

Town of Brookline

Americans with Disabilities Act Self-Evaluation And Transition Plan

November 2018

Completed by:
Caitlin (Haynes) Starr
DICR Assistant Director and former ADA Coordinator

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**Town of Brookline
Americans with Disabilities Act
Self-Evaluation and Transition Plan - Executive Summary**

The American with Disabilities Act of 1990, which prohibits discrimination against individuals on the basis of disability, specifically requires government entities and public accommodation facilities to take clear steps to ensure that individuals are not discriminated against or excluded from programming, services and activities based on disability. Under the ADA, the Town of Brookline is required to evaluate its services, policies, and practices, and, subject to exceptions, to modify any policies, practices, procedures, or physical facilities which do not permit access to all individuals with disabilities.

The ADA requires government entities with 50+ employees to have a designated ADA Coordinator. The Town of Brookline originally designated an ADA Coordinator in 1993. In 2016, Caitlin Haynes was designated as the ADA Coordinator and completed the Self-Evaluations included in this Transition Plan. As of the writing of this report, Sarah Kaplan is the Town of Brookline's ADA Coordinator.

The Town is responsible for notifying the public of the ADA and of its application to the Town in making accommodations. This public notice is posted on all Town documents that are circulated to the public and on Town web pages. The public notice is written as follows,

The Town of Brookline does not discriminate in its admission to, access to, or operations of programs or activities on the basis of disability or any other characteristic protected under applicable federal, state or local law. Individuals who are in need of auxiliary aids for effective communication in Town programs or activities may make their needs known by contacting the Town's ADA Compliance Officer. Assistive Listening Devices are available at the Public Safety Building for public use at Town of Brookline meetings and events. Those who need effective communication services should dial 711 and ask the operator to dial the Town's ADA Compliance Officer.

*Sarah E. Kaplan
Town of Brookline
11 Pierce St.
Brookline, MA 02445*

You can email Sarah E. Kaplan or call 617-730-2329 (TDD 617-730-2327) for more information.

Under the ADA, the Town is required to have a written grievance procedure. It may be used by any person who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by and within the Town of Brookline. The Town's updated grievance procedure has been circulated to all Town Departments, Commissions and Boards, published in Brookline new sources, and posted on the Office of Diversity, Inclusion and Community Relations' web page. The current grievance procedure is written as follows,

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 (ADA). It may be used by anyone who wishes to file a complaint alleging discrimination on the

basis of disability in the provision of public accommodation services, activities, programs, or benefits by and within the Town of Brookline.

The complaint should be in writing and contain information about the alleged discrimination including name, address, phone number of complainant and location, date, and description of the problem.

Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or their designee as soon as possible but no later than 60 calendar days after the alleged violation by mail, email or via the Town website form to:

*Sarah E. Kaplan
ADA Coordinator & Community Relations Specialist
11 Pierce St.
Brookline, MA 02445*

OR

skaplan@brooklinema.gov

OR

<http://www.brooklinema.gov/formcenter/office-of-diversity-inclusion-and-community-relations-8/brookline-discrimination-report-form-63>

Within 10 calendar days after receipt of the complaint, the ADA Coordinator will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, the ADA Coordinator will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will reiterate the specifics of the complaint and attempt a resolution. If necessary, the complainant may offer feedback and comments on the proposed solutions and request to meet with Department or public entity within the Town of Brookline that the complaint is against. A final response will be issued within 15 calendar days of the requested meeting.

If the final response by the ADA Coordinator does not satisfactorily resolve the issue, the complainant may contact the Massachusetts Office on Disability at (617) 727-7440 for assistance of filing directly with the Massachusetts Commission Against Discrimination or the Department of Justice.

All written complaints received by the ADA Coordinator and written communication in regards to the complaint will be retained by the Town of Brookline for at least three years.

The following Self-Evaluation and Transition Plan reports consist of data that was acquired through policy and program qualitative reviews and facility assessments in 2017-2018. For the purpose of conducting the self-evaluation and developing the transition plan, the ADA Coordinator and Commission on Disability elected to address the Town's programs, services and activities by Town Department. A self-evaluation of the Select Board's Office and the Human Resources Department were not completed due to unavailability to sit with the ADA Coordinator after multiple attempts.

Any comments, suggestions, or concerns relating to the 2017-2018 self-evaluation and transition plan can be answered by the ADA Coordinator.

Building Department Assessment and Transition Plan

The Building Department is located at Town Hall, 333 Washington Street, 3rd Floor and is accessible by elevator. The Building Department oversees the construction, alteration, repair and demolition of structures (including schools) throughout the Town as well as enforces by-laws, and regulations that pertain to zoning, preservations, plumbing, electrical and fire safety. All public meetings convened by the department take place in Town Hall, as well as other fully accessible town buildings, such as the Public Health Building.

The Building Department provides equal opportunity to people with disabilities to participate and benefit from their programs. The department has an informal process to respond to reasonable accommodation requests and has no separate programs for individuals with disabilities. The department does not have a familiar procedure to deal with requests for communication requests, such as an interpreter, video relay, or other auxiliary aids and services. The ADA Coordinator explained the procedure for dealing with a communication accommodation request from residents.

By January 2019, the ADA Coordinator will be distributing a Town wide written procedure to handle communication requests that will be further distributed to necessary department employees.

Council on Aging Assessment and Transition Plan

The Council on Aging is located in the Senior Center on 93 Winchester St. The Council on Aging provides a range of services and activities to improve the health status and quality of life of senior persons who live in Brookline. Specifically, the Council on Aging provides programs and services such as BETS, a taxi discount coupon program, a Caregiver Assistance Relief Effort, Transportation resources, an Elder Resource Guide, Equipment Loans, Information and Referral, Employment and Volunteer Referrals for seniors, Social Work Services, as well as Educational Programs, Exercise and Health Programs, Food Programs, Games and other Social Programs and Support Groups.

The Council of Aging provides equal opportunity to people with disabilities to participate and benefit from their programs. Participation of a person with a disability may be restricted or excluded if there is a safety issue pertaining to the person themselves or other participants; in this case, they be asked to participate with an aid. There are several separate programs designed specifically for individuals with disabilities. These include two programs for Individuals with Low Vision; Vibrant Program and Low Vision Support Group, as well as Memory Café Programs. The COA does contract with outside entities; in particular cab companies, Springwell, and vendors for lunches. The Council on Aging notifies each contractor of its responsibility to provided services in a nondiscriminatory manner and they have policies to ensure this and will report any contractors to licensing agencies if necessary. Employees are aware of their responsibility to make reasonable accommodations to programs and procedures. Service animal knowledge is present, although specific education regarding guidelines would be beneficial. Education would also be beneficial around power driven mobility devices and what credible assurance consists of. Information regarding programs and activities and resources through the Council on Aging are accessible via a printed newsletter and on the website. The COA has followed an informal procedure to accommodate communication requests, such as an interpreters, video relay, or other auxiliary aids and services. The Council on Aging has some aid available at the Senior Center, such as Assistive Listening Devices, closed captioning for videos, and screen reader software. Employees do know how to respond to telephone calls made through TTY.

The ADA Coordinator will develop a written document regarding Service Animal policies and power driven mobility device information to distribute to staff. The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019.

