Accessibility Evaluation and Transition Plan

Town of Sherborn

June 2025

Acknowledgements

The project team used the following websites in developing this plan. Where appropriate, references are cited. The team would like to recognize these invaluable resources:

- **Americans with Disabilities Act Title II Regulations**
- New England ADA Center's **ADA Title II Action Guide for State and Local Governments**
- Various accessibility resources throughout **mass.gov**

Table of Contents

Sherborn's Evaluation and Transition Plan is a lengthy catalogue of several separate documents. The table below outlines the sections of this document, which together form the framework for the Evaluation and Transition Plan. The final section of this document includes a menu of appendices, which are critical components of this Evaluation and Transition Plan and exist in separate documents.

Executive Summary

A brief overview for leadership outlining the federal requirement for the Town of Sherborn to be accessible to people with disabilities.

For Sherborn's Select Board

This document and its many appendices comprise Sherborn's Evaluation and Transition Plan for Sherborn, fulfilling a requirement for local government under Title II of the Americans with Disabilities Act (ADA). Town staff and volunteers supported the development of this plan by providing information and access to the project team and participating in trainings on program access and digital accessibility. This plan was also informed by community input on accessibility priorities, gathered through an online survey.

This plan is written to be easy to understand and implement. This section provides a high-level overview for you, an elected leader of Sherborn, on how you can support accessibility and compliance with the ADA.

By adopting or updating existing policies or bylaws

- Work with the Town Administrator and Town Counsel to customize accessibility-related policies in Appendix C to Sherborn's specifications and formally adopt them
- By prioritizing accessibility in leadership activities Expressly include accessibility in future Town-wide goals
- Allocate funding for accessibility needs, such as improvements to the built environment, assistive technology to provide accessible programs and services, and for staff and board member training opportunities
- Request periodic staff reports on the status of Transition Plan implementation
- Think about accessibility early and often – especially at initial capital planning phases
- Establish protocols for when third-party accessibility reviews are required for Town projects
- Use accessible communication practices when engaging with the public, and utilize an accessibility checker tool to make sure content is compliant

By making appropriate appointments or designations

- Appoint a member of the Disability Advisory Committee to critical Town task forces and ad-hoc committees to ensure accessibility remains at the forefront of future planning and design projects
- Review and update the job description and duties of the ADA Coordinator to reflect current needs
- Require that all Town vendors, contractors, and inspectors review and inspect for accessibility
- Draft language to include in contracts to ensure Town vendors and contractors understand they also are subject to Title II of the ADA and must provide accessible information, programs, and services

What is Accessibility

Accessibility means information and processes can be understood by all, buildings and spaces can be entered and used by all, and anyone who wants to can participate in programs and services in a meaningful way.

The **Americans with Disabilities Act (ADA)** is a federal law that prohibits discrimination against people with disabilities and requires employers, governments, businesses and nonprofits, telecommunications, and more to be accessible for all people, regardless of abilities or disabilities. **Title II** is the section of the law that governs local governments, guaranteeing the right to participate in and access local government. This document was developed to assist Sherborn to be compliant with Title II of the ADA.

Accessibility in Local Government

The Collins Center defines accessible local government as:

1. **PHYSICAL ENVIRONMENT**: Buildings, offices, rooms, or outdoor spaces, including emergency shelter, that people can access if they want or need to
2. **COMMUNICATION**: Information and materials that people can find, hear, see, or understand regardless of their abilities
3. **PROGRAMMING & SERVICES**: Events, programs, processes, services, or classes (including Town Meeting and elections) that people can attend or participate in in a meaningful way
4. **POLICY & PROCESSES**: Processes for providing reasonable accommodation when physical spaces, information, programs, or services cannot adapt to specific needs
5. **GRIEVANCE**: A procedure to file a grievance when necessary, and track grievances for future improvements

The process of developing these documents is referred to as an evaluation and transition plan where the Town evaluates how it currently complies with the ADA and sets a plan to transition to better compliance. Full compliance is not the expectation. Rather, through training, policy, and improvements of the physical spaces over time, the Town will become an accessible local government. **The law requires that as a whole, a local government's programs, services, and activities are accessible.**

Baseline Accessibility

The first steps of becoming an accessible local government are:

1. **Designate an employee** responsible for compliance with the ADA (commonly referred to as the ADA Coordinator)
2. **Post a notice** of the rights and protections under the ADA that explains how the Town complies with those obligations
3. **Establish a grievance procedure** for the public to use if they find those rights and protections are not in compliance with the ADA
4. **Conduct an Evaluation**, which is a comprehensive review of all programs, services, and activities operated by the Town, as well as its physical facilities
5. **Develop a Transition Plan**, which is a plan to move the Town towards operating more accessibly

With delivery of this final plan, Sherborn will have the means to accomplish all five steps.

