
ADA Self-Evaluation and Transition Plan for Municipalities

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General Information on the Institute for Human Centered Design

The Institute for Human Centered Design (IHCD) is an international education and design non-profit organization committed to advancing the role of design in expanding opportunity and enhancing experience for people of all ages, abilities and cultures through excellence in design. IHCD was founded in Boston in 1978 as Adaptive Environments and changed its name on its 30th anniversary to have an identity more reflective of current work. Our headquarters remain in Boston though some of the team work remotely in other parts of the US.

IHCD meets its mission through an unusual mix of education, technical assistance, consulting and inter-disciplinary design services. Each activity informs the others for a dynamic interplay of expertise, learning and exploration. We are deep content experts in both accessibility and universal/inclusive design. IHCD understands accessibility as a floor or baseline for inclusive design and the practice of designing for people across the broadest spectrum of ability and age as a dynamic activity at the heart of socially sustainable design.

IHCD Consulting and Design Services:

IHCD has a rare capacity for holistic consulting that can assess the physical, information, communication, and/or service environments of our clients. A wide range of consulting and design projects over the years include ADA Self-Evaluations and Transition Plans commonly with an overlay of considerations for opportunities for inclusive design, review of existing conditions for accessibility compliance and inclusive design opportunities in physical and digital environments, design review during the course of design development for new buildings, major renovations, landscapes, urban realm, exhibits, all aspects of print, digital and environmental graphics as well as service design. Consulting and design clients include museums, universities, government entities, public transit and private entities. Projects vary from local to international.

Beyond “Personas,” Engaging User/Experts:

IHCD believes that the most robust method of learning what users need and want is by engaging real people in assessing what works and what fails. We review environments such as exhibits, elements of the public realm, service environments like libraries or welfare offices, websites, apps and distance learning, and products. IHCD has hundreds of user/experts from adolescents to elders with a wide range of physical, sensory and brain-based functional limitations and can tailor a team of user/experts appropriate to the issues to be evaluated (e.g., older people when considering bus transit, young adults when considering apps and distance learning, culturally diverse families when considering public recreation, a mix of ages and physical, sensory and brain-based conditions for public buildings and places of public accommodation). When analysis would benefit from user/experts and the project is far from IHCD’s headquarters in Boston, IHCD recruits user/experts wherever the client is based. Using contextual inquiry methods, IHCD generates immediately pertinent, detailed information for that environment that range from small, cost-neutral changes to significant insights that change priorities for capital investment.

Accessibility:

On the accessibility side, IHCD has been a major US provider of educational materials, training and consulting services originally on Section 504 of the Rehabilitation Act and then on the Fair Housing Amendments of 1988 and the Americans with Disabilities Act of 1990. IHCD has a reputation for designing user-friendly materials and has been federally funded to create the first national training package on the ADA as well as the popular *Checklist for Existing Facilities* (www.ADAChecklist.org) and the *Title II Action Guide* (www.ADAActionGuide.org), *paper in its first version, digital in the current version*.

Current & Recent IHCD Projects with Federal Funding and Focused on Accessibility Compliance**Include:**

- New England Americans with Disabilities Act (ADA) Center, funded by the U.S. Department of Education since 1996 with funding through 2021;

- National Endowment for the Arts project (2012-2018) to create a comprehensive web-based national resource on accessibility and universal design for public and private cultural administrators that will become part of the NEA website;
- National Design and Construction Resource Center for the Fair Housing Act, funded by HUD from 2003 – 2015.

IHCD's Mission-driven Accessibility/Inclusive Design Consulting & Design Services:

IHCD are deep content experts on accessibility and on inclusive design and that is the sole focus of our work. Most commonly, we are doing consulting and design work that has elements of both. Even in our ADA Transition Plan consultations, we include guidance on opportunities for inclusive design and anticipates the wide range of functional limitations today beyond the wheelchair focus of the accessibility standards and codes. In our inclusive design projects, we are always paying attention to issues of legally compliant solutions in the physical, digital, and service or program-based.

- Consulting includes review of existing condition reviews for compliance with the ADA, Section 504, state and municipal accessibility codes, commonly to provide clients (e.g., US municipalities, higher education, cultural facilities, outdoor areas). Most commonly these result in ADA Self-Evaluations and Transition Plans that deliver practical tools for long-term planning and budgeting while building capacity among the client's own team for ongoing management. These range from small towns to universities with tens of thousands of students.
- Design services, often combined with a flexible mix of consulting services, included design review for new construction, landscape projects, major renovation, exhibits, services and programs, websites and apps. These projects are extremely varied in size and scope. IHCD responds to opportunities that go well beyond 'just tell me what I have to do,' a narrow focus that does not align with our mission. Rather IHCD works with clients to understand the

relationship between baseline compliance and the opportunity for inclusive design.

Representative work includes:

- A multi-year project to review all of the Massachusetts parks (10% of the state's land mass) for accessibility compliance but also for inclusive design opportunities. The project includes the development of an Inclusive Design Guide.
- A set of physical and digital design review projects for the Massachusetts Bay Transit Authority. These include a new MBTA Design Guide for Access, serving as accessibility and inclusive design consultant on Green Line "Transformation" of four light rail lines; making four commuter rail stations accessible; review of the MBTA's website and all accessibility apps. Each project includes extensive user/expert research.