The ADA Coordinator completed a physical assessment of the Senior Center facility for ADA compliance and found no areas of the facility that needed to be brought into compliance. All restrooms, entrances, and public areas met ADA compliance.

Emergency Preparedness Assessment and Transition Plan

The Emergency Preparedness Department is located in the Health Department on 11 Pierce St, on the 2nd Floor and is accessible by elevator. The department oversees several groups and programs, such as the Medical Reserve Corp, the Emergency Preparedness Buddies Program, CERT and Flu Clinics. The department works to prepare for disaster planning, interacting with police and fire, and providing outreach to the community to understand the importance of personal preparedness for both medical and non-medical emergencies.

The Emergency Preparedness Department provides equal opportunity to people with disabilities to participate and benefit from their programs. The department does have a separate program that may be utilized for seniors or adults with disabilities that live alone; the Emergency Preparedness Buddies Program, which matches volunteers with elders or adults with disabilities and assists them in developing an emergency plan. The department does not directly contract with any outside agencies or organizations. The department does have an informal process to respond to reasonable accommodation requests and holds trainings for emergency group volunteers that review medical dispense, and potential accommodations at shelter programs. The department has followed an informal procedure to accommodate communication requests, such as an interpreters, video relay, or other auxiliary aids and services. The department ensures the availability of Ipads, magnifying glasses, assistive listening devises and both English and pictograph signs for Flu Clinics held throughout the Town. The ADA Coordinator discussed the procedure for dealing with a communication accommodation request from residents.

The Emergency Preparedness Department has not done much emergency testing at all; however, they do plan preparation for all abilities. There is no written evacuation plan as the department deals with hazard planning; however, evacuation of buildings with elevators is still a national issue. There have been conversations with the Brookline Housing Authority to ID people who may have difficulty evacuating, however other than those conversations and a voluntary 911 Dispatch form; there is no current registry of individuals who may need notification or evacuation assistance or transportation. The Emergency Preparedness Coordinator discussed reassessing the medical dispense sites as the current ones are not accessible.

The ADA Coordinator will also distribute a Town Wide written procedure to address accommodation and communication requests by January 2019 that will be further distributed to necessary department employees. Lastly, it would be beneficial for the Emergency Preparedness Department to add accessibility features of Emergency Shelters and Medical Dispense Sites on the website by January 2019.

Finance Department Assessment and Transition Plan

The Finance Department is located in Town Hall at 333 Washington St. The Finance Department includes oversight and management of Treasury, Payroll, the Comptroller's Office, Purchasing and Assessing.

The Finance Department provides equal opportunity to people with disabilities to participate and benefit from their programs. There is no circumstance in which a person with a disability would be excluded or restricted. There are separate programs designed specifically for individuals with disabilities, based on income – such as abatements under state statute for people with disabilities, seniors or veterans. Employees are aware of their responsibility to make reasonable accommodations to programs, procedures and services. There is standard bid language through Purchasing and each contractor is notified of its responsibilities to provide the contracted services in a nondiscriminatory manner. Assurances from contractors are addressed by a questionnaire with the bid form; however there are no procedures in place to ensure the contractor provides these services. Service animal knowledge is present among employees, although specific education regarding guidelines would be beneficial. Education would also be beneficial around power driven mobility devices and what credible assurance consists of. Information regarding the Finance Department is accessible via the website and over the phone. The Finance Department has followed an informal procedure to accommodate communication requests, such as an interpreters, video relay, or other auxiliary aids and services.

The ADA Coordinator will develop a written document regarding Service Animal facts policies and power driven mobility device information to distribute to staff. The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019.

Fire Department Assessment and Transition Plan

The Brookline Fire Department is located at 350 Washington Street and is physically accessible with 2 handicapped parking spots within 200 feet of the entrance. The Fire Department includes several divisions and oversees several programs. Divisions of the Brookline Fire Department include Administration, Fire Prevention, Suppression, Training Division, Maintenance of engines, Dispatch and Public Safety. The majority of meetings convened by the department take place in the accessible Community Room located at 350 Washington St or at Town Hall. There are 5 Fire Stations. Fire Station #1 is located at 140 Washington St, #4 is located on Boylston St, #5 is located at 49 Babcock Street, #6 is located at 962 Hammond St and Station #7 is located on Washington St.

The Brookline Fire Department provides equal opportunity to people with disabilities to participate and benefit from their programs and services. The Fire Department also has a 911 Disability Indicator Form that is accessible online, a voluntary, confidential registration completed and given to the Police and Fire Dispatch Department. The department has an informal process to respond to reasonable accommodation requests and are aware of the ADA laws surrounding Service Animals; however were unaware about miniature horses and the ability for individuals to use other power driven mobility devices (such as Segways) in pedestrian areas. The ADA Coordinator explained the formal procedure for dealing with a communication accommodation request from residents.

All emergency communication (911) equipment is TTY compatible and is maintained well. Response time and quality for TTY calls are equal to voice responses and operate 24 hours a day, 7 days a week. Dispatchers are trained to respond to each silent, open line by querying the line with TTY. Training for TTY is included in all 911 trainings.

The Fire Department also oversees the maintenance of the Fire Alarm System Boxes throughout Brookline that are independent of electricity and used to report fires from the street. In March 2016 Environmental Partners took an inventory of the Fire Alarm System and of the 297 Street Boxes that were inspected, only 2 were ADA compliant; Box #31 and Box #146.

Brookline currently has 5 fire stations. **Station #1** is located at 140 Washington St and the first floor that is open to the public is moderately accessible. The main entrance has a threshold that is too high and does not have an automatic opener. However, an accessible entrance is through the apparatus doors and straight into the entrance area. There is no sign for this entrance. There is no public parking available and therefore no handicap spaces. Once inside, there is direct access to the public restroom and the main public area. The restroom is completely accessible and unisex, there is no sign, however, it is right off the main entrance area and well identifiable. **Station #4** is located on Boylston and has handicap parking within 200 feet of the building. The path of travel and main entrance are accessible. The main entrance is able to be used independently unless the door is locked because all firefighters are on a call – but there is a bell. The main public area is accessible and the single unisex bathroom is also completely accessible, without signage. **Station #5** is located at 49 Babcock St and has a small lot for employees with approximately 11 spots. There are no HP spots within this lot; however there is a public lot with 3 HP spots 1 block away. The main and accessible entrance is up a very

low grade ramp and is completely accessible when the door is not locked. The main public area is accessible and there is a single/unisex restroom that is completely accessible, but without signage. **Station #6** is located at 962 Hammond St and does not have any public parking. The main entrance has steps; however the accessible entrance is through the apparatus doors where there is an automatic open button as well as clear signage that it is the accessible entrance. The main public area is accessible and there is a single/unisex restroom that is completely accessible and has the appropriate signage. Lastly, **Station #7** is located on Washington St and does not have any public parking. The accessible entrance is up a low grade ramp and through the apparatus doors that has an automatic opener as well as the appropriate signage for accessible entrance notification. The main public area is not entirely accessible, the threshold is too high and the door frame is not wide enough, however, it is a very small space with clear visibility off the garage and staff is able to accommodate any guests. The bathroom is not for public use, as it is located on the main floor off the firefighters living quarters.