Ways to Improve Access

The ADA does not require the Town to fix every physical barrier. Instead, the law requires that the Town is, when viewed in its entirety, accessible to all residents, regardless of their abilities. Policies and procedures also improve municipal accessibility, Appendix C offers draft policies and procedures for Sherborn to customize. Accessibility can also be improved by thoughtful planning for programs and services, such as moving a program or service to a more accessible location or a more accessible building, or providing a service in writing rather than verbally, or bringing documents to the car of someone with a mobility issue.

The real work happens in implementing the transition plan, which is an ongoing process, and responding to requests for accommodation and grievances. Remember the goal is that the Town is, when viewed as a whole, accessible.

Overview of Disabilities

The **Centers for Disease Control** define a disability as:

Any condition of the body or mind that makes it more difficult for the person with the condition to do certain activities and interact with the world around them.

A disability can affect someone's:

- Vision
- Movement
- Thinking
- Remembering
- Learning
- Communicating
- Hearing
- Mental health
- Social relationships

Figure 1. Icons Demonstrating Types of Accessibility Supports (from the **Noun Project Accessibility Icon** collection)
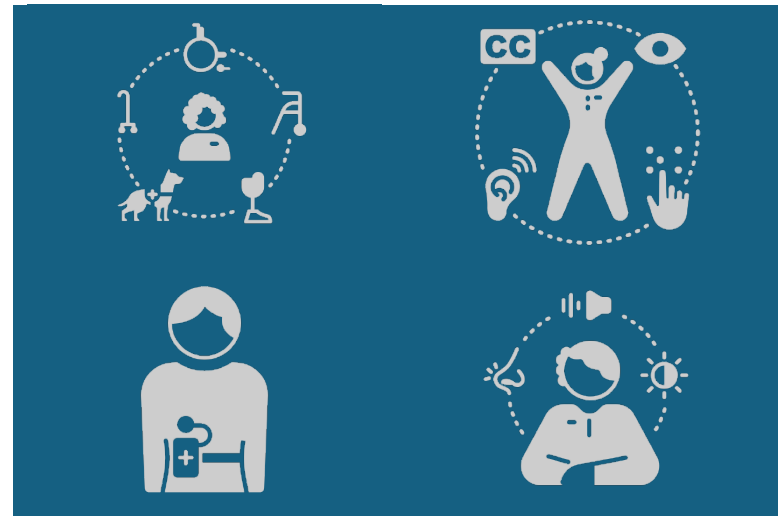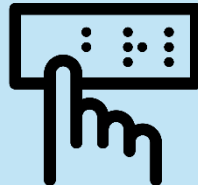
Overview of Reasonable Accommodations

Under Title II of the Americans with Disabilities Act, state and local governments are required to make "reasonable accommodations" to their policies, practices, and procedures when necessary to ensu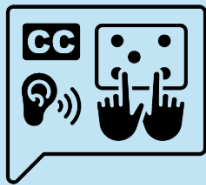re that individuals with disabilities have equal access to services, programs, and activities. This requirement ensures that all residents, regardless of ability, can fully participate in public life.

Reasonable accommodations are adjustments or exceptions to standard rules or practices that remove barriers for people with disabilities. These modifications must be provided unless providing them would fundamentally alter the nature of the service or pose an undue financial or administrative burden on the public entity.

Table 1. Examples of Reasonable Accommodations

AMBULATORY	HEARING	INDEPENDENT LIVING	COGNITIVE	SELF-CARE	VISION
Allow someone to submit paperwork over the phone or electronically if they have mobility limitations	Provide closed captioning and other assistive technology at public meetings	Allow a support person to accompany and assist someone even if it's not typically allowed	Explain a process without jargon for someone who has difficulty understanding	Extend a deadline for a process if a disability affects someone's ability to meet standard timelines	Read an application out loud for someone with sight limitations
Images from the **Noun Project Accessibility Icon** collection					

Title II prohibits Sherborn from discriminating anyone because of a disability. Sherborn's compliance with the law is a multi-pronged approach of updating communication materials, fixing physical barriers when possible or setting procedures to provide services around those barriers if necessary, regularly training staff on accessibility, continuously reviewing plans and processes for accessibility features, and updating this plan as priorities are addressed and new issues are identified.

From ADA.gov, the **Specific Requirements** for local government to comply with the ADA are:

- Communicate with people with disabilities as effectively as you communicate with others
- Make reasonable modifications to policies, practices, and procedures where needed to make sure that a person with a disability can access the state/local government's programs, services, or activities
- Allow service animals to be with their person even if you have a no pets policy
- Provide program access by ensuring that individuals with disabilities are not excluded from programs because existing buildings or facilities are inaccessible to them
- Follow specific standards for physical accessibility when building or altering a building or facility

How to Provide a Reasonable Accommodation

The person with a disability who is requesting an accommodation is the best expert in what type of accommodation they need. According to the **ADA Action Guide Title II Requirements**,

> "Public entities are required to give primary consideration to the type of auxiliary aid or service requested by the person with the disability unless they can demonstrate that another equally effective means of communication is available or that the aid or service requested would fundamentally alter the nature of the program, service, or activity or would result in undue financial and administrative burdens."

