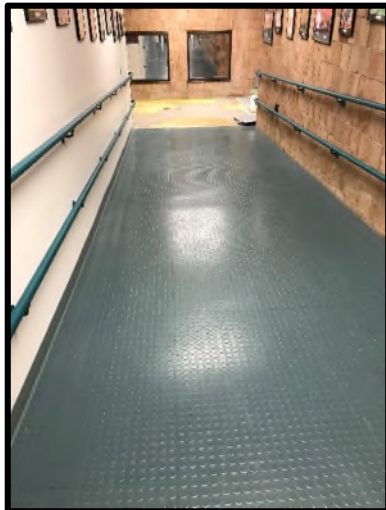


# ADA Self-Evaluation and Transition Plan

## For the Town of Erving

June 2022

Prepared by the Franklin Regional Council of Governments



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**With funding from:** Massachusetts Office on Disability FY2022 Planning Grant

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## Part A – Introduction

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

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

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

In 2022, the Town of Erving secured a grant from the Massachusetts Office on Disability and hired the FRCOG to conduct the ADA Self-Evaluation and prepare an ADA Transition Plan. The FRCOG assessed all Town-owned buildings, facilities, and parks as well as the Town’s programs, services, and activities to determine their accessibility to people with disabilities.

Like many communities in Massachusetts, Erving is faced with a number of aging municipal buildings and facilities that may pose obstacles to residents with disabilities. The cost and work that is required to remove these barriers and bring them into compliance can be overwhelming to smaller communities with limited financial resources like Erving. The Town has a total population of 1,740 residents, of which 251 (14%) have a disability.<sup>1</sup> This ADA Self-Evaluation and accompanying Transition Plan makes this daunting task a bit easier by identifying the issues, prioritizing them, and sorting out the high cost actions from the simpler, less expensive tasks.

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

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<sup>1</sup> 2015-2019 American Community Survey 5-Year Estimates, US Census Bureau.

prioritized, given an estimated timeframe, and assigned relative costs and responsible departments.

## Recent Progress

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

- Added an elevator to Town Hall;
- Designated an ADA Coordinator and adopted Nondiscrimination and Grievance policies;
- Constructed a new library in 2020 that is fully accessible;
- Constructed a new senior center in 2011 that is fully accessible; and
- Created a Complete Streets Prioritization Plan in 2020 and received funding in 2021 for pedestrian infrastructure improvements with ADA compliant crossings.

## Methodology

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

- Effective Communication practices
- General Nondiscrimination practices
- Website accessibility

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

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

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

## **Introduction**

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

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

## **Analysis**

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

### **1. Designation of Responsible Employee**

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

## **2. Complaint Procedures**

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

## **3. Notice**

Title II also requires that a local government provide public notice of the provisions of the ADA to members of the public that may participate in the Town's program, services, and activities. The Town of Erving has met this obligation with an approved Notice that is posted at Town Hall and on the town's website (<https://www.erving-ma.gov/home/pages/non-discrimination-notice>). See Appendix A for copy of Public Notice.

## **4. Effective Communication**

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

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

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



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

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

During the COVID-19 Pandemic, the Town of Erving had been conducting much of its municipal business virtually. The Town uses GoToWebinar as its video conferencing platform. GoToWebinar has accessible features that can be enabled to allow features such as high contrast mode and changes in font size. It also supports screen readers. However, employing these features takes some practice and training. As Erving continues to use either this or other video conferencing platforms, it will be very important that staff be trained on the software's accessibility features to ensure effective communication.

## **5. Reasonable Modifications of Policies, Practices, and Procedures**

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

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

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

## 6. Website Accessibility

Title II of the Americans with Disabilities Act requires that local governments ensure that, when viewed in their entirety, the programs, services, and activities offered are equally available to people with disabilities. Websites of a local government are considered to be a “program” and should be accessible to the standards of the Web Content Accessibility Guidelines 2.1 AA or Section 508 Standards. The Town just upgraded its website to include many accessibility features and is fully accessible (see Figure 1 for a screenshot of the accessibility menu of options on the Town of Erving’s new website).

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

Now that Erving has completed its website upgrade, staff with website editing privileges should be provided guidance about the requirements of the Web Content Accessibility Guidelines 2.0 AA. It would also be very helpful to the Town if people with disabilities who use screen reading software and other assistive technology periodically evaluate the website. Staff can periodically check its accessibility by using the free Web Accessibility Evaluation Tool (WAVE), which evaluates web content for accessibility under the Web Content Accessibility Guidelines.

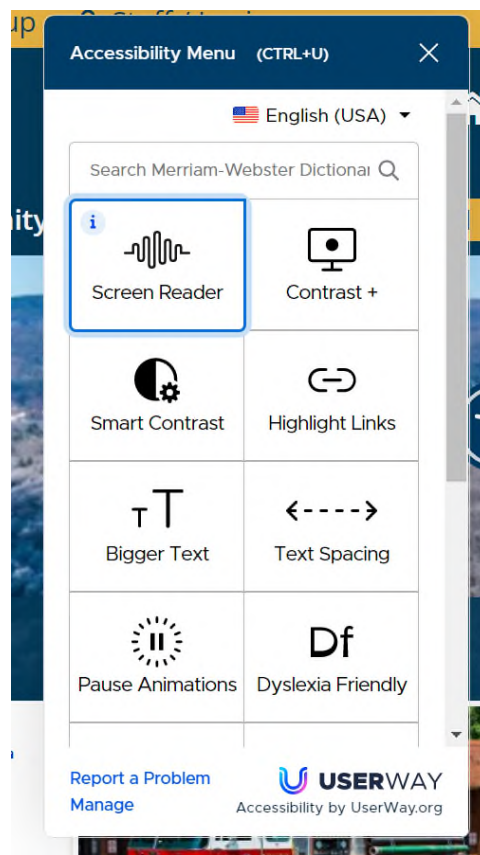


Figure 1. Image of Town of Erving's Webpage with Accessibility Options

# Part C – Evaluation of Facilities and Infrastructure

## Introduction

FRCOG staff evaluated the following Town-owned buildings and facilities for this ADA Self-Evaluation between February and April 2022 according to the 2010 ADA Standards:

### Buildings and Facilities owned by the Town of Erving and Evaluated by FRCOG

- Church Street Park
- Elementary School
- Erving Center Cemetery
- Fire Station #1 and #2
- Holton Cemetery
- Highway Garage
- Municipal Parking Lot (8 West Main Street)
- Pearl B. Care Historical Building
- Public Library
- Old Town Hall Site
- Park Street Park
- Poplar Mountain Conservation Area
- POTW #1, #2, and #3 Pump Stations
- Police Station
- Riverfront Park
- Senior & Community Center
- Veteran's Park
- Town Hall
- Zilinski Memorial Field

## Analysis of Building Accessibility

Erving's Town-owned buildings range in levels of accessibility. For this report, the FRCOG has assigned categories of "functional accessibility" to each building for ease of reference. These categories are:

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

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

Accessible	Mostly Accessible	Moderately Accessible	Minimally Accessible	Inaccessible
Municipal Parking Lot	Elementary School	Fire Station #2	Fire Station #1	Highway Garage & Water Department
Public Library	Police Station	Old Town Hall Site	Veteran's Memorial Park	Pearl B. Care Historical Building
Senior Center	Riverfront Park	Town Hall		Poplar Mountain Conservation Area
Church Street Park	Zilinski Field			Pump Stations
Park Street Park				

The above assessment rates each building's accessibility based on the ability of people with disabilities to access the programs, services, and activities that are offered within those buildings. However, it should be noted that many Town buildings have areas within them that

are not accessible at all (ex. basements or staff-only storage areas). Making these spaces accessible according to the 2010 ADA Standards may be structurally difficult and/or practically infeasible. Despite these potential obstacles, this accompanying Transition Plan identifies issues within these spaces and recommends ways to improve accessibility in ways that may be feasible – at least for users who do not require wheeled mobility devices – while acknowledging the inaccessibility these spaces pose for some persons with disabilities so that accommodations may be made.

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

## **Summary of Building Evaluation Findings**

### **Accessible Buildings**

#### **Church Street Park**

New sidewalks have recently been constructed leading to this park.

#### **Erving Public Library**

The Library was constructed in 2020 and meets all current ADA regulations and is fully accessible to both the public and staff.

#### **Senior & Community Center**

The Senior Center was newly constructed in 2011 and meets all current ADA regulations and is fully accessible to both the public and staff.

#### **Municipal Parking Lot**

This parking lot in Erving Center has been recently constructed. It contains accessible spaces and is connected to sidewalks and crosswalks.

#### **Park Street Park**

The Park Street Park in Erving side was just recently upgraded with new equipment and parking spaces.

## **Mostly Accessible Buildings**

### **Erving Elementary School**

The Elementary School is mostly accessible because while users can enter the building, engage in the primary function, and use the bathrooms; there are still minor issues throughout the building that prevent it from being completely accessible. These issues are mostly minor and inexpensive to fix and include the following: relocate furniture away from doors and light switches for unimpeded access; secure loose, unsecured carpets; and fix the sidewalks for a smooth path to the playground.

### **Police Station**

The Police Station is considered mostly accessible because a user can enter, access its primary function, and use the bathroom. To become fully accessible would require minor changes that include replacing sink control handles; installing ADA signage; and moving furniture.

### **Riverfront Park**

The recently created Riverfront Park is mostly accessible with just a few issues impeding full access. The major issue is that the ramp to the slide has a significant cross slope, which is dangerous to users with wheeled mobility devices.

### **Zilinski Memorial Field**

The Zilinski Field is mostly accessible in that users can access the primary function of the park and use the bathroom facilities. The Town is currently working on constructing an ADA compliant walkway connecting the parking lot with the basketball court, picnic tables, and playground. ADA signage on the bathroom facilities should be added and covering the pipes under the bathroom sinks will help make the site more accessible.

