are developed, KMA recommends ensuring information is disseminated to the public and staff as required.*

#### Police Department

The Eastham Police Department provides law enforcement and all related services to the residents of Eastham. The department consists of 17 sworn law enforcement officers as well as 6 civilian/clerical employees. Some of the services they provide include law enforcement services, firearms licensing, and multiple community involvement programs.

The police survey was completed by Chief Adam Bohannon. Survey responses indicate that the Police Department personnel have received training in the Town's policy of nondiscrimination. However, they have not received training in the Town's policies/procedures for responding to auxiliary aid requests, and reasonable modifications, or in how to use the Massachusetts Relay Service to make and receive calls. According to the survey, where documents are provided, notifications are not provided indicating documents can be requested in alternative formats neither they currently have a Public Notice of ADA Compliance.

*Recommendation: KMA recommends providing training to appropriate personnel in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls, and how to respond to requests for reasonable modifications, auxiliary aids, and services and documents in alternative formats. KMA recommends implementing these changes within the next year.*

*KMA also recommends developing a Public Notice (see Appendix for examples) and ensuring the Notice is visibly posted at Town buildings, on the Town website homepage, and in the Employee Handbook. Additionally, KMA recommends developing a policy to ensure the Public Notice is consistently provided on all Departmental literature. KMA recommends implementing these changes within the next six months.*

#### Department of Public Works Building

The Department of Public Works building is located at 555 Old Orchard Road. It is a one-story building that includes offices, toilet rooms, and locker rooms. There is one accessible parking space provided at this facility. The principal barriers identified include:

- The accessible parking space lacks an adjacent access aisle and signage is not mounted in the correct location.
- The exterior wooden handrail surfaces are abrasive.
- Natural Resources and Water Division entry doors lack maneuvering clearances.
- The DPW Main Office counter protrudes into the circulation space.
- Some of the brochures in the Natural Resources Office are mounted too high.

*Recommendation: Due to the moderate traffic at the DPW Building, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years. KMA recommends prioritizing the accessible parking and entries due to their high visibility.*

## Public Works Department (DPW)

The DPW is responsible for maintaining the Town's public infrastructure and facilities, while the Natural Resources department is responsible for preserving, protecting, and enhancing the natural resources located within the Town of Eastham. It consists of 17 full-time employees in the following 6 divisions: Administration, Building Maintenance, Highway, Natural Resources, Solid Waste and Water Supply. They are responsible for the Town's infrastructure including roadways & storm drains, signs & street markings, parking lots, street lighting, grounds, fields & parks, beaches & ponds, the transfer station (solid waste and recycling programs), municipal vehicles & equipment, and public buildings & facilities. The Public Works Department mainly works out the Public Works Building; however, they also have solid waste and recycling programs at 255 Old Orchard Road.

The DPW survey was completed by Silvio Genao, the Superintendent of Public Works and Natural Resources. Survey responses indicate that the Public Works Department personnel have not received training in the Town's policy of nondiscrimination, in the Town's policies/procedures for responding to auxiliary aid and services requests, and reasonable modifications, in how to effectively communicate with people with disabilities, or in how to use the Massachusetts Relay Service to make and receive calls. According to the survey, where documents are provided, notifications are not provided indicating documents can be requested in alternative formats neither do they currently have a Public Notice of ADA Compliance. Survey responses indicate that an emergency response plan that address the needs for individuals with disabilities at their facilities has not been established.

*Recommendation: KMA recommends providing training to appropriate personnel in the Town's policy of nondiscrimination, and how to respond to requests for reasonable modifications, auxiliary aids, and services and documents in alternative formats, in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls. KMA recommends implementing these changes within the next year.*

*KMA also recommends developing a Public Notice (see Appendix for examples) and ensuring the Notice is visibly posted at Town buildings, on the Town website homepage, and in the Employee Handbook. Additionally, KMA recommends developing a policy to ensure the Public Notice is consistently provided on all Departmental literature. KMA recommends implementing these changes within the next six months.*

*Additionally, KMA recommends confirming the following are provided in the existing emergency preparedness plan within the next year:*

- *Provisions to ensure that equal access to safe egress is provided for any visitor, member of the community or employee, including additional assistance if required to effectively evacuate and/or shelter them during an emergency.*
- *Protocols and signage for such issues as:*
  - *Fire exits signage and maneuvering space;*
  - *Safe wait areas;*

- *Evacuation Maps;*
- *Locations of fire exits and safe wait areas serving each municipal space; and*
- *Public and employee orientation to the Town's emergency evacuation procedures.*

### Transfer Station & Recycling Facility

The Transfer Station is run by the Public Works Department and provided for residents to dispose of any unwanted household items. Residents may also bring recycling, mattresses, brush, grass clippings, old batteries, and other disposable items to the Transfer Station. To use the Transfer Station, residents must purchase a yearly sticker.

