

TOWN OF BLACKSTONE, MA

ADA SELF-EVALUATION REPORT



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1 EXECUTIVE SUMMARY

The Town of Blackstone (the “Town”) has retained KMA, LLC to assist in the development of an Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan. This report has been prepared by KMA on behalf of the Town as part of the Town’s ongoing effort to assess ADA compliance across its programs, services, activities, and Town-owned facilities. As part of this initiative, KMA conducted accessibility audits of Town facilities, analyzed the results of customized community and staff surveys, reviewed written policies, rules, and regulations, and evaluated the Town’s website for digital accessibility.

The municipal portfolio assessed in this ADA Self-Evaluation and Transition Plan includes 14 Town facilities, consisting of:

- One administrative building (Municipal Building) that includes one senior center and two public safety wings (Police Station and Fire Station 1).
- One library.
- One historical museum.
- One Department of Public Works facility, the Corrosion Control Facility Building.
- One trash/recycling center.
- One animal control office/shelter.
- Two public safety buildings (two fire stations, one of which was decommissioned and is currently used for storage only by Town staff).
- Six recreational facilities (fives parks and one Town common).

Based on our comprehensive assessment – and the fact that the Town has consistently updated its ADA Self-Evaluation and Transition Plan –, the Town is making measurable progress toward ensuring that its programs, services, and activities are accessible to individuals with disabilities. Notable examples of this progress include:

- Formalized role of the ADA Coordinator with contact information posted on the Town’s website and social media and integrated on many distributed materials.
- Created a public notice and a grievance procedure with internal policies for distribution.
- A dedicated webpage consolidating accessibility-related information.
- Completed accessibility alterations in recent decades (for example, new accessible entrances and accessible toilet rooms at the Municipal Building).
- Built new facilities that are substantially more accessible such as the Public Library (2003).
- A committed Disability Commission that has pursued funding opportunities and has been awarded grant funds to improve Town parks on behalf of the Town (Massachusetts Office on Disability’s FY24 Municipal ADA Grant Recipient).

The Self-Evaluation process identified several areas where improvements are needed to enhance

the accessibility of the Town's programs, services, and activities. As is the case in many Massachusetts municipalities, the Town of Blackstone owns a number of aging facilities that present barriers to individuals with disabilities, including residents, visitors, and Town employees. When looked at in their entirety, the number and nature of these barriers significantly hinder the Town's ability to ensure full and equitable access to all municipal programs, services, and activities. For example, individuals with disabilities may face challenges participating in routine civic and community functions such as:

- Finding a van accessible parking space when visiting the Municipal Building to obtain a marriage license.
- Navigating the ramp leading to the police and fire stations.
- Using the toilet rooms at the Public Library.
- Parking and safely entering the Historical Museum to attend a meeting or access research materials.
- Attending a baseball game, including using the toilet rooms and purchasing concessions.

This Self-Evaluation Report summarizes KMA's findings and recommendations concerning the Town's compliance with Title II of the ADA. Section 4 outlines specific recommendations aimed at promoting full and equal participation in civic life for people with disabilities. These recommendations are categorized into two primary areas:

- **Programmatic Recommendations** – Approximately two dozen recommendations addressing policy and procedural updates, identification of appropriate auxiliary aids and services, and staff training to enhance understanding and implementation of ADA obligations.
- **Physical Recommendations** – Proposed modifications to selected Town facilities to improve physical accessibility in accordance with the 2010 ADA standards.

This Self-Evaluation Report is intended to support the Town's continued efforts to provide equitable access to all programs, services, and activities for individuals with disabilities. Along with the Transition Plan, this document should be considered a living document – subject to periodic review and regular updates – to maintain its relevance and effectiveness as a strategic planning resource for the Town of Blackstone.

2 REGULATORY CONTEXT

The Town of Blackstone is located in Worcester County, Massachusetts. With 11.2 square miles, Blackstone is bordered by North Smithfield, Rhode Island and Woonsocket, Rhode Island to the south; Millville, Massachusetts to the west; Mendon, Massachusetts to the north, and Bellingham, Massachusetts (Norfolk County) to the east. Blackstone is a part of the Providence metropolitan area. At the 2020 U.S. census, the population was 9,208.

