

ADA Self-Evaluation and Transition Plan

For the Town of Shutesbury

June 2026

Prepared by the Franklin Regional Council of Governments



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Prepared by the:



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Part A – Introduction

The Town of Shutesbury hired the Franklin Regional Council of Governments (FRCOG) to conduct a comprehensive evaluation of the Town’s compliance under Title II of the Americans with Disabilities Act (ADA), which prohibits discrimination on the basis of disability. Specifically, Title II requires that:

No qualified individual with a disability shall, on the basis of disability, 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 [35 CFR Part 35.130 (a)].

Title II of the ADA applies to state and local governments, while Title III of the ADA applies to the private sector such as business and non-profit organizations.

In 2026, the Town of Shutesbury secured a grant from the Massachusetts Office on Disability and hired the FRCOG to conduct the ADA Self-Evaluation and prepare an ADA Transition Plan. The FRCOG assessed all Town-owned buildings, facilities, and parks as well as the Town’s programs, services, and activities to determine their accessibility to people with disabilities.

Like many communities in Massachusetts, Shutesbury is faced with a number of aging and historic municipal buildings and facilities that may pose obstacles to residents with disabilities. The cost and work that is required to remove these barriers and bring them into compliance can be overwhelming to smaller communities with limited financial resources like Shutesbury. The Town has a total population of 1,910 residents, of which 229 (11.9%) have a disability.¹ This ADA Self-Evaluation and accompanying Transition Plan makes this daunting task a bit easier by identifying the issues, prioritizing them, and sorting out the high cost actions from the simpler, less expensive tasks.

Title II of the ADA sets administrative requirements on state and local governments and also requires that all Town’s programs, services, and activities be accessible to people with disabilities. Part B of this document summarizes the findings regarding the administrative requirements and access to programs, activities, and services. Part C discusses the evaluation and findings of the physical facilities owned by the Town of Shutesbury. Part D is the ADA Transition Plan, which catalogs all accessibility issues of the Town facilities that were found

¹ 2017-2021 American Community Survey 5-Year Estimates, US Census Bureau.

during the evaluations and recommends potential solutions. These recommendations have been prioritized, given an estimated timeframe, and assigned relative costs and responsible departments.

Recent Progress

Shutesbury has been proactive in implementing ADA improvements. These include both large and small projects. Below is a summary of some of the projects that the Town has completed to upgrade its facilities and meet ADA requirements:

- Built a new Library in 2025 that is fully accessible
- Installed a lift in Town Hall

Methodology

To conduct the ADA Self-Evaluation of the Town's programs, services, and activities, the FRCOG staff distributed checklists designed by the New England ADA Center (a project of the Institute for Human Centered Design) to all Department Heads that assessed three requirements of Title II of the ADA for each Department's programs and services:²

- Effective Communication practices
- General Nondiscrimination practices
- Website accessibility

The FRCOG also used the latest 2010 ADA Standards for Accessible Design (ADAAG 2010) to evaluate all the Town's buildings.

² Self-Evaluation Form Checklists from the New England ADA Center, <https://www.adaactionguide.org/resources#faqs>.

Part B – Evaluation of Non-Discriminatory Policies and Practices in Programs, Services, and Activities

Introduction

Title II of the ADA also places administrative requirements on local governments in addition to ensuring the accessibility of the Town's programs, activities, and services. These administrative requirements include the appointment of a Town ADA Coordinator, the creation of a public notice regarding nondiscrimination policies, and the adoption of a complaint procedure. The FRCOG staff, with the assistance of Shutesbury staff, evaluated the Town's compliance with these administrative requirements as well as the Town's policies related to nondiscrimination, effective communication, and website accessibility.

The findings of this evaluation are discussed in this section along with recommendations to ensure compliance with Title II of the ADA.

Analysis

The FRCOG evaluated each of Shutesbury's Departments and the overall Town governance with regard to accessibility requirements. Checklists from the New England ADA Center were provided to each Department Head to complete that evaluated a Department's policies related to General Nondiscrimination, Effective Communication, and Website Accessibility. The findings of these completed checklists are summarized below and recommendations are provided to ensure that people with disabilities are provided the same opportunities as others to participate in programs, services, and activities in the Town of Shutesbury.

1. Designation of Responsible Employee

Title II of the Americans with Disabilities Act requires that a local government designate a responsible employee to coordinate compliance with the ADA and ensure that there is a person at the Town who is knowledgeable with the many requirements of the ADA. The Town of Shutesbury has met this requirement by designating Hayley Bolton, the Town Administrator, as the ADA Coordinator.

2. Complaint Procedures

In addition to designating an ADA Coordinator, a local government is required to provide a complaint procedure that offers ways for people to file complaints alleging discrimination on the basis of disability with regard to employment or in the provision of services, activities, and programs. The Town of Shutesbury has met this obligation with an approved Complaint Procedure. See Appendix A for copy of Complaint Procedure.

3. Notice

Title II also requires that a local government provide public notice of the provisions of the ADA to members of the public that may participate in the Town's program, services, and activities. The Town of Shutesbury has met this obligation with an approved Notice that is posted at Town Hall. See Appendix A for copy of Public Notice.

4. Effective Communication

Under Title II of the Americans with Disabilities Act, the Town must communicate effectively with people who may have hearing, vision, or speech disabilities. To do so, this may require Shutesbury to provide auxiliary aids and services to meet its responsibility of effective communication. This may include, but is not limited to: providing sign language interpreters, Computer-Assisted-Real-time-Translation (CART), written materials for persons who are deaf or have difficulty hearing, Braille or large print information in digital format for people who are blind or have difficulty seeing.

Town of Shutesbury Department Heads completed checklists from the New England ADA Center that evaluated each department's practices and policies regarding their knowledge and ability to provide effective communication for their programs, services, and activities to allow equal participation for persons with disabilities. The completed checklists show that Town staff are willing to comply with Title II, but do not know how to do so in all elements of practice. In particular, most staff members do not know:

- How to obtain sign-language/oral interpreters and CART services, assistive learning devices and video remote interpreting.
- When and how to provide captioning and audio description on videos they produce or post online.
- What "primary consideration" for the person with a disability looks like in real situations,

Appendix B provides a summary of the answers to the checklist's questions regarding effective communication practices.

To ensure that Town staff comply with Title II, it is recommended that Shutesbury develop and distribute clear procedures for employees explaining how to obtain sign-language/oral interpreters, CART services, assistive listening devices, and video remote interpreting, when and how to provide captioning and audio description for videos produced or posted online, and how to give primary consideration to the requested aid or service of the person with a disability in real situations so staff understand their responsibilities and know what to do when a person needs assistance with communication.