The Transfer Station and Recycling Facility main spaces are located at 255 Old Orchard Road. The site consists of a one-story building, an outdoor space with several recycling containers, and a surface parking lot. Another one-story building with offices, employee areas, a toilet room, and one accessible parking space, located at 555 Old Orchard Road, complete the site. The principal barriers identified include:

- The accessible parking space has abrupt changes in level.
- The Sticker Office older ramp is too steep and lacks the required handrails.
- There is no accessible route provided to the newest ramp.
- The Sticker Office service counter and separation screen both protrude into the circulation space.
- The Stock Exchange main entrance ramp is too steep, and it lacks the required handrails and edge protection. The door threshold is too high, and the door hardware requires tight grasping and twisting of the wrist to operate.
- The Stock Exchange secondary entrance stair lacks the required handrails, and the door hardware requires tight grasping and twisting of the wrist to operate. The entrance also lacks the required signage to an accessible entrance.
- Stock Exchange interior headroom is <80" AFF.
- The recycling station lacks accessible parking.
- Recycling containers are too high.
- Some of the signs protrude into the circulation space.

*Recommendation: Due to the moderate traffic at the Transfer Station and Recycling Facility, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years. KMA recommends prioritizing the accessible parking and entries due to their high visibility. KMA also recommends establishing a policy for assisting residents who find difficulties or are unable to use this facility within the next 6 months.*

### Recreation and Beach Department

According to the Town's website the Recreation and Beach Department's mission is to provide and promote year-round programs and activities that enhance the quality of life of its participants. The department continually strives to develop and advance active and passive recreation to meet the ever-growing needs of the community. They manage the town's bay beaches and their

parking lots through sticker enforcement, collecting parking fees and providing safe and clean beaches. They also issue the town's beach stickers, transfer station stickers and shellfish permits, and provide customer service and windmill tours and history facts. They are located at 555 Old Orchard Rd (Sticker Office). They organize active and passive programs and events including but not limited to family events, youth sports, after-school programs, adult programs, special events, field trips, school vacation activities, and beach programs. Below is a list of their program locations:

- Field of Dreams - fields, courts, and playground.
- Wiley Park - playground, walking trails.
- Schools within the district.
- Beaches.
- Town Buildings - Library, COA, Town Hall.
- Windmill and Windmill Green.
- Bike path and any available open/outside space.
- Outside Buildings - local church, Willys gym.

According to survey responses, limited staffing and lack of training is one of the accessibility barriers identified. However, the Recreation Department has not received feedback about inaccessibility. Some of the services they provide for people with disabilities are beach wheelchairs and beach access mats.

The recreation survey was completed by Christine Mickle, the Department Director. Survey responses indicate that the Recreation Department personnel have received training in the Town's policy of nondiscrimination. However, they have not received training in the Town's policies/procedures for responding to auxiliary aid requests, and reasonable modifications, in how to effectively communicate with people with disabilities, or in how to use the Massachusetts Relay Service to make and receive calls. According to the survey, where documents are provided, notifications are not provided indicating documents can be requested in alternative formats neither they currently have a Public Notice of ADA Compliance. Survey responses indicate that an emergency response plan that address the needs for individuals with disabilities at their facilities has not been established.

*Recommendation: KMA recommends providing training to appropriate personnel in how to respond to requests for reasonable modifications, auxiliary aids, and services and documents in alternative formats, in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls. KMA recommends implementing these changes within the next year.*

*KMA also recommends developing a Public Notice (see Appendix for examples) and ensuring the Notice is visibly posted at Town buildings, on the Town website homepage, and in the Employee Handbook. Additionally, KMA recommends developing a policy to ensure the Public Notice is consistently provided on all Departmental literature. KMA recommends implementing these changes within the next six months.*

*Additionally, KMA recommends confirming the following are provided in the existing emergency*

*preparedness plan within the next year:*

- *Provisions to ensure that equal access to safe egress is provided for any visitor, member of the community or employee, including additional assistance if required to effectively evacuate and/or shelter them during an emergency.*
- *Protocols and signage for such issues as:*
  - *Fire exits signage and maneuvering space;*
  - *Safe wait areas;*
  - *Evacuation Maps;*
  - *Locations of fire exits and safe wait areas serving each municipal space; and*
  - *Public and employee orientation to the Town's emergency evacuation procedures.*

### Council on Aging Building

The Council on Aging is located at 1405 Nauset Road. It is a two-story building with a lift, public and employee toilet rooms, reception area, meeting rooms, conference room, and kitchen. There are two surface parking lots and one drop off area serving the building. Principal barriers identified include:

- The designated accessible parking spaces in the lower parking lot lack access aisles, have abrupt changes in level, signage is not mounted in the correct location, and pavement markings are not visible. Also, the parking area lacks a van accessible parking space.
- The designated accessible parking spaces in the upper parking lot lack access aisles, have slopes >2%, signage is not mounted in the correct location, and pavement markings are not visible. Also, the parking area lacks a van accessible parking space.
- The designated accessible parking spaces in the drop off parking area lack access aisles, have slopes >2%, and pavement markings are not visible. Also, the parking area lacks a van accessible parking space.
- Ramps to the parking are too steep and lack the required handrails and handrail extensions.
- The ramp to the secondary entrance at the conference room has cross slopes >2%, abrupt changes in level and lacks the required handrail extensions.
- The ramp to the secondary entrance at the reception area is too steep and lacks the required handrails and handrail extensions.
- The stair at the secondary entrance at the ground floor hallway lacks the required handrail extensions. The entrance lacks the required signage to an accessible entrance.
- The outdoor stair next to the main entrance lacks the required handrails and handrail extensions, and it has open risers and abrupt nosings.
- The threshold at the main entrance is too high.
- The wall mounted shelf at the lower ground floor corridor protrudes into the circulation space and the headroom under the ventilation system is <80”.
- The lift door lacks the required maneuvering clearance, and the lift control lacks the required adjacent level clear floor space.