The ADA Coordinator will distribute a Town Wide written procedure to address accommodation and communication requests by January 2019 that will be further distributed to necessary department employees. There should be an effort, if feasible, to make more of the Fire System street boxes ADA accessible if they are being updated. According to regulations, manual fire alarm boxes must be mounted not more than 48 inches high for front reach and controls and operating mechanisms must be operable with one hand, and not require tight grasping, pinching or twisting of the wrist. The force required to activate controls cannot exceed 5 lbf (22.2 N). Please let the ADA Coordinator know if there are planned updates to any alarm street boxes and if any are proposed to meet ADA regulations. The ADA Coordinator recommends the following for the Fire Stations to be completed by January 2019:

- Station #1 – add appropriate signage to show where the accessible entrance is located.
- Station #4 – add appropriate signage for restroom.
- Station #5 – add appropriate signage for restroom.

Health Department Assessment and Transition Plan

The Brookline Health Department is located in the Steven Glover Train Memorial Center on 11 Pierce St, with offices on the 2nd Floor that are accessible by elevator. The Department provides a range of environmental, community, and clinical health services to monitor and improve the health status and quality of life of persons who live or work in Brookline. Specifically, the Health Department oversees several programs, such as Environmental Health, which includes code enforcement and licensing, Public Health Nursing, Community Health, Emergency Preparedness, Tobacco Control, and a Day Care Division that specifically permits day care facilities.

The Health Department provides equal opportunity to people with disabilities to participate and benefit from their programs. There are no separate programs designed specifically for individuals with disabilities, other than the Buddies Program through the Emergency Preparedness Program. The department does contract with State entities; in particular for Mosquito Control, in which the State has an ADA disclosure on the website. However, there is not currently a procedure or language to ensure that contractors provide nondiscriminatory services. The department has an informal process to respond to reasonable accommodation requests and indicated need to refresh staff knowledge of this. Service animal knowledge is present most in enforcement and licensing staff and the department indicated need to train staff adequately and provide advisory information to include in renewal language for permits, etc. Education is also necessary around power driven mobility devices and what credible assurance consists of. The department has followed an informal procedure to accommodate communication requests, such as an interpreters, video relay, or other auxiliary aids and services. The ADA Coordinator discussed the procedure for dealing with a communication accommodation request from residents. Employees do know how to respond to telephone calls made through TTY.

The ADA Coordinator will develop a written document regarding Service Animal policies and power driven mobility device information to distribute to Staff as well as business owners that the Health Department works to license. The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019. Lastly, the ADA Coordinator will provide a general overview training PPT to the Health Department to distribute among staff as a basic training.

After assessing the Health Department facility for ADA compliance the ADA Coordinator makes the following recommendations:

- The automatic door opener for the second floor women's restroom needs to be fixed. The button did not activate the door opening.
- 1 handicap accessible spot in the parking lot needs to be labeled as Van Accessible. A new sign is needed to indicate this.

Information Technology Assessment and Transition Plan

The Information Technology Department is located in the Health Department at 11 Pierce St. The Information Technology Department provides oversight and maintenance of the Town's website, web presence and technology needs through employees in Application, Network Groups and the Help Desk. The IT Department assists with all technology needs in all 43 Town Buildings, including all of the Brookline schools.

The Information Technology Department provides equal opportunity to people with disabilities to participate and benefit from their programs. There is no circumstance in which a person with a disability would be excluded or restricted. There are no separate programs designed specifically for individuals with disabilities, however, there is access to assistive technology if necessary. Employees are aware of their responsibility to make reasonable accommodations to programs and procedures. Service animal knowledge is present, although specific education regarding guidelines would be beneficial. Education would also be beneficial around power driven mobility devices and what credible assurance consists of. Information regarding the Information Technology Department is accessible via the website.

The IT Department does have a policy that the Town of Brookline's website is accessible and in compliance with the W3C Web Content Accessibility Guidelines 2.0, and all staff and contractors responsible for webpage and content development are aware of the policy, as well as knowledgeable about the standards. The website is tested for compliance periodically, approximately twice a year. Currently, people with disabilities are not consulted during website evaluations; however, IT accepts feedback from end users with disabilities. While web content is currently compliant, the IT Department is always interested in finding what else they could be doing, to be innovative, and evolve forward in accessibility. The Information Technology has followed an informal procedure to accommodate communication requests, such as an interpreters, video relay, or other auxiliary aids and services.

The ADA Coordinator will develop a written document regarding Service Animal policies and power driven mobility device information to distribute to staff. The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019.

Brookline Public Library Assessment and Transition Plan

The Public Library of Brookline has three branches. The Main Library is located in Brookline Village at 361 Washington Street, the Coolidge Corner branch is located at 31 Pleasant Street, and the Putterham branch is located at 959 West Roxbury Parkway. The Library includes various departments including Reference, Children's, Administration, Custodial, Technical Services and Circulation. The Library runs various community programs throughout the year.

The Library provides equal opportunity to people with disabilities to participate and benefit from their programs and services. The Library provides a private study room with assistive technology, such as screen reader software and magnification software for individuals who may need it. The Library also co-sponsors a volunteer based program with the Council on Ageing called the Library Connection that delivers library items to people in their homes. While there are no eligibility requirements the program was designed for seniors or individuals with disabilities that would like access to library items but have difficulty navigating the community. The Library also gives the public access to books on tape and large print material. The department has an informal process to respond to reasonable accommodation and communication requests and they are aware of the ADA laws surrounding mobility devices and Service Animals; however were unaware about miniature horses. The ADA Coordinator explained the formal procedure for dealing with a communication accommodation request from residents. All three library locations have functioning TTYs available and staff are trained on use.

The ADA Coordinator will distribute a Town Wide written procedure to address accommodation and communication requests by January 2019 that will be further distributed to necessary department employees. The ADA Coordinator recommends the following for the Library locations to be completed by April 2019 if feasible:

Brookline Village

- Hallway to conference room on 2nd floor is not accessible due to abundance of loose items. Library employees need to clear this hallway and make accessible.

Coolidge Corner

- Signage for all restrooms on the Main Floor need to reflect accessibility with the "accessible" icon. Please install.
- The accessible entrance on the lower level should have an automatic access button. Please install.
- HP spots are not closest to accessible entrance ramp in the front of the Library. I recommend switching the HP spots (at least 1) to the spots closest to ramp entrance.
- Not all public areas are on an accessible path. Some of the ramps are too steep.

Office of Diversity, Inclusion and Community Relations Assessment and Transition Plan

The Office of Diversity, Inclusion and Community Relations is located in the Health Department at 11 Pierce St, on the 1st Floor and is accessible by elevator. The Office oversees several Commissions and programs, such as the Commission for Women, Commission on Disability, the DICR Commission and its subcommittees, and the Martin Luther King Jr. Celebration Committee. The Office also oversees programs such as ADA Coordination, Salary Negotiation Workshops, Education and Outreach, Discrimination Complaint Processes, Fair Housing, GARE, enrollment in benefit entitlement programs such as health insurance and SNAP, Sanctuary City policy development, and Domestic Violence Roundtable. The Office works to advance, promote and advocate for the human and civil rights through education, outreach and advocacy. The mission of the Office and the goal of the Town has been to strive for a community characterized by the values of inclusion.

