

## Appendix C. Draft Documents for Sherborn Customization

All materials in this Appendix are drafts. The project team are not lawyers, and the draft documents have not been developed or reviewed by legal experts. These drafts are provided to Sherborn for customization, legal review, adoption, and use.

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## Draft Accessibility Language

One of the most critical parts of becoming an accessible local government is clearly informing the public of their rights to accessible information, services, programs, events, and buildings. This is accomplished by prominently posting or including accessibility language in public facing materials & the Town's website. The draft language below is available for Sherborn to adapt to the Town's needs.

### Draft public notice for Sherborn websites

The Town of Sherborn does not discriminate on the basis of disability in admission to, access to, or operation of its programs, services, or activities. The Town of Sherborn does not discriminate on the basis of disability in its hiring or employment practices.

If you need auxiliary aids and services for effective communication, written materials in alternative formats, or reasonable modifications in policies and procedures, to access the programs and activities or to attend meetings of the Town of Sherborn, please contact:

ADA Coordinator  
[ADA@SherbornMA.gov](mailto:ADA@SherbornMA.gov)  
Phone: 508-651-7850 ext XXX

This notice is provided as required by Title II of the Americans with Disabilities Act (ADA) and by Section 504 of the Rehabilitation Act of 1973.

If your request for a reasonable accommodation is denied or not adequately addressed, you are encouraged to file a formal grievance. A copy of the Grievance Procedure is available on the Town website or can be obtained by contacting the ADA Coordinator.

## **Draft language for public meeting agenda and other notices**

If you need auxiliary aids and services for effective communication, written materials in alternative formats, or reasonable modifications in policies and procedures in order to access this [meeting / program /service], please contact the ADA Coordinator in advance at [Insert Contact info]

## **Draft language for public event posters and promotions**

If you need accommodations or modifications to access this [event or program], please contact Sherborn's ADA Coordinator in advance at [Insert contact info].

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## Draft Policies

Any activities Sherborn Town staff or volunteers perform to provide reasonable accommodations should be documented in written policies and standard operating procedures. Specific actions should also be recorded. These records serve as documentation that the Town actively strives to meet ADA requirements, and may be important if the Town is ever subject to a complaint.

### Draft policy for handling requests for accommodations from the public

#### Preamble

The Town of Sherborn is subject to Title II of the ADA, which ensures that people with disabilities can fully participate in all aspects of civic life. According to [ADA.gov](http://ADA.gov),

“Title II of the ADA requires state/local governments to give people with disabilities an equal opportunity to benefit from all of their programs, services, and activities. State/local governments can’t deny people with disabilities the chance to participate or make them participate in different programs than available to others.”

This means that Town staff, volunteers, and vendors or contractors must provide reasonable accommodations to people with disabilities.

This policy applies to requests for accommodations submitted by the public under Title II of the ADA law. Requests from staff or volunteers for accommodations under Title I of the ADA law should be handled by [Insert Responsible Staff OR Department].

#### Policy

This policy outlines how the Town of Sherborn responds to requests for reasonable accommodations made by members of the public under the ADA.

Requests for reasonable accommodations may be submitted in person, by phone, email, or in writing to any Town department, board, or staff member.

If a request is straightforward and can be resolved within the department's capacity (e.g., offering materials in large print or moving a meeting location to an accessible room), the department may address the accommodation directly.

Requests may be deferred to the ADA Coordinator if they involve structural considerations (e.g., permanent building modifications), pose an undue financial or administrative burden on the Town, raise uncertainty about whether the accommodation is reasonable, or if the requester is unsatisfied with the initial response or appeals a decision.

Requests must be handled as promptly as possible and, at minimum, provide an acknowledgement of the request within two (2) business days. **A copy of every accommodation request must be sent to the ADA Coordinator** at the time it is received, regardless of whether the department is handling them directly, to ensure proper documentation and tracking.

No staff member has the authority to deny a request for a reasonable accommodation. If a requested accommodation cannot be readily provided or raises questions about feasibility or undue burden, the request must be promptly forwarded to the ADA Coordinator for review and resolution.

Any department or board member that develops a reasonable accommodation or solution in response to a request must document the action in writing and share it with the ADA Coordinator to ensure consistent tracking, oversight, and alignment with the Town's accessibility policies.

## **Draft grievance procedure**

[Sections of the below grievance procedure have been adapted from the City of Somerville's [ADA Self-Evaluation](#)]

In accordance with the requirements of Title II of the Americans with Disabilities Act, the Town of Sherborn will not discriminate against individuals with disabilities on the basis of disability in its services, programs, or activities.

To ensure the prompt and equitable resolution of complaints alleging any action prohibited by the ADA, the Town has adopted the following grievance procedure.

### **Who may file a grievance**

Any person with a disability or their designee who believes they have been subjected to discrimination on the basis of disability in access to Town services, programs, or activities may file a grievance.

### **How to file a grievance**

The complaint should be in writing and contain the following information about the alleged discrimination: The name, address, and phone number of the person filing the complaint

- A description of the alleged discriminatory action or barrier
- The date and location of the incident
- The names of any individuals involved (if known)
- Any relevant documents or evidence

Alternative means of filing complaints, such as personal interviews, over the phone, through an interpreter, or audio recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or their designee as soon as possible but no later than sixty (60) calendar days after the alleged violation to:

ADA Coordinator  
[ADA@SherbornMA.gov](mailto:ADA@SherbornMA.gov)  
19 Washington Street  
Sherborn, MA 01027  
508-651-7850

Within fifteen (15) calendar days after receipt of the complaint, the ADA Coordinator will meet with the complainant to discuss the complaint and the possible resolutions. Within fifteen (15) calendar days of the meeting, the ADA Coordinator will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio recording. The response will explain the position of the Town and offer options for substantive resolution of the complaint.