- Single-user toilet rooms at the lower ground floor lack the required signage, toilet paper dispensers and accessible elements are not mounted in the correct locations, sink pipes are not insulated, wall mounted cabinets protrude into the circulation space. In one of the toilet rooms the flush valve is not accessible, and the coat hook is mounted too high. Also, doors lack maneuvering clearance.
- The stair lacks the required handrails and handrail extensions.
- There is no accessible route to the stage.
- The service counter is too high.
- The door at the computer room is not wide enough.
- The door at the common room lacks the required maneuvering clearance.
- At the kitchen, the sink and the cooktop are too high and lack the required knee/toe clearance for a forward approach. Also, the microwave controls and phone are mounted too high, and the door hardware requires tight grasping and twisting of the wrist to operate.
- Single-user toilet rooms at the ground floor lack the required signage, toilet paper dispensers and accessible elements are not mounted in the correct locations, have incorrect toilet centerlines, coat hooks mounted too high, sink pipes are not insulated and one of the flush valves is not accessible. Also, doors lack maneuvering clearance.

*Recommendation: Due to the high traffic of the Council on Aging, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years. In the next year, KMA recommends prioritizing mitigations in the exterior areas due to their high visibility and use, as well as the toilet rooms and lift. Where policies are developed, KMA recommends ensuring information is disseminated to the public and staff as required.*

### Senior Center Department

Limited information is provided on the Town's website regarding the responsibilities of the Eastham Senior Center Department. The Senior Center Department did not submit responses to the SETP Department Survey.

### Town Hall

Eastham Town Hall is located at 2500 State Highway. It is a two-story building with various town departments, conference and meeting rooms, kitchenettes, and public and employee toilet rooms. There is one surface parking lot serving the building. Principal barriers identified include:

- Some of the designated accessible parking spaces lack access aisles, have slopes >2%, are not located on the shortest accessible route to the entrance, and signage is not mounted in the correct location. The van accessible access aisle is not wide enough.
- All inaccessible entrances lack the required signage to an accessible one.
- The walkway from the accessible parking to the main entrance has abrupt changes in level.
- The ramp next to the main entrance lacks the required handrails and a level landing at the top.
- The walkway to the Field of Dreams has slopes >5%.

- The main entrance doorbell is mounted too high.
- The outdoor payment box is out of an accessible reach range.
- The outdoor mailbox lacks an adjacent level clear floor space.
- Public Women's and Men's toilet rooms at the lower level have mirrors mounted too high, sink pipes not insulated, and some flush valves are not accessible. Doors lack the required maneuvering clearances.
- The Small Hearing Room door lacks the required maneuvering clearance.
- At the kitchen, the sink and the cooktop lack the required knee/toe clearance for a forward approach.
- Service counters and computers on the first floor are too high.
- Single-user employees toilet rooms at the first floor have toilet paper dispensers and coat hooks mounted too high, sink pipes not insulated, and some flush valves are not accessible. Doors lack the required maneuvering clearance.

*Recommendation: Due to the high traffic of Town Hall, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years. In the next year, KMA recommends prioritizing mitigations in the exterior areas due to their high visibility and use, and the toilet rooms. Where policies are developed, KMA recommends ensuring information is disseminated to the public and staff as required.*

#### Town Hall Annex

The Town Hall Annex is located next to the Town Hall. It is a one-story building with a public office, employee kitchen, and employee toilet room. There is one surface parking lot serving the building. Principal barriers identified include:

- The accessible parking space and its aisle have abrupt changes in level and signage is not mounted in the correct location.
- The walkway to the main entrance has abrupt changes in level.
- The threshold at the main entrance is too high and the door lacks the required maneuvering clearance.