The Office of Diversity, Inclusion and Community Relations provides equal opportunity to people with disabilities to participate and benefit from their programs. The Office considers locations of events and programs for accessibility and events tend to be universally designed. However the Office does oversee the Commission on Disability, which is specifically for individuals with disabilities or their family members. Some programs, such as a Ramp Loan program through the COD, are specifically for individuals with disabilities. When contracting with outside organizations, the Office does notify contractors of their responsibility to provide services in a nondiscriminatory manner, however there are no written policies, Town wide, to ensure this. The Office is currently working on developing a policy to include procedures that ensure compliance among contractors. The Office is aware and has a process to respond to reasonable accommodation requests and is aware of regulations surrounding service animals and mobility devices. The Office would like to expand the reach of services and programs by increasing accessibility by utilizing mobile offices and kiosks. The Office is aware of how to provide auxiliary aids and services to people who are hard of hearing or visually impaired. The Office has just purchased an Assistive Listening Device that will be accessible to residents for all public meetings.

The ADA Coordinator is employed within the Office of Diversity, Inclusion and Community Relations. The last self-evaluation was completed in 2003. Currently, a self-evaluation is being conducted in 2017. The Town has a public notice and a grievance procedure published in print and audio formats online.

While the Office on Diversity, Inclusion and Community Relations has a procedure to address accommodation and communication requests, the ADA Coordinator will distribute a Town Wide written procedure to address accommodation and communication requests by January 2019 that will be further distributed to necessary department employees. The ADA Coordinator and the Office will also collaborate with the Commission on Disability to develop an ADA training for Town employees. The Office will continue to work on developing language to ensure compliance of nondiscriminatory policies and procedures among external contractors.

Planning and Community Development Assessment and Transition Plan

The Planning and Community Development Department is located at Town Hall, 333 Washington Street, 3rd Floor and is accessible by elevator. The department oversees several regulatory land use boards and commissions and advisory committees. All meetings convened by the department take place in Town Hall, as well as other fully accessible town buildings, such as the Public Health Building.

The Planning and Community Development Department provides equal opportunity to people with disabilities to participate and benefit from their programs. The department has an informal process to respond to reasonable accommodation requests and has no separate programs for individuals with disabilities. The department does not have a familiar procedure to deal with requests for communication requests, such as an interpreter, video relay, or other auxiliary aids and services. The ADA Coordinator explained the procedure for dealing with a communication accommodation request from residents.

The ADA Coordinator will distribute a written procedure as discussed, by January 2019 that will be further distributed to necessary department employees.

Police Department Assessment and Transition Plan

The Brookline Police Department is located at 350 Washington Street and is physically accessible with 2 handicapped parking spots within 200 feet of the entrance. The Police Department includes several divisions and oversees several programs. Divisions of the Brookline Police Department include Patrol, Detectives, Community Service, Traffic and Records and the Police Commission. Some of the programs through the Police Department include the Crisis Intervention Team, Certified Emergency Response Team, a Domestic Violence Program and Outreach to Youth as well as other safety initiatives. The majority of meetings convened by the department take place in the accessible Community Room within the Police Department or at Town Hall. One holding cell, located on the lower level of the building, is also accessible for person with a disability.

The Brookline Police Department provides equal opportunity to people with disabilities to participate and benefit from their programs and services. The department has an informal process to respond to reasonable accommodation requests and does have separate programs/services for individuals with disabilities. There is a Crisis Intervention Team for residents experiencing a mental health crisis; there are approximately 45-50 officers trained as part of this team and there is a case management system for CIT clients. The Brookline Police Department also supports the Emergency Preparedness Buddies Program, which matches volunteers with elders or adults with disabilities and assists them in developing an emergency plan. Lastly, the Police Department also has a 911 Disability Indicator Form that is accessible online, a voluntary, confidential registration completed and given to the Police Department.

Brookline has seven shelter locations that were assessed in 2013 for accessibility and other necessary precautions. Brookline does not have procedures to regularly seek input from persons with disabilities for all phases of emergency planning as this has already been completed; the Comprehensive Emergency Management Plan. The ADA Coordinator explained the formal procedure for dealing with a communication accommodation request from residents. Brookline PD does seek input from individuals with disabilities when simulating emergency disasters; the last occurring in 2014. For emergency planning purposes, the Police Department has the Buddies Program and the Disability indicator forms; however, there is a priorities gap, since both of these programs are voluntary. However resources have been identified for accessible transportation, if needed. Emergency Notification for the community is through the Blackboard Connect System which provides voice, TTY, text, and email. The Police Department does not currently have any written procedures to directly address evacuation plans for residents with a wide variety of disabilities. All emergency planners, staff, volunteers, and first responders have been trained on emergency procedures in relation to disability. The locations of emergency shelters are on the Police Department website; however they do not specify physical accessibility, access to electricity, refrigeration, or other potential accessibility features. Boston EMS would assist Brookline with any medical equipment that was needed at a shelter for individuals with disabilities or special medical needs.

All emergency communication (911) equipment is TTY compatible and is maintained well. Response time and quality for TTY calls are equal to voice responses and operate 24 hours

a day, 7 days a week. Dispatchers are trained to respond to each silent, open line by querying the line with TTY. Training for TTY is included in all 911 trainings.

The ADA Coordinator will create language and share with the Police Department to include in the Emergency Management policies and procedures that addresses specifics on individuals with disabilities during an emergency by September 2017. These should be considered and added to Emergency Management Policies by January 2020. The ADA Coordinator will also distribute a Town Wide written procedure to address accommodation and communication requests by January 2019 that will be further distributed to necessary department employees. Lastly, it would be beneficial for the Police Department to add accessibility features of each Emergency Shelter on the Police Department website by January 2019.

**Recommended Additions to Emergency Management Policies to address the Americans
with Disabilities Act
Provided to Brookline Police Department on September 5, 2017**

- Review language in any documentation with contracted response services to ensure it contains wording that ensures the third party entities comply with ADA requirements.
- Develop written procedures to include in community emergency plans that specifies evacuation safety measures for people with all types of disabilities (mobility disabilities, blind or low vision, deaf or hard of hearing, cognitive and psychiatric disabilities, etc).
- Specify in emergency plans that residents in need of evacuation assistance will be assisted and transported to shelters together with their families.
- Specify in emergency plans that people with disabilities will not be separated from their service animals during an emergency evacuation or transportation to shelter.
- Specify in emergency plans that individuals who are hard of hearing, or have speech impairments or vision impairments can be provided with effective communication while at any shelter.
- Specify kitchen access policies for individuals who require refrigerated medications and immediate access to food due to a disability.

Public Schools Assessment and Transition Plan

The Brookline Public Schools Administration Office is located at Town Hall, 333 Washington Street and is accessible by elevator. Brookline Public Schools oversees nine K-8 schools, Brookline High School, Brookline Early Education Program, Adult Learning, METCO, a Chinese Exchange Program, School Committee, SEPAC, Steps to Success, as well as Winthrop House (a sub program of the High School for students with disabilities), out of district placements for students with disabilities and collaborating with Special Education services with Brookline Private Schools. All public meetings convened by the department take place in Town Hall, as well as other fully accessible town buildings, such as the Public Health Building. There are 9 school facilities, Tappen Gym, and the Unified Arts Building that have been assessed for the purpose of this ADA Self Evaluation.

