



Town of Sandwich Massachusetts

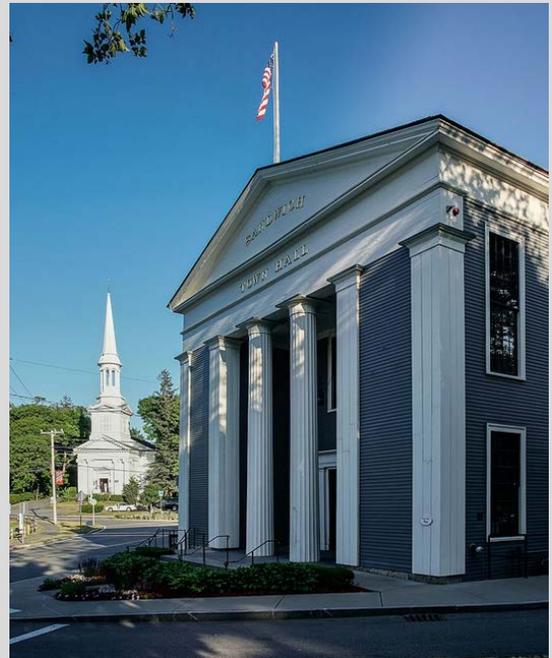
Part A - Executive Summary

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Prepared by the



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Introduction

The Institute for Human Centered Design (IHCD) has prepared this report on behalf of the Town of Sandwich as part of the Town's on-going effort to assess the current level of ADA compliance in programs, services and activities and Town-owned facilities. In preparing for the report, IHCD surveyed a selection of the Town's portfolio of facilities and properties that was included in the Request for Proposals. This report includes the review of eleven (11) public buildings and ten (10) parks/outdoor areas.

This ADA Self-Evaluation report includes a summary of the Town's policies as well as a summary of architectural barriers and proposed solutions for the Town's municipal buildings and parks/outdoor areas. All are designed to help move the Town towards full compliance with its obligations under the Title II of the Americans with Disabilities Act (ADA) and/or the 521 CMR Massachusetts Architectural Access Board regulations.

Most Town-owned facilities recently altered or renovated are substantially accessible and meet most architectural requirements. Continued facility alterations, and/or renovations will significantly reduce barriers and realize the Town's commitment to inclusion and equal rights. In the meantime, the greatest problems posed by existing barriers can be ameliorated by establishing policies and procedures to accommodate members of the community with disabilities. It is worth noting that the Town has taken several significant steps in this direction:

- The Town of Sandwich has hired a consultant (IHCD) to undertake its ADA self-evaluation (as basis for the Town's Transition Plan).
- The Town of Sandwich has an ADA Coordinator in place, Brendan Brides, the Building Commissioner from the Building Department.
- The Town has adopted a Public Notice Policy (posted on the Town's website).
- The Town has developed a Grievance Procedure (posted on the Town's website).
- The Town has developed extensive policies regarding its obligation to provide Effective Communication.

Many key facilities and outdoor areas are generally usable by people with disabilities but are not in full compliance with current accessibility requirements, though they may have been compliant when they were built or last renovated – before 1991. The Main Town Hall for instance, provides access to most programs and can be accessed by most people because the building features an accessible entrance, accessible toilet rooms, and has accessible routes through the building. Yet some of the service counters are higher than the maximum allowed, a key component to access some of the services provided by the Town. The Town Library is another example of a facility that

provides access to most programs, yet the facility lacks fully accessible multi-user toilet rooms which many individuals with mobility disabilities would have difficulty using.

Note that any alteration or renovation needed to ensure program accessibility would have to comply with the requirements of the 2010 ADA Standards and/or 521 CMR. The Marina Harbormaster's Office and the 'Tenants House' were recently renovated and yet lack accessible features. The roll-in shower in the Marina Harbormaster's Office lacks grab bars, the seat is not located on the side wall of the shower and the controls are not located 27" maximum from the shower seat. The roll-in shower at the 'Tenants House' lacks a clear floor space at the shower seat (men's toilet room) and the controls are not located where required.

Some of the parks also have many accessible features but lack accessible routes to areas of sport activity and/or amenities including picnic areas, concession stands, toilet rooms, etc. Furthermore, many of the beaches do not provide an accessible route to the high tide level (salt-water beaches) or to the normal recreation water level (fresh water beaches).

For clarity, this ADA Self-Evaluation report is organized as follows:

- Legal Overview;
- Executive Summary of the Evaluation of Policies in Programs, Services, and Activities;
- Executive Summary of the Evaluation of Facilities.

I. Legal Overview

The Town of Sandwich is obligated by both Federal laws and State codes concerning the rights of people with disabilities in the daily provision of programs, services, and activities. At the end of this report, there is a comprehensive list of relevant laws.

Federal Obligation: American with Disabilities Act (ADA)

Based on the 1964 Civil Rights Act and expanding upon the obligations of the 1973 Rehabilitation Act, the 1990 ADA prohibits discrimination against people with disabilities. The ADA provides civil rights protections to individuals with disabilities similar to those afforded to individuals on the basis of race, color, sex, national origin, age, and religion. The cornerstone of Title II of the ADA, which applies to state and local governments, is clear: no qualified person with a disability may be excluded from participating in, or denied the benefits of, the programs, services, and activities provided by state and local governments because of a disability.

The 2008 Amendments to the ADA (ADAAA), signed into law on September 25, 2008, describes in more detail the range of conditions covered by the civil rights protections of the ADA. The amendments expand the definition of “disability” to include impairments that substantially limit a major life activity and states that when determining whether someone qualifies as having a disability, one cannot take into account assistive devices, auxiliary aids, accommodations, medical therapies and supplies. The amendments also address episodic disabilities that may go into remission but still can significantly limit a major life activity when active, such as epilepsy and post-traumatic stress disorder. The ADA defines a disability as¹:

- A physical or mental impairment that substantially limits one or more major life activities (i.e. working, talking, hearing, seeing, caring for one's self);
- Having a record of a physical or mental impairment that substantially limits one or more major life activities;
- Being regarded by others as having an impairment such as individuals with severe facial scarring.