In most cases, the request is simple and can be performed without much planning or foresight. All accommodations should be tracked so that the Town can understand the types of frequently requested accommodations, in case more systematic changes should occur in the future. If it is determined that a requested accommodation results in an undue burden, that determination must be tracked and the Town still must provide another aid or service to meet the request.

Title II does not give much guidance about how to appropriately manage a request for accommodation, other than prohibiting "unnecessary inquiries" (**The Americans with Disabilities Act Title II Technical Assistance Manual**, II-3.5300). The Town should work with its legal counsel to determine appropriate questions and build those into its policies, procedures, and training.

MA-MOD provides the following guidance on **Reasonable Modifications** for businesses; the language in brackets was adjusted by the project team to reflect the circumstances of local government and the language used in this plan:

Supporting Documentation

"For most [accommodation] requests that are simple and on the spot, supporting documentation from a medical provider is not necessary and should not be requested.

It is rare that a request to a public place will require a letter of support from a medical provider. [Municipal employees] should remember that their analysis is rarely focused on determining whether a requester has a disability or what their symptoms are. The analysis will more likely be focused on the analysis of what the stated disability-related obstacle is and what would be an effective way to remove that obstacle.

In situations where the [Town] needs further information in order to evaluate a reasonable [accommodation] request, they are allowed to request it. They may ask for a supporting letter from a medical provider if:

- The disability-related need for the modification is not obvious
- They need verification from a professional about what modifications would be effective for the individual."

Best Practices

"Because any staff member could be asked for [accommodations] at any time, it is best practice for public places to:

- Make sure all staff are trained to recognize [an accommodation] request, understand how to resolve them, and understand when they have the authority to provide the modification themselves versus

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when they might need to pass on a request to a designated staff person, like [the ADA Coordinator]. This is important for in-person staff as well as staff that respond to phone or email inquiries.

- Consider what common requests are likely to be and how the goods or services will be provided when those requests arise.
- Decide in advance who the organization's decisionmaker will be when a complicated situation arises that frontline staff aren't prepared to respond to."

Meeting a request for an accommodation is a critical part of ensuring equitable access and fulfilling the ADA's goal of inclusion and non-discrimination in local government. **The person who submits the request is the best expert in how to adequately meet their needs.**

Sherborn's Accessibility Evaluation

The following section provides an overview of Sherborn's current public accessibility.

Methods of Evaluation

This plan uses four methods of discovery to form Sherborn's accessibility evaluation: an analysis of the Town's demographics, an evaluation questionnaire for the ADA Coordinator, a public survey, and an audit of Sherborn's main website, and its public facilities and outdoor spaces.

Demographic Context

The project team analyzed data from the **Massachusetts Community Health Data Tool** and the **Massachusetts Environmental Public Health Tracking Tool** to understand the context of Sherborn's demographics. Both tools rely on American Community Survey and Census data, as well as state-specific tracking tools.
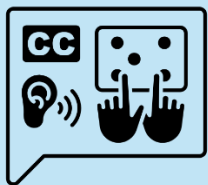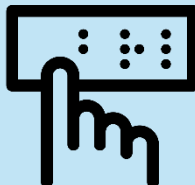
Overall, over five percent (5.35%) of Sherborn adults report having a disability, and the percentage is significantly higher to nearly 16 percent (15.97%) for residents over the age of 65.

Table 2. Sherborn Residents with Disabilities

	Under 18	Age 18-64	Age 65+
Percent of Sherborn residents that report having a disability	**0.76%**	**2.40%**	**15.97%**
Sherborn's population by age group	29.2%	54.86%	15.21%

In Sherborn, the most reported disability among residents is ambulatory limitations (1.81%), followed closely by hearing impairments (1.70%) and independent living difficulties (1.65%). Cognitive limitations affect 1.21% of residents. Fewer than 1% of residents with disabilities report vision impairments (0.23%) or challenges with self-care (0.54%).

Table 3. Percent of Residents with Disabilities, by Disability Type

1.81%	1.70%	1.65%	1.21%	0.54%	0.23%
Ambulatory	Hearing	Independent Living	Cognitive	Self-Care	Vision
Images from the **Noun Project Accessibility Icon** collection					

While age itself is not a disability, many people experience functional limitations, either temporary or progressive, as they get older. For planning purposes, it's important to note that (15.21%) of Sherborn residents are over the age of 65, a population more likely to benefit from accessible services and support.

Understanding residents' communication abilities and preferences is critical for all Town communications, especially during emergencies. State data shows that about (1.79%) of Sherborn households have slow or no internet, and a similar percentage (1.79%) report having no computer. These figures are lower than both state and national averages, but they still represent a segment of the population that may be harder to reach through digital communications alone.