The School Department provides equal opportunity to people with disabilities to participate and benefit from their educational programs and there are no circumstances in which the participation of a student would be excluded as the School uses an equal access, least restrictive inclusion model. Based on ability and needs, students with disabilities in the district can fall on a continuum of core service curriculums. This continuum ranges from general education with related services, to learning center services provided in each school, to RISE (a program where all peers have an IEP), to ALC at Lincoln and TLC at Devotion, to more restrictive programs such as ExCel and Winthrop House. There is also a new Standard Operating Procedure of Special Education that is a separate policy that was introduced in August 2018. The School Department contracts with outside agencies and notifies each contractor of their responsibility to provide services in a nondiscriminatory manner; however ensuring this is mostly based on informal supervision. The department has a process to respond to reasonable accommodation requests, however the School Department has also been working on making inclusion a priority and in 2017 discussed and reviewed several school policies to include students of all abilities; Substance Abuse, Hazing, Harassment, and Bullying. Policies the school will be looking at next are: Wellness, Discipline, and Attendance; for example taking in to account medical support needs that require a student to be absent. While School employees are familiar with allowing service animals to accompany individuals with disabilities, there is no training around service animals. School employees are aware that mobility devices are allowed to be used in all public places. The School Department does have a procedure to deal with requests for communication and accommodation requests, such as an interpreter, video relay, or other auxiliary aids and services through Student Services and Human Resources.

Based on a review of policies and procedures of the School Department as well as physical assessments of School facilities, the ADA Coordinator has made the following recommendations to improve access.

Policies:

1. ADA Coordinator and a representative from the School Department work together to develop language to ensure outside contractors provide ADA compliance by September 2020
2. The ADA Coordinator will develop a written document regarding Service Animal policies be to distribute to staff by January 2019.

Facilities: (Please See School Facility Assessment for Complete Reports – Appendix 1)

1. Brookline High School

- a. Add signage to both Male and Female bathrooms at Shluntz Gym (downstairs restrooms) by January 2019
- b. Add Accessible Signage to Gender Inclusive bathroom on 2nd Floor by January 2019
- c. Add signage to Men's room in back corner of 3rd Floor by January 2019
- d. Recommend removing sign or widen the sink area of Female bathroom by the Wellend Rd. entrance since while the stall is accessible, the sink is in a 27 inch alcove that is NOT accessible.
- e. Add signage to Men's room by the Wellend Rd. entrance by January 2019
- f. Test Assistive Listening Devices every Sept and March.
- g. Put in an automatic door opener on the Fire Doors outside of 257 by January 2019
- h. Recommend raising counter seating in Cafeteria to accommodate wheelchairs by September 2020.

2. Tappen Gym

- a. Recommend to make Female Locker room showers accessible, by widening, or adding shower chairs in the spaces by September 2019.
- b. Add signage to M floor Men's Room by January 2019.

3. Unified Arts Building

- a. Recommend adding rails to the ramp.
- b. Add signage to basement unisex bathroom by January 2019
- c. Add signage to 2nd floor Female bathroom by January 2019 and recommend removing heater that narrows path drastically to accessible stall.

4. Baker

- a. Add a short ramp to the back entrance to the BSED Lower Extended Day Program, which is currently inaccessible by September 2019
- b. Add signage to staff bathroom outside Rm 220 by January 2019.

5. Devotion – under construction. Walk through to be scheduled pre completion in June 2018. (Appendix 2)

6. Upper Devotion

- a. Ensure main entrance automatic door opener is functioning. Work order was submitted 11/19/17.

7. Driscoll

- a. Ensure the automatic door opener to the parking lot entrance is functioning by January 2019.
- b. One student bathroom on each floor should be made accessible or have an accessible stall by Sept 2020. Currently, none are.

8. Heath

- a. Add signage to student bathroom outside Rm 100 by January 2019.
- b. Unlock ALL gender neutral bathrooms, which are the only accessible bathrooms on each floor ASAP.

9. Lawrence

- a. Add signage to locker/restrooms in basement by January 2019.
- b. Recommend alternative way to access 3rd Floor. Elevator is only 25inches wide; too narrow to be considered accessible.

10. Lincoln

- a. Ensure the automatic door opener to main entrance is functioning. Work order submitted 11/9/17.
- b. Add signage to all restrooms on 1st, 2nd, and 3rd Floors by January 2019

11. Pierce

- a. Add signage to restroom in Cafeteria by January 2019.
- b. Add signage to RR in Rm 218 – not designated for student use, but is the only accessible restroom on the floor by January 2019
- c. Recommend to remodel the restroom in the Nurse's Office by January 2019
- d. Recommend making the overhead pathway to the large field accessible by Sept 2020.

Public Works Department Assessment and Transition Plan

The Department of Public Works is located at Town Hall, 333 Washington Street, 4rd Floor and is accessible by elevator. The department oversees Street and Sidewalk reconstruction and maintenance, Highway and Sanitation, Refuse Collection, Snow Removal, Water and Sewage, Transportation, and Public Parks. For the purpose of this evaluation the Transportation Division and Public Parks will be looked at separately. Aside from Town Hall (and not including Parks), Department of Public Works operates out of two other facilities; Water & Sewer Garage located at 44 Netherlands Road Brookline, MA 02445 and the Municipal Service Center 870 Hammond St. Chestnut Hill, MA 02467.

The Department of Public Works operates out of the Municipal Service Center 870 Hammond St. Chestnut Hill, MA 02467. There is one main entrance that is accessible by a curb cut and has sufficient accessible parking. The main door has an automatic button and a 32 inch clearance for opening. It was noticed that the push button for the automatic door to go outside was not functioning properly. There are no stairs at the entrance. All doors to public spaces have the appropriate clearance space and handles are approximately 38 inches high. There is no signage for the single public room on the Mezzanine level; however both main offices on the main floor have proper signage. The elevator has a call button 42 inches from the ground and all controls inside the cab have braille lettering. There is no lift. There are two restrooms (one male, one female) that are both completely accessible and single occupancy. Symbols are used to indicate restrooms; there is no braille signage. Both restrooms are locked and a key from the main office is required. There are no public telephones and the public drinking fountain is compliant with standards. Counters in both main public offices were between 40 and 43 inches high; as opposed to the 28-34 inches that is considered ADA compliant.

The ADA Coordinator asked that the automatic opener be fixed as soon as possible, no later than January 2019. The signage for the bathroom was also discussed. Since a key is required, staff can direct an individual to the correct bathroom when necessary. Lastly, the counters in the office do not meet requirements; however, there is open space on either side of the counter that can accommodate a person who is not able to clear the taller counter. If an individual needs to fill out a form or paperwork they could be accommodated by using accessible desk space in the office.