¹ To learn more about qualified individuals with disabilities or to read the full text of the ADA, please visit <http://www.ada.gov>

It is important to stress that the primary obligation to public entities such as the Town of Sandwich, under Title II of the Americans with Disabilities Act, is to ensure that, when *viewed in their entirety*, the programs, services, and activities offered are equally available to people with disabilities. The Town is required to follow the 2010 ADA Standards for Accessible Design in new construction and alterations. The 2010 ADA Standards must also be used for corrective actions if existing conditions don't comply with the original ADA Accessibility Guidelines. Municipalities also must relocate programs or otherwise provide access to programs located in inaccessible older facilities (e.g. facilities built before the ADA went into effect January 26, 1992). Ensuring program access may require capital investment when there is no alternative solution and should be a priority for corrective action.

Note that the websites of Title II entities are also considered "*programs*" and should be accessible to the standards of the Web Content Accessibility Guidelines 2.0 AA. Review of the Town of Sandwich's website will be provided as part of the scope of work of this contract.

The Town must **communicate effectively** with people who have hearing, vision, or speech disabilities. Sandwich is also required to make reasonable modifications to policies, practices, and procedures where necessary to ensure the equal participation of people with disabilities. Whatever is written or spoken must be as clear and understandable to people with hearing, vision, or speech disabilities as it is for people who do not have disabilities. In addition, the ADA requires the provision of "auxiliary aid and service" to meet their responsibility for effective communication. Auxiliary aid and service refer to readers, notetakers, sign language interpreters, assistive listening systems, open and closed captioning, text telephones (TTYs), videophones, information provided in large print, braille, audible, or electronic formats, and other tools for people who have communication disabilities.

Following the passage of the ADA, the Department of Justice issued the 1991 ADA Standards for Accessible Design to address physical access to facilities and transportation. These standards were based almost exclusively on the US Access Board's guidelines (ADA Accessibility Guidelines – ADAAG). In 1994, slight technical amendments were made. Then in 2004, the US Access Board issued new guidelines that were promptly adopted by the US Department of Transportation and other federal agencies. But only in 2010 did the Department of Justice issue a revised and updated ADA Standard called the 2010 ADA Standards for Accessible Design (2010 ADA Standards) that would apply to all Title II and Title III entities. These standards revised requirements for policies such as ticketing and service animals, and for physical elements such as assembly seating, established construction tolerances for certain elements and formalized long-standing guidelines for play areas, golf courses, recreational boating facilities, swimming pools, and other recreational facilities.

Facilities that meet or exceed the 1991 ADA Standards are not required to make changes to the new 2010 Standards except in the case of renovation. For elements that are non-compliant, the corrective measures must align with the 2010 ADA Standards. It is not expected that the buildings will meet or be brought up to all of the 2010 ADA Standards absent significant or total renovation. State and local governments must ensure that individuals with disabilities are not excluded from services, programs, and activities because buildings are inaccessible. This means Title II entities do not need to remove physical barriers, such as stairs, in all existing buildings, as long as they make their programs accessible to individuals who are unable to use an inaccessible existing facility.

Alterations to historic properties under the ADA

Alterations to historic properties must comply with the specific provisions governing historic properties in the 2010 ADA Standards, to the maximum extent feasible. Under those provisions, alterations should be done in full compliance with the alterations standards for other types of buildings. However, if following the usual standards would threaten or destroy the historic significance of a feature of the building, alternative solutions may be used. The decision to use alternative solutions for that feature must be made in consultation with the appropriate historic advisory board as designated in the 2010 ADA Standards (for Massachusetts, the Massachusetts Historical Commission), and interested persons should be invited to participate in the decision-making process.

Note that any corrective actions needed to ensure program accessibility would also have to comply with the requirements of the 2010 ADA Standards for historic facilities.

State Obligation:

Massachusetts Constitutional Amendment - Article 114

The Massachusetts Constitution states:

“No otherwise qualified handicapped individual shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity within the Commonwealth.”

Article 114 is written broadly. It prohibits discrimination based on disability on any level within the state, not just for recipients of state or federal funds. For example, Town meetings must be held in an accessible location with sign language interpreters provided if needed, and the Town cannot refuse to do business with an individual based on the person’s disability.

Massachusetts Architectural Access Board

The Architectural Access Board (AAB) is a regulatory agency whose mandate is to develop and enforce regulations designed to make public buildings accessible to, functional for and safe for use by persons with disabilities. See the Rules and Regulations of the Architectural Access Board 521 CMR. In addition to writing regulations, the Board decides on variance requests, provides training on its regulations, issues advisory opinions and makes decisions on complaints. Local building inspectors are responsible for enforcing the regulations which are a specialized section of the Massachusetts Building Code. See 780 CMR.

The construction, reconstruction, remodeling, alteration, or change of use of a building or facility that is open to the public triggers the authority of the Architectural Access Board. New construction must fully comply.

For renovation, remodeling, or alteration:

- The work being done must comply with the regulations.
- If the work done in any 36-month period is greater than \$100,000, the “work being performed” is required to comply. In addition, an accessible entrance and an accessible toilet room, telephone and drinking fountain (if toilets, telephones and drinking fountains are provided) shall also be provided.
- If the work done in a 36-month period is more than 30% of the “full and fair cash value” of the building², the entire building must come into compliance.

Enforcement: Anyone can file a complaint with the Architectural Access Board. The Board has the authority to issue variances and/or impose fines of up to \$1000 per violation per day of noncompliance with its order.

² This is usually the assessed value established by the city or town. See 521 C.M.R. § 5.38 for details about establishing value where no assessment exists.

II. Executive Summary of the Evaluation of Policies in Programs, Services and Activities

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination against qualified individuals with disabilities by public entities. Activities covered include all services, programs and activities offered by the public entity, all aspects of employment, services carried out by contractors, all activities of the local legislative and judicial branches and public transportation.

A thorough understanding of the requirements of Title II of the ADA is an essential responsibility of public entities. Please note that a complete summary of the Town's policies, practices and procedures is included in *Part B – Evaluation of Non – Discriminatory Policies and Practices in Programs, Services and Activities*.

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.

The Town of Sandwich has met its obligation to designate a responsible employee by appointing Brendan Brides, the Building Commissioner from the Building Department, as the Town's ADA Coordinator.

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.

The Town website provides an ADA/Accessibility Resources link to the ADA Notice on its homepage; the ADA Notice is also available from the Commission on Disability's web page. The Town also has an ADA Notice posted in the Town Hall, on the HR bulletin board and in the employment handbook.