Inclusive/Universal Design Projects Include:

IHCD builds from a solid base of rigorous expertise about accessibility requirements but embraces a larger vision of design as a transformative tool of social equity and enhanced experience for all.

- IHCD is the only North American representative in the governing structure of the International Association for Universal Design (IAUD) based in Japan.
- IHCD conducted the first international benchmarking study on the integration of universal design into the built environment for the government of Singapore.
- IHCD was one of five organizations that collaborated in the development of the Principles of Universal Design in 1997 that are copyrighted to the Center for Universal Design at North Carolina State University at Raleigh.
- The National Endowment for the Arts funded IHCD to create the first international web-based collection of universally designed case studies in ten categories of the built environment, a project in collaboration with the UN. The initial site is in place with dozens of additional projects in development (www.UniversalDesignCaseStudies.org)
- IHCD has been a lead organization in the international Universal/Inclusive Design movement, having hosted or co-hosted five international conferences as well as international student design competitions, awards programs, smaller regional meetings and publication of web and

print materials. IHCD collaborates and presents at international events, writes and publishes in global publications and collaborates on regional and national inclusive design projects.

- IHCD began the Access to Design Professions project with support from the National Endowments for the Arts (NEA) in 1999 as a memorial project to Ron Mace, considered the ‘father’ of universal design in the US. This international initiative focused on increasing the number of people with disabilities who enter and thrive in the design professions.
- IHCD tailors training on universal/inclusive design for public and private entities and service industries including universities, cultural facilities, public entities, corporations, financial services, healthcare, libraries, domestic violence and emergency management. These trainings are organized to present guidance on the information, communication, physical, and social and policy environments central to impacting the contextual definition of disability.
- IHCD has been involved with the UN Department of Economic and Social Affairs before, during and since the development of the Convention on the Human Rights of People with Disabilities (CRPD) and attended the development meetings and trained the delegates and UN staff on universal design.
- IHCD leaders provide an average of 30 lectures on universal design annually. Audiences range from international and national events to local. They include conference keynotes and workshops but also lectures for design students and design professionals. Every year there is a mix that includes professional development for designers, public health professionals, as well as events related to inclusion and the innovation economy, aging, sustainability, livable communities, housing and urban planning.
- IHCD publishes occasional books that contribute to the universal/inclusive design literature. Recent publications include:
 - *Universal Design, A Reconsideration of Barrier-Free* by Dr. Yoshihiko Kawauchi originally published in Japanese and issued in English in 2008;
 - *Classroom Design for Children with Autism* (2010) by Dr. Rachna Khare, a professor of universal design in India and parent of a child with autism;
 - *Directional Sense* (2011) by Drs. Janet Carpman & Myron Grant, premier experts in wayfinding;

- *Universal Design, A Methodological Approach* (2012) by Belgian Professor Hubert Froyen; and
- *Da Vinci Touch* (January 2015), a tactile book with print and digital French and English in collaboration with the Cité des Sciences et de l'Industrie in Paris.
- A new publication is in final draft stages: *Inclusive Learning Spaces for Higher Education*. It will be published by the end of 2019.

The IHCD team includes professionals across the design disciplines (architecture, city planning, interior design, industrial design, digital design, UX design), education, engineering and the humanities. Staff members reflect the organizational commitment to diversity of age, ability, culture and personal experience with functional limitations. Staff, interns and visiting fellows come from a mix of nations and provide cultural insights as well as multi-lingual capacity. IHCD hosts a wide range of US and international interns every year, most of whom are design undergraduate and graduate students but also studying related disciplines of sociology, anthropology, and occupational therapy. They range from high school students with disabilities to post-doctoral candidates in allied fields. This extensive national and international network of individual and organizational collaborators gives IHCD has an unusually rich and flexible expertise and capacity well beyond its core staff including the nation's premier individual experts and global collaborators.

IHCD's perspective is informed by the World Health Organization framework that defines disability as a *contextual* phenomenon. The WHO mainstreams functional limitation as a universal fact of life in the 21st century and describes disability as generated at the intersection of the person and their multiple environments: physical, information, communication, policy and social. This perspective about the opportunity to minimize limitations and make the most of strengths while improving experiences for everyone is the baseline for all of IHCD's work.

Relevant Experience with ADA Self Evaluation and Transition Plans

As noted in general information about IHCD, doing ADA Self-Evaluations and ADA Transition Plans is one of IHCD's core consulting services. We commonly work with the municipal ADA

Coordinator, members of Disability Commissions, as often as possible with Elder Affairs Commissions and/or Human Rights Commissions, often with planning and development staff, and always with municipal department heads. We welcome the direct participation of municipal staff and members of Commissions. We have consistently found people to be helpful, candid and eager to learn. IHCD retains long connections to our clients providing informal information and support.

We commonly also include a line item in the budget for hourly consultation for plan review if a client has building or park or public rights of way capital projects planned. An efficient, timely review catches problems and ensures that client's capital investments align with the goals of the ADA Self-Evaluation and Transition Plan. IHCD believes that there remains a great need in local government to understand responsibilities under the ADA. It isn't easy. Understanding the core requirement for ADA Title II entities to "program accessibility" can be baffling.