## **Moderately Accessible Buildings**

### **Fire Station 2**

The Fire Station located in Erving is moderately accessible because using the women's bathroom could be difficult due to the small size of the toilet stall. This building has other issues that are fairly minor to fix. These issues include upgrading the door knobs; adjusting the front door so that it closes more slowly; and installing accessible signage.

## **Town Hall**

The Town Hall is rated as only moderately accessible because users can enter the building, access its primary functions, but not use the bathrooms. Users with a mobility device could have difficulty accessing both the men's and women's bathrooms due to the obstruction of a privacy wall in each space. In addition, other accessibility issues include: lack of ADA wayfinding signage that is tactile and visually contrasting; door knobs are turn-style; and height of service desks. Aside from the bathrooms, most of the issues are relatively inexpensive and easy to correct.

## **Minimally Accessible Buildings**

### **Fire Station 1**

The Fire Station located in Erving Center is minimally accessible because there is no bathroom that is accessible to users with wheeled mobility devices and the front door is too narrow. Replacing sink controls and installing ADA signage would also help make this facility more accessible.

### **Veteran's Memorial Park**

The Veteran's Memorial Park is rated as minimally accessible because users will have difficulty accessing the amenities and/or using the bathroom. There are no accessible routes connecting the many amenities, such as the bleachers, picnic tables, basketball court, and baseball field. The bathrooms are not accessible due to a step to enter and the small size of the facilities. The Town of Erving has plans to redesign and upgrade Veteran's Park to include accessible features.

## **Inaccessible Buildings/Facilities**

### **Highway Garage/Water Department**

The Highway Garage is not accessible at all due to the presence of steps to enter the building; a main entrance door with a step; and the bathrooms are too small to be ADA compliant. There are multiple other issues that create accessibility problems throughout the building. These include a non-compliant ramp in the garage; door knobs are turn-style; and bathrooms are missing grab bars.

### **Pearl B. Care Historical Building**

The Pearl B. Care Building is a historic building and as a result has many accessibility issues. Correcting the issues should be done within the context of the historical nature

of the building. The primary problems are the lack of an accessible restroom on the site and the only way to access the 2<sup>nd</sup> floor is via a staircase.

### **Poplar Mountain Conservation Area**

The Poplar Mountain Conservation Area is a new recreation facility in Erving. It is considered inaccessible because it is a hiking trail that travels over steep and rugged terrain. The only current formal parking is a grassy area on the side of the road, but the Town is currently working on constructing a formal parking lot at the trailhead.

### **Wastewater Treatment Plant and Pump Stations**

The Wastewater Treatment Plant and pump stations are rated as inaccessible because users in wheeled mobility devices cannot enter the buildings due to the presence of steps and narrow doors. Because of the specific nature of the work involved at these sites and very few staff that are permitted access, bringing these buildings to ADA compliance is a low priority.

## **Program Accessibility**

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

Recreational programs offered at Veteran's Memorial Park are not currently accessible due to the lack of connecting paths to many of the amenities. However, Zilinski Field could be an alternative location for sports or other outdoor events/programming until Veteran's Park is redesigned.

The Water Department, Highway Department and Wastewater Department are currently not accessible in their buildings, but staff could conduct meetings at alternative accessible locations such as the Town Hall.



## Part D – ADA Transition Plan

The ADA Transition Plan for Erving catalogs every issue that the FRCOG staff discovered during the Self-Evaluation of the Town’s buildings and facilities between February and April 2022. The Transition Plan recommends solutions to bring these identified issues into compliance with the 2010 ADA Guidelines and then prioritizes them, provides relative costs, estimates a feasible timeframe of implementation, and assigns the issue to the appropriate implementing department. In addition, the majority of issues have been documented with photographs, which can be found in Appendix C.

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

- 1) **Priorities:** High  
Medium  
Low
- 2) **Timeframe:** Short (0-4 years)  
Medium (5-9 years)  
Long (10+ years)  
Ongoing
- 3) **Cost:** \$\$\$\$ (Major capital project)  
\$\$\$  
\$\$  
\$ (Maintenance costs)

Issues were assigned a “High” priority if they:

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

# Erving ADA Self-Evaluation & Transition Plan

Erving Elementary School (28 Northfield Road)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Exterior									
Pavilion	Picnic tables	185	Picnic tables do not have space for wheelchairs.		Replace at least 1 picnic table that has a space for a wheelchair to pull into with sufficient clearance underneath.	Medium	Short	\$\$	School District
Portable Toilet		191	There is no accessible route to the toilet facility.	0	Provide an accessible route with smooth surface to the toilet facility.	High	Short	\$\$	School District
		191	The toilet facility is not accessible for wheelchairs or other mobility devices.	0	Replace current portable toilet with one that is large enough to accommodate wheeled mobility devices and does not have more than 1/4" of a step from the ground.	High	Short	\$\$	School District
Playground									
Playground	Accessible Route	177	There is a 2" gap between the asphalt parking lot and the entrance to the playground surface.	2"	Patch surface so that there is a smooth route into the playground.	High	Short	\$	School District
Access to Goods and Services									
Nurse's Office	Accessible Route	21	Door to hallway does not have 18" of clearance to side of latch on pull side of door due to furniture.		Rearrange furniture to create appropriate clearances.	High	Short	\$	School District
Staff Lounge	Stove	31	Stove has turn control features located at rear of appliance.		Replace stove with one that has control features at the front for easier reach.	Low	Long	\$\$	School District
Hallway	AED		The AED is too high.	56"	Lower the AED so that it is no more than 48" high.	High	Short	\$	School District
Preschool 112	Accessible Route	71	There are loose, unsecured carpets on the floor.		Remove area rug or replace with one that is secured and smooth.	Medium	Short	\$	School District
Kindergarten 111	Refrigerator	87	The refrigerator handle is located on the wall side with not enough clearance to pull.	3"	Rehang door so that it swings away from wall for sufficient clearance to pull door open.	Medium	Medium	\$	School District
Room 106	Accessible Route	117	There is not 18" to the latch side on the pull side of the door, nor is there 12" of clearance on the push side of the door.		Move furniture so that there is 18" to the side of the latch so that door can be pulled open and so that there is 12" of clearance on the push side of the door.	High	Short	\$	School District
Room 103	Accessible Route	143	There is not 12" of clearance on the push side of the door.		Move furniture so that there is 12" of clearance on the push side of the door.	High	Short	\$	School District
Room 102	Light Switches	149	There is no clear floor space to reach the light switches.	0	Move furniture so that there is at least 30" wide x 48" long of clear floor space for a forward approach to the light switches.	High	Short	\$	School District
Room 101	Accessible Route	156	There are loose, unsecured carpets on the floor.		Remove area rug or replace with one that is secured and smooth.	Medium	Short	\$	School District

# Erving ADA Self-Evaluation & Transition Plan

Fire Station 1 (Church Street and E. Main Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
Main Entrance	Door	187	Door is too narrow	29"	Replace door with one that is at least 32" wide.	High	Short	\$\$\$	Fire Department
Entire Building	Signage		There are no accessible signs with tactile lettering.	0	Install signage with visually contrasting/tactile lettering and braille on the wall on latch side of door between 48" and 60" from floor.	Medium	Short	\$\$	Fire Department
Kitchen	Sink	205	There is no clear access to sink for forward approach.	0	Provide a sink with toe and knee clearance for a forward approach.	Medium	Medium	\$\$	Fire Department
	Sink	205	Sink has turn knobs that are not accessible.		Replace fixtures with lever that can be operated with a closed fist.	Medium	Medium	\$\$	Fire Department
Bathroom	Sink	199	Sink has turn knobs that are not accessible.		Replace fixtures with lever that can be operated with a closed fist.	Medium	Medium	\$\$	Fire Department
	Sink	199	Sink has exposed piping underneath.		Cover pipes to prevent contact.	Medium	Medium	\$\$	Fire Department
	Toilet Stalls	198	Toilet stalls are not big enough to maneuver with a personal mobility device.		Enlarge at least one stall to meet minimum dimensions of 48"x56" for maneuverability.	High	Long	\$\$\$\$	Fire Department

# Erving ADA Self-Evaluation & Transition Plan

## Fire Station #2 (Moore Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
Front entrance	Signage	320	There is no sign indicating that the space is reserved for accessible parking.	0	Install a sign that is a minumum of 60" from ground to the bottom of the sign.	Medium	Short	\$	Fire Department
Approach and Entrances									
Main Entrance	Door	324	Door closes too fast.		Adjust door closer so that it closes more slowly (takes at least 5 seconds to reach 12% closed).	High	Short	\$	Fire Department
Entire Building	Signage		Not all rooms are labeled with signs or the existing signs are in the incorrect locations.		Install signage with visually contrasting/tactile lettering and braille on the wall on latch side of door between 48" and 60" from floor.	Medium	Medium	\$\$	Fire Department
Doors	Doorway	346	Most doors have turn control knobs, which can be difficult to operate.		Replace with lever-style door fixtures.	High	Short	\$\$	Fire Department
Womens Bathroom	Stall	391	Toilet stall is too narrow.		Remove partition for additional room and make room single use.	High	Medium	\$	Fire Department
Mens Bathroom	Shower	403	Shower has a step to enter and is too narrow.	6" step 21" width	Replace shower with one that has a maximum threshold of 1/4" and is 60" x 36" wide.	Low	Long	\$\$\$\$	Fire Department