IHCD recommends clarifying with staff that their Notice of Non-Discrimination policy to comply with ADA Title II states that public entities shall take initial steps to notify program/service participants, beneficiaries and employees of its obligations by publishing the ADA Notice: in all the materials distributed by the Town; that they will post the Notice on the Town's website home page and post copies in public locations in the Town's buildings. Furthermore, the Town should include the ADA Coordinator's name, address, telephone number and email address on materials and publications that contain general information disseminated to staff and members of the public.

3. Develop and distribute Grievance Procedures (ADA Title II - 28 CFR Part 35.107 (b)) for prompt resolution of any complaint regarding disability discrimination.

The Town's website provides an *ADA/Accessibility Resources* link to a Grievance Procedure form on its homepage; that form is also available from the Commission on Disability's web page.

IHCD recommends the Town take steps to clarify its grievance process regarding members of the public. Ensure all Town employees and the public are aware of the grievance procedure process, ensure Town's employees can provide information to members of the public about the grievance procedure process when appropriate and post copies in visible locations in each of the Town's public buildings.

4. Modify its Policies, Practices and Procedures (ADA Title II – 28 CFR Part 35.130(b)(7)) when necessary to avoid discrimination.

There is no evidence that the Town has failed to reasonably modify its policies, practices and procedures when a reasonable modification is requested.

IHCD recommends the Town take additional steps to indicate the commitment to provide copies in accessible formats upon request; clarify the "no pets" policies in the *Beach Wedding Application* and the *School Education Group Permit* forms so that they do not apply to people who use service animals.

Note: This policy is clearly stated in the ADA Notice provided to members of the public but IHCD recommends clarifying that policies in all forms available to the public.

5. Provide Reasonable Accommodation (ADA Title II – 28 CFR Part 35.140(a)) to qualified employees with disabilities. This requirement may include modifying work schedules, job

restructuring, and making facilities used by employees readily accessible to an employee with a disability, or moving the employee, if possible without compromising job responsibilities, to an accessible location.

There is no evidence that the Town has failed to provide reasonable accommodation to its employees. IHCD recommends that the Town of Sandwich becomes familiar with the excellent free national resource from the *Job Accommodation Network* (<https://askjan.org>)

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. This requirement may include but is not limited to providing sign language interpreters, providing Computer-Assisted-Real-time-Translation (CART), written materials for persons who are deaf or have difficulty hearing, braille or large print information or information in digital format for people who are blind or have difficulty seeing.

There is no evidence that the Town has failed to provide effective communication when required. It is clear that the Town of Sandwich has developed policies that ensure that communication with members of the public who are deaf or hard of hearing or have a speech disability is as effective as communication with members of the public without disabilities. It is not clear if similar policies for member of the public who are blind or low vision have been developed.

IHCD recommends that the Town consider distributing the effective communication notice to all department heads, published in a local newspaper of general circulation serving the Town and in all materials regarding the Town's programs, services or activities.

In determining what type of auxiliary aid or service is necessary to comply with Title II of the ADA, the Town should give primary consideration to the expressed preference for a particular auxiliary aid or service by deaf and hard of hearing individuals. *Primary consideration* means that the Town of Sandwich will inquire as to the choice of auxiliary aid or service of the person with a disability and will honor the expressed choice unless the Town can demonstrate that another equally effective means of communicating is available.

Though the existing Sandwich ADA Coordinator may be able to manage requests in the context of effective communication, this is a specialized subset of duties that requires continuously updating knowledge and ready availability for staff and the public. It may be

worth considering if there is an employee who has a particular interest in sensory disabilities who might be willing to take on this key role for the Town.

Finally, ensure that the Town’s website and other web-based services are accessible to people with disabilities. It is the Department of Justice’s position that when services are provided on a website, those services too must be made accessible. The website should be considered a “program” of the Town. (See web accessibility report).

III. Executive Summary of the Evaluation of Facilities

The analysis of existing conditions that encompasses the body of this evaluation is based on observations and documentation completed by IHCD team during site visits between March – June of 2019. This accessibility survey included the following facilities:

Public Buildings*:

Main Town Hall
Town Hall Annex
Sandwich Public Library
Miscellaneous Town Offices
Human Services Building
Recreation Department
Marina Harbormaster’s Office
Town Owned Tourist Facilities (Grist Mill)
Town Owned Tourist Facilities (Hoxie House)
East Sandwich Fire Sub-Station
Sandwich Hollows Golf Club

*The Facilities Department and the Information Technology Department are not open to the public and were not surveyed.

IHCD’s review of the Town-owned facilities was based on compliance with the 2010 ADA Standards if not compliant with the 1991 ADA Standards and/or 521 CMR. In addition to the above facilities, IHCD also surveyed the following parks/outdoor areas:

Parks/Outdoor Areas

Forestdale School*
Oak Ridge School*
Sandwich High School*

Ryder Conservation Lands
Snake Pond Beach
Oak Crest Cove
The Adventure Playground
East Sandwich Beaches
The Boarwalk
Town Neck Beach

* Only the outdoor areas were surveyed at these facilities.

It is important to note that those elements in existing facilities that are subject to supplemental requirements of the 2010 ADA Standards (*e.g.* elements for which there are neither technical nor scoping specifications in the 1991 Standards) such as (C) *Recreational boating facilities*; (D) *Exercise machines and equipment*; (E) *Fishing piers and platforms*; (H) *Play areas*; (J) *Swimming pools, wading pools, and spas*; and (L) *Miscellaneous - (1) Team or player seating and Accessible route in court sports facilities*, need to be brought into compliance.³

Building Facilities Overview

The building facility set includes nine (9) public buildings. The accessibility survey of those facilities includes all the spaces where the Town offers programs, services and activities to members of the public.

It is important to remember that under Title II of the ADA the Town of Sandwich must make sure that *“No qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity”* [28 CFR Part 35.149].

A public entity may not deny the benefits of its programs, services and activities to individuals with disabilities because its facilities are inaccessible. This means that each program, service and activity of the Town, when viewed in its entirety, must be readily accessible to and usable by individuals with disabilities.” This requirement is known as Program Accessibility [28 CFR Part 35.150].

The program accessibility requirement does not necessarily require a public entity to make each existing facility accessible or to take any action that would threaten or destroy the historic significance of a historic property or require a public entity to take any action that it can

³ As described in 28 CFR 35.150(b)(2)(i) Title II ADA Regulations

demonstrate would result in a fundamental alteration in the nature of the program or in an undue financial and administrative burden.