During the COVID-19 Pandemic, the Town of Shutesbury had been conducting much of its municipal business virtually. The Town uses Zoom as its video conferencing platform Zoom has many accessible features and meets almost all website-related Section 508 and WCAG 2.1 AA accessibility recommendations. Zoom also has various options that can be enabled to allow features such as closed captioning directly or through third parties. However, employing these features takes some practice and training. As Shutesbury continues to use either this or other video conferencing platforms, it will be very important that staff be trained on the software's accessibility features to ensure effective communication.

5. Reasonable Modifications of Policies, Practices, and Procedures

Title II of the ADA also requires that local governments ensure that people with disabilities have an equal opportunity to participate in the services, programs, and activities that the Town provides. This may require that the Town of Shutesbury provide "reasonable modifications" to policies and practices to allow equal participation. When applying to Town staff, this requirement may include modifying work schedules; job restructuring; and making facilities used by employees readily accessible to an employee with a disability. When applying to members of the public to be able to participate in a program, service, or activity, this requirement may include allowing service animals in locations where animals are not typically permitted; allowing the use of motorized devices in places where they are not allowed; or providing assistance with application completion.

The results of the completed checklists from the Town's Department Heads show that with respect to the general nondiscrimination requirements of Title II, Shutesbury staff members are very willing to comply and have a good, general understanding of the many responsibilities and requirements that they have as a local government. However, there are topics with which Department staff could be more familiar. For example, some departments need clarity on procedures explaining how to obtain sign-language/oral interpreters, CART services. Assistive learning devices, and video remote interpreting. Appendix B provides a summary of the answers to the checklist's questions regarding general nondiscrimination practices.

A written and distributed summary of nondiscrimination policies will help staff ensure that all participants have the opportunity for equal participation.

6. Website Accessibility

Title II of the Americans with Disabilities Act requires that local governments ensure that, when viewed in their entirety, the programs, services, and activities offered are equally available to people with disabilities. Websites of a local government are considered to be a “program” and should be accessible to the standards of the Web Content Accessibility Guidelines 2.1 AA or Section 508 Standards.

To evaluate the Town of Shutesbury’s websites, a checklist was sent to each Department that maintained its own website or had website administrative privileges. The completed checklists show that the staff members who have administrative rights are not aware of website accessibility standards. They would like a policy to clarify this and to help make sure that future content is accessible.

Staff with website editing privileges should be provided guidance about the requirements of the Web Content Accessibility Guidelines 2.0 AA. It would also be very helpful to the Town if people with disabilities who use screen reading software and other assistive technology periodically evaluate the website. Staff can periodically check its accessibility by using the free Web Accessibility Evaluation Tool (WAVE), which evaluates web content for accessibility under the Web Content Accessibility Guidelines.

The FRCOG assessed the main Town of Shutesbury Website (<https://www.Shutesbury.org/>) in the free Web Accessibility Evaluation Tool (WAVE), which evaluates web content for accessibility under the Web Content Accessibility Guidelines. The results show that there is one remajor errors on the website related to refreshing. The other issues are more minor and are mostly related to the contrast and size of fonts against backgrounds. There are also other warnings and alerts that could prevent or hinder visually-impaired individuals from fully accessing the Town’s website. Fortunately, many can be easily fixed with simple actions, such as changing the color of backgrounds or providing alternative text for images. The website receives an WAVE Accessibility Impact (AIM) score of 7.9 out of 10.

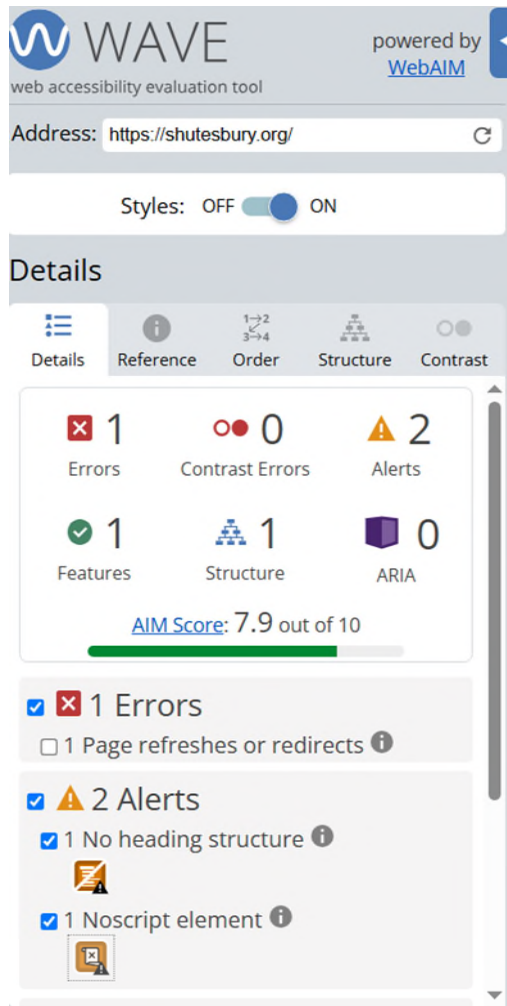


Figure 1. Summary report from the WAVE tool regarding the accessibility issues found on the Shutesbury website.

Part C – Evaluation of Facilities and Infrastructure

Introduction

FRCOG staff evaluated the following Town-owned buildings and facilities for this ADA Self-Evaluation between February and March 2026 according to the 2010 ADA Standards:

Buildings and Facilities owned by the Town of Shutesbury and Evaluated by FRCOG

- Town Hall
- M. N. Spear Public Library
- Shutesbury Public Library
- Shutesbury Elementary School
- Fire Department
- Highway Department

Analysis of Building Accessibility

Shutesbury’s Town-owned buildings range in levels of accessibility. For this report, the FRCOG has assigned categories of “functional accessibility” to each building for ease of reference.

These categories are:

- **Accessible** – the facility is fully accessible to a wheeled mobility device user or person with mobility challenges;
- **Mostly Accessible** – A wheeled device user or person with mobility challenges can enter the facility, access the primary function within the facility, and access the bathroom;
- **Moderately Accessible** – A wheeled device user or person with mobility challenges can enter the facility, access the primary function within that facility, but cannot use the bathroom;
- **Minimally Accessible** – A wheeled device user or person with mobility challenges can only enter the facility, but cannot access the primary function or the bathroom;
- **Inaccessible** – A physical barrier exists that would prevent a wheeled device user from entering the facility.