Like all municipalities, the Town has a regulatory obligation to ensure that it does not discriminate against individuals with disabilities in the provision of municipal programs and services. The Americans with Disabilities Act (ADA) does not necessarily require that all the Town's facilities be fully accessible. Rather it requires that all the Town's programs and services, "when viewed in their entirety" are accessible. The Town is required to perform a Self-Evaluation to determine what barriers exist to their programs and services, and to develop and implement a plan to remove those barriers.

The ADA defines individuals with disabilities as those who fall into one of the following three categories:

- Individuals who have a physical or mental impairment that substantially limits one or more major life activities;
- Individuals with a record of such an impairment; and
- Individuals regarded as having such an impairment.

The broad prohibition against disability-based discrimination requires that all Town programs and services be accessible to individuals with disabilities. The ADA requires a public entity to take five administrative action steps:

- Designate an employee responsible for carrying out compliance activities.
- Provide notice to the public of its rights and protections under the ADA and how the entity complies with those obligations.
- Establish a grievance procedure.
- Conduct a Self-Evaluation, a comprehensive review of policies and procedures.
- Develop an ADA Transition Plan.

Thus, the Town must assess specific services, policies, and practices, and address the removal of physical barriers and/or the revision of policies and procedures, to ensure compliance with the applicable ADA and Section 504 regulations, and with all provisions of the Massachusetts Code of Regulations (521 CMR). Massachusetts State law further requires that the Town apply the more stringent of the above standards to achieve accessibility.

2.1 APPLICABLE REGULATIONS

There are four federal and state requirements for architectural barrier removal from existing buildings and in alterations to existing buildings. These are:

- PL101-336: 1990 Americans with Disabilities Act (ADA). This is the federal civil rights statute whose first purpose is:
...To provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities. (42 USC 12101. Sec.2(b))
- 28 CFR Part 35, Title II: Nondiscrimination on the Basis of Disability in State and Local Government Services (as amended by the final rule published on September 15, 2010). These are the U.S. Department of Justice’s regulations implementing the ADA, as required in 42 USC 12101, Sec.204(a))
- 29 USC 794: Section 504 of the 1973 Rehabilitation Act (504)
- 521 CMR: The Rules and Regulations of the Massachusetts Architectural Access Board. (1977, 1987, 1990, 1992, 1996, 1998, 2006)

2.2 ADA AND 504 BARRIER REMOVAL REQUIREMENTS

There are two requirements under Title II of the ADA that require a public entity such as the Town to remove existing barriers to bring an end to and to prevent discrimination against a person or people with disabilities. These two requirements are:

1. Program Accessibility: Program Accessibility requires that individuals with disabilities be provided an equally effective opportunity to participate in or benefit from a public entity’s programs and services. The ADA requires that public entities provide physical and communication access to each program service or activity. The Town must identify and correct policies and practices that have the effect of discriminating against individuals with disabilities.
2. Alterations: Any alterations that are performed must conform to the 2010 ADA Standards.¹ Alterations may trigger an obligation to perform additional barrier removal outside the planned scope of work. The ADA accessible path of travel requirement states: "When alterations are made to a primary function area that affect the usability of that area, alterations to provide an accessible path of travel to the altered area must also be made unless the cost is disproportionate." Further, the Town is required to maintain its existing facilities to ensure continued, unfettered, and uninterrupted access to persons with disabilities.

2.3 PROGRAM ACCESS

The Town’s fundamental obligation is to ensure that individuals with disabilities are afforded an equally effective opportunity to participate in, or benefit from, all its programs and services, subject only to the limitations of fundamental alteration and/or undue burden. Therefore, the Town must implement policy changes, if necessary, so that persons with disabilities can have full access. Further, the Town must continue to make changes to prevent discrimination and

¹ And 521 CMR: *The Rules and Regulations of the Massachusetts Architectural Access Board* (MAAB).

continually work to increase accessibility.

The ADA's Section 202 Discrimination states:

... no qualified individual with a disability shall, by reason of such 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 such entity.

The ADA's Section 204 required that the U.S. Department of Justice (DOJ) promulgate implementing regulations by 26 July 1991, one year after enactment of the legislation. These regulations are 28 CFR 28, published on July 26, 1991.