The Town may comply with the requirements through such means as redesign or acquisition of equipment, reassignment of services to accessible buildings, delivery of services at alternate accessible sites, alteration of existing facilities and construction of new facilities, or any other methods that result in making the Town’s services, programs or activities readily accessible to and usable by individuals with disabilities. A public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section.

In choosing among available methods for meeting the requirements of this section, a public entity shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

In order to comply with the program accessibility obligations the Town of Sandwich should consider:

1. Relocation of its programs, services and activities within current facility

Often the simplest solution is for the Town to use what it already has in place. IHCD strongly recommends the relocation of programs, services and activities to accessible locations within the facility.

2. Relocation of its programs, services and activities to another facility

When not possible to relocate them within the current facility, program, services, and activities should be relocated to an accessible facility.

3. Renovation/alteration of its facilities to ensure access to programs, services and activities

The Town may consider the renovation of its facilities to ensure that the programs, services and activities are offered in the most integrated seating possible.

Special consideration should be given to the Town Offices. The distribution of Town offices across three different locations is far from optimal. The most effective way to provide program accessibility is to have as many Town Offices as possible in a single location.

Note that any corrective actions needed to ensure program accessibility must comply with the requirements of the 2010 ADA Standards and/or 521 CMR.

To determine which buildings must be made accessible, the Town should consider:

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- How to provide the program in the most integrated setting appropriate;
 - The locations where the activities are offered;
 - Which facilities are accessible and to what extent.

Key Recommendations for the Building Facilities:

- Ensure there is an accessible route from all arrival points to those areas in the building where the programs, services and activities are provided.
- Ensure that fully accessible toilet rooms are provided in the building. Where it is technically infeasible to provide multi-user toilet rooms provide a single-user toilet room in the same area as the existing multi-user toilet rooms.
- Ensure that where the programs, services or activities are offered there is a sufficient number of accessible features (accessible counters, accessible work surfaces, etc.)
- If audible communication is integral to the use of the space, provide a compliant assistive listening system.

IHCD submitted separate reports for each municipal building and outdoor facility that was surveyed. Buildings were assessed for compliance with the ADA and/or state code. To assist in prioritizing accessibility improvements to ensure compliance with the ADA Title II, each of the building and outdoor area reports include an overview that identifies the most substantial accessibility issues and order of magnitude cost estimate for corrective action. Additionally, a detailed catalog that supplements the ADA Self-Evaluation report is also included. The catalog provides element-by-element illustrated photos of compliance issues, location and measurements – when applicable - at each assessed facility accompanied by recommendations and cost estimation for each accessibility issue.

In addition, a spreadsheet of priorities for corrective action organized by type of building and including order of magnitude costs was provided to the Town. When the Town presents findings and recommendations to the community and receives feedback, some recommendations may need adjustment. These spreadsheets are a capital planning and budgeting file - the “ADA Transition Plan” intended as a long-term tool to update as work is completed. The Town should make a good effort to complete the work in a reasonable time (IHCD recommends a five to ten year period). Together, the ADA Self-Evaluation and ADA Transition Plan will enable the Town to make substantial progress in meeting its ADA responsibilities. The recommendations for corrective action on policies and procedures of the ADA Self-Evaluation are not included in the ADA Transition Plan since that is limited to capital issues. But they are a blueprint for meeting compliance responsibilities other than capital.

Public Buildings

Main Town Hall

Accessibility issues at Main Town Hall include lack of a compliant ramp leading to the emergency exit, lack of an assistive listening system at the auditorium (2nd floor) and service counters that are higher than the maximum height allowed (1st floor). Other accessibility issues include signs that lack raised characters and braille and that are not mounted alongside each door on the latch side (1st floor) and lack the International Symbol of Accessibility (ISA) at the toilet rooms and minor accessibility issues in the toilet rooms.

IHCD recommends the following improvements at Main Town Hall:

- Provide a compliant ramp (route to the emergency exit).
- Provide an assistive listening system (auditorium on the 2nd floor).
- Provide accessible counters.
- Provide signs with raised characters and braille and ensure signs are mounted alongside each door on the latch side.
- Provide signs with the International Symbol of Accessibility (ISA) at the toilet rooms.
- Ensure the clear floor space at all fixtures in the toilet rooms are maintained at all times.

IHCD recommends the following best practice and inclusive design improvements at the Main Town Hall:

- Recommend replacing or removing the patterned carpet on the central stairway with a surface that improves the visual contrast of the stair risers.
- Recommend removing door knobs where present, saving the door knobs because they may be historic, and installing accessible door hardware that does not require tight grasping, pinching, or twisting of the wrist.

Alternately, the Town has the option to prop the doors open. This is an acceptable and compliant solution though, not ideal.

Town Hall Annex

The major accessibility issues at the Town Hall Annex is the lack of access to all programs and services in the building. Also of concern is the lack of compliant service counters, lack of compliant designation signs and lack of emergency egress signage (braille and raised characters).

IHCD recommends the following improvements at Town Hall Annex:

- Provide accessible counters.
- Provide designation signs with raised characters and braille.
- Provide egress signs with raised characters and braille.

Sandwich Public Library

Accessibility issues at the Sandwich Public Library include lack of compliant slopes at the route from the parking area to the accessible entrance and lack of a compliant van accessible parking space. Also of concern is the lack of fully accessible toilet rooms, lack of an accessible counter at the front checkout desk and lack of work surfaces with the required knee and toe clearance. Other accessibility issues include lack of compliant designation signs (raised characters and braille), lack of compliant egress signs (raised characters and braille) and lack of directional signage. Additional accessibility issues include lack of compliant door hardware, lack of a drinking fountain for standing users, lack of a fire alarm (conference room on the first floor) and lack of securely attached mats.

IHCD recommends the following improvements at the Sandwich Public Library:

- Provide a compliant van accessible parking space.
- Provide fully accessibility toilet rooms.
- Provide an accessible counter at the front checkout desk.
- Provide accessible work surfaces with knee and toe clearance.
- Provide designation and egress signs with raised characters and braille.
- Provide compliant door hardware.
- Provide a drinking fountain for standing users.
- When fire system is updated, provide a visual and audible fire alarm in the conference room (1st floor).
- Ensure mats are securely attached.

