

EASTHAM FINDINGS & RECOMMENDATIONS

KMA used the Survey responses to develop the following findings and recommendations. 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. KMA recommends reviewing this document along with the DRAFT Eastham SETP Report and the Audit Reports found in the Appendix.

Prioritization Key:

- A. Immediate priority
- B. High Priority: 6 Months to 1 Year
- C. Medium Priority: 1 to 3 Years
- D. Long-term Priority: 3 to 5 Years

FINDINGS & RECOMMENDATIONS						
#	Findings	Recommendations	Priority	Target Date	Responsible Party	Comments
Administrative (Policies/ Print Materials/ Staff Training/etc.) <u>Please Note: The Administrative Survey responses were not provided.</u>						
1.	ADA Coordinator: It is unclear if an ADA Coordinator has been appointed.	Confirm that an ADA Coordinator has been appointed. The designated ADA coordinator should complete ADA training offered by the National Association of ADA Coordinators: https://www.adacoordinator.org/page/Training	A			
2.	Alternative Formats: Where Town documents are provided, department survey responses indicate that notification is not provided indicating that documents can be requested in alternative formats. For examples, see https://www.eastham-ma.gov/sites/g/files/vyhlf4371/f/uploads/rental_registration_application2.pdf	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.	B			



3.	<p>Auxiliary Aids and Services:</p> <p>Responses to the department surveys indicate the need to establish the capacity across all Town departments to provide auxiliary aids and services and then to disseminate information about their availability. Additionally, limited information was provided on what external auxiliary aid resources are available (i.e. interpreters).</p>	<p>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/ndnr-c-materials/disability-guide/auxiliary-aids-and-services/</p>	B			
4.	<p>COVID-19 Response:</p> <p>The Town did not provide information on their response to the current COVID-19 pandemic.</p>	<p>KMA recommends reviewing the continuously changing guidance to ensure it is available in accessible formats and proposed policies are in line with the ADA. KMA recommends reviewing the current guidance and developing a policy for continued reviews within the next six months. For more information on ensuring emergency response plans are meeting their accessibility obligations please see the information on the ada.gov website. (https://www.ada.gov/emerg_prep.html).</p>	A			



5.	<p>Documents & Publication:</p> <p>It is unclear if Town documents/ announcements have been reviewed to ensure they do not use stigmatizing language (e.g. “handicapped”).</p>	<p>KMA recommends ensuring the Town’s policy on nondiscrimination includes information on patronizing or stigmatizing language and/or images. “People-first” or “person-first” language is a way of describing disability that involves putting the word “person” or “people” before the word “disability” or the name of a disability, rather than placing the disability first and using it as an adjective. Some examples of people-first language might include saying “person with a disability,” “woman with cerebral palsy,” and “man with an intellectual disability.” The purpose of people-first language is to promote the idea that someone’s disability label is just a disability label—not the defining characteristic of the entire individual. Many guides on disability language and etiquette may likely emphasize using person-first language, except, perhaps, when discussing certain disability cultural groups that explicitly describe themselves with disability-first language. Thus, while it is generally a safe bet to use people-first language, there are members of certain disability groups in the US who prefer not to use it, such as the American Deaf community and a number of Autistic people/ Autistics. The basic reason behind members of these groups’ dislike for the application of people-first language to themselves is that they consider their disabilities to be inseparable parts of who they are. Using person-first language, some also argue, makes the disability into something negative, which can and should be separated from the person.</p>	A			
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6.	<p>Emergency Preparedness:</p> <p>A formal emergency preparedness plan was not provided for review. Department survey responses are unclear on emergency response plans that address the needs for individuals with disabilities at their facilities.</p>	<p>KMA recommends confirming the following are provided in the existing emergency preparedness plan within the next year:</p> <p>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.</p> <p>Protocols and signage for such issues as:</p> <ul style="list-style-type: none"> • 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. 	B			
7.	<p>Grievance Policy:</p> <p>The Town's Grievance Policy was not provided for review. It is unclear if the Town has a fully developed Grievance Policy and Procedure to resolve disability related complaints.</p>	<p>Develop a Grievance Policy (see Appendix for example/ resources) and ensure it is posted in conspicuous locations in all Town buildings and distributed to all departments within the next six months.</p>	B			
8.	<p>Licensing/ Certification:</p> <p>It is unclear if Town licenses or certifications (i.e., liquor, restaurant, etc.) application process ensures that qualified persons with disabilities are not screened out.</p>	<p>Provide department training to ensure all Town licenses/ certifications provide equal access to persons with disabilities.</p>	A			