# Erving ADA Self-Evaluation & Transition Plan

Highway Garage and Water Department (Public Works Bldv)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
Parking	Accessible Parking	35	The sign marking the ADA space is too low.	44"	Raise height of signs to a minumum of 60" from ground to the bottom of the sign.	Medium	Short	\$	Highway Department
Access to Goods and Services									
Entire building	Signage	61	Signage is not posted to the latch side of the door and is not tactile.		Install signage with visually contrasting/tactile lettering and braille on the wall on latch side of door no higher than 60".	High	Short	\$\$	Highway Department
Doors	Door Handles	56	Most doors have turn control knobs, which can be difficult to operate.		Replace with lever-style door fixtures.	High	Short	\$\$	Highway Department
Main Entrance	Accessible Route	43	Sidewalk leading to main entrance has 4 steps.		Redesign approach so that there is a ramp that is 36" wide and a slope that does not exceed 8.3%.	High	Medium	\$\$\$	Highway Department
Main Entrance	Doorway	44	The door has a high step at the threshold.	6.5"	Redesign doorway so that threshold that does not exceed 1/4".	High	Medium	\$\$\$	Highway Department
Entrance from Garage	Ramp	50	The ramp to enter the building from garage is too steep with no handrails.	15%	Install handrails along open side of ramp and redesign ramp so that slope does not exceed 8.33%.	Low	Long	\$\$\$	Highway Department
Breakroom	Sink	64	Sink does not have toe or knee clearance positioned for a forward approach.	0	Provide a sink with toe and knee clearance of 17"-25" for a forward approach.	Low	Long	\$\$	Highway Department
Women' Bathroom	Doorway	55	Door is too narrow.	28"	Widen doorway so that it is a minimum of 32" wide.	High	Medium	\$\$\$	Highway Department
	Bathroom	53	Bathroom is not big enough to maneuver with a personal mobility device.		Enlarge room to meet minimum dimensions of 60"x56" for maneuverability or reverse the door swing.	High	Medium	\$\$-\$\$\$\$	Highway Department
	Sink	54	Pipes under sink are exposed and could be a strike hazard.		Cover pipes to protect against contact.	Low	Medium	\$\$	Highway Department
	Toilet	53	There are no grab bars.	0	Install side and rear grab bars for toilet 33" high from floor.	High	Medium	\$\$	Highway Department
	Toilet	53	Flush control is not on the open side.		Reconfigure flush control to be on the open side of the stall.	Medium	Medium	\$\$	Highway Department
Men's Bathroom	Bathroom	53	Bathroom is not big enough to maneuver with a personal mobility device.		Enlarge room to meet minimum dimensions of 60"x56" for maneuverability or reverse the door swing.	High	Long	\$\$\$\$	Highway Department
	Vestibule	67	Privacy wall is too close to entrance.	25"	Relocate privacy wall so that there is a minimum of 42" from door latch to privacy wall and 24" to the side of the door to turn. Reverse door swing. Alternatively, remove privacy wall.	High	Medium	\$\$-\$\$\$\$	Highway Department
	Shower	73	Shower threshold is too high.	4"	Remove threshold so that it does not exceed 1/4" high.	Low	Long	\$\$\$	Highway Department

# Erving ADA Self-Evaluation & Transition Plan

Library (2 Care Drive)

Location	Floor	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking										
Front entrance		Sidewalk	228	Cement surface is rough, making it difficult for a wheeled mobility device to maneuver.		Resurface sidewalk for a smoother texture.	Medium	Short	\$\$	Town Administrator
Access to Goods and Services										
Kitchen		Sink	237	Sink does not have toe or knee clearance positioned for a forward approach.	0	Provide a sink with toe and knee clearance of 17"-25" for a forward approach.	Low	Long	\$\$	Town Administrator

# Erving ADA Self-Evaluation & Transition Plan

Municipal Parking Lot (West Main Street)

Location	Floor	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking										
No issues found at this site.										

# Erving ADA Self-Evaluation & Transition Plan

Pearl B. Care Historical Building (East Main Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
Entire Building	Accessible Routes	225	There is furniture and objects preventing a clear accessible path through the building.		Move furniture and objects so that a clear path of at least 36" is maintained.	Low	Short	\$	Historical Commission
	Bathroom	229	If there is a bathroom, it is located in the basement down narrow, steep stairs.		Install a bathroom on the ground floor.	Low	Long	\$\$\$\$	Historical Commission
Second Floor	Accessible Routes	233	There is no elevator or lift to the second floor.		Install a lift to the second floor if it is intended to be publically accessible.	Low	Long	\$\$\$\$	Historical Commission



# Erving ADA Self-Evaluation & Transition Plan

Police Station (71 French King Highway)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Access to Goods and Services									
Kitchen	Sink	264	Sink has turn knobs that are not accessible.		Replace fixtures with levers that can be operated with a closed fist.	Medium	Medium	\$\$	Police Department
Holding Cells	Doorways	281	Doorways into the holding cells are too narrow.	30"	Widen doorways to a minimum of 32".	Low	Long	\$\$	Police Department
	Accessible Route	279	There is a filing cabinet blocking a portion of the doorway to Cell 1.		Relocate filing cabinet so that there is a minimum width of 36" for an accessible route.	Low	Long	\$	Police Department
Accessible Bathroom	Signage	294	Signage indicating the ADA bathroom is not in the correct location.		Relocate signage with visually contrasting/tactile lettering and braille on the wall on latch side of door between 48" and 60" from floor.	Medium	Short	\$	Police Department

# Erving ADA Self-Evaluation & Transition Plan

Senior Center (1 Care Drive)

Location	Floor	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking										
Front entrance		Signage		Signs for ADA spaces are too low.	48"	Raise height of signs to a minumum of 60" from ground to the bottom of the sign.	Medium	Short	\$	Town Administrator
Access to Goods and Services										
Arts & Craft Room and Gym		Sink	219	Sink does not have toe or knee clearance positioned for a forward approach.	0	Provide a sink with toe and knee clearance of 17"-25" for a forward approach.	Low	Long	\$\$	Town Administrator
Service Desk		Service Desk	220	There is a not a clear floor space of at least 30" wide x 48" long for a parallel approach to the service desk.		Move furniture so that there is sufficient space in front of the service desk.	Medium	Short	\$	Senior Center

# Erving ADA Self-Evaluation & Transition Plan

Town Hall (12 East Main Street)

\*\* Functions as the Town's Polling Place

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
Lower level ramp	Accessible Route	376	Ramp has a steep cross slope.	3.26%	Reconstruct ramp so that it has a maximum cross slope of 2%.	Low	Long	\$\$\$	Town Administrator
Access to Goods and Services									
Elevator	Signage	368	There is no signage on door jambs indicating the floor number or the main floor.		Install a sign on both door jambs at every floor identifying the floor number. Install a tactile star on both door jambs at the main ground entry level.	High	Short	\$	Town Administrator
Tax Collector, Town Clerk	Service Desk	346	Service desk is too high.	44"	Lower service desk to no more than 36" high. Ensure that there is a floor clearance of at least 30" x 48" for a parallel approach to the service desk.	High	Short	\$\$\$	Town Administrator
Entire building	Signage	342	Signage is not posted on the latch side of the door and is not tactile.		Install signage with visually contrasting/tactile lettering and braille on the wall on latch side of door between 48" and 60" from floor.	High	Short	\$\$	Town Administrator
Entire building	Doorway	347	Most doors have turn control knobs, which can be difficult to operate.		Replace with lever-style door fixtures.	High	Short	\$\$	Town Administrator
Water fountain		341	Water fountain is too high with not enough clearance underneath. Nor is there sufficient clear floor space near spigot.		Replace water fountain with one that is no higher than 48" from floor and has a depth of 20". Ensure a clear floor space of 30" x 48" for a forward approach.	Medium	Medium	\$\$\$	Town Administrator
Stairway	Handrails	354	The handrail does not reutrn to a wall, guard, or landing surface.		Replace handrails with one that extends at least 12" past bottom of stairs and returns to a wall, guard, or landing surface.	Medium	Long	\$\$\$	Town Administrator
Women's Bathroom	Signage	355	There is no signage on latch side of door indicating that bathroom is accessible.		Install signage with ADA symbol on latch side of door between 48" and 60" from floor.	High	Short	\$	Town Administrator
	ADA Stall	357	Door does not self-close.		Install or repair closer on door so that it self-closes.	High	Short	\$	Town Administrator
	Accessible Route	355	There is not sufficient mauneuvering space to enter the restroom due to proximity of privacy wall to doorway.	36"	Relocate or remove wall so that there is at least 42" of space past doorway.	High	Medium	\$\$\$\$	Town Administrator
Men's Bathroom	Accessible Route	371	There is not sufficient mauneuvering space to enter the restroom due to proximity of privacy wall to doorway.	36"	Relocate or remove wall so that there is at least 42" of space past doorway.	High	Medium	\$\$\$\$	Town Administrator
	Toilet	372	Flush control is on the wrong side of the toilet.		Relocate flush control to the open side of the toilet.	Medium	Medium	\$\$	Town Administrator
Basement Offices	Threshold	361	Threshold is too high.	1"	Lower threshold or install bevel so that there is a height difference of no more than 1/4"	Medium	Short	\$\$	Town Administrator
Kitchen	Sink	366	Sink control knobs are turn style.		Replace faucet sink controls with lever style controls.	Medium	Medium	\$\$	Town Administrator

# Erving ADA Self-Evaluation & Transition Plan

Church Street Park (Church Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Access to Goods and Services									
No issues found at this site.									