Note: Remove snow accumulation at the accessible parking spaces to ensure they are maintained in operable working condition.

Miscellaneous Town Offices

Accessibility issues at Miscellaneous Town Offices include lack of maneuvering clearance at the storm door at the building's entrance and lack of an interior accessible route to the offices, meeting rooms and toilet rooms located on the second floor. Accessibility issues at the toilet room include lack of accessible single-user toilet rooms. Other accessibility issues include lack of compliant service counters, lack of compliant handrails and extensions at the top and bottom

risers (central stairway) and lack of compliant door hardware. Additional accessibility issues include lack of compliant designation signs (raised characters and braille), egress signs (raised characters and braille) and lack of directional signs.

IHCD recommends the following improvements at the Miscellaneous Town Offices:

- Ensure maneuvering clearance is provided at the storm door (building entrance).
- Provide accessible counters.
- Provide accessible single-user toilet rooms.
- Provide compliant handrails (central stairway).
- Provide compliant door hardware.
- Provide designation and egress signs with raised characters and braille.
- Provide directional signs.

IHCD recommends the following best practice and inclusive design improvements at the Miscellaneous Town Offices:

- Recommends locating as many Town offices as possible in a single location. The distribution of Town offices across three locations is far from optimal. And this property is three miles from Town Hall.
- Recommend providing a Town logo sticker in the middle of the door or some type of glass manifestation (e.g., glass safety strips) to alert people with low vision or people with cognitive disabilities of the presence of the glass at the door.

Human Services Building

Accessibility issues at the Human Services Building include lack of compliant accessible parking spaces and lack of an accessible route to the picnic table. Accessibility issues at the toilet rooms include lack of fully accessible toilet rooms (first floor and basement) and lack of an accessible toilet room in the nurse's office. Also of concern is the lack of compliant door hardware, lack of maneuvering clearances at some doors and lack of a compliant threshold at the entrance door (basement). Additional accessibility issues include lack of compliant egress signs (raised characters and braille), lack of directional signs and lack of the International Symbol of Accessibility (ISA) at the accessible entrances/exits. Other accessibility issues include lack of a drinking fountain for standing users, lack of an accessible service counter (basement), and lack of an accessible picnic table. Accessibility issue at the kitchen includes a lack of a fully accessible kitchen.

IHCD recommends the following improvements at the Human Services Building:

- Provide compliant parking spaces (both parking lots).

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- Provide an accessible route to the picnic table.
 - Provide fully accessibility toilet rooms (1st floor and single-user toilet in basement).
 - Provide a fully accessibility toilet room at the nurse's office.
 - Provide compliant door hardware.
 - Ensure maneuvering clearance is maintained at all doors.
 - Provide a compliant threshold at the entrance door (basement).
 - Provide an accessible service counter (basement),
 - Provide a drinking fountain for standing users.
 - Provide an accessible picnic table.
 - Provide egress signs with raised characters and braille.
 - Provide directional signs at the inaccessible entrances/exits to the accessible entrances/exits.
 - Provide the International Symbol of Accessibility (ISA) at the accessible entrances/exits.
 - Provide a fully accessible kitchen (including an accessible sink, an accessible work surface, etc.).

IHCD recommends the following best practice and inclusive design improvements at the Human Services Building:

- IHCD staff was informed that members of the public are asked not to use the emergency exit near the kitchen. Recommend providing a sign directing members of the public to a different accessible exit.
- Recommend providing a larger typeface font at message boards.
- Recommends providing handrails with extensions beyond the top and bottom riser at the stair.
- IHCD staff was told that members of the public are responsible for retrieving mobility aides from the storage garage. Recommend having staff available that can provide that service for members of the public with disabilities.

Recreation Department

The assessment for this facility includes the Recreation Department and Hamilton Hall. The accessibility issues at the basketball court, tennis court, and waterfront access to Peters Pond are included in the report for Oakcrest Cove.

Accessibility issues at the Recreation Department include excessive running slopes and cross slopes at the route from the parking area to the entrances to the buildings and lack of fully accessible parking spaces. Accessibility issues at Hamilton Hall include lack of a compliant exterior ramp (minimum width, railing, etc.). Also of concern is the lack of accessible multi-user toilet rooms (basement level and 1st floor), lack of accessible showers (1st floor) and minor

accessibility issues at the toilet room located in Hamilton Hall. Other accessibility issues include lack of egress signs (raised characters and braille), lack of compliant designation signs at the toilet rooms and lack of directional signs at the inaccessible emergency exits. Additional Accessibility Issues include lack of an accessible counter at the front desk, lack of hardware that does not require tight pinching, grasping, or twisting of the wrist (Function Hall kitchen and office doors) and lack of fire alarms at the Hamilton Hall (meeting room). Accessibility issue at the kitchens located at the Recreation Department and the Hamilton Hall includes a lack of fully accessible kitchens.

IHCD recommends the following improvements at the Recreation Department and Hamilton Hall:

- Provide an accessible route (from the parking area to the entrances to the buildings).
- Provide compliant accessible parking spaces.
- Provide a compliant exterior ramp (Hamilton Hall).
- Provide accessible toilet rooms (basement level, 1st floor and Hamilton Hall).
- Provide egress signs with raised characters and braille.
- Provide directional signs at the inaccessible entrances/exits to the accessible entrances/exits.
- Provide designation signs with raised characters and braille.
- Provide an accessible counter (front desk).
- Provide compliant door hardware. (Function Hall kitchen and office doors)
- When the fire alarm system is updated, provide fire alarms at the Hamilton Hall (meeting room).

Note: Remove snow from the accessible parking spaces to ensure they are maintained in operable working condition. In addition, the maneuvering clearance at the meeting hall's exit also need to be maintained and free of snow.

IHCD recommends the following best practice and inclusive design improvements at the Recreation Department:

- Consider removing excess stored goods in order to improve circulation in the Function Room Office.

Marina Harbormaster's Office

Accessibility issues at the Marina Harbormaster's Office and the 'Tenants House' toilet rooms includes lack of fully accessible roll-in showers. Also of concern is the lack of accessible fixtures (urinal, toilet and lavatory) at the 'Tenants House' toilet room. Additional accessibility issues

include lack of the identification sign with the designation “van accessible” at the van accessible parking space, lack of compliant designation signs (raised characters and braille) and lack of a drinking fountain for standing users.