9.	<p>Meetings at Accessible Locations:</p> <p>It is unclear if the Town has a formal written policy to ensure that all meetings are held in accessible locations. Furthermore, some of the department survey responses and our physical audit findings identified some inaccessible areas where meetings are held.</p>	<p>KMA recommends that the Town develop written protocols for accessible meetings and distribute to all departments, boards and commissions. Helpful documents on how to write such protocols can be found on the mass.gov website. See: https://blog.mass.gov/mod/access/5-ways-to-improve-event-accessibility/ and https://www.mass.gov/files/documents/2016/07/uy/planning-for-accessible-events.pdf</p>	A			
10.	<p>Public Notice:</p> <p>The Town's Public Notice of ADA Compliance was not provided for review.</p>	<p>KMA 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.</p>	A			
11.	<p>Reasonable Modifications of Policies:</p> <p>It is unclear if the Town has a process for responding to requests for modifications to policies or practices for people with disabilities to participate. Responses to the department surveys indicate that personnel do not have a clear understanding of the Town's ADA policy.</p>	<p>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 eeoc.gov website. See: https://www.eeoc.gov/policy/docs/accommodation.html.</p>	B			



12.	Service Animal Policy: It is unclear if the Town of Eastham currently has a written policy regarding service animals in municipal facilities.	KMA recommends developing a written Service Animal policy and post it in Town facilities and on the website within the next six months.	A			
13.	Staff Training on City's Policy of Nondiscrimination: Several department survey responses indicate that personnel have not received training in the Town's policy of nondiscrimination.	KMA recommends ensuring all departments are included in a recurring training on the Town's policy of nondiscrimination within the next six months.	A			
14.	Surcharges: Department responses indicate that surcharges are not imposed to recover the cost of accommodations, effective communication services, or accessibility features.	None	--			
15.	Title III Entities Using City Facilities: It is unclear if the Town's policies on the reservation and use of Town Facilities include information on the obligation of the Title III Entity (i.e., sports leagues, theater groups, fundraisers) to facilitate the participation of persons with disabilities.	KMA recommends developing language to be included in Town rental agreements that ensure Title III entities of their obligations to facilitate the participation of persons with disabilities within the next six months.	A			



16.	<p>Training:</p> <p>Submitted department survey responses indicated a need for training of front-line Town personnel in several aspects of accessible program delivery.</p>	<p>KMA recommends providing training to appropriate personnel in the Town's nondiscrimination policy, how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls, and how to respond to requests for reasonable modifications, auxiliary aids and services, and documents in alternative formats.</p>	B			
17.	<p>Transportation:</p> <p>It is unclear if the Town contracts for transportation services.</p>	<p>Within the next 6 months, clarify whether the Eastham Local Transit service contracted through the Town. If so, ensure procedures for responding to requests from persons with disabilities to provide schedule and route materials in a timely manner in an accessible form are established. The Town transportation services also should develop procedures to provide information with no delay nor additional cost to persons with disabilities, provide training and testing to assure employees are fully qualified to serve passengers with disabilities by their contracts with the Town, and provide regular and frequent checks of lifts, as well as other access-related equipment or vehicles.</p>	A			