# Erving ADA Self-Evaluation & Transition Plan

Old Town Hall Site (Hanson Court)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
	Accessible parking		The closest accessible parking is located across the street at the Municipal Parking Lot.		Create an accessible space on Hanson Court.	Low	Long	\$\$\$	Highway Department

# Erving ADA Self-Evaluation & Transition Plan

Park Street Park (Park Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
	Accessible Route	282	There is no path connecting the parking lot to the swinging bench.		Create a smooth, path from parking to all amenities.	Low	Long	\$\$\$	Recreation Commission

# Erving ADA Self-Evaluation & Transition Plan

Poplar Mountain Conservation Area (Old State Road)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
Parking	Accessible Parking		There is no ADA parking designated.	0	Designate at least 1 space as accessible with a sign.	Low	Short	\$	Recreation Commission
Access to Goods and Services									
	Accessible Route		Trail is rugged and uneven.		Continue to maintain trail for individuals with minor ambulatory disabilities. Creation of a wheelchair accessible trail is not practical.	Medium	Ongoing	\$	Recreation Commission

# Erving ADA Self-Evaluation & Transition Plan

Riverfront Park (Arch Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
	Accessible parking	299	Sign for accessible parking is too low.	43"	Raise height of sign so that it is at least 60" from ground.	High	Low	\$	Recreation Commission
Access to Goods and Services									
	Accessible Route	310	Ramp to slide has a significant cross slope at landing.	8%	Resurface ramp so that the cross slope does not exceed 2%.	Medium	Medium	\$\$-\$\$\$	Recreation Commission



# Erving ADA Self-Evaluation & Transition Plan

## Veterans Memorial Park (Moore Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
	Accessible Route	272	There is no path connecting the parking lot to the bleachers, picnic table, bike rack, or basketball court.		Create a smooth path from parking to amenities.	High	Medium	\$\$\$	Recreation Commission
Parking									
	Accessible parking		There is no sign designating the ADA space as accessible.	0	Install a sign designating the parking space as accessible at least 60" from the ground.	High	Low	\$	Recreation Commission
Access to Goods and Services									
	Tennis Court	279	Surface of tennis court is cracked and uneven.		Resurface tennis court.	Low	Long	\$\$\$\$	Recreation Commission
	Bleachers	277	Bleachers are in poor condition and are difficult to navigate.		Update bleachers with ones that are more accessible (ex. have handrails).	Low	Long	\$\$\$\$	Recreation Commission
Bathrooms	Accessible Route	312	Approach to bathroom doors is too small with a high threshold to doors.		Enlarge concrete pad to provide a larger area to maneuver. Raise height of landing concrete so that there is a maximum threshold of no more than 1/4".	Medium	Long	\$\$\$\$	Recreation Commission
	Bathroom	53	Bathroom is not big enough to maneuver with a personal mobility device.		Enlarge room to meet minumum dimensions of 60"x56" for maneuverability or reverse the door swing.	Medium	Long	\$\$\$\$	Recreation Commission
	Sink	54	Pipes under sink are exposed and could be a strike hazard.		Cover pipes to protect against contact.	Low	Medium	\$\$	Recreation Commission
	Sink	264	Sink has turn knobs that are not accessible.		Replace fixtures with levers that can be operated with a closed fist.	Medium	Medium	\$\$	Recreation Commission
	Toilet	53	There are no grab bars.	0	Install side and rear grab bars for toilet 33" high from floor.	Medium	Medium	\$\$	Recreation Commission

# Erving ADA Self-Evaluation & Transition Plan

Zilinski Memorial Field (Prospect Street Ext)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
	Accessible Route	272	There is no path connecting the parking lot to the bleachers, picnic tables, or playground.	0	Create a smooth, path from parking to amenities.	High	Short	\$\$\$	Recreation Commission
Parking									
	Accessible parking		There is no sign designating a parking space as accessible.	0	Install a sign designating a parking space as accessible at least 60" from the ground.	High	Low	\$\$	Recreation Commission
Access to Goods and Services									
	Dugouts	167	There is a step to enter the dugouts.	6"	Install ramp to enter dugouts and widen doorway to a minumum of 32".	Low	Long	\$\$\$	Recreation Commission
	Bleachers	168	Bleachers are difficult to navigate.		Update bleachers with ones that are more accessible (ex. have handrails)	Low	Long	\$\$\$\$	Recreation Commission
Bathrooms	Signage	153	There is no signage indicating which bathroom is accessible.	0	Install signage with visually contrasting/tactile lettering and braille on the wall on latch side of door between 48" and 60" from floor.	Medium	Short	\$\$	Recreation Commission
	Sink	158	Pipes under sinks are exposed and could be a strike hazard.		Cover pipes to protect against contact.	Low	Medium	\$\$	Recreation Commission
	Sink	158	Sinks have turn knobs that are not accessible.		Replace fixtures with levers that can be operated with a closed fist.	Medium	Medium	\$\$	Recreation Commission
	Toilet	165	Not every toilet room has a rear grab bar.	0	Install side and rear grab bars for toilet 33" high from floor.	Medium	Medium	\$\$	Recreation Commission
Playground	Accessible Route	317	Surface is covered in mulch making access difficult.		Make sure that ground surface complies with current <i>ASTM Standard Specification for Determination of Accessibility of Surface Systems Under and Around Playground Equipment</i> .	Medium	Medium	\$\$\$	Recreation Commission

# Erving ADA Self-Evaluation & Transition Plan

Erving Center Cemetery (Mountain Road)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
Parking	Accessible Parking		There are no parking spaces designated as accessible.	0	Designate 1 space as accessible that is 8' wide with a 5' wide aisle.	Low	Long	\$	Highway Department

# Erving ADA Self-Evaluation & Transition Plan

## Pump Station (Arch Street)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Access to Goods and Services									
Entrance	Stairs	126	There are steps to enter the pump station.	3 steps	Install a ramp to enter the station.	Low	Long	\$\$\$	Water Department

## POTW#2 (Waste Water Road)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Access to Goods and Services									
Entrance	Stairs	131	There is a flight of stairs to enter the building.	6 stairs	Install ramp to the building.	Low	Long	\$\$\$\$	Wastewater Department
Parking	Accessible Space	128	There is no sign designating the ADA space as accessible.	0	Install a sign designating the parking space as accessible at least 60" from the ground.	Medium	Long	\$\$	Wastewater Department

## POTW#3 (Farley)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Access to Goods and Services									
Entrance	Stairs	110	There is a step to enter the valve building.	2"	Raise path height so there is a threshold that does not exceed 1/4".	Low	Long	\$\$	Water Department

## River Street Pumps (34 River St)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Access to Goods and Services									
Entrance	Door	96	The doorway width is too narrow.	28"	Change door so that it is a minimum of 32" wide.	Low	Long	\$\$	Water Department

# Appendix A

## Erving's Notice of Nondiscrimination and Complaint Procedure

### Non-Discrimination Notice

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), the Town of Erving will not discriminate against qualified individuals on the basis of disability in its services, programs, or activities.

**Employment:** The Town of Erving does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the ADA.

**Effective Communication:** The Town of Erving will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Town of Erving programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

**Modifications to Policies and Procedures:** The Town of Erving will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in Town of Erving offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the Town of Erving, should contact the office of the Select Board as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the Town of Erving to take any action that would fundamentally alter the nature of its programs or services or impose an undue financial or administrative burden. Complaints that a program, service, or activity of the Town of Erving is not accessible to persons with disabilities should be directed to:

**Bryan Smith, ADA Coordinator, 12 East Main Street, Erving, MA 01344.**

The Town of Erving will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing the auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to person who use wheelchairs.

## **Town of Erving ADA GRIEVANCE PROCEDURE**

The Town of Erving has adopted an internal grievance procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by the U.S. Department of Justice regulations implementing Title II of the Americans with Disabilities Act. Title II states, in part, that "no otherwise qualified disabled individual shall, solely by reason of such disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination" in programs or activities sponsored by a public entity.

Complaints should be addressed to:

Bryan Smith, Administrative Coordinator  
12 East Main Street  
Erving, MA 01344  
(413) 422-2800  
(or successor as ADA Coordinator)

1. A complaint should be filed in writing, contain the name, address, and phone number of the person filing it, and briefly describe the alleged violation of the regulations. Other arrangements for submission of a grievance such as a personal interview or tape recording will be made available for people with visual impairments or those with motor impairments upon notification of such impairments.
2. A complaint should be filed within 30 days after the complainant becomes aware of the alleged violation. (Processing of allegations of violations of the act which occurred before this grievance procedure was in place will be considered on a case-by-case basis.)
3. An investigation, as determined necessary by the ADA Coordinator, shall be made within a reasonable time following the filing of a complaint. Said investigation shall be conducted by the ADA Coordinator or his designee. These rules contemplate an informal but thorough investigation affording the person or persons alleging a violation and their representative, if any, an opportunity to submit relevant material in connection with the complaint.
4. A written determination of the findings made as a result of the investigation, and the proposed resolution, if any, shall be issued by the ADA Coordinator and copy shall be forwarded to the Complainant with 15 working days after its being filed with the Complaint file.
5. The ADA Coordinator shall maintain the files and records of the Town of Erving relating to the complaints filed with him under the ADA.
6. The Complainant may request a reconsideration of the finding made by the-ADA Coordinator by the Board of Selectmen. The request for a reconsideration must be made in writing and submitted to the Board of Selectmen within seven (7) business days of the mailing of the determination to the Complainant. The Board of Selectmen shall review the findings made by the ADA Coordinator and may either affirm or reject that determination. No new evidence or material shall be submitted to the Board of Selectmen regarding any request for reconsideration except to the extent that the same is requested in writing by the Board. Any determination by the Board of Selectmen shall be final.