IHCD recommends the following improvements at the Marina Harbormaster’s Office:

- Provide compliant accessible roll-in showers (Marina Harbormaster’s Office and the Tenants House).
- Provide fully accessible toilet rooms (Tenants House).
- Provide compliant designation signs with raised characters and braille.
- Provide a drinking fountain for standing users.
- Provide a compliant identification sign with at the van accessible parking space.

Town Owned Tourist Facilities (Hoxie House)

Accessibility issue at Hoxie House include the lack of an accessible route to the entrance and lack of a compliant accessible entrance. Also of concern is the lack of accessible vertical access to the second floor and the doorways that are narrower than the minimum width required. Other accessibility issues include lack of a directional sign to the accessible entrance, lack of compliant accessible parking spaces and lack of a securely attached mat.

IHCD recommends the following improvements at Hoxie House:

- Provide an accessible route to the entrance.
- Repair doorways to provide the minimum width required.*
- Provide a directional sign at the inaccessible entrance
- Provide compliant accessible parking spaces.
- Ensure mat is securely attached.

*Note: Due to the historic nature of the building, this repair might be technically infeasible.

IHCD recommends the following best practice and inclusive design improvements at Hoxie House:

- Consider adding a sign on the low-hanging beams that say "Low Headroom" or "Low Ceiling".
- Due to the historic nature of the building, IHCD recommends providing a wayside depicting views from the second floor.

Town Owned Tourist Facilities (Grist Mill)

Accessibility issues at Grist Mill include lack of stable, firm, and slip resistant routes to the Mill entrances from the ticket counter and the lack of an accessible route to the picnic table in the area. Other accessibility issues include excessive thresholds at doorways, lack of compliant egress signs, lack of a securely attached mat at the main entrance and lack of an accessible picnic table.

IHCD recommends the following improvements at Grist Mill:

- Repair exterior routes.
- Provide an exterior ramp to provide access to the upper level.
- Provide an accessible picnic table.
- Provide compliant egress signs with raised character and braille.

IHCD recommends the following best practice and inclusive design improvements at Grist Mill:

- Recommend providing a wayside depicting the view from the Mill Viewing Area.

East Sandwich Fire Sub-Station

Accessibility issues at the East Sandwich Fire Sub-Station include a lack of a van accessible parking space. Other accessibility issues include lack of a fully accessible single-user toilet room (near the main entrance). Additional accessibility issues include lack of directional signage at the inaccessible entrance and emergency exits, lack of compliant hardware at doors and lack of knee and toe clearance at the picnic table.

IHCD recommends the following improvements at the East Sandwich Fire Sub-Station:

- Provide a compliant van accessible parking space.
- Provide a fully accessible single-user toilet room (near the main entrance).
- Provide directional signs at the inaccessible entrance and emergency exits.
- Provide compliant door hardware.
- Provide an accessible picnic table (with knee and toe clearance).

IHCD recommends the following best practice and inclusive design improvements at East Sandwich Fire Sub-Station:

- IHCD did not review areas used exclusively by employees but strongly recommends designing those areas to be more accessible.
 - At the kitchen area, recommend providing an accessible table (with knee and toe clearance) and a counter mounted at least 34" above the floor.

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- Recommend having the handrails, at the stairs to the firefighter’s quarters mounted between 33” – 36” above the floor.

Sandwich Hollows Golf Club

Accessibility issues at the Sandwich Hollows Golf Club include lack of the required number of accessible spaces at the parking lot, lack of the required accessible features at the designated accessible parking spaces and excessive running slope at the accessible route (from the accessible parking spaces to the clubhouse accessible entrance). Also of concern is the lack of a compliant ramp leading to the accessible entrance, lack of maintenance at some of the golf cart routes (near 6th, 10th, 13th, and 16th holes) and lack of accessible routes to some amenities along the golf course (picnic area near entrances, ball cleaners, trash cans, etc.). Accessibility issues at the toilet rooms include a lack of fully accessible single-user toilet rooms (basement level, 1st and 2nd floors). Other accessibility issues include lack compliant signage (raised characters and braille) at the emergency exits, lack of compliant designation signs (raised characters and braille), lack of the International Symbol of Accessibility (ISA) and lack of directional signs. Additional accessibility issues include lack of an accessible counter at the clubhouse, lack of an accessible dining surface at the bar in the restaurant, lack of an accessible work surface at the score computer in the pro shop and lack of securely attached mats along the accessible routes.

IHCD recommends the following improvements at Sandwich Hollows Golf Club:

- Provide the required number of accessible spaces at the parking lot.
- Ensure all designated accessible parking spaces have the required access aisles and that identification signs are mounted at the minimum height required.
- Reduce the excessive running slope at the accessible route (from the accessible parking spaces to the clubhouse accessible entrance),
- Provide a compliant ramp leading to the accessible entrance.
- Ensure golf cart routes (near 6th, 10th, 13th, and 16th holes) are maintain in operable working condition.
- Provide an accessible route to all amenities along the golf course (picnic area near entrances, ball cleaners, trash cans, etc.).
- Provide fully accessible toilet rooms (basement level, 1st and 2nd floors).
- Provide egress signs with raised characters and braille.
- Provide designation signs with raised characters and braille. Ensure designation signs are located on the latch side of the door.
- Provide directional signs at the inaccessible entrances/exits.
- Provide an accessible counter at the clubhouse.
- Provide an accessible dining surface at the bar in the restaurant.

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- Provide an accessible work surface at the score computer in the pro shop.
 - Securely attached mats along the accessible routes.

IHCD recommends the following best practice and inclusive design improvements at the Sandwich Hollows Golf Club:

- Recommend providing handrails with a circular cross-section.
- Tee maps lack information on the location of the golden accessible teeing points; recommend adding the location of the accessible teeing grounds.

Outdoor Facilities Overview

The outdoor facility set includes eleven (11) parks/outdoor areas. The accessibility survey of those spaces encompassed elements such as accessible routes, walking surfaces, slopes, picnic tables, play areas, recreational areas, beaches and maintenance of accessible features.

The program accessibility obligation does not typically require that every outdoor area be made accessible. As noted before, “when viewed in its entirety” applies to programs for which there are multiple locations for comparable programs. Usually, a public entity determines which method it will use for meeting its program accessibility obligations. When structural changes are made to existing facilities, the changes must comply with the 2010 ADA Standards for Accessible Design. When choosing to purchase equipment or to make structural changes, the public entity should factor financial resources required to maintain program accessibility.