18.	Use of Contractors: It is unclear whether the Town of Eastham 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.	Within the next 6 months, KMA recommends developing language to be included in Town contracts that alerts contractors of their obligations to facilitate the participation of persons with disabilities in programs and activities the contractor operates on behalf of Eastham. The Town should also develop materials for contractors explaining the Title II obligations they inherit when contracting with the Town and disseminate the information to all current contractors.	A			
19.	Website: The Town's website and websites run by Town Departments do not fully conform with Section 508 technical design accessibility standards and there is little information on the websites regarding access to programs and services for people with disabilities. See Appendix for more in depth technical analysis.	Redesign the website to fully conform with Section 508 of the Rehabilitation Act and W3C-WAI's WCAG 2.0. This should also include independent websites run by Town departments (i.e. the Library). Include an accessibility page that includes more information regarding access to programs and services for people with disabilities. Information on the accessibility of facilities, information on the Town's accessibility policies (nondiscrimination, service animal, grievance procedure) communication materials, and the process for requesting accommodations or auxiliary aids/services would be helpful. Include how to request an accommodation in all meeting announcements posted to the Town's website.	B			
Department Specific						
20.	Accounting Department	KMA recommends implementing the recommendations noted in the	B			
21.	Administration Department		B			



22.	Assessing Department	Administrative section of this report within the next year.	B			
23.	Building Department		B			
24.	Eastham Government Access TV Department		B			
25.	Conservation Department		B			
26.	Finance Department		B			
27.	Fire Department		B			
28.	Health Department		B			
29.	Library Department		B			
30.	Planning Department		B			
31.	Police Department		B			
32.	Public Works Department		B			
33.	Recreation and Beach Department		B			
34.	Town Clerk		B			
35.	Treasurer/ Collector Department		B			
36.	Cape Light Compact Department The Cape Light Compact Department did not respond to the SETP Department Survey.		KMA recommends following up with the Department regarding ADA compliance and their current understanding of the Town's obligations.	A		
37.	Human Resources Department The Human Resources Department did not respond to the SETP Department Survey.	A				

38.	MIS Department The MIS Department did not respond to the SETP Department Survey.		A			
39.	Senior Center Department The Senior Center Department did not respond to the SETP Department Survey.		A			
40.	Town Moderator The Moderator Department did not respond to the SETP Department Survey.		A			
Employment						
<u>Please Note: The Administrative Survey responses were not provided.</u>						
41.	Human Resources It is unclear if the Town's employment practices, procedures, and personnel have been thoroughly reviewed for accessibility. An employee manual was not provided for review.	KMA recommends reviewing the City's job postings and employment application process, job descriptions to distinguish between essential functions and marginal functions, developing protocols to ensure personnel files are managed so that information identifying disability is contained in a separate file, reviewing performance evaluation forms, ensuring all staff who conduct interviews have received ADA training, and ensuring the City's employment documents are available in alternate formats.	B			



Buildings					
42.	<p>Fire Station</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p>	C		

43.	<p>Library</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p> <p>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.</p>	<p>C</p> <p>B</p>			
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45.	<p>DPW Building</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p>	C			
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46.	<p>Transfer Station & Recycling Facility</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p> <p>KMA also recommends establishing a policy for assisting residents who find difficulties or are unable to use this facility within the next 6 months.</p>	C			
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<p>47.</p>	<p>Council on Aging</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p> <p>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.</p>	<p>C</p> <p>B</p>			
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<ul style="list-style-type: none"> • 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 					
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	<p>microwave controls and phone are mounted too high, and the door hardware requires tight grasping and twisting of the wrist to operate.</p> <ul style="list-style-type: none"> • 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. 					
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48.	<p>Town Hall</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p> <p>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.</p>	C			
			B			

	<ul style="list-style-type: none"> • 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. 					
49.	<p>Town Hall Annex</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • 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. 	<p>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.</p>	C			



Beaches						
52.	<p>Beaches</p> <p>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.</p>	<p>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.</p>	C			
Sports Facilities						
53.	<p>Sports Facilities</p> <p>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.</p>	<p>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.</p> <p>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.</p>	C B			
Trails						
54.	<p>Trails</p> <p>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.</p>	<p>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.</p>	C			