## **Appendix B**

Summary of responses by Erving Department Heads regarding ADA Policy Requirements

Effective Communication Checklists

General Nondiscrimination Checklists

Website Checklists

# Erving ADA Self-Evaluation

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



# Erving ADA Self-Evaluation

Effective Communication Checklist		Total Responses	
	Questions	Yes	No
12)	Where telephones are available to the public for making outgoing calls, such as in hospital waiting rooms, are TTYs available for people with hearing and speech disabilities?		7
13)	Do telephone emergency services, including 911, provide direct access to people who use TTYs and computer modems?	2	4

# Erving ADA Self-Evaluation

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

# Erving ADA Self-Evaluation

General Nondiscrimination Checklist		Total Responses	
	Questions	Yes	No
	c. They may not ask about the nature and extent of the individual's disability, but may ask an individual to provide a credible assurance that the mobility device is required because of the person's disability?	6	3
12)	Are employees and officials aware that the public entity may not place a surcharge on people with disabilities to cover the costs of measures, such as the provision of auxiliary aids or program accessibility, that are required to provide nondiscriminatory treatment?	6	3
13)	Are tickets for accessible seats sold during the same hours; through the same methods of purchase (by telephone, on site, through a website, or through third-party vendors); and during the same stages of sales (pre-sales, promotions, general sales, wait lists, or lotteries) as non-accessible seats?	1	5
14)	If accessible seating is not available in areas of the venue with lower prices, is lower priced accessible seating available in higher priced locations?		5
15)	Do venues and third-party sellers provide the same information about accessible seats as provided about non-accessible seats?		5
16)	Can ticket sellers describe accessible seating in enough detail to permit the purchaser to determine if a seat meets his or her needs?	1	4
17)	Do ticket sellers know that people purchasing a ticket for a wheelchair space may purchase up to three additional seats for their companions as close as possible to the wheelchair space and that these companion seats may include wheelchair spaces?		5
18)	Do ticket sellers know that unsold accessible seats may be released and sold to members of the general public in only one of three circumstances: when all non-accessible seats have been sold (excluding luxury boxes, club boxes, suites, and seats the venue holds been sold; or when all non-accessible seats in a particular price category have been sold back when declaring a sell-out); or when all non-accessible seats in a particular seating section have been sold; or when all non-accessible seats in a particular price category have been sold?		5
19)	If the venue permits patrons to give or sell their tickets to others, does the venue know that the same right must be extended to patrons with disabilities and that those tickets may be sold to someone who does not have a disability?		5
20)	Do ticket sellers know that for single event tickets, venues may ask purchasers to state that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?		5
21)	Do ticket sellers know that for series of events tickets, purchasers may be asked to attest in writing that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?		5
22)	Is information about the public entity's accessible services, activities and facilities available to the public and to current and future program participants?	3	4