*Recommendation: Due to the moderate traffic at the Town Hall Annex, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years. KMA recommends prioritizing the accessible parking and entry due to their high visibility.*

#### Town Clerk

According to the Town's website the Town Clerk is the official keeper of all town records, by-laws, the town seal, chief election official and public records. The Town Clerk is also responsible for: Public records requests, Vital Records (records and preserves vital records including birth, death and marriage), Town Committee member appointments, ethics and terms of office, Permits (dog, yard sale, raffle, temporary sign permits), License permits (business licenses, auto, billiards, coin-operated amusements, common victualler, entertainment, hawker-peddler, liquor and mini golf), Annual Town Report (compiling reports from all Town departments, committees and boards and working with the publisher to produce a timely, accurate report of all the activity, expenditures and projects for the prior year), Town Planning Board and Zoning Board of Appeals are filed with

the Town Clerk's office, and all Town Committee meetings postings. They are located in Town Hall. The survey was completed by Cindy Nicholson, the Town Clerk. Survey responses indicate that the Town Clerk Department personnel have not received training in the Town's policy of nondiscrimination, in the Town's policies/procedures for responding to auxiliary aid requests, and reasonable modifications, in how to effectively communicate with people with disabilities, or in how to use the Massachusetts Relay Service to make and receive calls. According to the survey, where documents are provided, notifications are not provided indicating documents can be requested in alternative formats neither they currently have a Public Notice of ADA Compliance.

*Recommendation: KMA recommends providing training to appropriate personnel in the Town's policy of nondiscrimination, and how to respond to requests for reasonable modifications, auxiliary aids, and services and documents in alternative formats, and in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls. KMA recommends implementing these changes within the next year.*

*KMA also recommends developing a Public Notice (see Appendix for examples) and ensuring the Notice is visibly posted at Town buildings, on the Town website homepage, and in the Employee Handbook. Additionally, KMA recommends developing a policy to ensure the Public Notice is consistently provided on all Departmental literature. KMA recommends implementing these changes within the next six months.*

#### Town Moderator

According to the Town's website the Moderator presides at Town Meetings and is available to answer questions about the Town Meeting process and how citizens may participate. They are in Town Hall. The Town Moderator did not submit responses to the SETP Department Survey.

#### Treasurer/Collector Department

According to the Town's website The Office of the Treasurer/Tax Collector is responsible for the timely billing and collection of all of revenues to, as well as the disbursement of all payments by the Town of Eastham. Additionally, the Office manages all the Town's debt issuance and repayment. The Office also manages Town payroll, and coordinates benefits for current employees as well as retirees. They are in Town Hall.

The treasurer/collector survey was completed by Susan Laak, the Town Treasurer/Collector. Survey responses indicate that the Treasurer/Collector Department personnel have not received training in the Town's policy of nondiscrimination, in the Town's policies/procedures for responding to auxiliary aid requests, and reasonable modifications, in how to effectively communicate with people with disabilities, or in how to use the Massachusetts Relay Service to make and receive calls. According to the survey, where documents are provided, notifications are not provided indicating documents can be requested in alternative formats neither they currently have a Public Notice of ADA Compliance. Additionally, Treasurer/Collector survey responses indicate that an emergency response plan that address the needs for individuals with disabilities at their facilities has not been established.

*Recommendation: KMA recommends providing training to appropriate personnel in the Town's*

*policy of nondiscrimination, and how to respond to requests for reasonable modifications, auxiliary aids, and services and documents in alternative formats, and in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls. KMA recommends implementing these changes within the next year.*

*KMA also recommends developing a Public Notice (see Appendix for examples) and ensuring the Notice is visibly posted at Town buildings, on the Town website homepage, and in the Employee Handbook. Additionally, KMA recommends developing a policy to ensure the Public Notice is consistently provided on all Departmental literature. KMA recommends implementing these changes within the next six months.*

*Additionally, KMA recommends confirming the following are provided in the existing emergency preparedness plan within the next year:*

- *Provisions to ensure that equal access to safe egress is provided for any visitor, member of the community or employee, including additional assistance if required to effectively evacuate and/or shelter them during an emergency.*
- *Protocols and signage for such issues as:*
  - *Fire exits signage and maneuvering space;*
  - *Safe wait areas;*
  - *Evacuation Maps;*
  - *Locations of fire exits and safe wait areas serving each municipal space; and*
  - *Public and employee orientation to the Town's emergency evacuation procedures.*

### Chamber of Commerce

The Chamber of Commerce is located at 1700 State Highway. It is a one-story building with a reception area and office. There are no accessible parking spaces provided. Principal barriers identified include:

- The parking lacks accessible spaces.
- Outdoor brochures are out of the accessible reach range.
- The outdoor trash receptacle is not on an accessible route and lacks a level clear floor space.
- The main entrance door lacks the required maneuvering clearances, is not wide enough and the hardware requires tight grasping and twisting of the wrist to operate.
- The reception counter is too high.

*Recommendation: Due to the moderate traffic at the Chamber of Commerce, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years. KMA recommends prioritizing the accessible parking and entry due to their high visibility. KMA recommends mitigating all other barriers identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as Town budget permits within the next three to five years.*

## Trails

KMA reviewed the following trails:

- Wiley Park Trail
- Nickerson Property Trail
- Cottontail Acres Trail
- Sandy Meadow Trail

KMA did not observe any fully accessible trails in the Town of Eastham. When provided, they lacked accessible parking and accessible routes to the trailheads.