The following table places each building or facility into one of these categories:

Accessible	Mostly Accessible	Moderately Accessible	Minimally Accessible	Inaccessible
Shutesbury Public Library	Town Hall		M. N. Spear Public Library	Highway Department
	Shutesbury Elementary School			Fire Department

The above assessment rates each building’s accessibility based on the ability of people with disabilities to access the programs, services, and activities that are offered within those buildings. However, it should be noted that many Town buildings have areas within them that are not accessible at all (ex. basements or staff-only storage areas). Making these spaces accessible according to the 2010 ADA Standards may be structurally difficult and/or practically infeasible. Despite these potential obstacles, this accompanying Transition Plan identifies issues within these spaces and recommends ways to improve accessibility in ways that may be feasible – at least for users who do not require wheeled mobility devices – while acknowledging

the inaccessibility these spaces pose for some persons with disabilities so that accommodations may be made.

An important caveat to this rating system is that it primarily evaluates the Town facilities from a member of the public's perspective, not necessarily from the perspective of an employee who must work in these facilities and access non-public spaces on a regular basis. However, all of the deficiencies in the buildings with respect to the 2010 ADA Guidelines have been noted in the ADA Transition Plan that is included in this Report.

Summary of Building Evaluation Findings

Accessible Buildings

Shutesbury Public Library

Shutesbury Public Library is considered fully accessible because people needing accommodations can independently reach the site, enter the building, and use its primary public services (e.g. renting books, event space, and bathrooms). The building is recently constructed in 2025 and opened in early 2026 meeting current ADA standards for entrances, interior circulation, and restroom access, so remaining items such as lowering the exterior book return box and improving sink knee clearance and faucet reach in the staff kitchen are relatively minor but should be considered for full access.

Mostly Accessible Buildings

Town Hall

Town Hall is rated as mostly accessible because users can enter the building, access the primary public offices and meeting spaces, and use at least one accessible restroom, although some elements are still non-compliant. The site provides accessible parking and an accessible entrance, but there are several interior improvement suggestions. Some of these include narrow clearances at some office doors, non-tactile or missing braille signage, turn-style door hardware, small non-compliant bathroom in the copy room, limiting full independent access to all rooms and floors. Most of these barriers can be addressed through targeted, relatively modest changes such as rearranging furniture, replacing hardware, and adding signage.

Shutesbury Elementary School

Shutesbury Elementary School is classified as mostly accessible, but there are numerous scattered barriers that affect day-to-day usability. Key issues include a lack of automatic door openers at the main entrance, lifted or unsecured flooring in multiple locations,

blocked clearances at many doors and routes, a few drinking fountains and sinks that are mounted too high or lack proper knee clearance, missing or improperly mounted tactical signage, and limited accessible desks or tables in some rooms. These conditions mean that while the school's primary educational programs are largely reachable, some students, staff, and visitors with mobility or sensory disabilities may need assistance or encounter difficulty navigating the building outdoor areas. A priority to address should be making the doors on the bathroom doors self-closing.

Minimally Accessible Buildings

M.N. Spear Memorial Library (Old Library)

The M.N. Spear Library (Old Library) is rated as minimally accessible because the current ramp and interior features do not provide reliable, independent access for many people with disabilities. The front door still has turn-style hardware, and the exterior ramp exceeds ADA slope requirements, which makes entering with a wheelchair or walker difficult and potentially unsafe. Inside, a lack of accessible signage, unclear light switch locations, and other small interior barriers reduce ease of use. There are currently no bathroom facilities or running water in the building.

Inaccessible Buildings/Facilities

Fire Department

The Fire Department is rated inaccessible because it lacks the core elements needed to provide independent access for people with mobility impairments. There is no designated accessible parking, the front entrance is not currently easily accessible due to turn-style knob on door, and interior doors are too narrow and lack required clearances and grab bars in the bathrooms.

Highway Department

The Highway Department is considered inaccessible because basic building access is limited due to its entryway and lack of accessible parking conditions. There are no designated accessible parking spaces and a step at the front door prevents a smooth accessible route into the building. The entrance also uses turn-style door hardware that is difficult for some users with limited hand strength or dexterity.

Program Accessibility

Town programs located at the Shutesbury Town Hall should be located at the most accessible area, which currently is the conference room in the basement. Improvements to this area should be made where stated in the Transition plan include confirming that the conference table provides an accessible height with adequate knee clearance, and that the designated accessible parking is cleared of any snow or debris all times of year.

If the M. N. Spear Library is used in the future for town programming, it will need substantial accessibility upgrades, including correcting steep interior ramps, inconsistent handrail heights, and adding accessible signage and wayfinding. In addition, it will need the addition of a bathroom and running water. In contrast, the new Shutesbury Public Library is accessible and would only require minor improvements identified in the Transition Plan, such as modifying the kitchen sink configuration and lowering the exterior book drop for full universal accessibility.

Part D – ADA Transition Plan

The ADA Transition Plan for Shutesbury catalogs every issue that the FRCOG staff discovered during the Self-Evaluation of the Town’s buildings and facilities between February and March 2026. The Transition Plan recommends solutions to bring these identified issues into compliance with the 2010 ADA Guidelines and then prioritizes them, provides relative costs, estimates a feasible timeframe of implementation, and assigns the issue to the appropriate implementing department. In addition, the majority of issues have been documented with photographs, which can be found in Appendix C.

The following categories were used for the Transition Plan’s prioritization:

- 1) **Priorities:** High
Medium
Low
- 2) **Timeframe:** Short (0-4 years)
Medium (5-9 years)
Long (10+ years)
Ongoing
- 3) **Cost:** \$\$\$\$ (Major capital project)
\$\$\$
\$\$
\$ (Maintenance costs)

Issues were assigned a “High” priority if they:

- Made it difficult and/or prevented a person with a disability to enter a room in which a service is provided;
- Made it difficult and/or prevented a person with a disability to use the bathroom facilities; or
- Made it difficult and/or prevented a person with a disability to access an important civic site as a pedestrian on a sidewalk.