Often, data collected at the state or federal level, like the disability figures presented here, can be imprecise, particularly for small communities. The following information provides a general sense of the levels and types of disability in Sherborn but should not be considered comprehensive. The data does not include information on all types of disabilities, either, or may rely on a person self-identifying as having a disability.

Questionnaire

The Town Administrator completed a self-evaluation questionnaire that asked about the Town's priorities for accessibility, existing accessibility plans, policies, or procedures, as well as any grievances that have been filed with the Town in the past ten years. The questionnaire also inquired about existing communication tools and applications the Town uses, and about any assistive devices the Town currently has.

The questionnaire determined that Sherborn's previous Evaluation and Transition Plan was conducted over ten years ago. The current Town Administrator has not received any formal grievances during his tenure but has heard verbal complaints and inquiries related to the accessibility of the Town Hall elevator as well as various trails and parks. The website was redesigned in 2024. The Town uses websites, Microsoft applications, Facebook, and Instagram for most public communications.

Public Survey

The Town offered an online survey to gather public input. The survey asked one open-ended question:

"How can Sherborn's public facilities, services and programs, and communications be more accessible for all community members, including those with disabilities or other challenges?"

The survey was open April 1, 2025, to June 3, 2025 (10 weeks) and was promoted through Town social media accounts, postings on the Town website, and at Town Meeting. The survey had good traction, with 137 respondents. Respondents expressed a strong desire for improved accessibility across Town facilities, programs, and communication methods. Over half (55%) of all responses advocated for safer, better maintained, and more extensive sidewalks and bike paths. Specifically, there is a desire to connect neighborhoods like Old Orchard and Page Farm to the Town center.

Participants also emphasized the importance of making the Town website more user-friendly and enhancing communication through email and newsletters. Additional suggestions include improving audio systems at public meetings to accommodate those with hearing impairments, expanding virtual participation in meetings, and improving accessible parking and entrances at public buildings. Overall, respondents highlighted both physical and digital barriers and called for thoughtful, inclusive infrastructure and communication improvements to ensure equitable

access for all community members. The priorities offered in the transition plan reflect many of the comments from the survey.

Sherborn's Accessibility Assets

Sherborn has many accessible features and assets. Some examples are:

- Sherborn has a newly designed website that incorporates many accessible design features and links to a **Website Accessibility** page with information about ADA compliance, supportive assistive technology, and a means to report issues with the website
- Sherborn has assigned the ADA Coordinator responsibilities to the Town Administrator, which is an appropriate, public-facing position to be assigned those responsibilities
- Sherborn has an active and engaged Disability Advisory Committee
- Town staff and volunteers demonstrate a culture of commitment to accessible practices
- Survey respondents highlighted many positive features of Sherborn, such as the programming and resources available at the Council on Aging
- Residents exhibit a shared commitment to making Sherborn more accessible and inclusive for all through robust survey engagement

The next section begins Sherborn's Transition Plan, which introduces Sherborn's Priorities for Accessibility Improvements, and provides a list of appendices to support and guide the Town's transition.

Sherborn's Transition Plan

Based on the findings in the evaluation, the remainder of this document and its appendices comprise the Town's plan to transition to a more accessible local government.

Sherborn's Priorities for Accessibility Improvements

Based on the evaluation learnings, the project team offers priorities to guide Sherborn to becoming a more accessible local government. Organized by the core domains of local government (Physical Environment, Communication, Programs and Services), each domain contains five priorities for implementation. Some priorities are simple actions, some priorities are to develop plans that will then lay out actionable next steps, and some may require securing financial and other resources. All priorities are achievable over the next five years.

The goal is to move each domain to a more accessible state. Not all aspects of local government can be made fully accessible, and that's where policy comes in. Sherborn must develop policies for providing access when something remains inaccessible, whether a room, an archived hard copy file, or a regulatory board approval process that can't be simplified. The Town must show a good faith effort in improving accessibility, and the priorities outlined in this plan offer starting places.

Appendix A offers a tool to support staff in implementing these identified priorities. The objectives and action items the project team added to the tool are for illustrative purposes only and should be reviewed and adjusted by Sherborn staff.

Physical Environment

Appendix B contains a detailed physical environment audit and a priority guide developed by our architectural access experts at KMA. Consult that Appendix for more detail on the extent and breadth of the findings. Note that **Title II requires the Town to post signage at inaccessible entrances directing the public to an accessible entrance or to a location at which they can obtain information about accessible facilities.** For any entrances or facilities that are inaccessible, this signage is a priority and can be adjusted as improvement projects are completed.