- How do you assess the circumstances in which capital investment is needed in order to meet the responsibilities for equal access to programs, services and activities?
- When is it appropriate to move a program or activity?
- What constitutes a unique set of functions that requires that a building be brought into compliance?
- How do you prioritize corrective actions when you have a comprehensive set of information about the current situation?
- What are the responsibilities for web and other digital programs?

Our collaborative process of cross-walking all of the data gathered in the ADA Self-Evaluation process – both programs and built environment – results in a prioritized and sequenced planning and budgeting tool – in Excel – that makes the implementation strategy clear to all.

Selected facility review projects by scope and services provided include:

Municipalities	Services Provided								
	Selected City/Town Property	Selected Outdoor Spaces	Outdoor Inclusive of PRW*	Program Access	Select Public Schools	Web Site	Training	Plan/ Design Review	Other Services
Charlotte, NC 2012-2013	X	X	X	X	X	X	X	X	
Somerville, MA 2013-2015	X	X		X	X	X	X		X**
Worcester, MA 2014-2015	X			X		X		X	
Arlington, MA 2014		X				X			
Arlington, MA 2019	X		X	X	X				
Taunton, MA 2015	X	X		X	X	X	X		X
Agawam & Longmeadow MA 2015	X	X		X	X	X	X		
City of Stamford, CT 2016	X	X		X			X		
City of Newton, Parking Lots 2018		X							
Town of Andover, MA 2018	X			X	X	X			
Town of Conway, MA 2017	X			X	X				
City of Everett, MA 2018	X	X		X	X	X			
City of Chelsea, MA 2018	X	X		X	X	X			
Town of Ridgefield, CT 2018	X	X		X	X	X			
Town of Harwich, MA 2018	X	X		X	X				
Town of Longmeadow, MA 2018	X	X		X	X				
City of Pittsfield, MA 2018	X	X		X	X	X			
Town of Sandwich, MA 2019	X	X		X		X			
Town of Plymouth, MA 2019	X	X		X	X	X			

Town of Arlington, MA 2019	X	X		X	X	X			
City of Fall River, MA 2019	X	X		X		X			
City of Salem, 2019	X	X		X		X			

Misc. Governmental	Selected Property	Selected Outdoor Spaces	Outdoor Inclusive of PRW*	Program Access		Web Site	Training	Plan/ Design Review	Other Services
National Endowment for the Arts - Design for Accessibility 2016-Present						In Process Design / Build of Site			
MassDot 2016						Interactive Transit Maps			
MBTA (Review of New Website) 2016 - Present						Wireframes and range of programming intervals			
MBTA Commuter Rail (26 Stations) 2017	X	X						X	
MBTA Green Line Stations 2017	X	X						X	
MBTA Design Guidelines									X
MA Department of Conservation and Recreation 2016 – Current (multi-year)		X	X				X	X	

* Public Rights of Way

** Web-based in four languages to solicit comments by residents with disabilities about draft priorities for corrective action

*** Walk-throughs during construction/post construction & post construction access audit

**** Material and Furniture Specification

Project Approach

The appeal of working with municipalities

As noted in general information about IHCD, doing ADA Self-Evaluations and ADA Transition Plans is one of IHCD's core consulting services. Doing that work with cities and towns is attractive because it impacts a sizeable cross-section of a population. We have had an excellent experience with municipalities that made a serious commitment to build expertise through the process and to use the information generated from the consultation as a tool for action, not just to minimize a liability concern.

Client participation in the project

We commonly work with the municipal ADA Coordinator, members of Disability Commissions, as often as possible with Elder Affairs and Aging Commissions if there are standing Commissions, and always with municipal department heads. We welcome the direct participation of municipal staff and members of Commissions. We have consistently found people to be helpful, candid and eager to learn. The process is often a means by which people with disabilities can learn about the specifics of municipal responsibilities, the limits of the law and where there may be opportunities for advocacy beyond compliance.

Flexibility

IHCD knows that the course of a scope of work might shift once it is underway and priorities are assessed. Our goal is to meet the client's needs and we are happy to collaborate in making adjustments or responding to changed priorities.

We commonly also include a line item in the budget for hourly consultation in order for opportunities for quick engagement to occur within a scope like an ADA Transition Plan. That is likely to be for plan review if a client has building or park or public rights of way capital projects underway. A timely review catches problems and ensures that client's capital investments align with the goals of the ADA Self-Evaluation and Transition Plan. IHCD is also always happy to share

informally on issues pertinent to our clients during a project but also retains long connections to our clients providing informal information and support.

Training/building capacity

IHCD believes that there remains a great need in local government to understand responsibilities under the ADA. It isn't easy. Understanding the core requirement for ADA Title II entities to "program accessibility" can be baffling. How do you assess the circumstances in which capital investment is needed in order to meet the responsibilities for equal access to programs, services and activities? When is it appropriate to move a program or activity? What constitutes a unique set of functions that requires that a building be brought into compliance? How do you prioritize corrective actions when you have a comprehensive set of information about the current situation? Our collaborative process of cross-walking all of the data gathered in the ADA Self-Evaluation process – both programs and built environment – results in a prioritized and sequenced planning and budgeting tool – in Excel – that makes the implementation strategy clear to all.

Multi-disciplinary teams

The Institute for Human Centered Design (IHCD) believes that a mix of disciplines is the best way to ensure a quality deliverable. For each project, IHCD organizes a multi-disciplinary team of both regular and consulting staff aligned with the scope of work.