The Water and Sewage Facility is located on 44 Netherlands Rd, Brookline, MA 02445. This facility is very rarely used by the public, as the administration offices are located in Town Hall. There is one main entrance that is accessible without a curb cut; however there was not an accessible parking spot in the lot. A lot with 1-25 spaces needs to have 1 accessible spot, according to the ADA. The main door has an automatic button and a 32 inch clearance for opening. It was noticed that the push buttons for the automatic doors to go in and out were not functioning properly. There are no stairs at the entrance. All doors to public spaces have the appropriate clearance space and handles are approximately 37 inches high. There is only a single public office. The elevator has a call button 42 inches from the ground and all controls inside the cab have braille lettering. There is no lift. The elevator would only be used by the public if they needed use of the restroom, which is located on the second level. There is one public restroom for unisex use that is completely accessible and single occupancy. Symbols and braille lettering are used to indicate restrooms. Counters in the main public offices were between 40 and 43

inches high. However, there is an opening that is approximately 36 inches wide and a counter/table that is approximately 30 inches high with plenty of clearance underneath.

The ADA Coordinator asked that the automatic openers (x4) be fixed as soon as possible, but by no later than January 2019. Also, an accessible spot will need to be designated within 100 feet of the entrance, with proper signage and dimensions, again as soon as possible, but no later than January 2019.

The **Transportation Division** operates mainly out of Town Hall and oversees Permit Parking and Public Parking, Traffic Calming, Pedestrian Safety, Division Study Requests, Complete Streets for road ways; which assists with surveying road ways, as well as licensures for taxis, livery vehicles and valets within Brookline. The Transportation Division provides equal opportunity to people with disabilities to participate and benefit from their programs. The department has an informal process to respond to reasonable accommodation requests. The only separate programs for individuals with disabilities within the Transportation Division is the residential request for handicapped parking; which is approved in collaboration with the Transportation Board. The Transportation Division does not have a formal procedure to deal with requests for communication requests, such as an interpreter, video relay, or other auxiliary aids and services.

The ADA Coordinator explained the procedure for dealing with a communication accommodation request from residents. The ADA Coordinator will be distributing a Town wide written procedure, as discussed, which will be further distributed to necessary employees by January 2019. Due to several resident complaints and assessments completed by the Brookline Commission on Disability regarding public handicapped parking spaces on street and in public lots, the Transportation Division, in collaboration with other DPW divisions, will update all public handicapped parking spots by Summer 2019.

The **Division of Parks and Open Spaces** is located at Town Hall, 333 Washington Street, 4th Floor and is accessible by elevator. The department oversees the conditions assessments, management and maintenance of community parks, historic parks, neighborhood parks, passive parks, school playgrounds, conservation areas, traffic medians and islands, and reservoirs and water supplies (77 total properties) as well as 3rd party audits of play equipment. All meetings convened by the department take place in Town Hall, as well as other fully accessible town buildings, such as the Public Health Building.

The Division of Parks and Open Spaces provides equal opportunity to people with disabilities to participate and benefit from their programs. There are no separate services or programs for people with disabilities, but there has been more focus on Universal Design as the department moves forward with new renovations. The department has an informal process to respond to reasonable accommodation requests. The department has an informal procedure to deal with requests for communication requests, such as an interpreter, video relay, or other auxiliary aids and services. The ADA Coordinator explained the procedure for dealing with a communication accommodation request from residents. Physical assessments were completed by the ADA Coordinator, accompanied by the Parks and Open Space Director over a period of several months. A detailed chart of each assessed park and playground is in a separate attachment (Appendix 3).

The ADA Coordinator will be distributing a written procedure as discussed, that will be further distributed to necessary department employees by January 2019. An Action Plan to

address some of the issues follows here. This is not to say that items not listed on this Action Plan are fully compliant or do not need to be addressed, however, the items here are attainable and are ways to address accessibility without renovating an entire park. The ADA Coordinator recommends addressing the following by April 2019:

1. Harry Downes Field – Add the appropriate signage to the accessible restroom
2. Skyline Park - Add the appropriate signage to the accessible restroom
3. Soule Recreation Center - Add the appropriate signage to the accessible restroom
4. Judge Henry Crowley Park at St Mark's Square – The only HP spot (corner of Vernon) is adjacent to the ONLY inaccessible park entrance. This spot should be moved to an accessible entrance.

Recreation Department Assessment and Transition Plan

The Recreation Department is located at 133 Eliot St in Brookline. The department oversees several programs, such as Health and Fitness, Recreation Therapy, After School Program, Environmental Education program, Summer Rec, CRAFT, Brookline Day, as well as a variety of sports. Aside from the main Recreation facility at Elliot, the Recreation Department also oversees the Aquatic Center, Soule, and the Robert Lynch Municipal Golf Course.

The Recreation Department provides equal opportunity to people with disabilities to participate and benefit from their programs. The Recreation Department generally operates as an inclusive program, however, there are circumstances in which participation of a person with a disability would be restricted; such as if a participant had significant physical limitations and a coach was not trained in proper physical accommodation or the program was large and there was not enough staffing. The Recreation Department would only restrict participation of disabled persons if it was a safety concern for all participants, including the individual with a disability. The Recreation Department also has a separate program for individuals with disabilities; the Recreation Therapy Program. The Department does contract with outside organizations and agencies and does notify contractors of responsibility to provide services in nondiscriminatory manner; however, procedures to assure Title II requirements are upheld are based on complaint based investigations.

The Department is aware of its obligation to provide reasonable modifications to participants. While the Department is aware that Service Animals and power driven mobility devices may accompany and be used by people with disabilities in all public areas, some training or written information would be beneficial to ensure that staff are familiar with Service Animal rights and mobility devices. The Department does not have a formal procedure to deal with requests for communication requests, such as an interpreter, video relay, or other auxiliary aids and services. Staff are not trained on how to respond to TTY calls.

The ADA Coordinator will develop a written document regarding Service Animal policies and power driven mobility device information. The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019.

After assessing the four facilities for ADA compliance the ADA Coordinator makes the following recommendations.

1. The Recreation Facility at Eliot needs signage for the rest room indicating that is handicap accessible. This signage should be installed before January 2019.
2. The Pool facility needs to lessen the tension on the bathroom doors – they are heavier than 5 pounds. This facility also needs a hand dryer in one of the bathrooms. These modifications should be made before January 2019.
3. The Golf Course facility needs clearly marked access lines for the van accessible handicap parking spot. The access lines should be painted behind the last spot.

Retirement Board/Office Assessment and Transition Plan

The Retirement Department is located in the Health Department at 11 Pierce St., on the lower floor and is accessible by elevator. The Retirement Department includes the Retirement Board, consisting of 5 individuals, and the current 3 staff persons. This department assists active Town employees and retirees navigate the retirement process and accompanying paperwork. Staff will complete site visits for individuals who are unable to come to the office. The department also holds Social Security Seminars once or twice a year.

The Retirement Department provides equal opportunity to people with disabilities to participate and benefit from their programs. When contracting with outside organizations, such as the software vendor, the department is unsure of any ADA obligations of the vendor and does not have any written policies, Town wide, to ensure nondiscriminatory and accessible services. The department is aware and has an informal process to respond to reasonable accommodation requests and is aware of regulations surrounding service animals and mobility devices. However, the department was unsure of the specific questions and documentations that are acceptable to request, if necessary. The department was also unaware of the potential use of a miniature horse as a service animal. The department is aware of how to provide auxiliary aids and services to people who are hard of hearing or visually impaired and have an informal process.