Over time, the Town will need to reassess its compliance with program accessibility, and it may become necessary to acquire new accessible equipment or make structural modifications

When looking at the outdoor facilities, Sandwich needs to ensure that a sufficient number is accessible. For instance, the Town of Sandwich offers a variety of experiences at its parks/outdoor areas e.g., playgrounds, picnic areas, playing fields, beach access, etc. The Town needs to make sure that a sufficient number of each type of these facilities is accessible. The Town also needs to keep in mind that each unique program needs to be accessible.

To determine which outdoor areas must be made accessible, the Town should consider:

- How to provide the program in the most integrated setting appropriate;
- Locations where the activities are offered;
- Which outdoor areas are accessible and to what extent;

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- Level of dispersion of the accessible outdoor areas (playgrounds, baseball fields, soccer fields, beaches, etc.) and convenience to reach them (accessible by car or pedestrian routes).

Key Recommendations for the Outdoor Facilities:

- Ensure there is an accessible route to all elements in the park/outdoor space (picnic area, playground, beaches, basketball court, toilet facilities, etc.).
- Ensure that accessible routes are provided to and around the playground; in addition, ensure that an accessible route is provided in the play area to all accessible play components.
- Ensure that a certain number of amenities (at least 5%) in the parks/outdoor spaces are accessible (e.g. picnic tables, benches, etc.).

Parks / Outdoor Areas

Forestdale Elementary School (only the outdoor area was surveyed)

Accessibility issues at the Forestdale Elementary School include lack of an accessible route to and between amenities near the main entrance (picnic area and community garden), lack of a surface that is firm, stable and slip resistant at the community garden, lack of maintenance at the route near the parking area and minor accessibility issues at the parking lot. Other accessibility issues include lack of an accessible route to areas of sport activity (baseball field and lacrosse field), lack of a compliant accessible route to and around the playground and lack of an accessible route to each play component in the playground. Also of concern is the excessive running slope at the access ramp to the elevated play components in the playground. Additional accessibility issues include lack of an accessible picnic table and lack of an accessible portable toilet.

IHCD recommends the following improvements at Forestdale Elementary School:

- Provide an accessible route that connects all amenities (picnic area and community garden).
- Provide a surface that is firm, stable and slip resistant at the community garden.
- Provide compliant identification signs at the accessible parking spaces.
- Provide an accessible route to areas of sport activity (baseball field and lacrosse field).
- Provide an accessible route to and around the playground.
- Provide an accessible route to all play components in the playground.
- Provide an accessible picnic table.
- Provide an accessible portable toilet.

IHCD recommends the following best practice and inclusive design improvements at Forestdale Elementary School:

- Recommend providing raised planters for seated users with knee clearance and mounted 34” above the ground.
- Recommend providing accessible parking spaces near the entrance to the sport activity and staff parking lot.

Oak Ridge School (only the outdoor area was surveyed)

Accessibility issues at the Oak Ridge School include lack of compliant accessible parking spaces and the route from the parking lot on the west side to school has an excessive cross slope at the curb ramp. Other accessibility issues include lack of an accessible route to the areas of sport activity, lack of accessible routes to team seating areas, lack of an accessible route to the rubberized surface around the playground and lack of a compliant accessible route to and around the swing set. Also of concern is the non-compliant transfer system on the playground. Additional accessibility issues include lack of an accessible portable toilet located on an accessible route.

IHCD recommends the following improvements at Oak Ridge School:

- Provide compliant accessible parking spaces. Ensure identification signs are mounted at the minimum required height and add the designation “van accessible” at the sign located at the van accessible space.
- Provide a compliant curb ramp (route from the parking lot on west side to school).
- Provide an accessible route to the areas of sports activity.
- Provide accessible routes to team seating areas.
- Provide an accessible route to the rubberized surface around the playground. Ensure the transfer system on the playground is compliant.
- Provide an accessible route to and around the swing set.
- Provide an accessible portable toilet and ensure it is located on an accessible route.

IHCD recommends the following best practice and inclusive design improvements at Forestdale Elementary School:

- Since the only way into the playpen at the school is by stepping over a ledge, consider finding an alternative playpen with a gate to allow for greater access.
- When restriping the parking lot on the west side of the school, ensure the curb ramp aligns with the access aisle at the accessible parking space.

Sandwich High School (only the outdoor area was surveyed)

Accessibility issues at the Sandwich High School includes lack of accessible routes to the majority of sport activity (including play areas, practice areas, seating areas, and dugouts), lack of an accessible route to the community garden and lack of the minimum width at the routes inside the community garden. Other accessibility issues include lack of accessible portable toilets and lack of an accessible picnic table (front of the school).

IHCD recommends the following improvements at Sandwich High School:

- Provide accessible routes to all areas of sport activity (including playing areas, practice areas, seating areas, and dugouts).
- Provide an accessible route to the community garden and ensure the minimum clear width at the routes inside the community garden are maintained.
- Provide accessible portable toilets and ensure they are located on an accessible route.
- Provide an accessible picnic table (front of the school).

IHCD recommends the following best practice and inclusive design improvements at Sandwich High School:

- Recommend providing raised planters for seated users with knee and toe clearance mounted 34" above the ground.

Ryder Conservation Lands

Accessibility issues at the Ryder Conservation Lands include lack of an accessible route to and between park amenities, lack of a route surface that is firm, stable and slip resistant, lack of an accessible route to the beach play area and to the normal recreation water level at Wakeby Pond. Other accessibility issues include lack of a compliant accessible route to and around play components and lack of fully accessible multi-user toilet rooms.

IHCD recommends the following improvements at the Ryder Conservation Lands:

- Provide an accessible route to and between park amenities.
- Provide a route surface that is firm, stable and slip resistant.
- Provide an accessible route to the beach play area and to the normal recreation water level at Wakeby Pond.
- Provide a compliant accessible route to and around play components.
- Provide fully accessible multi-user toilet rooms.

IHCD recommends the following best practice and inclusive design improvements at Ryder Conservation Lands:

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- Recommend providing seating areas 60" wide min. adjacent to beach mats near the normal recreation water level.
 - Recommend providing edge protection at the walkway to kayaking and sailing areas.