In a typical scope of work for a Title II ADA Transition Plan, that would include management by architectural designers with a mix of staff and interns on teams. If the client scope warrants it, IHCD has landscape architects, accessible public realm experts, one of the nation's premier engineers expert in accessibility who is also a person with a disability, and digital accessibility technical staff (websites are considered part of the 'effective communication' responsibilities for both Title II and Title III entities by the Department of Justice). In addition, the IHCD team includes nationally respected trainers in accessibility and civil rights for people with disabilities

(e.g., Janice Majewski, Kathy Gips). Approximately half of IHCD's team of professional and supporting staff includes people with personal experience of disability.

Principle in Charge - Valerie Fletcher, Executive Director (30+ years of experience)

Project Co-Director - Meghan Dufresne, Architectural Designer (7 years of experience)

Project Co-Director – David West, Lead, Outdoor Areas (10 years of experience)

Design Review, Cost Estimating - Ana Julian, Architectural Designer, Assoc. AIA and ICC
Accessibility/Inspector Plan Examiner (18 years of experience)

Survey Tool Specialist and Website Review - Anoop Sundararajan (2 years of experience)

Surveyors – IHCD survey teams include a mix of staff and interns all trained and supervised by senior IHCD staff.

Trainer – Kathy Gips (30+ years of experience) or Stacy Hart (5 years of experience) NOTE: MS. GIPS
or MRS. HART WILL PROVIDE TRAINING PRO-BONO THROUGH IHCD'S NEW ENGLAND ADA
CENTER TAILORED TO THE TOWN'S NEEDS.

Detailed Scope of Work

Task 1: Self Evaluation and Involvement

Ideally, the entire consultation would begin with a kickoff meeting that could be convened by the Town Manager or Administrator, ADA Coordinator, Town Planner or whoever is deemed the Project Manager. The kickoff meeting would include an overview presentation on Title II of the ADA and the specific activities that will be undertaken by IHCD for the Town. IHCD will also provide information on local demographics of disability in the immediate area and links to general resources such as a Glossary of ADA terms. A link to the Self-Assessment Survey Forms will be shared with Department Heads or designees at that time. There will be an opportunity to ask questions. At the kickoff meeting, time will be allocated to exploring options for Town staff and members of the Board of Selectmen, if they wish, to participate in the ADA Self-Evaluation.

Nearing the end of the ADA Self-Evaluation (at 75%) and prior to the generation of final recommendations for prioritized corrective actions (the ADA Transition Plan); IHCD will work with the Town:

1. to generate an approved draft Self-Evaluation with draft priorities for the Transition Plan's corrective actions appropriate for public dissemination;
2. to host a public meeting to share findings and draft priorities for corrective action and solicit comments and any corrections especially from people with disabilities in the town including outreach to the appropriate Independent Living Center for members in the town and with a proactive invitation to older residents and to families of children with disabilities.

IHCD has developed a set of self-assessment survey tools that we tailor for each client for gathering information on current practice and on the scope of programs offered by the Town. As noted above, IHCD prefers to begin this process with an overview of ADA Title II and the process we'll undertake for ADA Self-Evaluation and ADA Transition Plan. That discussion will also include a face-to-face opportunity to meet with department heads or their designees makes for the best quality of return of forms. A key portion of the ADA Self-Assessment is a breakdown of programs, services and activities and confirmation about where those are delivered in each property on the Towns' list of buildings and sites. If not self-evident, IHCD will also ask for a description of the participants in those public services and programs. Reviewing all materials with the Town's Project Manager and/or ADA Coordinator would also be desirable.

Included in the survey process will also be requests for specific information from each Town department requesting information about current practice relative to "effective communication," for people with sensory or communication limitations. This will help to sensitize Town staff to the requirements for "effective communication" as well as to gather that information as part of the program accessibility requirements.

Task 2: Evaluation of Policies and Programs

The primacy of program access in ADA Title II is supported through an infrastructure of policies and procedures that must be in place and fully implemented. These will sometimes be Town wide and sometimes need to be at the Department level.

The ADA *administrative requirements* help ensure that the needs of people with disabilities are addressed in all services, programs and activities that the Town operates. A Title II entity is required to:

1. Designate a Responsible Employee (ADA Title II - 28 CFR Part 35.107 (a)) to coordinate compliance with the ADA. The purpose of having a responsible employee – ADA Coordinator - is to ensure that when the public deals with a state or local government agency the public is able to identify a person who is knowledgeable with the requirements of the ADA.
2. Adopt and distribute a public Notice (ADA Title II - 28 CFR Part 35.106) of the provisions of the ADA to members of the public who may participate in the Town's programs, services and activities. The effective notice should state the Town's obligations under the ADA and include the complete contact information of the ADA Coordinator.
3. Develop and distribute Grievance Procedures (ADA Title II - 28 CFR Part 35.107 (b)) for prompt resolution of any complaint regarding disability discrimination.
4. Modify its Policies, Practices and Procedures (ADA Title II – 28 CFR Part 35.130(b)(7)) when necessary to avoid discrimination.
5. Provide Reasonable Accommodation (ADA Title II – 28 CFR Part 35.140(a)) to qualified employees with disabilities.
6. Provide Auxiliary aids and services (ADA Title II – 28 CFR Part 35.160) to ensure effective communication with people with disabilities. This provision requires ADA Title II entities to take steps to ensure that communication with members of the public and employees with disabilities is as effective as communication with others.