While the Retirement Department has an informal procedure to address accommodation and communication requests, the ADA Coordinator will distribute a Town Wide written procedure to address accommodation and communication requests by January 2019 that will be further distributed to necessary department employees. The ADA Coordinator will also develop and distribute a Service Animal and Mobility Device Fact Sheet. The Director will look into any ADA fulfillment obligations from outside organizations that are currently contracted and begin to develop language to ensure these obligations are met.

Town Clerk Assessment and Transition Plan

The Town Clerk's Office is located in Town Hall at 333 Washington St. The Town Clerk's Office includes oversight and management of Public Records, Elections, and Voter Registration as well as various licensing. The Town Clerk's Office has an accessible low counter as well as table space. All voting locations are accessible; they have been inspected by the State.

The Town Clerk's Office provides equal opportunity to people with disabilities to participate and benefit from their programs. There is no circumstance in which a person with a disability would be excluded or restricted. There are separate programs designed specifically for individuals with disabilities such as Licensing of Service Animals as well as providing (through the State) "Handicap Marking Units" for specific voting locations that provide braille, contrasting visuals as well as touch screen formats. Employees are aware of their responsibility to make reasonable accommodations to programs, procedures and services. Service animal knowledge is present among employees, although specific education regarding guidelines and questions would be beneficial; reported that during licensing of service animals it is all client driven. Education would also be beneficial around power driven mobility devices and what credible assurance consists of. Information regarding the Town Clerk's Office is accessible on the Town website. The Town Clerk's Office has followed an informal procedure to accommodate communication requests, such as an interpreters, video relay, or other auxiliary aids and services. The Office does have magnification for documents available on site.

The ADA Coordinator will develop a written document regarding Service Animal facts policies and power driven mobility device information to distribute to staff. The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019. Also discussed was the use of a Language Line to assist residents of all languages; the Office of Diversity will share the Language Line code with Town Offices.

Town Counsel Assessment and Transition Plan

The Town Counsel's Office is located in Town Hall at 333 Washington St. on the 6th Floor. The Town Counsel's Office handles claims brought to Brookline by individuals or attorneys and works to represent and protect Town Employees. The Town Counsel's Office reviews legal language used by the Town in contracts and policies. The Town Counsel's Office is also a resource for the public and often refers residents to other places and organizations to find legal advice. The Office space has an accessible low counter.

The Town Counsel's Office provides equal opportunity to people with disabilities to participate and benefit from their services. There is no circumstance in which a person with a disability would be excluded or restricted. There are no separate programs designed specifically for individuals with disabilities, however, by-laws have been adjusted to include remote participation for specific trainings for Commission and Board Members. Employees are aware of their responsibility to make reasonable accommodations to programs, procedures and services, however there have been no formal trainings regarding accessibility. Town Counsel contracts with other law firms, outside counsel and vendors and reviews contracts for nondiscrimination for all Departments. Currently, there is no formal procedure to ensure contractors provide service in a nondiscriminatory manner once the contract is signed; it is complaint based. Service animal knowledge is present among employees, although specific education regarding guidelines and questions would be beneficial. Education would also be beneficial around power driven mobility devices and what credible assurance consists of. Information regarding the Town Counsel's Office is accessible on the Town website. The Town Counsel's Office has resources to provide for several communication requests and has followed an informal procedure to accommodate communication requests, such as an interpreters, video relay, or other auxiliary aids and services. There is currently no formal policy to determine if an auxiliary aid or service would be an undue financial or administrative burden.

The ADA Coordinator will develop a written document regarding Service Animal facts policies and power driven mobility device information to distribute to staff. The ADA Coordinator will work with the appropriate Departments to set up an ADA training for Town Employees. The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019. The ADA Coordinator will collaborate with Town Counsel to develop a formal procedure to determine undue financial or administrative burden to be used Town wide by July 2019.

Action Plan Items

Building Department:

1. ~~ADA Coordinator will provide written procedure for communication and accommodation requests by January 2019.~~ 12/18/18

Council on Aging:

1. ~~The ADA Coordinator will develop a written document regarding Service Animal policies and power driven mobility device information to distribute to staff.~~ 1/28/19
2. ~~The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019.~~ 12/18/18

Emergency Preparedness:

1. ~~ADA Coordinator will provide procedure for communication and accommodation requests by January 2019.~~ 12/18/18
2. Finding new and accessible medical dispensary sites.
3. Add accessibility features to Emergency Shelters and Medical Dispense sites to website by January 2019.

Finance Department:

1. ~~The ADA Coordinator will develop a written document regarding Service Animal policies and power driven mobility device information to distribute to staff.~~ 1/28/19
2. ~~The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019.~~ 12/18/18

Fire Department:

1. ~~ADA Coordinator will provide procedure for communication and accommodation requests by January 2019.~~ 12/18/18
2. Effort to make more of the Fire System street boxes accessible as they are updated.
3. ~~Station 1 appropriate signage to indicate accessible entrance~~
4. ~~Station 4 signage for restroom~~
5. ~~Station 5 signage for restroom~~

Health Department:

1. ~~ADA Coordinator will provide procedure for communication and accommodation requests by January 2019.~~ 12/18/18
2. ADA Coordinator will work with department to develop language to ensure contractors provide ADA compliance.

3. ~~ADA Coordinator will provide a Service Animal Fact Sheet for Employees and Business Owners and power driven mobility device information.~~ 1/23/19
4. ~~ADA Coordinator will develop general training for employees (11/28/17 adata.org and 2/5/18 NACCHO Health and Disability Webinar)~~
5. Need 1 HP Van Sign in parking lot
6. ~~Automatic opener at on women's restroom second floor needs to be fixed.~~

Information Technology:

1. ~~The ADA Coordinator will develop a written document regarding Service Animal policies and power driven mobility device information to distribute to staff.~~ 1/28/19
2. ~~The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019.~~ 12/18/18

Libraries:

By April 2019

1. CC-Signage for all restrooms on the Main Floor need to reflect accessibility with the "accessible" icon. Please install.
2. CC - The accessible entrance on the lower level should have an automatic access button. Please install.
3. CC - HP spots are not closest to accessible entrance ramp in the front of the Library. I recommend switching the HP spots (at least 1) to the spots closest to ramp entrance.
4. CC - Not all public areas are on an accessible path. Some of the ramps are too steep.
5. ~~BV - Hallway to conference room needs to be cleared.~~ 1/14/19
6. ~~The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019.~~ 12/18/19

Office of Diversity, Inclusion and Community Relations:

1. Office will work to develop a language for policy to ensure contractors provide nondiscriminatory services.
2. ~~The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019.~~ 12/18/18
3. Collaborate with Commission on Disability to develop/provide an ADA training for Town Employees.

Planning and Community Development Department

1. ~~ADA Coordinator will provide procedure for communication and accommodation requests by January 2019.~~ 12/18/18

Police Department:

1. ~~ADA Coordinator will provide procedure for communication and accommodation requests by January 2019.~~ 12/18/18
2. ID Shelters online regarding accessibility, refrigeration, electricity, etc. by January 2019.
3. ~~ADA Coordinator will create language to include in the Emergency Management Policies and procedures to address specifics on individuals with disabilities by Sept 2017.~~
4. Update Emergency Management policies to address specifics on individuals with disabilities.