# Erving ADA Self-Evaluation

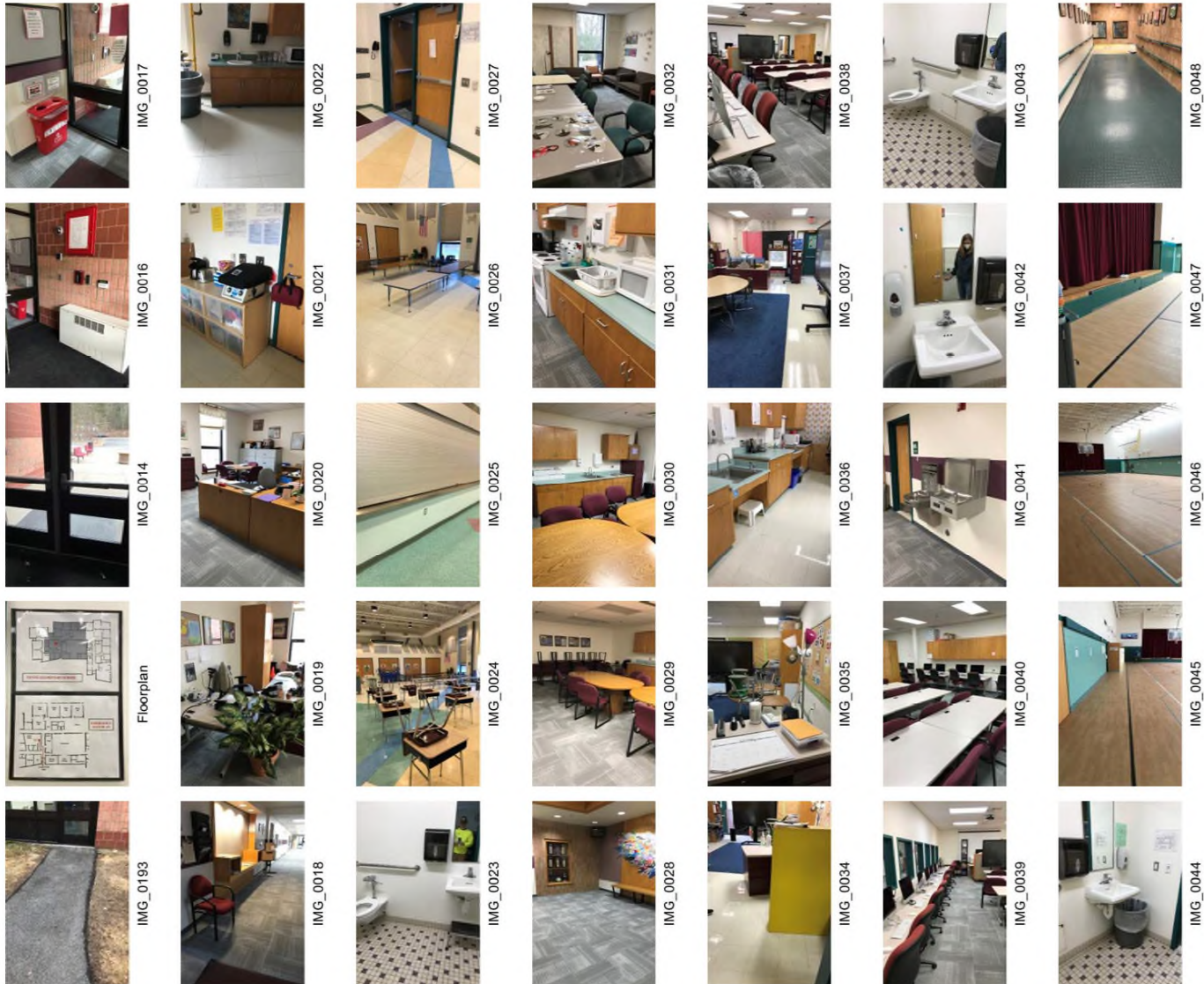
## Website Accessibility Checklist

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

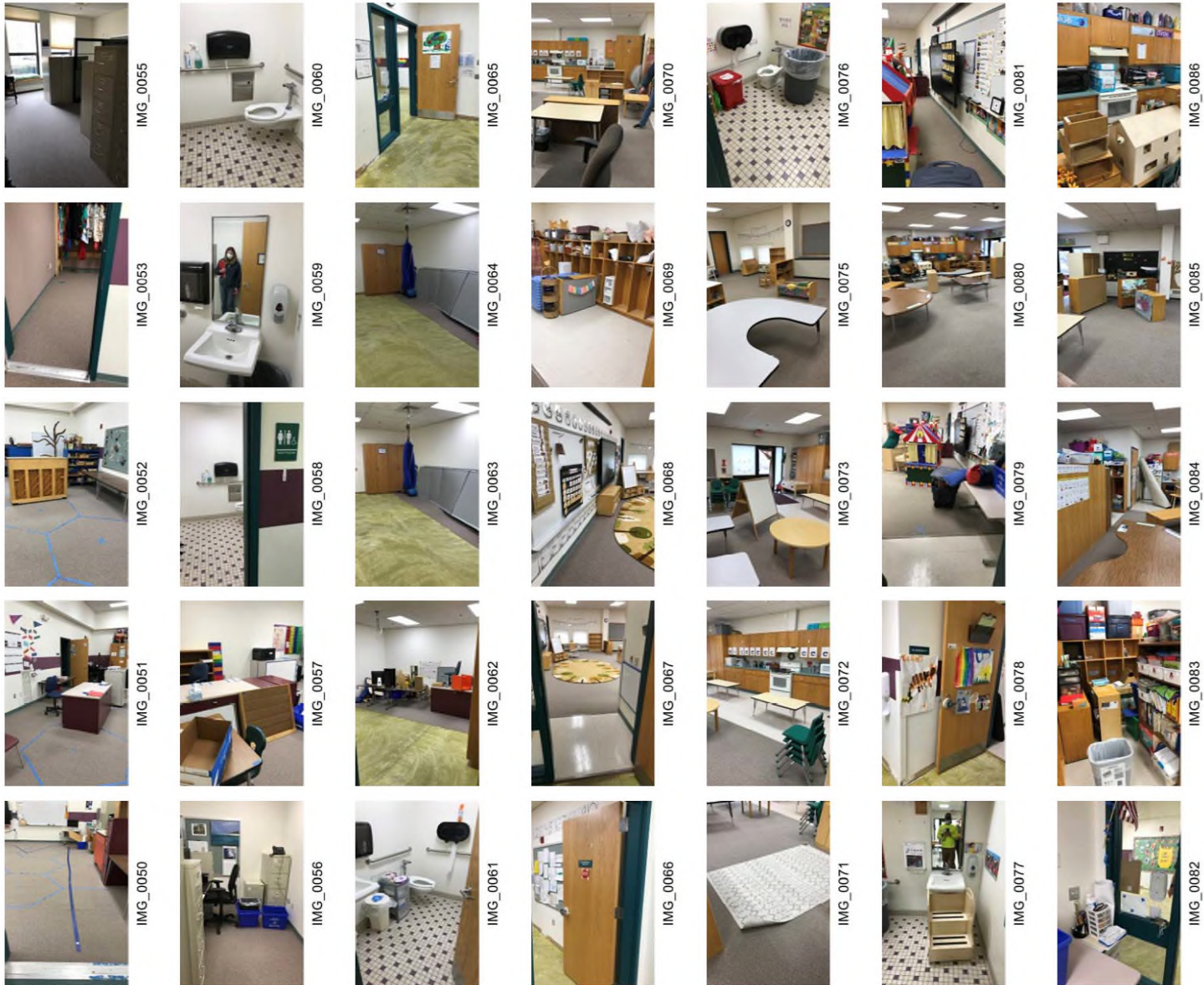
## **Appendix C**

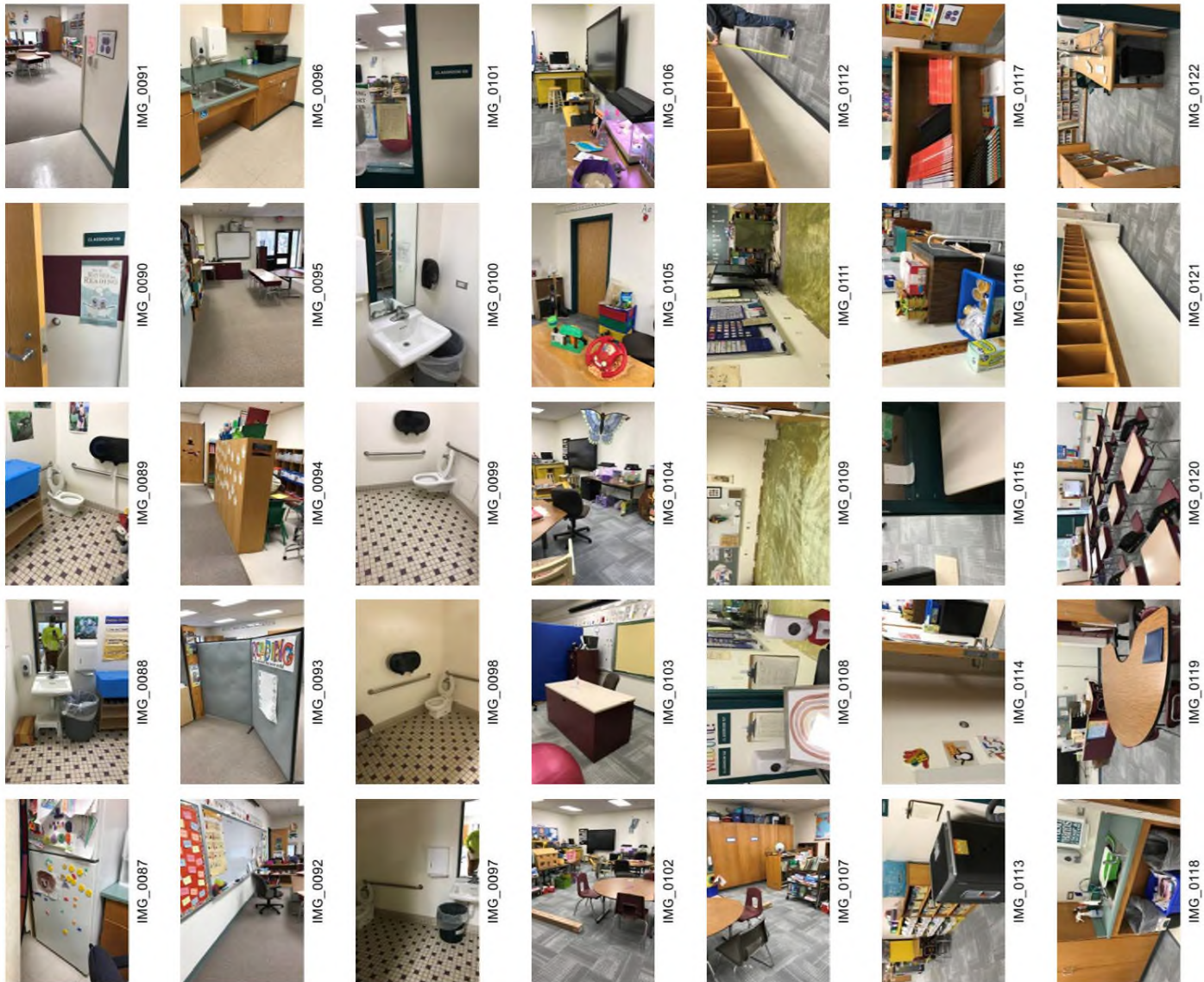
Photographs documenting issues found in the Transition Plan

## Erving Elementary School













IMG\_0127



IMG\_0126



IMG\_0125



IMG\_0124



IMG\_0123



IMG\_0133



IMG\_0132



IMG\_0130



IMG\_0129



IMG\_0128



IMG\_0139



IMG\_0137



IMG\_0136



IMG\_0135



IMG\_0134



IMG\_0144



IMG\_0143



IMG\_0142



IMG\_0141



IMG\_0140



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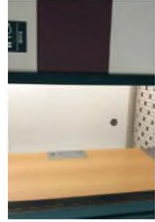
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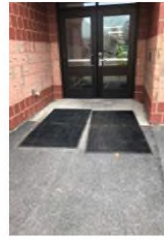
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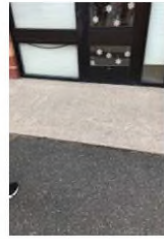
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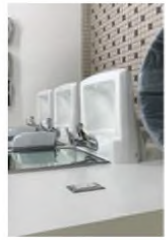
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## Erving Center Fire Station



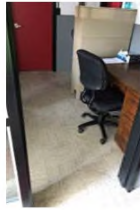
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IMG\_0207



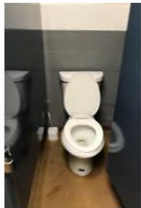
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IMG\_0199



IMG\_0205



IMG\_0184



IMG\_0190

## Erving Fire Station 2



IMG\_0320



IMG\_0325



IMG\_0331



IMG\_0338



IMG\_0345



IMG\_0356



IMG\_0361



IMG\_0419



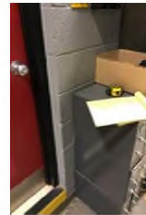
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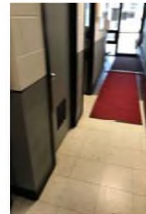
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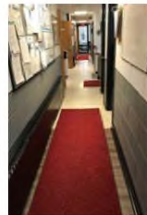
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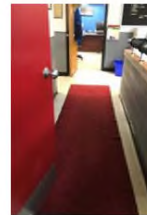
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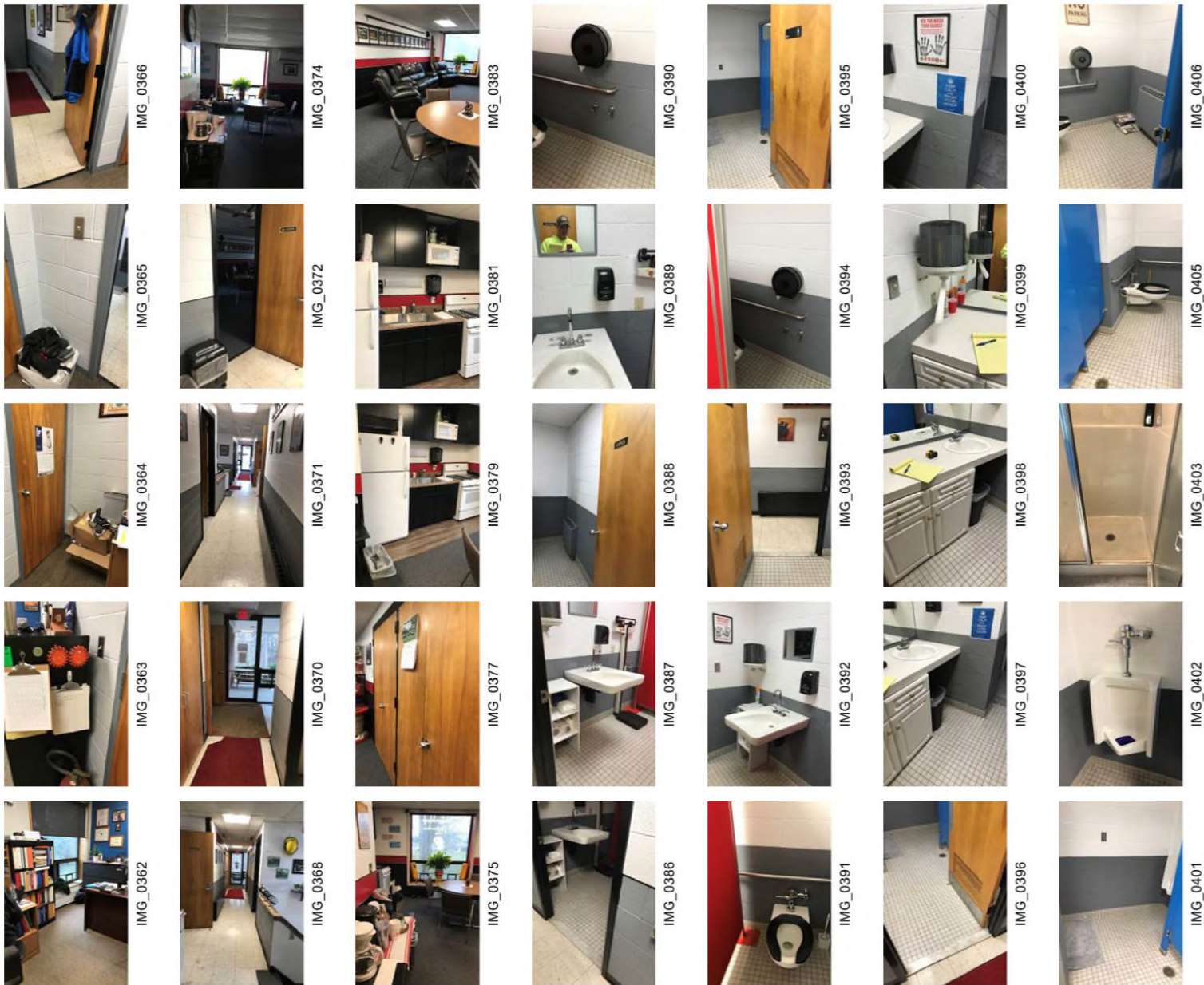