IHCD will review existing policies, evaluate them for compliance, identify errors and gaps. Based on the review by IHCD of the Town's departments' Surveys from Task 2 and of policies and procedures regarding access by persons with disabilities, IHCD will identify departments that do not have policies or whose policies and procedures require modifications. IHCD shall assist in the development of model policies and procedures recommended for use by departments and shall include those model policies in the ADA Transition Plan.

Task 3: Evaluation of Facilities

Provide a field review of requested buildings, parks, and rights of way to evaluate compliance with the ADA and provide remedial options for compliance.

IHCD tailors an on-line survey for each Title II client and have found that the digital option generates far greater responses than a paper survey.

- A. Having more detail on your facilities inventory paired with detail about programs, we would then be in a position to make recommendations for the field review based on those factors along with details such as date of construction, date(s) of renovation and whether the building offers a unique service.

- B. Provide a field review of Town-owned and operated, publicly-accessible buildings, parks, parking lots, and playgrounds, including infrastructure providing egress to such facilities, to evaluate compliance with the ADA and provide remedial options for compliance. IHCD uses a proprietary digital survey tool on iPads that we tailor it to the particular situation of each client. Depending on the location of the municipality, IHCD would add the pertinent state building codes to the ADA tool for compliance surveys. We photo document each element that needs corrective action. The survey is the basis of the illustrated catalog for each facility and outdoor area.

C. IHCD generates a set of reports as part of the ADA Self-Evaluation deliverables:

- a narrative summary and illustrated catalog for each building and outdoor space with recommendations for corrective action and order-of-magnitude cost estimations. Note that IHCD has partnered twice with RS Means to create the ADA Cost Catalog. As order-of-magnitude cost estimates, they are for planning and *not* for bidding. Based on rising costs of construction in most of our recent projects, we have modified the most recent data from RS Means to be more in keeping with actual costs.

- Two ADA Self-Evaluation narrative reports:

- facilities - an overview with details and explanation of options for compliance
- review of policies + procedures that details the state of compliance with the ADA administrative responsibilities and any gaps or modifications that are needed

The ADA Transition Plan is built from the ADA Self-Evaluation but is a significant distillation of a great deal of information. We create a detailed spreadsheet of prioritized recommendations for corrective action broken out by category of facility and outdoor spaces. This is a planning and budgeting tool intended to be used to keep the project updated as work gets done.

Measures for setting priorities and managing time for survey:

- Age of the building and date and extent of renovations relative to accessibility; if relatively recent and done well, a survey that captures only non-compliant elements goes quickly.
- Significance of the building for use by the public raises the priority ranking of the building or outdoor area.
- Repetition of floor plans in the design of larger buildings like schools; there is no need to look at the full building room by room if floor plans repeat that include classrooms and toilet rooms.

- Proportion of space within a building that houses a program, service, and/or activity; for example, a fire house to which the public goes only on voting days is a very quick survey.
- For parking lots and garages, a survey of each type, combined with clarifying charts and drawings of required accessibility features for parking might be adequate to the Town's needs.
- For parks and playgrounds, a survey of each type, combined with supplemental materials about playground and outdoor area accessibility may be adequate to the Town's needs.

Each site shall have all aspects of the infrastructure located on the site examined that pertain to ADA compliance (that includes routes from parking, access from public and private points of arrival). IHCD understands that the information provided in the size/use column is to provide an idea of the scope of a site and does not represent all the aspects of a site that are to be reviewed.

ADA Title II for public entities has a primary mandate for program access and not for "readily achievable barrier removal" which is desirable but not required. That standard applies to Title III entities or privately owned "public accommodations." However, municipalities should be aware that all new construction and major alterations undertaken by Title II entities must fully meet the 2010 ADA Standards for Accessible Design. For facilities that are determined to require physical modification, the changes must align with the 2010 ADA Standards and the appropriate State Building Codes. Any new construction or previous modifications prior to the implementation of the 2010 ADA Standards that meet the 1991 ADA Standards (also known as ADAAG) can remain; those modifications for accessibility that do not meet the 1991 ADA Standards will need to be corrected using the 2010 ADA Standards.

Note that IHCD reviews all facilities, as well as through the analysis of program accessibility, with attention to two of the core principles of the ADA and Section 504 of the Rehabilitation Act: Effective Communication and Integrated Setting.

This tool is built to gather extensive, detailed data that becomes the primary source for the building and outdoor area narrative overviews and catalogs. For each facility or building and for each outdoor area IHCD will deliver drafts in digital format and final versions in hardcopy and digital. Hard copies can be requested of drafts. IHCD will set up a web-based project file-sharing site on its Citrix FileShare program to ensure that all materials are available and easy to locate.

- Building Narrative Summary Report noting the building or facility's programmatic function and key issues of concern relative to accessibility.
- Catalog of each element with an accessibility issue in the building or facility that names the issue, has a photograph to illustrate the issue, pertinent legal citation(s), and a suggested remedy for fixing the issue as well as an Order-of-Magnitude cost estimation. It includes fields that can capture the pertinent legal citations if desired as well as GIS data if needed.

IHCD sends a draft of this pair of files for each building for the Town's review as completed.