School Department:

- Policies:
 1. ADA Coordinator and a representative from the School Department work together to develop language to ensure outside contractors provide ADA compliance by September 2020
 2. ~~The ADA Coordinator will develop a written document regarding Service Animal policies to distribute to staff by January 2019.~~
- Facilities:

Brookline High School

1. Add signage to both Male and Female bathrooms at Shluntz Gym (downstairs restrooms) by January 2019.
2. Add Accessible Signage to Gender Inclusive bathroom on 2nd Floor by January 2019.
3. Add signage to Men's room in back corner of 3rd Floor by January 2019.
4. Recommend removing sign or widen the sink area of Female bathroom by the Wellend Rd. entrance since while the stall is accessible, the sink is in a 27 inch alcove that is NOT accessible.
5. Add signage to Men's room by the Wellend Rd. entrance by January 2019.
6. Test Assistive Listening Devices every Sept and March.
7. Put in an automatic door opener on the Fire Doors outside of 257 by January 2019.
8. Recommend raising counter seating in Cafeteria to accommodate wheelchairs by Sept 2020.

Tappen Gym

1. Recommend to make Female Locker room showers accessible, by widening, or adding shower chairs in the spaces by Sept 2019.
2. Add signage to M floor Men's Room by January 2019.

Unified Arts Building

1. Recommend adding rails to the ramp.
2. Add signage to basement unisex bathroom by January 2019.
3. Add signage to 2nd floor Female bathroom By January 2019 and recommend removing heater that narrows path drastically to accessible stall.

Baker

1. Add a short ramp to the back entrance to the BSED Lower Extended Day Program by Sept 2019. Currently inaccessible.
2. Add signage to staff bathroom outside Rm 220 by January 2019.

Upper Devotion

1. Ensure main entrance automatic door opener is functioning. Work order was submitted 11/19/17.

Driscoll

1. Ensure the automatic door opener to the parking lot entrance is functioning by January 2019.
2. One student bathroom on each floor should be made accessible or have an accessible stall by Sept 2020. Currently, none are.

Heath

1. Add signage to student bathroom outside Rm 100 by January 2019.
2. Unlock all gender neutral bathrooms, which are the only accessible bathrooms on each floor ASAP.

Lawrence

1. Add signage to locker/restrooms in basement by January 2019.
2. Recommend alternative way to access 3rd Floor. Elevator is only 25inches wide; too narrow to be considered accessible.

Lincoln

1. Ensure the automatic door opener to main entrance is functioning. Work order submitted 11/9/17.
2. Add signage to all restrooms on 1st, 2nd, and 3rd Floors by January 2019.

Pierce

1. Add signage to restroom in Cafeteria by January 2019.
2. Add signage to RR in Rm 218 – not designated for student use, but is the only accessible restroom on the floor by January 2019.
3. Recommend to remodel the restroom in the Nurse's Office by January 2019.
4. Recommend making the overhead pathway to the large field accessible by Sept 2020.

Public Works:1. DPW:

- a. ~~ADA Coordinator will provide procedure for communication and accommodation requests by January 2019. 12/18/18~~
- b. Municipal Service Center
 - i. ~~Automatic button to enter building needs to be fixed~~
- c. Water and Sewage Facility
 - i. ~~Make 1 HP space available with paint and signage~~
 - ii. ~~Automatic function working on main entrance~~

2. Transportation Division:

- a. ~~ADA Coordinator will provide procedure for communication requests by January 2019. 12/18/18~~
- b. Survey Public Lots to ensure access and compliance; repaint and add signage as necessary.
 - i. Center St (East and West) Lot – COMPLETE
 - ii. Webster Lot – NEEDED
 - iii. Babcock St – COMPELTED
 - iv. John St Lot – NEEDED
 - v. School St – NEEDED

3. Parks and Open Space Division

By April 2109:

- a. Harry Downes Field – Add the appropriate signage to the accessible restroom
- b. Skyline Park - Add the appropriate signage to the accessible restroom
- c. Soule Recreation Center - Add the appropriate signage to the accessible restroom
- d. Judge Henry Crowley Park at St Mark's Square – The only HP spot (corner of Vernon) is adjacent to the ONLY inaccessible park entrance. This spot should be moved to an accessible entrance.
- e. ~~ADA Coordinator will provide procedure for communication and accommodation requests by January 2019. 12/18/18~~

Recreation Department:

- 1. ~~ADA Coordinator will provide procedure for communication and accommodation requests by January 2019. 12/18/18~~
- 2. ~~ADA Coordinator will develop a fact sheet for staff regarding Service Animals and Power Driven Mobility Devices 1/19/19~~
- 3. Rec Facility – Need appropriate signage for restroom by January 2019.
- 4. Pool Facility – lesson tension on bathrooms door to make easier to open and add a hand dryer to bathroom where it was missing by January 2019.
- 5. Golf Course – Van HP spot needs to be identified and lines painted.

Retirement Office:

1. ~~The ADA Coordinator will distribute a Town Wide written procedure to address accommodation and communication requests by January 2019.~~ 12/18/18
2. ~~The ADA Coordinator will develop and distribute a Service Animal and Mobility Device Fact Sheet.~~
3. The Director will look into any ADA fulfillment obligations from outside organizations that are currently contracted and begin to develop language to ensure these obligations are met.

Town Clerk:

1. ~~The ADA Coordinator will develop a written document regarding Service Animal policies and power driven mobility device information to distribute to staff.~~ 1/28/19
2. ~~The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019.~~ 12/18/18
3. ~~Share the Language Line Code with Town Clerk.~~

Town Counsel:

1. ~~The ADA Coordinator will develop a written document regarding Service Animal facts policies and power driven mobility device information to distribute to staff.~~ 1/28/19
2. The ADA Coordinator will work with the appropriate Departments to set up an ADA training for Town Employees.
3. ~~The ADA Coordinator will also develop a Town wide procedure for communication and accommodation requests by January 2019.~~ 12/18/18
4. The ADA Coordinator will collaborate with Town Counsel to develop a formal procedure to determine undue financial or administrative burden to be used Town wide by July 2019.

Select Board Office

1. ~~The ADA Coordinator will develop a written document regarding Service Animal facts policies and power driven mobility device information to distribute to staff.~~
2. ~~The ADA Coordinator will distribute the Town wide procedure for communication and accommodation requests.~~
3. The ADA Coordinator will collaborate with Town Counsel to develop a formal procedure to determine undue financial or administrative burden to be used Town wide by 2021.
4. The ADA Coordinator will work with the Purchasing Department, Town Counsel, and the Assistant Town Administrator to develop language for contracts that assures compliance with the nondiscrimination language by 2021.
5. Recommended that on the Select Board website, under the subheading of 'Meetings', specify that the *Select Board Hearing Room is fully accessible and assistive listening devices are available.*
6. The ADA Coordinator will make a recommendation for an accessible separate podium or an adjustable podium for the Hearing Room by July 2020.