A note about inaccessible parking and walkways: the US Access Board's "**Guide to the ADA Accessibility Standards: Floor and Ground Surfaces**" states:

> "Accessible floor and ground surfaces must be stable, firm, and slip resistant. Stable surfaces resist movement, while firm surfaces resist deformation by applied forces. Accessible surfaces remain unchanged by external forces, objects, or materials."

While pavement or asphalt is one commonly used solution, it's not the only one. Working with a designer familiar with accessibility codes is the best way to determine a solution that meets accessibility laws and codes while avoiding other issues such as designing for proper drainage. Wood, grass mats, porous pavement, and gravel grids are options, as are designs that include accessibility among other features such as rain gardens and shade trees.

Below are the top five Sherborn Town government facilities requiring improvements, ranked by frequency of use ("traffic") and degree of inaccessibility:

1. **Address issues that hinder access to Town Meeting.** Survey responses indicated both physical and communication access issues. Voting and Town Meeting access are the most crucial elements of local government and access to those functions are most critical. The facility audit found Lindquist Commons access is hindered by accessible parking with excessive slopes and missing signs, non-compliant ramps leading to the auditorium, an auditorium with egregious instances of non-compliance for a large, assembly space used for public meetings, and partially accessible toilet rooms. Survey responses indicate issues with physical access, such as having to climb stairs to check in, requests for closed captioning or live transcription, and general difficulties hearing Town Meeting proceedings. There were requests in the survey for remote participation for Town Meeting, which currently is not possible, but MOD may be able to assist the Town in developing other, more accessible solutions

2. **Develop strategies for improving pedestrian access and walkability across Town in light of existing projects and plans.** Survey responses indicate that sidewalks and connected pedestrian access are community priorities. The Town has existing projects, such as the village center transportation improvement project, that include improvements in pedestrian access. Any improvements to walkability should include third-party accessibility reviews to ensure design plans include features appropriate for mobility-challenged residents

3. **Develop a strategy for improving accessible parking spots and parking signage across Town**. The audit found many examples of noncompliant parking signage at Town facilities. Strategically approaching the issue Town wide may allow for cost savings and design innovations. A Town-wide strategy can facilitate quality control for wayfinding, too, as wayfinding signage can be improved comprehensively and implemented Town-wide

4. **Improve access to recreational facilities and expand accessible recreational features.** The outdoor spaces audit found that athletic/recreational areas access is hindered by missing or non-compliant accessible parking, and sports areas (soccer/lacrosse/baseball fields, tennis/pickleball and basketball courts, skate park, etc.) and associated team/player and/or spectator seating (when provided) that are not connected to an accessible route. Additionally, beach/water access at Farm Pond Beach is hindered by non-compliant accessible parking, completely inaccessible boat launch and boat slips, and a beach that is not connected to an accessible route. Survey responses indicate difficulty accessing restroom facilities, needing more accessible parking at Farm Pond Beach, and requesting accessible tennis courts and playgrounds

5. **Review the audits and raw survey data to determine additional facility improvement priorities.** The audit found both significant and minor accessibility issues at all facilities audited, and the survey responses reported a wide range of issues such as stair-only access in the library, multiple requests for sidewalks behind Pine Hill School, issues with automatic doors at Town Hall, and the lack of accessible parking, pedestrian access, and handrails throughout Town facilities. Further review and discussion is required to determine a strategy for mitigation, see the section **Translating Priorities into Action** for suggestions

Communication

A municipality's website is its core public communication tool. Sherborn's main website meets many accessibility criteria, though multiple survey responses indicated information is either missing or hard to find on the website. Sherborn also has many external websites, which is not recommended. Typically, the project team recommends most Town functions (departments, boards and committees, planning activities, processes and applications) be hosted on the Town's main website, with only departments that require websites with very specific audiences or functionality needs, such as libraries and schools, using external websites.

Each additional website adds challenges to ensuring compliance with accessibility guidelines. The challenge with any municipal website is to ensure the website stays accessible as processes, materials, and documents are added, adjusted, and uploaded. Sherborn's deadline for Web Content **Accessibility Guidelines (WCAG) 2.1** compliance is **April 26, 2027**.

There is more to accessible communications than websites, as well. Meeting agenda, program posters, regulations, and application forms are all examples of communications that must be accessible. The following list provides recommendations for priorities for accessible Town communications:

1. **Develop a plan for website compliance**. In Sherborn's case, the first step should be consolidating external websites. (Typically, the project team supports external websites for libraries and schools, as those departments require a different set of functions (examples: online catalogues, password-protected access for parents, multilingual content). Most municipal departments require online functions that can be supported by the average municipal content management system such as calendar, carousel or other display of current programs, access to rules or policies, application forms or software.) By moving most external content onto the Town's website, and by checking for accessibility as content is migrated, the Town will be better prepared to make all Town web content WCAG compliant by April 2027. Customize and formally adopt an archiving policy and procedure for online materials. Train all staff who upload material in accessible uploads (see Appendix D for training materials). Set deadlines for reviewing existing material for plain language improvements. Develop a plan so that any content

added as of FY26 is compliant, and archiving is complete for compliance deadline of April 2027. Make sure any remaining external sites abide by the plan deadlines, as well