NOTE: The simultaneous gathering of program data informs the prioritization of corrective actions. A final set of spreadsheets organized to meet the Town's preferences will include each issue for corrective action, its priority, and its order-of-magnitude cost estimation. This is the core planning and budgeting tool that is the ADA Transition Plan. For each element in need of corrective action, a responsible department must be stipulated.

IHCD's approach to field review includes close work with the client in order to ascertain the level of detail required to be captured, to ensure that the right balance is struck between data collection and its eventual application in project planning and management. The sequencing decisions for the specified facilities would be negotiated with the Town. IHCD suggests that any location slated for

renovation be prioritized in order for the data generated from the ADA Self-Evaluation to be available to incorporate into design development.

Town staff is invited to participate in the facility survey with IHCD staff. This is an ideal way to transfer knowledge not only about how to survey but also about the rationale of the requirements in terms of usability. But we appreciate that it is unlikely that anyone has sufficient available time to participate in all of the surveying.

There is a critical role for people in the Town with disabilities in the penultimate draft stage of the Self-Evaluation when considering programs, services, and activities that are currently being offered in inaccessible locations. There are three options to consider:

1. Move the program or activity in the same building to an accessible location.
2. Move the program or activity to an alternative accessible location.
3. Renovate the space to be accessible.

The IHCD Project Manager with the Town Project Manager will work out final logistics and, potentially, with a Town employee designated as the Town ADA Coordinator or other Town designee on the order of buildings to be reviewed. To the extent feasible, the Town will provide floor plans for buildings and maps of outdoor areas to be surveyed. The Town will need to provide a point person for each building and outdoor area to be surveyed to ensure that the survey teams can get into the buildings and that that any staff are aware of the visit and purpose of it. IHCD will provide in advance a date, time and names of team members who will participate on the audit team to allow notifying building employees.

Task 4: Action Steps and Timeline

IHCD is committed to negotiating a schedule that aligns with the Town's needs. Please see the following Table of Contents for a Town's ADA Self-Evaluation.

ADA Self-Evaluation Plan Sample Table of Contents

Executive Summary

Legal Overview

Evaluation of Non-discriminatory Policies and Practices in Programs, Services, and Activities

Introduction

Analysis

I - Designation of Responsible Employee

II - Complaint Procedures

III – Notice

IV - Reasonable Modification of Policies Practices, and Procedures

V - Employment and Reasonable Accommodation

VI - Auxiliary Aids and Services

Model Policies

Resource List

Evaluation of Facilities

Introduction

Accessibility Survey Methodology

Program Accessibility

- 1) Relocation of programs, services and activities within current facility
- 2) Relocation of programs, services and activities to another
- 3) Renovations to ensure access to programs, services and activities

NOTE: the following sections will include a narrative summary for each category the municipality has requested to be reviewed along with a total of order-of-magnitude

cost estimates for the category and a building summary and catalog for each building. Catalogs depict inaccessible issues, preliminary remedies, and cost estimations.

- Municipal Buildings
- Public Safety
- Parks & Recreation
- Downtown Sidewalks

IHCD provides an individual narrative report for each property along with an illustrated catalog with a photo of the element out of compliance, a recommended corrective action and an order-of-magnitude cost estimation. The narrative is in Word. The illustrated catalogs are generated from the digital tool used for survey that is built from FileMaker Pro software. Those are delivered as PDFs. Cost Estimations and priorities are provided in an excel spreadsheet. IHCD will work with the Town to make sure that that format aligns with their preferences.

Note that IHCD has twice partnered with R.S. Means, the world's leading provider of construction cost data, in the publication of the ADA Compliance Pricing Guide (1994 and 2004). IHCD paid R.S. Means to update the 2004 numbers in 2016 to align with current pricing for meeting the ADA 2010 Standards and paid for a consultation for R.S. to create cost estimates for outdoor areas. Please see a sample Order-of-Magnitude Cost Estimation Spreadsheet sample in the Attachments.

Early in the project implementation, IHCD would review these sample costs with the Town. If recent Town capital projects experience warrants it, IHCD will tailor a percentage increase across the board to the order-of-magnitude cost estimations.

Share with the Town 75% drafts for the ADA Self-Evaluation

IHCD will share draft facility narrative reports and illustrated catalogs as they are completed.

The overview reports (Evaluation of Non-discriminatory Policies and Practices in Programs, Services, and Activities and Evaluation of Facilities) provide a comprehensive snapshot of current compliance and any gaps. These can only be generated after the facility surveys are completed and the program and policies and procedures information gathered and analyzed.

IHCD recommends that the Town Administration complete their review of drafts of the ADA Self-Evaluation and draft spreadsheet of the ADA Transition Plan before scheduling the Public Hearing. At that point, that information can be shared with the public. IHCD has found that some municipalities prefer to share reports without estimated cost data and some prefer it to include it. IHCD will prepare materials for public comment per the Town's choice.

Public Hearing on ADA Self-Evaluation and Transition Plan Draft – The Town shall schedule a public hearing at which IHCD shall make a presentation on the Draft (including priority needs). The date, time and location shall be set by the Town and posted fourteen (14) days prior to the hearing. The notice shall state that the Draft is available for public review and is available at Town Hall as well as on the Town Website and that comments may be submitted for up to ten (10) days following the day of the public hearing.

This step of a public hearing occurs only after the Town has reviewed and accepted a penultimate draft.