*Recommendation: KMA recommends providing at least one trail with accessible parking and a route to the trailhead, with priority going to the one that has the highest use, in the next one to three years.*

## Sports Facilities

KMA reviewed the following sports facilities:

- Eastham Elementary School Fields
- Field of Dreams

KMA did not observe any fully accessible athletic facilities in the Town of Eastham. Athletic facilities lacked accessible routes, compliant accessible parking, and accessible seating.

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

*When provided, ensure at least one accessible portable toilet serving each athletic facility will be installed and designated as unisex within the next year. Ensure the accessible portable toilet is located on an accessible route.*

## Playgrounds

KMA reviewed the following playgrounds:

- Eastham Elementary School Playground
- Wiley Park Playground

KMA did not observe any fully accessible play areas in the Town of Eastham. The play areas lacked an accessible route, accessible play surfaces, accessible seating, and accessible parking spaces.

*Recommendation: KMA recommends providing at least one fully accessible playground in the next one to three years, with priority going to the one with the highest use. Ensure any modifications to existing play areas or newly constructed play are done in compliance with the 2010 ADA Standards. Information regarding the accessible playgrounds should be disseminated to residents and available on the Town website. For information on accessible play area requirements please see:*

*<https://www.access-board.gov/files/ada/guides/play-areas.pdf>*

## Beaches

KMA reviewed the following beaches:

Cooks Brook Road Beach

First Encounter Beach

Wiley Park Beach

KMA did not observe any fully accessible beaches in the Town of Eastham. They lacked a sufficient number of accessible parking spaces, accessible routes, accessible seating, and fully compliant public toilet rooms.

*Recommendation: KMA recommends providing at least one beach with accessible parking, accessible routes, and accessible toilet rooms (designate the toilet rooms as unisex and modify at least one to be fully accessible) within the next one to three years.*

## SECTION 5: SUMMARY OF PUBLIC SURVEY RESPONSES

---

KMA developed an online public comment survey to get input from citizens of the Town of Eastham regarding their ideas and concerns about the accessibility of the Town programs and facilities. The survey was made up of five questions that ranged from asking about the ease of use of Town facilities/buildings to whether residents understand where to go to request an accommodation. The survey was distributed on the Town's email, website, and social media pages. KMA received 7 online responses. The focus of the responses was on the physical/structural accessibility of the Town. A complete record of all the Public Survey Responses can be found in the *Appendix*. The principal issues raised in the survey responses include:

1. Comments to the survey acknowledge a general need for the Town to make accessibility improvements.
2. One resident requested an adult seat swing for people with autism and other disabilities.
3. One resident has had difficulty using the Recycling Facility.
4. One resident requested a board walk style ramp at the Campground Beach, First Encounter Beach, and Thumpertown Beach, as well as beach wheelchairs for public use at Eastham Bay Beaches.
5. One resident requested increased maintenance on Route 6 existing pedestrian sidewalks (cleaning and snow removal).
6. Another resident also has had difficulties using and getting information in the Town's Website.

# SECTION 6: SUMMARY OF RESPONSES TO DRAFT REPORT

The Town did not have any substantive responses to the DRAFT report.



## APPENDIX

---

PROPERTIES LIST

GRIEVANCE POLICY

PUBLIC NOTICE OF ADA COMPLIANCE

SAMPLE EVENT LANGUAGE

WEBSITE ANALYSIS

FUNDING RESOURCES

SURVEY FORMS

Administration

Departments

Employment

Public

COMPLETED SURVEYS

PUBLIC SURVEY RESPONSES

ACCESS AUDIT REPORTS

FINDINGS & RECOMMENDATIONS

## PROPERTIES LIST

Recreation Facilities	
Property	Address
Field of Dreams Playground	2480 State Hwy
Eastham Elementary School Playground	200 School House Rd
Wiley Park Playground	1400 Herring Brook Rd
Field of Dreams	2480 State Hwy
Eastham Elementary School Fields	200 School House Rd
Wiley Park Beach	1400 Herring Brook Rd
Cooks Brook Road Beach	Steele Rd
First Encounter Beach	Samoset Rd
Sandy Meadow Trail	Sandy Meadow Way
Wiley Park Trail	1400 Herring Brook Rd
Nickerson property Trail	Herring Brook Road
Cottontail Acres Trail	Samoset Rd with Lawton Rd
Buildings	
Property	Address
Town Hall	2500 State Hwy
Town Hall Annex	2500 State Hwy
Police Department	2550 State Hwy
Fire Department	2520 State Hwy
Eastham Public Library	190 Samoset Rd
DPW Building	555 Old Orchard Rd
Recreation Dept. Office	555 Old Orchard Rd
Transfer Station/Recycling Facility	255 & 555 Old Orchard Rd
Council on Aging Building	1405 Nauset Rd
Chamber of Commerce Information Building	1700 State Hwy

# EASTHAM GRIEVANCE POLICY

---

The Town has not provided a Grievance Policy and Procedure to resolve disability related complaints.

Sample Grievance Procedures:

## Sample Grievance Procedures

### Long

#### Americans with Disabilities Act Grievance Procedure

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

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

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

(ADA Coordinator name and contact information).