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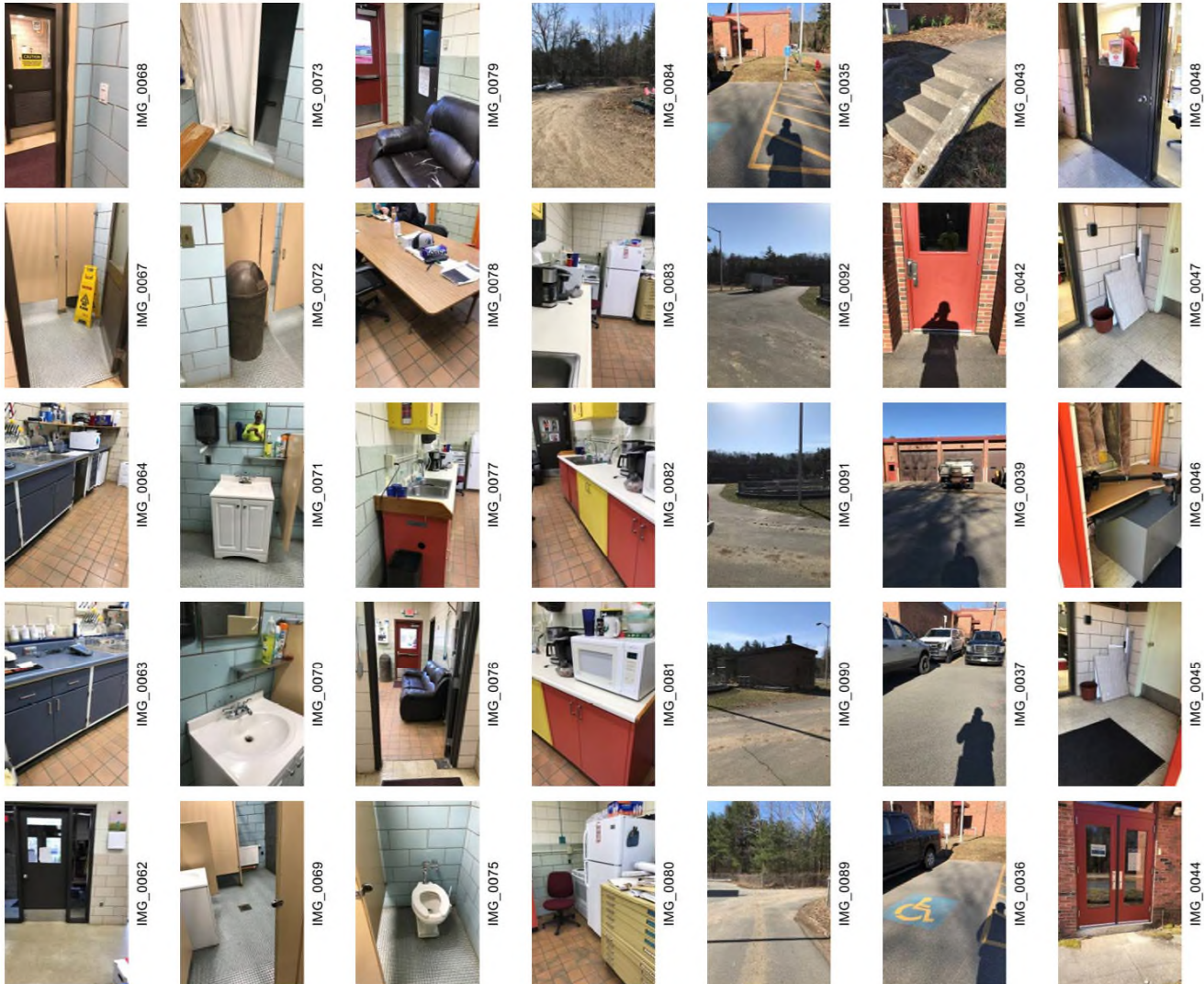


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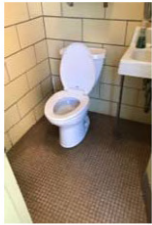




## Highway Garage and Water Department



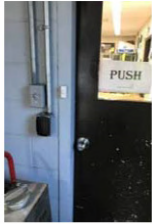




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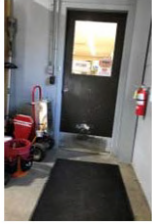
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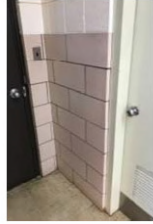
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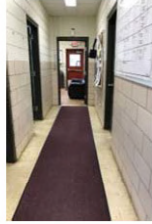
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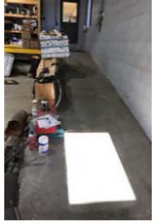
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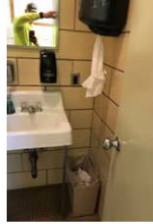
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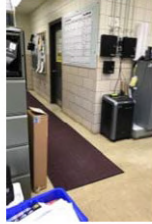
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IMG\_0059

## Library



IMG\_0227



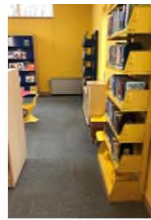
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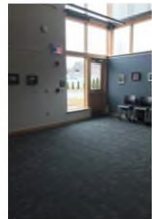
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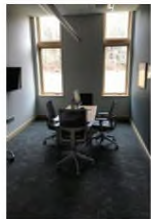
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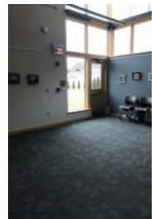
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IMG\_0229



IMG\_0234



IMG\_0239



IMG\_0247



IMG\_0252



IMG\_0258



IMG\_0264



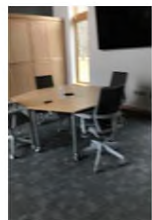
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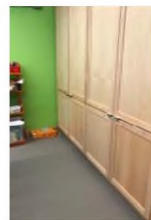
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IMG\_0246



IMG\_0251



IMG\_0257



IMG\_0263



## Municipal Parking Lot



20210916\_133112



20210916\_133213

## Old Town Hall Site



IMG\_0141



IMG\_0140



IMG\_0138



IMG\_0148



IMG\_0147



IMG\_0145



IMG\_0144



IMG\_0143



IMG\_0142

## Pearl B. Care Building



IMG\_0220



IMG\_0225



IMG\_0232



IMG\_0219



IMG\_0224



IMG\_0231



IMG\_0217



IMG\_0223



IMG\_0229



IMG\_0235



IMG\_0215



IMG\_0222



IMG\_0228



IMG\_0234



IMG\_0237



IMG\_0221



IMG\_0226

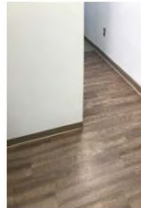


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## Police Station



IMG\_0304



IMG\_0241



IMG\_0247



IMG\_0252



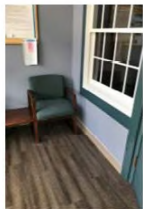
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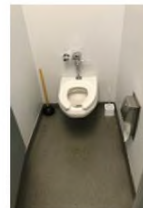
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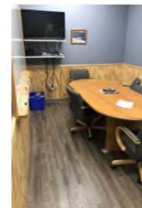
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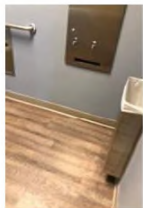
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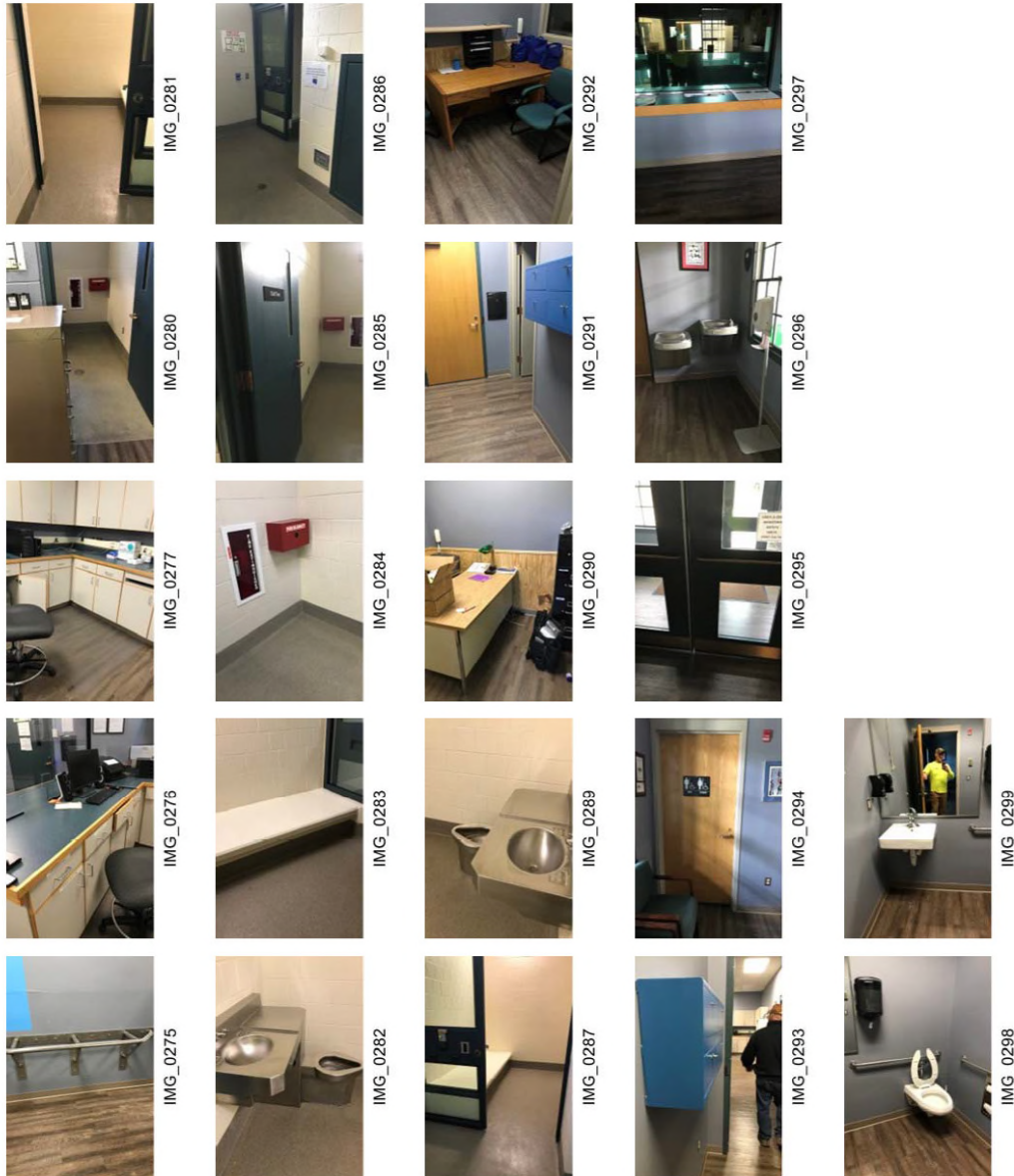