Shutesbury ADA Self-Evaluation & Transition Plan

Town Hall (1 Cooleyville Rd)									
Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
	Accessible Parking	IMG_3354	Pavement markings for accessible spaces need repainting.		Ensure pavement markings are visible and clearly designate spaces that are at least 8 ft wide with a 5 ft median.	Medium	Short	\$	Highway Department
Access to Goods and Services									
Conference Room	Signage	IMG_3295	Sign needs tactile braille.		Install signage with visually contrasting/tactile lettering and Grade 2 braille on the wall on latch side of door between 48" and 60" from floor to baseline of characters.	Medium	Short	\$\$	Town Administrator
Conference Room	Table	IMG_3296	Table needs accessible route to pass around table.	< 30"	Ensure clear accessible route of at least 36" wide around conference table for maneuvering.	Medium	Medium	\$	Town Administrator
Assessor's Office	Accessible Route	IMG_3298; IMG_3299; IMG_3300; IMG_3302	Insufficient clearance next to door for maneuvering.	12"	Move furniture to provide clear floor space of at least 18" on latch side of door (preferably 24" for better access).	High	Short	\$	Town Administrator
Assessor's Office	Accessible Route	IMG_3303	Narrow passage to back office.	28"	Widen or clear passage to back office to provide minimum clear width of 32" for accessible route.	High	Medium		Town Administrator
Administrator's Office	Accessible Route	IMG_3316	Insufficient door clearance on latch side.	6"	Move furniture to provide clear floor space of at least 18" on latch side of door (preferably 24").	High	Short		Town Administrator
Administrative Assistant's Office	Signage	IMG_3317	Needs new placard with tactile marking.		Install signage with visually contrasting/tactile lettering and Grade 2 braille on wall on latch side of door between 48" and 60" from floor.	High	Short	\$	Town Administrator
Closet (near Admin Asst)	Door Hardware	IMG_3319	Round turn style door knob is not accessible.		Replace door hardware with lever-style fixtures that can be operated with a closed fist.	Medium	Medium	\$	Town Administrator
Closet (near Admin Office)	Door Hardware	IMG_3320	Round turn style door knob is not accessible.		Replace door hardware with lever-style fixtures that can be operated with a closed fist.	Medium	Medium	\$	Town Administrator
Closet (near Admin Office)	Accessible Route	IMG_3321	Need to maintain space for accessible route in closet.		Ensure clear accessible route of at least 36" wide is maintained within closet for access to storage.	Low	Short	\$	Town Administrator
Town Accountant Office	Accessible Route	IMG_3324	Door clearance on latch side is adequate.	18"	Maintain current clearance of 18" minimum on latch side of door.	Low	Medium	\$	Town Administrator
Hallway	Dropbox	IMG_3313	Tax bill dropbox is mounted too high.	42"	Lower dropbox so that operable parts (slot opening) are no higher than 48" from floor for forward reach.	Medium	Medium		Town Administrator
Entire Building	Door Hardware		Door knobs throughout building are turn style.		Replace all public-facing door hardware with lever-style fixtures that can be operated with a closed fist.	High	Medium	\$\$	Town Administrator
Kitchen	Sink	IMG_3344	No clearance under sink.		Provide sink with knee clearance of 27" high minimum, 30" wide, and 11"-25" deep for forward approach. Cover exposed pipes.	Medium	Medium		Town Administrator
Ground Floor Accessible Bathroom	Door	IMG_3327	Door is heavy and difficult to open.		Adjust door closer to reduce opening force to maximum 5 lb of force or install automatic door opener with accessible push button.	High	Medium	\$	Town Administrator

Shutesbury ADA Self-Evaluation & Transition Plan

Town Hall (1 Cooleyville Rd)									
Bathroom (near Conference Room)	Door	IMG_3338	Door is heavy and difficult to open.		Adjust door closer to reduce opening force to maximum 5 lb of force or install automatic door opener with accessible push button.	High	Medium	\$	Town Administrator
Bathroom (near Conference Room)	Soap Dispenser	IMG_3340	Soap needs to be attached to the wall.		Install wall-mounted soap dispenser no higher than 48" from floor for forward reach or 44" for side reach.	High	Short	\$	Town Administrator
Bathroom (near Conference Room)	Accessible Route	IMG_3342	Insufficient clearance on push side of door.	7"	Move furniture or fixtures to provide clear floor space of at least 18" on push side of door for maneuvering.	High	Short	\$	Town Administrator
Bathroom (in Copy Room)	Door Hardware	IMG_E3290	Doorknob is round turn style style.		Replace door hardware with lever-style fixtures that can be operated with a closed fist.	Low	Long	\$	Town Administrator
Bathroom (in Copy Room)	Doorway	IMG_E3290	Door is too narrow.	29"	Widen doorway to provide minimum clear width of 32" when door is open to 90 degrees.	Low	Long	\$\$\$	Town Administrator
Bathroom (in Copy Room)	Grab Bars	IMG_E3293	Bathroom has no handrails.		Install side and rear grab bars for toilet 33"-36" above finished floor.	Low	Long	\$\$	Town Administrator
Bathroom (in Copy Room)	Bathroom Size	IMG_E3293	Bathroom is very small.	35" x 46"	Renovate bathroom to provide clear floor space of at least 60" diameter or 60" x 60" T-shaped turning space, with minimum 30" x	Low	Long	\$\$\$\$	Town Administrator