### **Appeal process**

If the response by the ADA Coordinator does not satisfactorily resolve the issue, the complainant and/or their designee may appeal the decision within fifteen (15) calendar days after receipt of the response. Within fifteen (15) calendar days after receipt of the appeal, the ADA Coordinator will meet with the complainant to discuss the complaint and possible resolutions.

Within fifteen (15) calendar days after the meeting, the ADA Coordinator will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution.

### **Recordkeeping**

All written complaints, appeals, and responses received by the ADA Coordinator will be retained by the Town of Sherborn for at least (3) years.

## Draft accessible communications policy

The Town of Sherborn is committed to ensuring that all members of the public, including people with disabilities and those with limited English proficiency, have equal access to information about Town services, programs, and activities. This Accessible Communications Policy outlines procedures and standards to ensure that Town communications are inclusive, accessible, and compliant with the ADA.

This policy applies to all communications developed, published, or distributed by Town departments, including but not limited to:

- Printed materials (e.g., brochures, flyers, notices)
- Digital content (e.g., websites, social media, PDFs)
- Public meetings and events
- Email and telephone communications
- Videos, recordings, and public service announcements

Accessible communications include, but are not limited to, the following:

- All digital documents (e.g., PDFs, Word documents) shall be designed using accessible templates and tools, including built-in accessibility checkers, to the best of the creators' ability
- All meaningful images, such as photos, charts, or infographics, shall include concise, descriptive alternative text
- Written text shall be in the style of plain language and approximately an 8<sup>th</sup>-grade reading level
- Text shall maintain a color contrast ratio of at least 4.5:1; verified using a color contrast checker
- Avoid the use of scanned text when possible; if used, include text-recognizable versions
- All Town websites and online platforms shall conform to [WCAG 2.1 AA standards](#) to the extent feasible
- All public promotions, invitations, and meeting notices shall state how individuals can request accommodations

- Upon request, auxiliary aids and services will be provided
- Hybrid and remote meeting options shall include accessibility features such as live captions

Individuals who believe they have been denied effective communication access may file a grievance under the Town's ADA Grievance Procedure. The Town ADA Coordinator is responsible for ensuring compliance and addressing complaints. For accessibility requests, concerns, or more information, please contact:

ADA Coordinator  
[ADA@Sherbornma.gov](mailto:ADA@Sherbornma.gov)  
19 Washington Street  
Sherborn, MA 01027  
508-651-7850

## Draft accessible events and programs policy

[Sections of the accessible events and programs policy below are adapted from the Massachusetts's Office on Disability's [Tips for hosting accessible events and meetings](#)]

The Town of Sherborn is committed to ensuring that all members of the public, including people with disabilities, have equal access to Town events, programs, and activities. This policy outlines actions to ensure that Town events and programs are inclusive, accessible, and compliant with the ADA.

This policy applies to all departments, boards, and committees organizing or hosting public-facing events, meetings, and programs, whether in-person, virtual, or hybrid.

Accessible events and programs include, but are not limited to, the following:

- All event organizers must consider accessibility during the early planning stages
- To the best of the Town's ability, venues shall be physically accessible, including parking, entrances, seating, restrooms, and meeting rooms
- Virtual events must use accessible platforms and include captions or live transcription as needed
- All public announcements and promotional materials must include the Sherborn ADA accommodations statement
- Reasonable accommodations must be provided upon request
- When co-hosting events with outside organizations, the Town must ensure accessibility requirements are clearly communicated and upheld by all partners

Individuals who believe they have been denied effective event and program access may file a grievance under the Town's ADA Grievance Procedure. The Town ADA Coordinator is responsible for ensuring compliance and addressing complaints. For accessibility requests, concerns, or more information, please contact:

ADA Coordinator  
[ADA@SherbornMA.gov](mailto:ADA@SherbornMA.gov)

19 Washington Street  
Sherborn, MA 01027  
508-651-7850

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## Draft website content archiving policy

The purpose of this policy is to ensure the Town of Sherborn manages and maintains website content in a manner that complies with the ADA law and its referenced guidelines ([Web Content Accessibility Guidelines \(WCAG\) 2.1 AA](#)). This policy applies to all official Town websites and web pages managed or overseen by any Town department, board, commission, or authorized staff.

State and local government websites often include content that is no longer current. Content that is outdated, unnecessary, or duplicative should be deleted. Older web content, such as meeting minutes, or previous versions of adopted plans, should remain accessible for reference on the website, but may be formally archived to avoid the need to re-design the content to meet current accessibility standards.

According to ADA.gov's [Summary of the Exceptions](#), web content may be designated as "archived" and exempt from compliance with WCAG 2.1 AA if it meets all four of the following criteria:

1. It was created before April 26, 2027; and
2. It is kept only for reference, research, or recordkeeping; and
3. It is not altered or updated after the date of archiving; and
4. It is organized and stored in a dedicated area or areas clearly identified as being archived content.

Archived content must have a clear, consistent label that identifies it as archived. This may be a section of a dedicated site or a labeled subsection of an existing page. The title should clearly state "ARCHIVE" as well.

**The Town of Sherborn must provide archived web content in an accessible format if an individual requests it.**