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IMG\_0267





## Senior Center



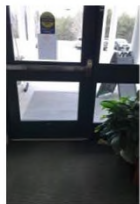
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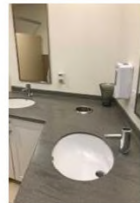
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IMG\_0215



IMG\_0214



IMG\_0213



IMG\_0221



IMG\_0220

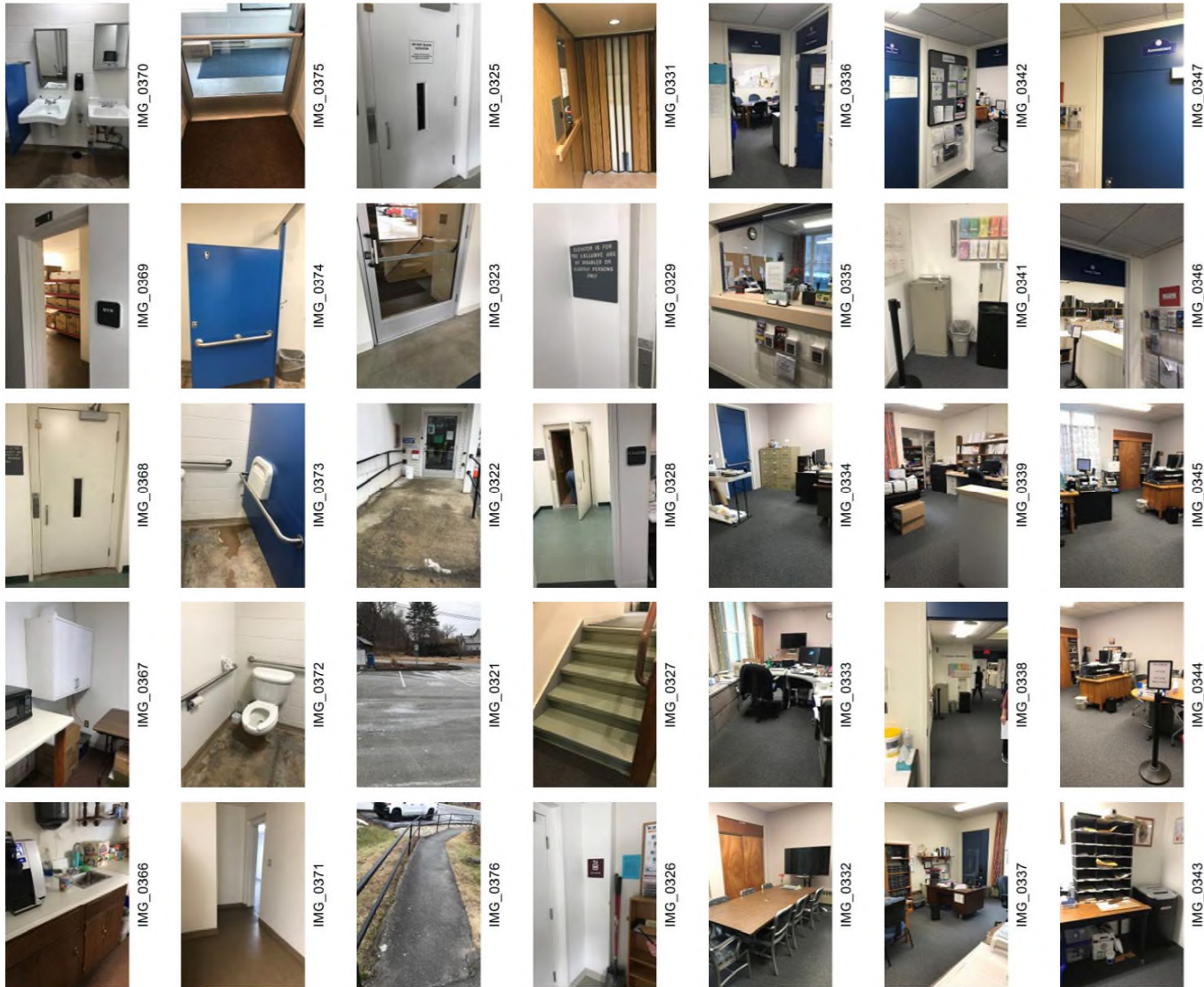


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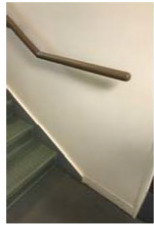


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## Town Hall



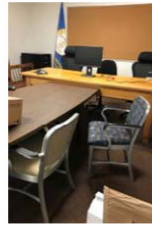




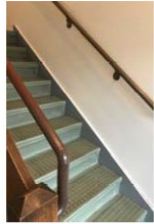
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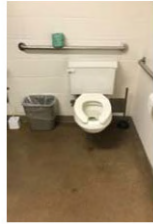
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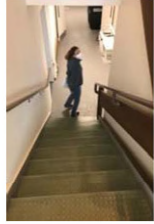
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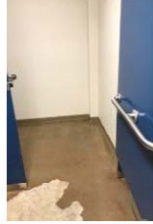
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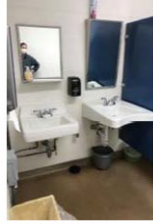
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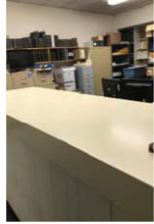
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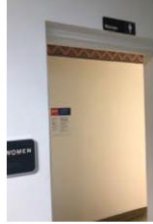
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IMG\_0355



IMG\_0361

## Church Street Park



IMG\_0318



IMG\_0317



IMG\_0320

## Park Street Park



IMG\_0283



IMG\_0282



IMG\_0281



IMG\_0280



IMG\_0297



IMG\_0292



IMG\_0290



IMG\_0288



IMG\_0286



IMG\_0284



IMG\_0295



IMG\_0293

## Poplar Mountain



IMG\_4489



IMG\_4574



## Riverfront Park



IMG\_0301



IMG\_0307



IMG\_0299



IMG\_0306



IMG\_0316



IMG\_0304



IMG\_0311



IMG\_0314



IMG\_0303



IMG\_0310



IMG\_0313

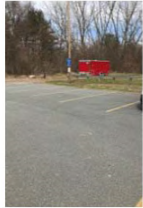


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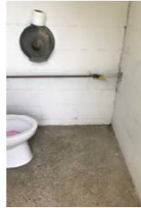


IMG\_0309

## Veteran's Park



IMG\_0310



IMG\_0316



IMG\_0272



IMG\_0309



IMG\_0315



IMG\_0271



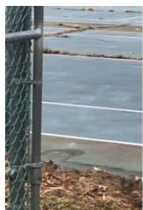
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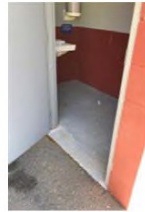


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## Zilinski Field



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IMG\_0162



IMG\_0167



IMG\_0173



IMG\_0179



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IMG\_0161



IMG\_0166



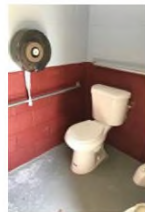
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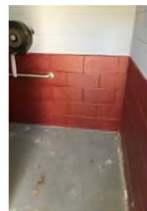
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IMG\_0169



IMG\_0175



IMG\_0182



IMG\_0183



IMG\_0157



IMG\_0163



IMG\_0168



IMG\_0174



IMG\_0180



## Erving Center Cemetery



IMG\_0432



IMG\_0438



IMG\_0431



IMG\_0437



IMG\_0429



IMG\_0436



IMG\_0428



IMG\_0434



IMG\_0442



IMG\_0446



IMG\_0433



IMG\_0440

## Holton Cemetery



IMG\_0424



IMG\_0423



IMG\_0422



IMG\_0421



IMG\_0427



IMG\_0425

## Pump Houses



IMG\_0124



IMG\_0123



IMG\_0122



IMG\_0121



IMG\_0126



IMG\_0125



IMG\_0111



IMG\_0110



IMG\_0109



IMG\_0108



IMG\_0120



IMG\_0117



IMG\_0116



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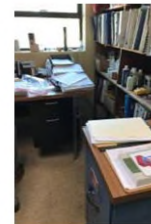
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IMG\_0134



IMG\_0097



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IMG\_0100



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IMG\_0104



IMG\_0103



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