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Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Fire Department (42 Leverett Road)									
Parking									
	Accessible Parking	IMG_3369	No accessible parking or signage.		Designate at least 1 accessible parking space that is 8 ft wide with a 5 ft aisle. Install sign at minimum height of 60" from ground to bottom of sign.	Medium	Short	\$	Highway Department
Approach and Entrances									
Front Door	Accessible Route	IMG_3369	Front door is not accessible due to turn style door knob.		Replace door hardware with lever-style fixtures that can be operated with a closed fist.	Medium	Medium	\$	Select Board / Town Administrator
Access to Goods and Services									
Entire Building	Door Hardware	IMG_3355	All door knobs in building are turn style style.		Replace all door hardware with lever-style fixtures that can be operated with a closed fist.	Medium	Medium	\$	Select Board / Town Administrator
Kitchen/Meeting Area	Sink	IMG_3359	Sink needs clearance underneath.	< 27"	Provide sink with knee clearance of 27" high minimum, 30" wide, and 11"-25" deep for forward approach. Cover exposed pipes.	Low	Long	\$\$	Select Board / Town Administrator
Kitchen/Meeting Area	Oven Controls	IMG_3358	Oven door knobs are at back end rather than front.		Replace oven with front-mounted controls or ensure controls are within reach range of 15"-48" from floor.	Low	Long	\$\$	Select Board / Town Administrator
Storage Room	Signage	IMG_3366	Sign needs to be on latch side of door, not on door itself.		Install signage with visually contrasting/tactile lettering and braille on wall on latch side of door between 48" and 60" from floor.	Medium	Short	\$	Select Board / Town Administrator
Office	Doorway	IMG_3368	Office door is too narrow.	29"	Widen doorway to provide minimum clear width of 32" when door is open to 90 degrees.	Medium	Long	\$\$	Select Board / Town Administrator
Storage Room	Step	IMG_3367	Step down to truck bay is a trip hazard.	7"	Install signage warning of level change. Consider installing ramp for accessible route to truck bay if public access is needed.	Medium	Medium	\$	Select Board / Town Administrator
Bathrooms									
Women's and Men's Bathroom	Doorway	IMG_3360; IMG_3361	Door is too narrow.	29"	Widen doorway to provide minimum clear width of 32" when door is open to 90 degrees.	Low	Long	\$	Select Board / Town Administrator
Women's and Men's Bathroom	Sink	IMG_3362; IMG_3364	Sink needs clearance under and grab bars.		Provide sink with knee clearance of 27" high minimum, 30" wide, and 11"-25" deep. Install grab bars if sink is used for support. Cover exposed pipes.	Low	Long	\$	Select Board / Town Administrator

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Highway Department (59 Leverett Road)									
Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Parking									
	Accessible Parking	IMG_3370	No accessible parking designated.		Designate at least 1 accessible parking space that is 8 ft wide with a 5 ft aisle. Install sign at minimum height of 60" from ground.	Low	Long	\$	Highway Department
Approach and Entrances									
Front Door	Step	IMG_3371	Step up at front door is too high.	7"	Install ramp that is at least 36" wide with slope that does not exceed 1:12 (8.33%), with handrails on both sides, or construct accessible alternate entrance.	Low	Long	\$\$\$	Select Board / Town Administrator
Front Door	Door Hardware	IMG_3378	Front door handle is turn style.		Replace door hardware with lever-style fixtures that can be operated with a closed fist.	Low	Long	\$	Select Board / Town Administrator
Access to Goods and Services									
Entrance	Signage	IMG_3374	Sign to highway office is present but needs tactile features.		Verify signage has visually contrasting/tactile lettering and braille on wall on latch side of door between 48" and 60" from floor.	Low	Long	\$	Select Board / Town Administrator

Shutesbury ADA Self-Evaluation & Transition Plan

M. N. Spear Public Library (10 Cooleyville Road)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
Front Door	Door Hardware	IMG_3279	Turn style door handle on front door is not accessible.		Replace door hardware with lever-style fixtures that can be operated with a closed fist.	Medium	Medium	\$	Select Board / Town Administrator
Ramp	Ramp Slope	IMG_3284; IMG_3283	Ramp slope exceeds ADA maximum.	9%	Reconstruct ramp to ensure running slope does not exceed 1:12 (8.33%). Current 9% slope is non-compliant.	Medium	Medium	\$\$\$	Select Board / Town Administrator
Access to Goods and Services									
Entire Building	Signage	IMG_3280	No signage on doors.		Install signage with visually contrasting/tactile lettering and Grade 2 braille on wall on latch side of door between 48" and 60" from floor for all rooms.	High	Short	\$	Select Board / Town Administrator
Interior	Light Switches		Light switches are not obviously placed.		Ensure light switches are located in logical positions with clear floor space of 30" x 48" for approach. Install tactile indicators if needed.	Medium	Short	\$	Select Board / Town Administrator

Shutesbury ADA Self-Evaluation & Transition Plan

Shutesbury Public Library (66 Leverett Road)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
Exterior	Book Return Box	IMG_3392	Return box for books outside is mounted too high.	50"	Lower exterior book return box so that operable parts are no higher than 48" from ground for forward reach or 44" for side reach.	Medium	Medium	\$\$	Library Director
Access to Goods and Services									
Kitchen	Sink	IMG_3391	Kitchen sink is missing clearance underneath.		Provide sink with knee clearance of 27" high minimum, 30" wide, and 11"-25" deep for forward approach. Cover exposed pipes.	Medium	Medium	\$	Library Director
Kitchen	Faucet Reach	IMG_3391	Faucet is too far from edge of sink.	29"	Replace sink or faucet so that controls are no more than 20" from front edge of counter for forward reach approach.	Medium	Medium	\$	Library Director
Accessible Bathroom									
Bathroom	Grab Bars	IMG_3390	Grab bars are too high.	40"	Reinstall grab bars to be 33"-36" above finished floor. Current 40" height is non-compliant.	High	Medium		Library Director

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Shutesbury Elementary School (23 West Pelham Road)

Location	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances									
Nurse's Office	Signage	IMG_0710	No accessible signage pointing to nurse's office.		Install signage directing users to the nurse's office and accessible route, with tactile lettering and braille where room identification signage is used.	High	Short	\$	School District
Entrance Vestibule	Floor Surface	IMG_0696	Entrance flooring has lifted up causing a tripping hazard.		Repair or secure lifted flooring to create a stable, firm, slip-resistant surface with height changes no greater than 1/4 inch vertical.	High	Short	\$	School District
Building-wide	Automatic Door Openers	IMG_0690; IMG_0756	No accessible automatic doors or handicap buttons were noted at multiple locations, including the main entrance, gymnasium, auditorium.		Prioritize automatic door openers at the primary accessible entrance and public-use areas; evaluate other public doors where opening force or use conditions limit access.	High	High-Medium	\$\$\$	School District
Building-wide	Door Clearance / Accessible Route	IMG_0756; IMG_0760; IMG_0835; IMG_0826; IMG_0856; IMG_0913; IMG_0666	Objects or furniture are limiting required clearances at multiple doors/routes, including the principal's door, nurse's office, gymnasium entrance, auditorium entrance, art studio, Room 161, Room 122, Room 115, and library entrance.		Move furniture, garbage cans, copy machine, cabinets, storage containers, and other objects to maintain required maneuvering clearance and accessible routes at least 36 inches wide.	High	Short	\$	School District
Entrance Hallway	Drinking Fountain	IMG_0724	Water fountain is too high off ground.	38" spigot	Water fountain should be adjusted lower so the spigot is no higher than 36" from the ground.	Medium	Medium	\$\$	School District
Playground	Accessible Route		Missing a cleared designated path from the pavement to the picnic tables.		Provide and maintain an accessible route with a stable, firm, slip-resistant surface from pavement to picnic tables.	High	Medium	\$\$	School District
Playground	Picnic Tables	IMG_0979; IMG_0971	Missing accessible picnic tables.		Provide accessible picnic tables with wheelchair seating spaces and compliant knee/toe clearance.	Medium	Medium	\$\$	School District