28 CFR 35.149 states:

... no otherwise qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

28 CFR 35.150 states:

A public entity shall operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.

This statutory and regulatory language above describes what is known as “program access” – a situation in which all programs are readily accessible to, and usable by, qualified persons with disabilities. In addition, qualified students with disabilities must be provided with equal services in as integrated a setting as possible, and the setting that is most appropriate to encourage interaction among all users. The determination of what is an equal and integrated setting is made on a case-by-case basis. What is appropriate for one person with a specific impairment may not be useful or appropriate for another person with the same impairment.

Failure to provide “program access” is an illegal act of discrimination under Title II of the ADA. The Town must identify and correct policies and practices that have the effect of discriminating against individuals with disabilities. The law provides public entities with some flexibility in how this standard can be met. Both structural and nonstructural methods of providing “program access” can be used.

2.4 METHODS OF PROVIDING PROGRAM ACCESS

28 CFR 35.150 details the methods that a public entity such as the Town may use to provide program access. These include:

- Reassignment of services to accessible buildings.
- Delivery of services at alternate accessible sites.
- Alteration of existing facilities and construction of new facilities.
- Any other methods that result in making its services, programs, or activities readily

accessible to and usable by individuals with disabilities.

From an architectural standpoint, this requirement does not mean that every Town facility must be accessible. However, every program must be accessible. When choosing a method of providing program access, the Town is required to give priority to the one which results in the most integrated setting possible and is most appropriate to encourage interaction among all users. The determination of what is an equal and integrated setting will be made on a case-by-case basis. What is appropriate for one person with a specific impairment may not be useful or appropriate for another person with the same impairment.

2.5 LIMITATIONS ON OBLIGATION TO PROVIDE PROGRAM ACCESS

The ADA's regulations specify certain clear limitations on a public entity's obligation to provide program access. An entity is not required to perform an action that poses an undue financial or administrative burden or constitutes a fundamental alteration. The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or their designee – in Town's case, Jeffrey Madison, the Town Administrator, and must be accompanied by a written statement of the reasons for reaching that conclusion. The threshold for an action constituting an undue burden is a high one for state and local government entities. If it is determined that barrier removal will result in such an alteration or burdens, the Town must still, "take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity."

2.6 SCHEDULE FOR PROGRAM ACCESS COMPLIANCE

Both 504 and Title II of the ADA presume that people with disabilities will be using the programs and services of public entities. In anticipation, they both mandate proactive steps to prevent discrimination by removing existing barriers. They do not permit public entities to wait until a person with a disability arrives before beginning to make accommodations. 504 and Title II mandate proactive barrier removal so that when a student with a disability arrives at school, the programs and services are substantially accessible. Minor accommodations may be needed, but the significant assessment and barrier removal should be complete.

28 CFR 35.150 sets a time period for ADA compliance stating:

"Where structural changes in facilities are undertaken to comply with the obligations established under this section, such changes shall be made within three years of January 26, 1992, but in any event as expeditiously as possible."

3 PROJECT METHODOLOGY

The Town of Blackstone retained the services of KMA to perform an accessibility assessment of its programs, services, and facilities. To date, KMA has performed the following tasks:

1. On March 17, 2025, KMA conducted a project kick-off meeting with the Town to discuss project goals and methodology. At this meeting, KMA also:
 - a. Reviewed roles and responsibilities of the consulting team and the Town.
 - b. Introduced the provisions of the ADA and the ADA Self-Evaluation process.
 - c. Discussed protocols for accessing Town facilities.
 - d. Presented a tentative project schedule.
2. On March 24, 2025, KMA shared the following surveys for review and comment by the Town:
 - a. Administrative Survey for the Town Administrator.
 - b. Department Survey for all Town Departments.
 - c. Public Survey for residents.

The Town had no edits to these surveys.

3. On April 4, 2025, KMA shared a pre-recorded training intended for representatives from several Town departments. The training covered:
 - a. The history, enactment, administration, and enforcement of the ADA.
 - b. The relationship between the ADA and other federal and state accessibility laws that apply to units of local government, focusing primarily on Title II of ADA.
 - c. Examples to assist in the identification of Town's programs, services, policies, and procedures that require evaluation.

KMA also shared the surveys listed above for distribution and completion by the Town.