2. **Customize and finalize draft language, including a formal grievance procedure,** from Appendix C for posting on the Town's website and for all public meeting postings and event or program promotions. Clearly state how to file a grievance on the Town's website and other prominent locations such as Town bulletin boards

3. **Post plain language signage about accessible parking and accessible wayfinding** to enter Town facilities. Check that all accessible wayfinding is clearly posted prior to critical events such as voting, Town Meeting, and any emergency operations while plans are made to make long term improvements to the physical environment. The Disability Advisory Committee may be able to assist with these efforts. For programs and services offered in inaccessible locations, put a formal procedure in writing on how those services can be provided in an accessible format so it is available for all staff to deploy

4. **Make public meetings accessible**. Public survey responses included requests that all meetings be hybrid. Setting hybrid meetings as the standard allows for consistent closed captioning ability, as well as enables access for other reasons, such as inability to drive at night. Survey respondents appreciate the existing hybrid meetings. Some respondents indicate trouble hearing speakers at in-person and hybrid public meetings. To address this, ensure microphones are available and properly amplified and instruct chairs to remind speakers to use the microphones. One respondent suggested installing hearing loop technology[1] in the Select Board meeting room. The Town may wish to install one as well in the Lindquist Commons. Enable captions or provide Communication Access Realtime Translation, also known as CART at meetings, including Town Meeting

5. **Establish good communication standards and procedures**: such as newsletters, promoting services online and manually through posters, banners, and variable message boards, and responding to inquiries in a timely manner. Survey responses included requests for more accessible information online and in resident inboxes and mailboxes, as well complaints about staff not returning phone calls

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[1] For more information on hearing loops see "Listening in Public Venues" from the Hearing Loss Association of America at
 https://www.hearingloss.org/find-help/hearing-assistive-technology/hearing-loop-technology/

Programs and Services

Compliance with the ADA is the duty of the whole Town, and all Town programming and services should be considered from the lens of accessibility. The following priorities are offered to help Sherborn foster a culture of accessibility. There are likely more steps a specific department or board can take to be more accessible, the priorities below provide a more general overview:

1. **Support the ADA Coordinator on critical tasks**:
    a. Post signage at inaccessible entrances and facilities directing the public to accessible entrances or how to request access to programs and services
    b. Establish a specific email address for ADA related communication (for example: **ADA@SherbornMA.gov** which can deliver mail directly to the Town Administrator). This makes it easier for the public to have a single contact for accessibility concerns, and keeps the information evergreen as the email address can be assigned to different staff inboxes for redundancy purposes or in case of staff turnover
    c. Customize draft language from Appendix C and after formal adoption, distribute the language among staff and volunteers for use
    d. Assemble a list of Sherborn's accessible facilities or entrances, and any programs or services with specific accessibility features. Share with all staff and volunteers, and update the list as improvements are made or programs are added. For historic facilities or wings, consider developing video or 3D tours
    e. Participate in trainings offered by MA MOD for local ADA coordinators
    f. Implement a centralized tracking system for accommodation requests and grievances for all Town staff and volunteers to utilize
2. **Specify in procurement requests and vendor contracts** that all Town vendors and consultants will meet ADA requirements under Title II. Include accessibility as a core consideration for project activities, physical environment projects, and plans. Identify a third party to review capital improvement plans for accessibility prior to determining project costs

3. **Review all emergency plans and procedures** to ensure that accessibility practices and considerations are included in emergency planning, preparedness, and response activities and plans (see Appendix E for accessible emergency planning resources)
4. As accessibility policies and procedures are formally adopted, include in **staff and volunteer training and onboarding** processes
5. **Assign departments and boards to self-evaluate for accessibility**. Task individual departments and boards to review documents, applications, and processes for accessibility improvements. Ask the Disability Advisory Committee for input on improvements

Translating Priorities into Action

The priorities identified in each domain, as well as the draft tasks in the implementation guide provide a starting point for the Town to transition to better accessibility. Figure 2 offers a guide for prioritizing accessibility projects beyond those identified in this plan. The highest priorities are removing impediments to fundamental civil rights such as access to education, voting, or due process. From there, the Town prioritizes improvements that have been identified by the public already, ensuring accessibility is built into any projects that are already planned and budgeted for, that nothing new is created or designed that is inaccessible (from forms, processes, content, to paths or playgrounds), and then targeted items that are easily remedied such as signage, moving existing items, or adjusting processes. Finally, the Town can itemize and prioritize remaining deficiencies and barriers for future improvements.