Shutesbury ADA Self-Evaluation & Transition Plan

Shutesbury Elementary School (23 West Pelham Road)

Access to Goods and Services									
Building-wide	Signage	IMG_0725; IMG_0734; IMG_0773; IMG_0786; IMG_0842; IMG_0871; IMG_0665	Missing, obstructed, or incorrectly mounted accessible signage was noted in several areas, including the entrance hallway, boys bathroom, 2nd grade bathroom, adult bathroom next to staff room, 5th grade bathroom, Room 122, Room 121, and library.	Adult bathroom sign bottom: 64"; library signs: 20"	Install or relocate compliant signage with tactile characters and Grade 2 braille on latch side of doors, mounted within the required 48 to 60 inch height range where applicable.	High	Short	\$	School District
Building-wide	Floor Surfaces	IMG_0699; IMG_0817; IMG_0840; IMG_0848; IMG_0920	Carpet, rugs, or lifted floor surfaces need to be secured in multiple areas, including the entrance, 5th grade classroom, Room 163, Room 122, and Room 115.		Secure carpet and rugs and repair lifted surfaces to provide stable, firm, slip-resistant accessible routes.	High	Short	\$	School District
Building-wide	Accessible Desks / Tables	IMG_0878; IMG_0918; IMG_0687; IMG_0959	Several tables or desks may not provide accessible knee clearance, including Room 119 desk at 20 inches, Room 115 desks at 25 inches, library computer tables at 20 inches, and cafeteria/kitchen tables missing open ends for mobility devices.	20" to 25" knee clearance noted	Provide at least one accessible desk/table in each applicable room with knee clearance of 27 inches minimum high, 30 inches wide, and 17 to 25 inches deep; provide accessible cafeteria tables with open wheelchair spaces.	High	Short	\$\$	School District
Building-wide	Sinks / Pipe Protection	IMG_0785; IMG_0785; IMG_0788; IMG_0796; IMG_0966; IMG_0678	Sinks and drainage protection need review in multiple areas, including staff kitchen, Room 122, 5th grade bathroom, 6th grade bathroom, Room 155, and library.	Examples: staff kitchen counter 36"; Room 122 sink 33" wide; Room 155 sink 30" high; library kids sink 27" high	Provide a sink with toe and knee clearance between 17"-25" for a forward approach, clear floor space, reachable controls, and pipe protection; install drain/pipe covers where missing.	High	Medium	\$\$	School District
Restrooms	Self-closing Doors / Door Closers	IMG_0731; IMG_0737; IMG_0786; IMG_0675	No self-closing door was noted in boys bathroom accessible stall, 2nd grade bathroom accessible stall, 5th grade bathroom, and library accessible bathroom.		Install or adjust door closers or self-closing mechanisms where required for accessible restroom/stall doors.	Medium	Short	\$	School District
Conference Room	Table	IMG_0742	Table is 29 inches tall and doorway should be kept clear.	29" high	Maintain table if knee clearance is at least 27 inches high, 30 inches wide, and 17 to 25 inches deep; maintain clear doorway and route around furnishings.	Low	Short	\$	School District
Room 163	Exit	IMG_0839	Missing a second exit from the room.		Review egress requirements with building/fire officials and determine whether a second exit or code-compliant egress strategy is required.	High	Long	\$\$\$\$	School District
Library	Service Counter / Tables / Shelving	IMG_0671;	Bookshelf aisles are too narrow.	30" aisles	Maintain accessible counter and tables if clear floor/knee space is provided; rearrange shelving to provide at least 36 inches minimum clear width along accessible routes.	High	Short	\$	School District

Appendix A

Shutesbury's Notice of Nondiscrimination and Complaint Procedure

Policy number: 991026

Effective Date: October 26, 1999

This policy and grievance procedure is established as an act of the Selectboard.

Policy of Non-Discrimination & Grievance Procedures

Policy

This is to notify all persons that it is the policy of the Town of Shutesbury to refrain from discrimination against any person because of race, color, religious creed, national origin, gender, sexual orientation, age, ancestry, disability or marital status in the provisions of, or access to, services, employment and activities.

This is in accordance with all applicable federal and state law, including, but not limited to, Section 504 of the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act, as amended, the Civil Rights Act of 1964, as amended, Article 114 of the Massachusetts Constitution, Chapters 151B and 272, sections 92,98, and 98A, of the Massachusetts General Laws and Executive Orders 227, 246 and 253.

The Town Administrator shall administer compliance with the law and regulations.

Grievance

The Town has established the following procedure to address any grievances which fall into two categories: 1) Employment, 2) Access.

1. Employment

For any individual who feels that they have not been afforded appropriate treatment when applying for a position with the Town of Shutesbury, the Town Administrator will review the procedure with the applicant. After the review, if the applicant feels that discrimination has occurred, then the applicant will be referred to the Massachusetts Commission Against Discrimination.

For individuals employed by the Town, should the employee feel the need to file a grievance, the employee will file a grievance with the Town Administrator. The Town Administrator will review the grievance and, if needed refer the employee to a union representative or civil service regulations and procedures.

2. Access to Programs and facilities

For an individual who feels that s/he has been denied access to the physical facilities or the programs of the Town because of a disability, a grievance can be brought to the Town Administrator. The Town Administrator will convene the ADA Committee who will meet with the Town Administrator and hold a hearing (with notice of said hearing made at least 7 days prior to its date). At this hearing, the complainant will present his/her case. The committee will make a recommendation within 7 days and notify the complainant of that recommendation.