Within 15 calendar days after receipt of the complaint, (name of ADA Coordinator) will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, (name of ADA Coordinator) will respond in writing, and where appropriate, in format that is accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the (Name of Public Entity) and offer options for substantive resolution of the complaint.

If the response by (name of ADA Coordinator) does not satisfactorily resolve the issue, the complainant may appeal the decision within 15 calendar days after receipt of the response to the (Head of Public Entity) or designee.

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

### Short

#### Americans with Disabilities Act Grievance Procedure

Complaints concerning discrimination on the basis of disability by the (Name of Public Entity) may be sent to (ADA Coordinator name and contact information). (Name of ADA Coordinator) will contact the complaint within 15 calendar days after receipt of the complaint to discuss the complaint and will respond in writing within 15 days of the discussion.

# PUBLIC NOTICE OF ADA COMPLIANCE

---

Sample notices:

## Long

### **Americans with Disabilities Act**

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

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

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

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

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

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

## Short

### **Americans with Disabilities Act**

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

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

A grievance procedure is available to resolve complaints.

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

(ADA Coordinator name and contact information)

## SAMPLE EVENT LANGUAGE

---

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

# WEBSITE ANALYSIS

---

KMA, LLC conducted a cursory review of the Town of Eastham’s website ([eastham-ma.gov](http://eastham-ma.gov)) to help identify any significant and recurring accessibility and usability problems. The basis for the review was the guidance from Section 508 of the Rehabilitation Act and W3C-WAI’s WCAG 2.0.

KMA utilized Chrome, WebAim’s WAVE Toolbar, The Paciello Group’s Colour Contrast Analyzer (CCA) and ARC Toolkit, and NVDA screen reader to review the Town’s web site. Generally, the Town of Eastham’s website is usable and can be made accessible with modifications.

The main issues are:

- Incomplete alternative text for images,
- Lack of accessible PDF and Word documents, and
- Low color contrast.

## INCOMPLETE ALTERNATIVE TEXT FOR IMAGES

**Issue:** Limited or incomplete alternative text for images.

**Why it matters:** A screen reader user will not know what the text in the image is without more specific alt text.



**Issue:** The Town of Eastham Massachusetts seal and text image has alt text of “Eastham MA”. The alt text should also include a description of images and visible text.

**Recommendation:** Suggested alt text: Town seal that says Town of Eastham – Incorporated 1651. Text surrounds the profile of a Native American wearing a feather headdress with the words “Nauset 1620” underneath it. Text “Eastham Massachusetts” is beside the seal.



**Issue:** The alt text for this image states: reopening timeline. None of the information provided in the image is provided in the alt text or elsewhere on the website.

**Reference:** WCAG 1.1.1 Non-text Content: All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below. <sup>2</sup>

**Recommendation:** Suggested that the alt text include a description of the flyer. Flyer with a teal border and a drawing of a healthcare worker in the lower left corner that includes updated reopening timeline. May 18<sup>th</sup>: Young Athletes will no longer have to wear face coverings to play sports outdoors. Face coverings will no longer be required for K-12 & childcare settings, like recess. May 29<sup>th</sup>: The Commonwealth’s current face covering order will be rescinded & replaced with an order consistent with new CDC guidance. The gatherings limit will be lifted. All COVID-related industry restrictions will be lifted & capacity will increase to 100%. June 15<sup>th</sup>: Governor Baker will end the State of Emergency

<sup>1</sup> For more information see: <https://www.w3.org/TR/UNDERSTANDING-WCAG20/text-equiv-all.html>  
<sup>2</sup> For more information see: <https://www.w3.org/TR/WCAG21/#contrast-minimum>

for the Commonwealth of Massachusetts. Teal text box: To ensure this reopening continues as smoothly and safely as possible, PLEASE GET VACCINATED.

### Resources:

[What is Alt Text](#)

[Web Accessibility Initiative \(W3C\) Tutorial: Tips and Tricks](#)

[City of Chicago Alt Text Guidelines](#)

### LOW COLOR CONTRAST



**Issue:** insufficient color contrast between foreground text and the background

**Why it matters:** Eastham’s website lacks sufficient color contrast between text and background on some of its webpages. W3C observes that in addition to low vision and legally blind users, low color contrast may be an issue for older residents with low contrast sensitivity and residents with color blindness (1 in 4 men and 1 in 200 women).

**Reference:** Success Criterion WCAG 1.4.3 Contrast (Minimum) The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following:

- Large Text: Large-scale text and images of large-scale text have a contrast ratio of at least 3:1;
- Incidental: Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.
- Logotypes: Text that is part of a logo or brand name has no contrast requirement.<sup>3</sup>

<sup>3</sup> For more information see: <https://www.access-board.gov/guidelines-and-standards/communications-and-it/about-the-ict-refresh/final-rule/text-of-the-standards-and-guidelines>

***Recommendation:*** ensure text has a minimum contrast ratio of 4.5:1.

## **LINKS TO PDFS AND WORD DOCUMENTS**

**Issue:** Eastham has numerous pdfs documents on its website. There is no indication on the webpages that a link opens a pdf or Word document.