4. On April 4, 2025, the Town distributed the Department surveys for completion. The following Town staff participated in this survey:
 - Chad Lovett: Town Administrator.
 - Tiziana Milano: Senior Center.
 - Tara Sullivan: Town Clerk.
 - Kevin Roy: Fire Department.
 - Lisa Cheever: Library.
 - Lauren Taylor: Accountant.
 - Gregory Gilmore: Police Department.

- Matthew Ryan: Collector/Treasurer.
5. On June 24 and July 8 and 15, 2025, KMA completed access audits of Town facilities, both buildings and outdoor facilities to determine whether there are physical barriers to access programs. For a complete list of facilities and more information on the methodology applied to audits and reports, please refer to Section 4 of this report.
 6. In August and September 2025, KMA reviewed the completed surveys and other policy documents received from the Town.
 7. In August and September 2025, KMA performed a review of small sampling of webpages of the Town's website, in accordance with guidance from Section 508 of the Rehabilitation Act and W3C-WAI's WCAG 2.0.
 8. In September 2025, KMA developed a draft ADA Self Evaluation report to summarize the ADA Title II requirements and KMA's primary findings and recommendations.
 9. On October 15, 2025, KMA submitted the Draft Self-evaluation report for review and comment to the Town; small edits were requested by the Town.
 10. On October 23, 2025, the Town posted on the Public survey on the Town's website.
 11. On November 19, 2025, KMA attended a Public Meeting at the Municipal Building and presented the latest findings and recommendations to the Town Administrator and members of the Disability Commission/residents.
 12. On December 19, 2025, KMA issued the final deliverables to the Town, including this Self-evaluation report with Appendices and the Transition Plan.

4 FINDINGS AND RECOMMENDATIONS

4.1 INTRODUCTION TO FACILITIES, PROGRAMS, SERVICES AND ACTIVITIES

KMA completed access audits of the following 14 Town facilities, including buildings and outdoor facilities, to determine whether there are physical barriers to access programs:

1. Municipal Building.
2. Public Library.
3. Historical Museum.
4. Corrosion Control Facility Building.
5. Recycling Center.
6. Animal Control.
7. Fire Station 2.
8. Fire Station 3.
9. Roosevelt Park.
10. Town Common/Gazebo.
11. Elm Street Park.
12. Goulet Park.
13. Turbesi Park.
14. Valati Park.

According to the Town's website, Blackstone provides programs, services, and activities through the following departments, in alphabetical order:

- Accountant.
- Animal Control.
- Assessors.
- Building and Inspectional Services.
- Collector/Treasurer.
- Emergency Management.
- Fire Department.
- Library.
- Parks and Recreation.
- Police Department.
- Public Works.

- Recycling Center.
- Senior Center.
- Town Administrator.
- Town Clerk.
- Veterans Services.

The following lists all Town departments and the Town facilities in which programs, services, and activities are provided to members of the public:

A. **Municipal Building** at 15 Saint Paul Street:

- Accountant.
- Assessors.
- Collector/Treasurer.
- Emergency Management.
- Inspectional Services.
- Parks and Recreation.
- Police Department.
- Senior Center.
- Town Administrator.
- Town Clerk.
- Veterans Services.

While the Parks and Recreation Department is located at the Municipal Building, the department offers programs, services, and activities at the following outdoor facilities throughout the Town:

- Roosevelt Park at 15 Saint Paul Street.
- Goulet Park at 175 Lincoln Street.
- Turbesi Park at 667 Rathburn Street.
- Valati Park at 8 Summer Street.
- Elm Street Park at 132 Elm Street.
- Town Common at Main and Butler Streets.

B. **Library** at 86 Main Street:

- Public Library.

C. **Historical Museum** at 23 Main Street:

- Historical Commission.

D. **Corrosion Control Facility/Water Treatment Plant** at 53 Elm Street:

- Public Works.

E. **Recycling Center** at 14 Chestnut Street:

- Recycling Center.

F. **Animal Control** at 14 Chestnut Street:

- Animal Control.

G. **Fire Station 2** at 666 Rathburn Street:

- Fire.

H. **Fire Station 3** at 132 Elm Street:

- Storage. Fire Station 3 was listed in the scope of work, but it was found to be not open to the public during our audit. Therefore, no programs, services, or activities are offered to the public at this facility.