Figure 2. How to Prioritize Accessibility Improvement Projects in Local Government

How to Prioritize Accessibility Improvement Projects in Local Government

WHAT IMPEDES FUNDAMENTAL CIVIL RIGHTS
(Access to education, voting (Town Meeting and elections), due process)

What the Public Identifies
(Via complaints, surveys, public comment)

What is Already in the Works
(Planned and budgeted construction, upgrades, purchases)

What Hasn't Been Created
(New documents, website content, playground)

What Can Easily Be Fixed
(Move soap dispensers, print a new sign, adjust a process)

Everything else is inventoried and further prioritized

UMass Boston

The priorities offered in the physical environment domain included recommendations that the Town engage in further discussion and prioritization exercises to develop strategies to improve:

- Pedestrian access and walkability
- Accessible parking and wayfinding
- Recreation facilities and features
- Additional facility improvements

Developing those strategies is a political process that requires an understanding of current and future capital improvement projects, which facilities, areas, and buildings experience the highest use, alignment with Sherborn's broader municipal goals and existing plans, as well as available resources.

Strategic planning in for these topics should consider not only legal obligations under the ADA, and which improvements are most vital to the community, but also what is feasible given staff capacity, fiscal constraints, and planned investments. This Transition Plan and its implementation guide can be updated to reflect the new strategies. Below are suggestions to guide strategic planning efforts.

- Convene relevant stakeholders, such as
  - Town Administrator/ADA Coordinator
  - Select Board
  - Disability Advisory Committee
  - Finance Director
  - Town Planner
  - Director of Department of Public Works
  - Recreation Director
  - Recreation Commission
- Determine whether and how the findings in this Evaluation and Transition Plan align with Sherborn's existing priorities. Priorities may be outlined in active plans and documents such as:
  - Town's Master Plan

- o Open Space and Recreation Plan
- o Capital Improvement Plan
- o Select Board annual goals or objectives
- o Any other plans or service provision policies (such as an Age-Friendly Community plan)
- Discuss which identified areas of improvement have the highest use or otherwise align with existing goals (for example, if Sherborn is working on becoming an Age-Friendly Community, then the Town may want to prioritize access for children under school age and seniors)
- Inventory resource availability, including:
  - o Internal staffing
  - o Town funding
  - o Grant opportunities
  - o Potentials for external partnerships

The strategies that emerge from these conversations can be added to the implementation guide (Appendix A), providing clear steps for implementation that align with existing plans and efforts. As strategies are realized the implementation guide can be updated.

For the ADA Coordinator

Most local governments designate an "ADA Coordinator" for the public whose tasks include:

1. Maintain a list of accessible buildings, programs, and services and distribute among Town staff and volunteers
2. Post and update notices about accessible entrances and facilities
3. Receive requests for modifications or accommodations from the public
4. Provide reasonable modifications and accommodations when requested
5. Receive, monitor, and track grievances from members of the public whose accessibility needs are not met
6. Update Sherborn's Evaluation and Transition Plan as improvements are made or additional issues are identified or reported via grievances or staff reports
7. Maintain communications with MOD and participate in trainings, and disseminate MOD materials among Town staff and volunteers as appropriate

Accessibility is the responsibility of all Town staff, volunteers, and contractors. The ADA Coordinator can locate and schedule training and development opportunities for all Town staff to continue to improve accessibility for the public, for example. Meanwhile, any department that provides programming, such as the Council on Aging (COA) or Library, will include language on how to request an accommodation on future program promotions, and offer assistive technology upon request. The Town Clerk will ensure voting is offered in an accessible manner, and review meeting notices for language on how to request accommodations. Other Town departments will review their processes for opportunities to simplify or strike unnecessary steps and then use plain language and other accessibility features such as headings and alt-text on any written materials.

The Town may choose to appoint an internal ADA Coordinator as well, for Title I (employment-related) accessibility actions. These are different functions and sections of law, the duties may be distributed across different positions or assigned to the same position.

ADA Coordinators are not alone in improving access to Sherborn's local government. The state offers many resources, which the project team highly recommends the Sherborn ADA Coordinator use. The **Massachusetts Office of Disability (MOD)** offers to municipal ADA Coordinators trainings and question and answer sessions as well as other peer resources. If Sherborn's ADA Coordinator receives a request for an accommodation that is unfamiliar or you are unsure how to source the request, calling the MOD is a good place to start.

Also, the **Massachusetts Commission for the Deaf and Hard of Hearing (MCDHH)** provides support and can help the Town with determining a reasonable accommodation so that programs, services, and opportunities are fully accessible to persons who are Deaf and hard of hearing.

For the Disability Advisory Committee

Massachusetts state law (**MGL Chapter 40, Section 8J**) allows, but does not require, a local government to establish a local disability commission. State law requires a local disability commission to have at least five members, hold a minimum of ten meetings a year, and to submit an annual report.