**Why it matters:** PDFs posted on the Town’s website are frequently scanned copies of original documents and inaccessible to screen readers. This is especially problematic when scanned PDFs are meeting notices that include contact information, time/date, and location or required forms for permits. Unless authored with accessibility in mind, PDF documents often have accessibility issues.



[Home](#) » [Select Board](#)

# 2021 SELECT BOARD MEETING PACKET ARCHIVE

- [06-21-2021 Select Board Meeting Packet](#)
- [06-07-2021 Select Board Meeting Packet](#)
- [05-17-2021 Select Board Meeting Packet](#)

***Example:*** [06-21-2021 Select Board Meeting Packet](#)

**Reference:** Section 508 – “504.2 Content Creation or Editing. Authoring tools shall provide a mode of operation to create or edit content that conforms to Level A and Level AA Success Criteria and Conformance Requirements in WCAG 2.0 (incorporated by reference, see 702.10.1) for all supported features and, as applicable, to file formats supported by the authoring tool. Authoring tools shall permit authors the option of overriding information required for accessibility.”<sup>4</sup>

***Recommendation:*** Ensure that PDF and Word documents are accessible. Additionally, inform the user that the link will open a PDF or Word document either with text inside the link (\*pdf or \*doc) or an icon with appropriate alt text ( .

## FUNDING RESOURCES

---

### Municipal Americans with Disability Act (ADA) Improvement grant

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

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

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

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

### Community Development Block Grant (CDBG)

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

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

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

# SURVEY FORMS

## A. ADMINISTRATION

### Town of Eastham MA

### ADA Self Evaluation & Transition Plan: Administration Survey

Name of Individual filling out this form:

Position:

Phone:

Email:

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



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

a. the Town's policy of nondiscrimination,				
b. how to respond to requests for reasonable modifications,				
c. their roles and responsibilities in providing auxiliary communication aids and services,				
d. the available resources for providing auxiliary aids and services,				
e. effective communication with people with disabilities.				
f. Use of the Massachusetts Relay Service to make and receive calls.				
<b>C. REASONABLE MODIFICATIONS OF POLICIES</b>				
1. The Town has a process for responding to requests for modifications to policies or practices if the modification is necessary for a person with a disability to participate?				
a. The process includes criteria for determining whether a modification would fundamentally alter the nature of the program.				
<b>D. SERVICE ANIMALS</b>				
1. The Town has a written policy regarding service animals in municipal facilities.				Please attach
<b>E. USE OF CONTRACTORS</b>				
1. The Town has included language in its contracts to ensure that contractors are aware of their obligations to facilitate the participation of persons with disabilities in programs and activities the contractor operates on behalf of the Town.				Please attach sample language



2. The Town has developed a procedure to disseminate information about ADA requirements to contractors.				Please describe how this is accomplished.
<b>F. TRANSPORTATION</b>				
1. The Town provides or contracts for transportation services. (If the answer is no, skip the rest of this section)				
2. The Town or contractor has procedures for responding to requests from persons with disabilities to provide schedule and route materials in a timely manner in an accessible form.				
3. The Town or contractors have procedures to provide information with no delay nor additional cost to persons with disabilities. _				
4. The Town or contractor provides training and testing to assure employees are fully qualified to serve passengers with disabilities. _				
5. The Town or contractor has a policy that requires regular and frequent checks of lifts, as well as other access-related equipment or vehicles. _				
<b>G. COMMUNICATIONS</b>				
1. There is a policy requiring and implementing procedures for making Auxiliary Aids and Services available to persons who are deaf or hard of hearing and people who are blind or have limited sight.				
a. All program announcements include information about how to request an auxiliary aid or service.				



b. Sound amplification and assistive listening systems are available and maintained in assembly/meeting spaces and performance areas.				
c. The Town has a procedure to ensure that qualified interpreters are provided in an expeditious manner when requested in advance at meetings, hearings, interviews, conferences, or public appearances by Town officials. _				
2. The Town has the resources necessary to provide materials in alternative (to traditional print) formats including large print, audio and/or scanned material for use with screen readers,				Please describe how this is accomplished.
3. Where phone numbers are provided as a means of contacting the municipality, an alternative means of communication (e.g., TTY number or email) is also provided.				
a. TDD numbers or telephone relay numbers been added to all The Town directories, pamphlets, brochures, letterhead, etc. _				
<b>H. DOCUMENTS AND PUBLICATION</b>				
1. The Town has reviewed public documents to eliminate patronizing or stigmatizing language and images.				
<b>I. WEBSITE</b>				
2. Is there a policy regarding the accessibility of the Town's webpages, that is, in compliance with the W3C Web Content Accessibility Guidelines (WCAG) 2.0 or Section 508 Standards?				