Complete Final ADA Self Evaluation Report and ADA Transition Plan – Following the public hearing, IHCD will deliver a final ADA Self-Evaluation Report and an ADA Transition Plan that incorporates any changes agreed to based on the public comment period and public hearing. Unlike the ADA Self-Evaluation that contains comprehensive information about the current state of compliance and details of any corrective steps necessary to make continuing progress on compliance, the ADA Transition Plan is limited to capital issues. It is a tool for planning and

budgeting and that details a prioritized, sequential set of corrective actions requiring capital investment to meet program accessibility obligations.

The ADA Transition Plan is an excel spreadsheet, commonly broken out by department, and typically projects capital expenditures for corrective action out over a number of years, commonly out to as many as eight (8) or ten (10) years. It details what needs to be done, an order-of-magnitude cost estimation, and stipulates the party/department responsible for completing the task. The ADA Self-Evaluation serves as a much more detailed companion data set for clarification.

Other Suggested Items

Website Review

Provide a full review of the Town's Website, social media and online information resources for ADA compliance. These digital resources are commonly understood as part of a Title II entity's responsibility for effective communication under the ADA.

IHCD proposes the following strategy for the digital reviews:

- IHCD's Inclusive Technology team conducts an initial compliance review.
- Conduct Contextual Inquiry review with "user/experts," people with physical, sensory or brain-based functional limitations across the spectrum of age and culture. This is IHCD's standard research method to work with real people evaluating physical and digital environments. We do this for a wide range of universities, cities, museums and others. Each "user/expert" is paid a stipend for their time. We would invite the opportunity to recruit residents of the Town with disabilities to become user/experts.
- A comprehensive report would be created that has very specific recommendations for corrective action.
- The IHCD team would conduct training for all Town staff that does social media on how to make all of the most popular social media accessible.

Hourly Plan Review Services

Ensuring that the Town gets the quality of accessible renovations and construction it deserves in its commitment to accessibility would benefit from a flexible option of design review services that would guarantee that what gets constructed delivers the caliber of accessibility you expect. See a sample markup included with the sample reports. (This is a consulting service charged by the hour with scope, deliverables and budget agreed to with the client.)

Polling Places

In the case of all polling places we suggest that work eventually be done on an election day when they are being used. Given the central role of voting in equal opportunity and non-discrimination, these sites are almost always considered in DoJ Settlement Agreements. Given their temporary nature, compliance issues are a mix of building, external parking and path of travel and accessible set-up on voting days these reviews must be done on voting days. (If interested, costs for this service will be provided under a separate agreement after the Town provides a full list of polling locations.)

Key Personnel

The IHCD team includes 28 professionals across the design disciplines (architecture, interior design, industrial design, digital design), education, engineering, the humanities as well as administrative staff. It reflects the organizational commitment to diversity of age, ability and culture. Staff range in age from 21 to 70 with approximately half the team comprised of people with disabilities. Staff, interns and visiting fellows come from a mix of nations and provide cultural insights as well as multi-lingual capacity. Some members of the team are based in other states. We are not currently certified by the MA State Supplier Diversity Office but are in the process of applying for a W/NPO.

The roles and bio-sketches for the team designated for the a consultation are below. There is some duplication built for surveyors based on playing triage with multiple projects. Professional staff are guaranteed.

Valerie Fletcher, Executive Director – Principal in Charge

Valerie Fletcher has been Executive Director since 1998 of the Institute for Human Centered Design (IHCD). Fletcher writes, lectures and works internationally. She currently oversees projects ranging from the development of design guides for accessibility compliance and inclusive design to a wide range of consultation and design services to public, and private entities in the US and globally. She created the IHCD User/Expert Lab which has over 300 people engaged in the evaluation of places, products and services. Her research focus is integrated social and environmentally sustainable solutions for multifamily housing, healthcare, culture, workplaces, and the public realm.

Fletcher's career has been divided between design and social justice. She worked on the reintegration of Boston public housing after the NAACP won a discrimination lawsuit. She is the former Deputy Commissioner of the Massachusetts Department of Mental Health where she oversaw the largest participatory planning process ever undertaken in a state mental health system. She was Principal of Fletcher Studio Design from 1978-1985.

She has been a Special Advisor on Inclusive Design to the Open Society Institute and the UN Department of Economic and Social Affairs. She is on the North American representative on the Board of the International Association for Universal Design (IAUD) in Japan. Fletcher has a master's degree in ethics and public policy from Harvard University. The Boston Society of Architects awarded her the Women in Design award in 2005. She is a member of the Board of Trustees of the Boston Architectural College.

IHCD Team Bios**Meghan Dufresne, Architectural Designer, LEED AP - Project Co-Director**

Meghan Dufresne is an architecture designer who joined IHCD in 2012. She has over 15 years of experience at architectural firms around the Boston area. Her childhood experience of using a

wheelchair has driven her fascination with inclusive design and the complex relationship between people and their environment. She has experience working on environmentally and socially sustainable, multi-sensory, institutional, healthcare, commercial, religious, cultural, manufacturing, laboratory, industrial and residential projects. She created a training program to teach non-designers, especially people with disabilities, to read architectural plans.