KMA completed access audits of the Town facilities listed above to determine whether there are physical barriers to access programs. Audits were performed relative to conformance with the 2010 ADA Standards for Accessible Design and focused on those elements necessary for program access. For each facility, KMA completed an audit report with the following information:

- a. Building/facility summary.
- b. Barrier identification, location, and citation.
- c. Representative photos.
- d. Typical barrier mitigation and its estimated cost.

Barriers were categorized based on the program access criteria and based on facility information received by KMA prior to the audit, including but not limited to type of facility, programs and services provided, etc. The access audit reports are included in Appendix 9 of this report.

In addition to the evaluation of facilities described above, KMA also performed an evaluation of programs, services, and activities that included:

- a. A review of the results of the following surveys:
 - **Administrative Survey**: This survey included questions regarding the accessibility of the Town's current policies and procedures. The Administrative survey was completed by Chad Lovett, the Town Administrator – please refer to Appendix 4 of this report.
 - **Department Survey**: This survey was developed as a means for Town staff to review the accessibility of their department's programs, policies, and procedures. The survey

was intended to document how the Town is meeting its obligations under the ADA. KMA relied on the Town Administrator to identify a point person for each department and help collect responses from staff – please refer to Appendix 5 of this report.

- Public Survey: This survey presented the project and solicited input from members of the public regarding their experiences and opinions of accessibility issues in the Town of Blackstone. The survey was comprised of five questions about access to the built environment and programs, policies, and procedures in Blackstone – please refer to Appendix 6 of this report. KMA advised the Town on strategies for disseminating information regarding the survey to maximize responses. For a summary of public survey responses, please refer to Section 5 of this report. For a copy of the survey announcement, please refer to Appendix 7 of this report.
- b. A review of written policies, rules, and regulations of the Town and its departments to determine which, if any, contain language or processes that may be discriminatory and/or non-compliant with the ADA.
- c. A review of the five most visited webpages of the Town’s website: [Collector/Treasurer](#), [Agendas](#), [Assessors](#), [Jobs](#), and [Bid Posting](#) – please refer to Appendix 8 of this report.

Based on the holistic review of items listed above as well as observations during the access audits, KMA identified the following findings and recommendations:

4.2 ADMINISTRATIVE STEPS OF THE ADA

Title II of the ADA requires public entities to take several steps to become compliant with the ADA. To date, the Town has met all administrative requirements as follows:

4.2.1 ADA Notice:

A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part. (28 CFR Part 35.106)

Finding: As determined by the response of the Administrative survey, the Town has adopted a Public Notice of ADA Compliance to notify members of the public of the Town’s non-discrimination policies and ensure all residents have equal access to Town facilities, programs, and services – please refer to Appendix 1 of this report. The notice was last revised on February 8, 2024. The notice includes information on employment, effective communication, modifications to policies and procedures, how to request an accommodation, and includes the name and contact information – both address and email address – of the ADA Coordinator. However, the response of the Administrative survey as well as the website review and the access audits of municipal buildings indicate inconsistencies in where the Public Notice is posted.

Recommendation: KMA recommends revising the Town’s Public Notice to include the ADA Coordinator’s telephone number as a second means of access for contact information and creating an abbreviated version for announcements, per notice samples provided by the U.S. Department of Justice. Additionally, KMA recommends ensuring the Public Notice is prominently displayed or posted on:

- Entrances/lobbies, bulletin boards, and gathering places in all Town facilities.
- Social media and the Town’s website, including all webpages where information about disability services, public events and facility accessibility is displayed.
- Employee handbooks, manuals, and Department literature.
- Event posters, flyers, program brochures, and all materials distributed by the Town.
- Program announcements (in abbreviated form).

KMA recommends implementing these changes within the next six months. For a sample Public Notice, alternatives formats, and other methods to share this information with the public, please consult the New England ADA Center’s [‘ADA Title II Action Guide for State and Local Governments’](#) and the U.S. Department of Justice’s [‘The ADA Best Practices Tool Kit for State and Local Governments’](#).

4.2.2 ADA Coordinator:

A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph. (28 CFR Part 35.107 (a)).