3. Are the staff and contractors who are responsible for webpage and content development aware of the policy and knowledgeable about these standards?				
4. Has the website been tested for compliance with either of these standards?				
a. If yes, have people with disabilities who use screen reading software and other assistive technology participated in the evaluation?				
<b>J. EMERGENCY EVACUATION</b>				
1. Municipal alerts and emergency warnings are sent in multiple formats?				
2. Emergency evacuation procedures from buildings address the needs of individuals with disabilities?				Please attach a copy of the section of your emergency preparedness plan that addresses individuals with disabilities
3. Emergency personnel are trained in effective communication with people with disabilities.				
<b>K. WEBSITE</b>				
5. Is there a policy regarding the accessibility of the Town webpages, that is, in compliance with the W3C Web Content Accessibility Guidelines (WCAG) 2.0 or Section 508 Standards?				
6. Are the staff and contractors who are responsible for webpage and content development aware of the policy and knowledgeable about these standards?				
7. Has the website been tested for compliance with either of these standards?				

a. If yes, have people with disabilities who use screen reading software and other assistive technology participated in the evaluation?				
<b>L. EMERGENCY EVACUATION</b>				
1. Municipal alerts and emergency warnings are sent in multiple formats?				
2. Emergency evacuation procedures from buildings address the needs of individuals with disabilities_				Please attach a copy of the section of your emergency preparedness plan that addresses individuals with disabilities
4. Emergency personnel are trained in effective communication with people with disabilities.				

If you have any questions, please contact: J Garofalo, [jgarofalo@kmaccess.com](mailto:jgarofalo@kmaccess.com)

## B. DEPARTMENT

Note: this survey was also made available online

### Town of Eastham MA

### ADA Self Evaluation & Transition Plan: Department Survey

---

Department Name:

Department Contact Person:

Phone:

Email:

---

1. Please provide a brief description of your department:
2. Please provide a list of the programs/ services your department provides to residents of the Town (licensing, permits, youth soccer, notarization, etc.).
3. Please provide a list of the locations where the programs/ services noted in Question 3 are located.
4. What, if any, do you think may be barriers (architectural, operational, etc.) for individuals with disabilities to access your programs/services?
5. Have you ever received feedback that one of your programs was difficult to access by an individual(s) with a disability? If yes, please describe:
6. Do you charge any user fees related to providing accessibility to your programs? If yes, please describe:
7. Do you offer any separate services, programs, or activities for people with disabilities? If yes, please describe:

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

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

If you have any questions, please contact: J Garofalo, [jgarofalo@kmaccess.com](mailto:jgarofalo@kmaccess.com)



C. EMPLOYMENT

Town of Eastham MA  
 ADA Self Evaluation & Transition Plan: Employment Survey

---

Name of Individual filling out this form:

Position:

Phone:

Email:

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

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

If you have any questions, please contact: J Garofalo, [jgarofalo@kmaccess.com](mailto:jgarofalo@kmaccess.com)

## D. PUBLIC

Note: this survey was also made available online

### Town of Eastham MA ADA Self Evaluation & Transition Plan: Public Survey

---

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

1. Are there Town buildings/facilities (building structures, parks, playgrounds, trails, docks, recycling centers, etc.) that you have had difficulty using? If yes, please describe.
2. Have you ever had difficulty getting information about a Town program, service, or event? If yes, please describe.
3. Do you know how to request Town materials in alternate formats (for example, large print or Braille)?
4. Do you know how to request an accommodation (for example, ASL interpreters or assistive listening systems) for Town services and events?
5. Any other comments about accessibility?

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

## COMPLETED SURVEYS

---

Below is a copy of all the online Public Survey responses KMA received.

### Survey Responses:

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

Responses: 3 yes/ 4 no

Comments:

- Sometimes I have trouble at the recycling center
- Campground Beach. Board Walk Style Ramp needed, Thumpertown Beach Ramp Needed First Encounter Beach, Board Walk Style Ramp Needed Need beach large tire wheelchairs like national seashore at Eastham Bay beaches for public use.
- Every sidewalk on Route 6 never cleaned nor had snow removal.

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

Responses: 2 yes/ 5 no

Comments:

- It is very hard to find information on the town website. The search button is completely useless.

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

Responses: 2 yes/ 5 no

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

Responses: 3 yes/ 4 no

5. **Question: Any other comments about accessibility?**

Comments:

- I wish there was an adult seat swing for people with autism and other disabilities.
- I have no need for vision or hearing help. I can't carry much or walk that far.
- Clean your sidewalks.

## ACCESS AUDIT REPORTS

---

KMA's audits were not comprehensive. In some cases, a representative sample of certain areas and elements (such as thresholds or other common-use spaces) were audited, and recommendations were developed based on observed patterns of compliance.

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

See attached:

*Eastham SETP\_Buildings\_04.19.2022*

*Eastham SETP\_Outdoor Facilities\_04.19.2022*

# FINDINGS & RECOMMENDATIONS TABLE

---

This section of the report was developed based on Department Survey responses, input from the Town, and input from the public. It includes information on identified program accessibility issues and which modifications should be prioritized. This document is meant to serve as a working file between KMA and Town personnel. Columns highlighted in yellow are meant to be filled out by the Town.

See attached:

*Eastham SETP\_Findings and Recommendations\_04.19.2022*