Meghan's projects at IHCD have included developing a group home for formerly institutionalized people with disabilities outside of Bucharest, Romania in collaboration with Habitat for Humanity, and accessibility analyses and recommendations for MBTA Green Line and Commuter Rail projects, Harvard Medical School, the Massachusetts State House, Boston City Hall, the Museum of Science and Industry in Chicago, Stonehill College and Georgia Institute of Technology, Department of Conservation and Recreation (DCR) parks throughout Massachusetts, and a wide range of municipal projects.

In 2005, Meghan received an accelerated master's degree from the University of Illinois in Urbana-Champaign in Architecture on a full scholarship. Prior to this degree, she received a bachelor's degree in English Literature with a minor in Visual Arts from Boston University and worked in the publishing industry. Her research into restroom design, history, psychology and culture during architecture school has been recorded into the Congressional Record and presented in several publications, including the book "Ladies and Gents: Public Toilets and Gender." She has been published in Dwell magazine online as part of a design competition, taught at Suffolk University's Interior Design Department, and is a LEED Accredited Professional.

David West, Surveyor, Project Co-Director, Lead for Outdoor Areas

Mr. West has been with IHCD since 2009. He brings many years of experience in diverse industries including technical writing and non-profit development. He is central to IHCD accessibility consulting in the physical environment and has built particular expertise on outdoor recreation, including beaches, and on public rights of way.

Mr. West is responsible for maintaining and building the existing set of databases as well as helping to build the outreach strategies to priority stakeholders. He also plays a key role in promotion of new materials to target populations. He is active in the Greater New England Chapter of the National Multiple Sclerosis Society and is on the Board of Summer Ink, an adventure-based camp that teaches writing skills to young people in greater Boston.

Mr. West has a BA in Political Science and Social Psychology from Tufts University.

**Ana Julian, Architectural Designer, Assoc. AIA and ICC Accessibility/Inspector Plan Examiner,
Senior Project Manager**

Ana Julian is an architectural designer with expertise in the accessibility requirements of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, the Federal Fair Housing Act and the International Building Code. She is a primary lead on design review for both accessibility and inclusive design.

Ana has served IHCD in a mix of capacities beginning in 1998. She provided technical assistance for IHCD's New England ADA Center and its national Fair Housing Design and Construction Resource Center (DCRC). Since 2015, she has been Senior Project Manager for IHCD's consulting and design work. Ana has extensive experience managing ADA Transition Plan projects for municipalities, public agencies and public institutions. As a certified ICC Accessibility/Inspector plan examiner, she also provides guidance under the International Building Code (IBC) and distinctive state codes such as the Massachusetts Architectural Access Board. Ana also works with the internal design team reviewing plans for both private and public facilities.

Ana was born in Colombia then moved to Paris as an adolescent, she earned a Master of Architecture degree from the Ecole Speciale d'Architecture in Paris and then a Master in Techniques of Construction at the Institute de la Construction Industrialisee also in Paris. Ana also

has a strong interest in the renovations of religious spaces to improve the accessibility and sense of welcome for the community across the spectrum of ability and age. Ana is fluent in Spanish, French and English.

Anoopa Sundararajan, Senior Inclusive Technology Researcher, Lead, Web Review

Anoopa was born in India and grew up in Kenya and Bahrain. She obtained dual bachelor's degrees in Applied Mathematics and Psychology from the Illinois Institute of Technology in Chicago. Anoopa leverages this academic intersection of psychology and engineering to bring expertise in user-centered design with a mission to use data for social good. In IHCD’s digital lab she leads a variety of consulting projects, with an emphasis on the cultural sector. In her role, Anoopa engages real users to drive the engineering and design of inclusive experiences spanning from web platforms to digital immersives. She also heads data analysis and visualization endeavors, leading design projects for IHCD’s New England ADA Center with a commitment to develop engaging and inclusive visual stories through data. Her passion is to build a more accessible world for people of all ages and abilities.

References

Included below are additional references and information for pertinent IHCD projects.

Project	Location	Contact Person	Contact Information
Town of Harwich ADA Self-Evaluation and Transition Plan (no schools)	Town of Harwich, MA & Harwich Disability Commission	Christopher Clark, Town Administrator	508-430-7513 cclark@town.harwich.ma.us
City of Everett, MA Comprehensive ADA Self-Evaluation and Transition Plan	City of Everett, MA	Tony M. Sousa, AICP Director of Planning & Development	617-394-2334 Tony.Sousa@ci.everett.ma.us
City of Chelsea, MA Comprehensive ADA Self-Evaluation and Transition Plan	City of Chelsea, MA	Alexander Train Senior Planner, Project Manager	617-466-4192 ATrain@chelseama.gov

		Planning and Development Department 617-466-4192	
MA Department of Conservation & Recreation DCR's focus is also on the assessment of at least a full representation of all facility and outdoor area types for compliance with ADA title II and MAAB but also Federal Forest Service Design Guidelines that incorporate universal design elements and distinct DCR accessibility policies (e.g., design of accessible parking spaces).	Review of all DCR parks and recreational areas in the state (3 year project)	Thomas J. McCarthy Director, Universal Access Program	413-545-5353 thomas.j.mccarthy@state.ma.us

Schedule

TASKS	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6
Task 1: Community and Staff Evaluation and Involvement						
Task 2: Review of Existing Policies/Procedures						
Task 3: Evaluation of Prior Reports and Facility & Park Reviews						
Task 4: Action Steps & Timelines						