Snake Pond Beach

Accessibility issues at the Snake Pond Beach include lack of an accessible route to the beach. Other accessibility issues include lack of fully accessible multi-user toilet rooms and lack of audible and visible alarms in the toilet rooms. Additional accessibility issues include lack of a compliant van accessible parking space and lack of an accessible service counter at the "Snack Shack".

IHCD recommends the following improvements at Snake Pond Beach:

- Provide an accessible route to the beach (beach mat).
- Provide fully accessible toilet rooms.
- When fire system is updated, provide a visual and audible fire alarm in the toilet rooms.
- Provide a compliant van accessible parking space.
- Provide an accessible service counter at the "Snack Shack".

IHCD recommends the following best practice and inclusive design improvements at Snake Pond Beach:

- Recommend providing a seating area 60" wide minimum near the normal recreation water level (recommend using a beach mat to provide seating area).

Oak Crest Cove

Accessibility issues at the Oakcrest Cove and Peters Pond include lack of an accessible beach access route to the normal recreation water level and pavilion picnic area. Accessibility issues at the day camp toilet rooms include lack of accessible toilet rooms, lack of accessible transfer showers and lack of audible and visible alarms. Also of concern is the lack of an accessible toilet room trailer. Additional accessibility issues include lack of the compliant number of car and van accessible parking spaces, lack of accessible picnic tables and lack of designation signs with the International Symbol of Accessibility (ISA) at the toilet rooms.

IHCD recommends the following improvements at Oakcrest Cove and Peters Pond:

- Provide an accessible beach access route to the normal recreation water level and pavilion picnic area.
- Renovate toilet rooms at the day camp.
- Provide accessible transfer showers at the day camp.

- Provide an accessible portable toilet (near the toilet room trailer).
- Provide the compliant number of car and van accessible parking spaces.
- Provide accessible picnic tables.
- Provide designation signs with the International Symbol of Accessibility (ISA) at the toilet rooms.

IHCD recommends the following best practice and inclusive design improvements at Oakcrest Cove and Peters Pond:

- Recommend providing a seating area 60" wide minimum near the normal recreation water level (recommend using a beach mat to create seating area).

The Adventure Playground

Accessibility issues at the Adventure Playground include lack of a compliant accessible route to and around play components in the younger children play area.

IHCD recommends the following improvements at the Adventure Playground:

- Provide an accessible route to each play component.

East Sandwich Beaches

Accessibility issues at East Sandwich Beaches include lack of compliant van accessible parking spaces and lack of an accessible route to both beaches (55 North Shore Drive and at 147 North Shore Drive).

IHCD recommends the following improvements at East Sandwich Beaches:

- Provide compliant accessible van accessible parking spaces.
- Provide compliant beach access routes (beach mats at both beach locations).

IHCD recommends the following best practice and inclusive design improvements at East Sandwich Beaches:

- Recommend providing seating areas 60" wide minimum adjacent to beach access route near the high tide water level at both beach locations (recommend using a beach mats to create seating areas).
- Recommend providing a crosswalk from the non-beach side accessible parking area towards the start of the beach access route at 55 North Shore Boulevard.
- Recommend removing sand to maintain boardwalk at 55 North Shore Boulevard or providing a cane-detectible barrier on all sides of the small portion of the boardwalk that is above ground to prevent beach visitors from tripping or falling.

The Boardwalk

Accessibility issues at the Sandwich Boardwalk include lack of compliant accessible parking spaces at the parking lot, lack of a compliant ramps (Boardwalk ramp and over the dunes near the staircase) and lack of an accessible route to the beach from the Boardwalk because the Boardwalk connects to a staircase at the end near the ocean.

IHCD recommends the following for the Sandwich Boardwalk:

- Provide compliant accessible parking spaces at the parking lot.
- Provide compliant ramps (Boardwalk ramp and over the dunes near the staircase).
- Provide an accessible route to the beach from the Boardwalk.

IHCD recommends the following best practice and inclusive design improvements at Sandwich Boardwalk:

- Recommend providing a viewing platform accessible from the Boardwalk located at the top of the dune before the staircase to the beach. (A viewing platform would allow those who can't use the stairs to enjoy the boardwalk with a view of the beach and ocean.)
- Recommend providing a beach mat from the start of the beach near the stairs at the ocean end of the Boardwalk to the high tide water level, and recommend providing an accessible seating area that is 60" wide minimum near high tide level (recommend using a beach mat to create a seating area).
- Recommend reducing cross slopes on the edges of the beach access route (beach mat) just before ramp to staircase.
- Recommend reducing the running slope (10.00% max. recommended) on beach access route (both ends of beach mat) just before ramp to staircase.
- Recommend providing 2" high minimum edge protection on the exterior of the boardwalk for its full length from the Tobey Island parking area to the staircase at the dune above the beach, and from the Wood Avenue parking lot to the main Boardwalk.

Town Neck Beach

Accessibility issues at the Town Neck Beach include lack of the compliant number of van accessible parking spaces at the parking lots and lack of an accessible route to the beach at Town Neck Beach and at First Beach.

IHCD recommends the following improvements at the Town Neck Beach:

- Provide compliant accessible parking spaces.
- Provide compliant beach access routes (beach mats).

IHCD recommends the following best practice and inclusive design improvements at Town Neck Beach:

- Recommend providing a seating area 60” wide minimum near the high tide water level (recommend using a beach mat to create a seating area).
- Recommend providing a sign reading, “*No Beach Access*” at the non-accessible permanent dune crossing that was damaged in a storm and is blocked off at the beach end.
- If the damaged permanent dune crossing at Town Neck Beach is rebuilt, IHCD recommends that it comply with the slope, width and other requirements for permanent dune crossings stated in the Accessibility Standards for Federal Outdoor Developed Areas.

Reference List:

Federal Laws:

- American with Disabilities Act (ADA)
- 2010 ADA Standards for Accessible Design

State Law:

- 521 CMR Massachusetts Architectural Access Board – Rules and Regulations

Guidance:

- ADA Action Guide for State and Local Governments: www.adaactionguide.org
- ADA Checklist for Existing Facilities
- Outdoor Developed Areas: A Summary of Accessibility Standards for Federal Outdoor Developed Areas.
- US Access Board: <https://www.access-board.gov/guidelines-and-standards/buildings-and-sites/about-the-ada-standards/guide-to-the-ada-standards/animations>