Sherborn has an active and dedicated Disability Advisory Committee, first established in 2008 with the following charge:

1. Research local problems of people with disabilities
2. Advise and assist municipal officials and employees in ensuring compliance with state and federal laws and regulations that affect people with disabilities
3. Coordinate or carry out programs designed to meet the problems of people with disabilities in coordination with the program of the Massachusetts Office on Disability
4. Review and make recommendations about policies, procedures, services, activities and facilities of departments, boards and agencies of Sherborn as they affect people with disabilities
5. Provide information, referrals, guidance and technical assistance to individuals, public agencies, businesses and organizations in all matters pertaining to disability
6. Coordinate activities of other local groups organized for similar purposes

This is a broad charge. The current Disability Advisory Committee may want to set annual goals or objectives to focus its work on a yearly basis. Also, Town's website lacks information, such as the purpose or mission of the Committee. The project team recommends updating the website with the charge, annual goals or objectives, and any other information that the Committee deems helpful for the general public to know about its work.

Given that the ADA Coordinator has full-time management duties as the Town Administrator, it may serve Sherborn to formally delegate specific ADA-compliance tasks to the Disability Advisory Committee. The ADA Coordinator and Disability Advisory Committee should work together to determine the best division of labor.

Here are some suggestions from the project team:

- Join Town staff and leadership in planning meetings recommended in Physical Environment priorities 2-4 (2. Develop a plan for improving pedestrian access and walkability across Town; 3. Develop a plan for improving accessible parking spots and parking signage across Town; 4. Improve access to recreational facilities and expand accessible recreational features) to further specify Town priorities based on factors such as resources, existing capital plans, degrees of use, and other Town-wide priorities
- Assemble the list of accessible buildings, programs, and services for the ADA Coordinator to distribute
- Lead accessible wayfinding efforts, including supporting the tasks involved in posting and updating notices about accessible entrances and facilities, starting with critical activities such as voting and Town Meeting
- Support the ADA Coordinator in updating Sherborn's evaluation and transition plan as improvements are made and updating the implementation guide
- Maintain communications with MA MOD and participate in trainings, sharing MOD materials with the ADA Coordinator to share among Sherborn staff and volunteers as appropriate
- Provide a member of the Disability Advisory Committee to sit on committees and boards that work on Town-wide plans, such as master plan or open space and recreation updates, and for future Town facility planning, such as a building committee

Other Accessibility Considerations for the Town

This plan applies to physical spaces, programs, and services offered by the Town's general administration. It does not offer recommendations or areas of improvement for schools or the provision of public safety services, both of which also fall under Title II but require a depth of knowledge and expertise in those disciplines as well as in accessibility. The project team recommends each of those departments engage in department-specific evaluation and transition planning processes.

Further, there are other parts of the ADA law outside of Title II that may be applicable to the Town, including Title I, which governs employers, including local government. Title I covers accessibility in the workplace and how to provide modifications to employees. Title I is regulated and enforced by the U.S. Equal Employment Opportunity Commission (EEOC); more information is available on the EEOC's **EEOC Disability-Related Resources** webpage.

Next Steps

Having an up-to-date transition plan opens Sherborn up for opportunities. For example, the Massachusetts Office of Disability offers a grant program to support capital improvements for identified barriers to accessibility in the physical environment.

A recent transition plan is also required to receive a Housing Choice designation from the state, which allows exclusive access for some state housing grants and enhanced competitiveness for other state housing grants.

This plan is designed to be a living document: the implementation guide can be refined and updated as priority actions are completed, the policies and procedures are shared in draft format for the Town to review and revise to make them work for Town staff and volunteers. The project team recommends an internal review and update to the plan every five years, where lower priority items can move up in priority as higher priority items are addressed.

Menu of Appendices

The rest of the plan is offered in external appendices that are offered in a format appropriate for the content.

Appendix A. Implementation Guide (Excel)

This spreadsheet lists Sherborn's Priorities for Accessibility Improvements with suggested deadlines and staff lead. The tool is customizable to fit the needs of the Town and designed to be a living document that is updated as priorities are addressed.

Appendix B. Physical Environment Audit (PDF)

KMA, LLC audited the Town's public building and outdoor facilities, the full results of which are in this appendix. KMA also provides a suggested priority table, which comprises the first section of the audit.

Appendix C. Draft Documents for Sherborn Customization (Word)

The project team worked with Sherborn staff to develop a list of documents required by Title II of the ADA that the Town currently lacks. This appendix offers draft versions of these documents for the Town to review, customize, and submit to legal counsel for review.

Appendix D. Materials from Trainings (PDF)

A core element of Sherborn's transition to a more accessible local government were the training sessions offered throughout the course of this project. All training materials from both the **Program Access** and **Digital Communications** training sessions are included in this Appendix.

Appendix E. Supporting Tips, Tools, and Resources (PDF)

This Appendix offers additional tools and resources to assist Sherborn in providing accessible programs and services.