Appendix B

Summary of responses by Shutesbury Department Heads regarding ADA Policy Requirements

Effective Communication and General Nondiscrimination Checklists

Shutesbury ADA Self-Evaluation

Effective Communication Checklist		Total Responses	
		Yes	No
1)	Does the public entity know how to provide the following for people who are deaf or hard of hearing?		
	a. Sign language, oral, and cued speech interpreters		4
	b. Video remote interpreting (VRI) services		4
	c. Computer-assisted real-time transcription (CART) services	1	3
	d. Assistive listening devices		4
	e. Open and closed captioning of videos	1	3
	f. Real time captioning of television programs		4
	g. Other		4
2)	Does the public entity know how to provide documents in the following formats for people how are blind or visually impaired and others with print disabilities?		
	a. Braille	1	3
	b. Large print	1	3
	c. Audio recordings	2	2
	d. Accessible electronic formats that can be accessed by screen reading software (plain text or html)	2	2
	e. Screen reader software installed on a computer that is used by the public (ie. library)		4
	f. Magnification software installed on a computer that is used by the public (ie. computer lab)		4
	g. Optical readers		4
h. Other		4	
3)	Does the public entity have a policy or procedure to handle requests for auxiliary aids and services?		4
4)	Are employees and officials aware of the public entity's obligation to provide auxiliary aids and services?	1	3
5)	Do employees and officials know how to arrange for auxiliary aids and services? Arrangements could be made directly or through the ADA coordinator or another staff person.		4
6)	Does the public entity give primary consideration to the person with a disability when determining what type of auxiliary aid or service to provide?	2	2
7)	Are employees and officials aware that it is inappropriate to request that family members and friends of people who are deaf serve as sign language interpreters, except in emergencies or if the individual wants the family member or friend to interpret and it's appropriate to do so?	1	3
8)	Are employees and officials aware that a companion of a program participant has a right to auxiliary aids and services if the companion has a communication disability and is an appropriate person with whom the public entity should or would communicate?	1	3
9)	Are captions and audio description provided on videos and television programs the public entity produces and videos on its website?	1	3
10)	Does the public entity have a policy or procedure for determining if an auxiliary aid or service would be an undue financial and administrative burden?		4
11)	Do employees and officials know how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls?		4

Shutesbury ADA Self-Evaluation

Effective Communication Checklist		Total Responses	
	Questions	Yes	No
12)	Where telephones are available to the public for making outgoing calls, such as in hospital waiting rooms, are TTYs available for people with hearing and speech disabilities?		4
13)	Do telephone emergency services, including 911, provide direct access to people who use TTYs and computer modems?		4

Shutesbury ADA Self-Evaluation

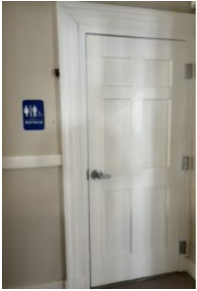
General Nondiscrimination Checklist		Total Responses	
		Yes	No
1)	Do policies, practices and procedures provide an equal opportunity for people with disabilities to participate in services, programs and activities; that is, do policies not discriminate against people on the basis of disability?	3	1
2)	Are there circumstances in which the participation of a person with a disability would be excluded or restricted?		4
3)	If yes, are the exclusions or restrictions necessary to the operation of the program or to the safety of other participants?		4
4)	Are there separate services, programs or activities for people with disabilities or a class of people with disabilities?		4
5)	Do all employees who contract with outside agencies, organizations or businesses know that the public entity's obligations apply whether the public entity provides the service, program or activity directly or contracts for it?	3	1
6)	Does the public entity notify each contractor of its responsibilities for providing contracted services in a nondiscriminatory manner?	1	3
7)	Does the public entity require assurances from contractors of their fulfillment of Title II requirements?		4
8)	Are there procedures to ensure that contractors provide the services, programs and activities in a nondiscriminatory manner consistent with the Title II requirements?		4
9)	Are employees and officials aware that the public entity is obligated to make a reasonable modification in policies, practices, or procedures if the modification is necessary for a person with a disability to participate?	4	
10)	Are employees and officials aware that:		
	a. The public entity must allow service animals to accompany people with disabilities in all areas where people without service animals are allowed to go?	4	
	b. Only two questions may be asked: (1) Is the dog a service animal required because of a disability? and (2) What work or task has the dog been trained to perform?	4	
	c. The public entity may not ask about a person's disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task?	4	
	d. A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken and, in these circumstances employees must offer the person with the disability the opportunity to obtain goods or services without the animal's presence?	4	
	e. The public entity must permit a miniature horse to accompany a person with a disability where reasonable?	2	2
11)	Are employees and officials aware that:		
	a. People with mobility disabilities may use wheelchairs, scooters and manually-powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities in any areas open to pedestrian use?	4	
	b. People with mobility disabilities may use other power-driven mobility device in any areas open to pedestrian use unless the public entity can demonstrate that the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements?	4	
	c. They may not ask about the nature and extent of the individual's disability, but may ask an individual to provide a credible assurance that the mobility device is required because of the person's disability?	4	

Shutesbury ADA Self-Evaluation

General Nondiscrimination Checklist		Total Responses	
		Yes	No
12)	Are employees and officials aware that the public entity may not place a surcharge on people with disabilities to cover the costs of measures, such as the provision of auxiliary aids or program accessibility, that are required to provide nondiscriminatory treatment?	4	
13)	Are tickets for accessible seats sold during the same hours; through the same methods of purchase (by telephone, on site, through a website, or through third-party vendors); and during the same stages of sales (pre-sales, promotions, general sales, wait lists, or lotteries) as non-accessible seats?		
14)	If accessible seating is not available in areas of the venue with lower prices, is lower priced accessible seating available in higher priced locations?		
15)	Do venues and third-party sellers provide the same information about accessible seats as provided about non-accessible seats?		
16)	Can ticket sellers describe accessible seating in enough detail to permit the purchaser to determine if a seat meets his or her needs?		
17)	Do ticket sellers know that people purchasing a ticket for a wheelchair space may purchase up to three additional seats for their companions as close as possible to the wheelchair space and that these companion seats may include wheelchair spaces?		
18)	Do ticket sellers know that unsold accessible seats may be released and sold to members of the general public in only one of three circumstances: when all non-accessible seats have been sold (excluding luxury boxes, club boxes, suites, and seats the venue holds been sold; or when all non-accessible seats in a particular price category have been sold back when declaring a sell-out); or when all non-accessible seats in a particular seating section have been sold; or when all non-accessible seats in a particular price category have been sold?		
19)	If the venue permits patrons to give or sell their tickets to others, does the venue know that the same right must be extended to patrons with disabilities and that those tickets may be sold to someone who does not have a disability?		
20)	Do ticket sellers know that for single event tickets, venues may ask purchasers to state that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?		
21)	Do ticket sellers know that for series of events tickets, purchasers may be asked to attest in writing that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?		
22)	Is information about the public entity's accessible services, activities and facilities available to the public and to current and future program participants?	1	2

Appendix C

Photographs documenting issues found in the Transition Plan



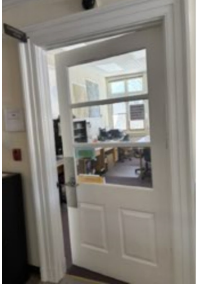
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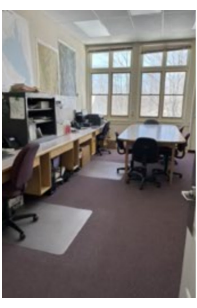
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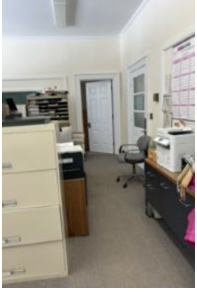
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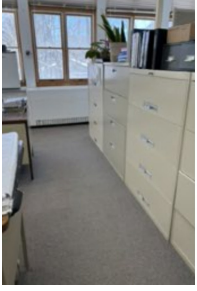
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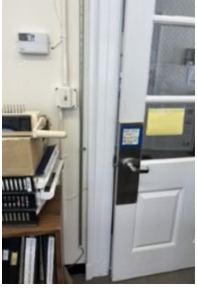
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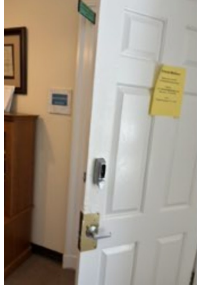
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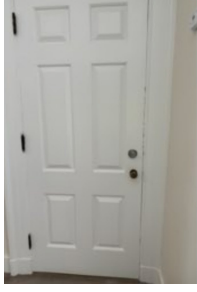
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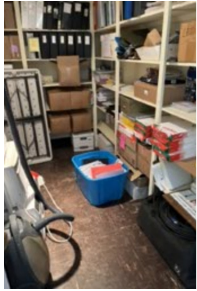
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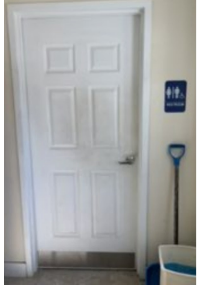
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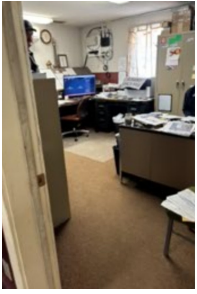
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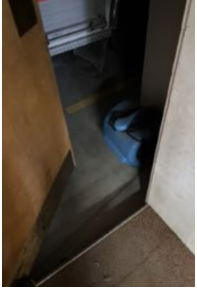
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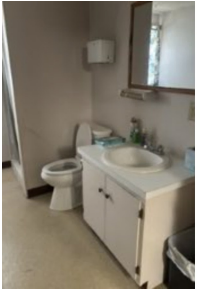
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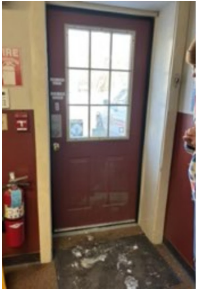
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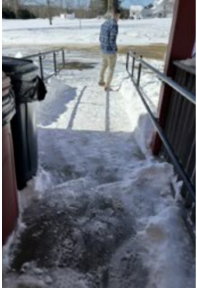
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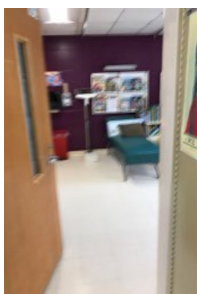
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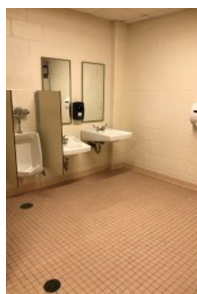
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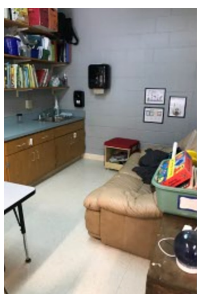
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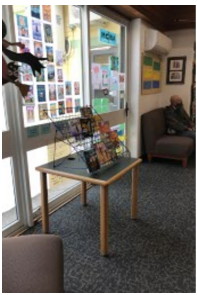
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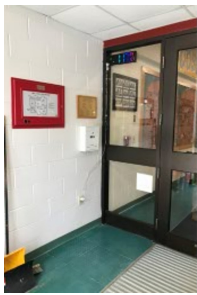
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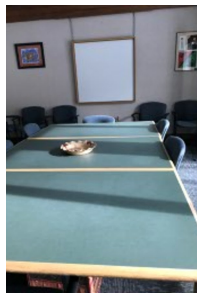
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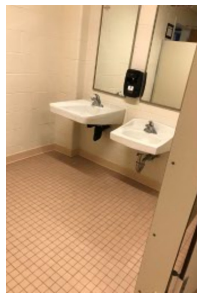
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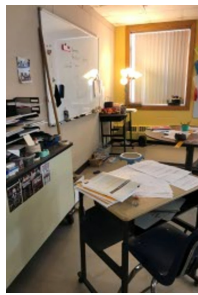
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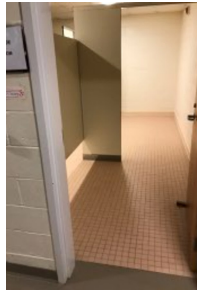
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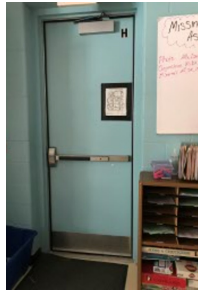
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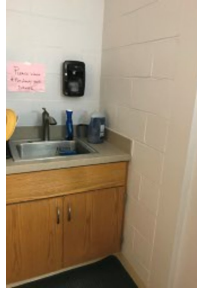
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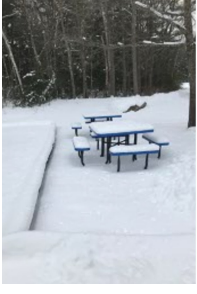
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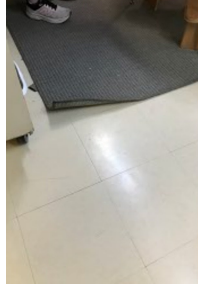
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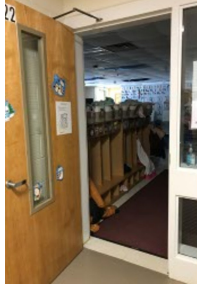
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