Finding: Chad Lovett appointed to fulfill the responsibility of an ADA Coordinator to coordinate the Town’s ADA obligations on December 11, 2023 – please refer to Appendix 2 of this report. While his name and contact information with two means of access (telephone number and email address) are listed on the Town website, his name and contact information with only one means of access (email address) are listed on the Public Notice and on the Grievance Procedure. Mr. Lovett has not received yearly training on accessibility compliance.

Recommendation: KMA recommends that Mr. Lovett complete the ADA training offered by the [National Association of ADA Coordinators](#) and the [Massachusetts Office on Disability](#). In addition, KMA recommends providing the ADA Coordinator’s contact information with two means of access (telephone number and email address) on all materials distributed by the Town. KMA recommends implementing these changes within the next six months.

4.2.3 Grievance Procedure:

A public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action

that would be prohibited by this part. (28 CFR Part 35.107 (b))

Finding: The Town has adopted and published a Grievance Procedure as well as an ADA Grievance Complaint Form to resolve disability-related complaints – please refer to Appendix 3 of this report. Both the Grievance Procedure and ADA Grievance Complaint Form were last revised on February 8, 2024. Mr. Lovett’s name and contact information with only one means of access (email address) are listed therein. The response of the Administrative survey indicates the policy has not been consistently distributed to Department Heads, boards, and commissions. Although the survey response listed the Grievance Procedure as being “posted in conspicuous locations in all Town buildings”, KMA did not find such notice in all audited buildings.

Recommendation: KMA recommends revising the Town’s Grievance Procedure to include the ADA Coordinator’s telephone number as a second means of access for contact information and confirming that it is posted in conspicuous locations in all Town facilities. Also, KMA recommends regularly redistributing the grievance procedure to Department Heads, boards, and commissions. KMA recommends implementing these changes within the next six months. For more guidance on how to post and/or distribute the Grievance Procedure, please consult the New England ADA Center’s [‘ADA Title II Action Guide for State and Local Governments’](#) and the U.S. Department of Justice’s [‘The ADA Best Practices Tool Kit for State and Local Governments’](#).

4.2.4 Self-evaluation and Transition Plan:

(a) A public entity shall, within one year of the effective date of this part, evaluate its current services, policies, and practices, and the effects thereof, that do not or may not meet the requirements of this part and, to the extent modification of any such services, policies, and practices is required, the public entity shall proceed to make the necessary modifications. (28 CFR Part 35.105).

Existing facilities: (d) Transition plan. (1) In the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop, within six months of January 26, 1992, a transition plan setting forth the steps necessary to complete such changes. A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan shall be made available for public inspection. (2) If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas. (3) The plan shall, at a minimum—(i) Identify physical obstacles in the public entity’s facilities that limit the accessibility of its programs or activities to individuals with disabilities; (ii) Describe in detail the methods that will be used to make the facilities accessible; (iii) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year,

identify steps that will be taken during each year of the transition period; and (iv) Indicate the official responsible for implementation of the plan. (28 CFR Part 35.150).

Finding: As determined by the scope of this project, the Town is currently updating its ADA Self-evaluation and Transition Plan. According to the Town, its first-ever Self-evaluation and Transition Plan was performed in 2006, and updates were published in 2011, 2017, and most recently, in 2024.

Recommendation: Once the Self-evaluation and Transition Plan for the 12 Town facilities listed above is completed, the Town should consider implementing Self-evaluation and Transition Plans to understand whether the following programs, services, and activities in other Town-owned facilities are accessible: educational programs by Blackstone Public Schools in school buildings and housing in facilities managed by the Blackstone Housing Authority within the next five years.

4.3 EVALUATION OF PROGRAMS, SERVICES AND ACTIVITIES

Recommendations to ensure that all programs, services, and activities are accessible to people with disabilities and bring the Town into compliance are broken down into:

- Programmatic recommendations, such as:
 - Adding or changing policies or procedures.
 - Purchasing auxiliary aids, such as an assistive listening device.
 - Identifying places to arrange for auxiliary services, such as sign language interpreters.
 - Providing training for staff on ADA obligations and the public entity's procedures for responding to requests and resolving complaints.
- Physical recommendations through alterations to existing Town facilities.

4.3.1 Programmatic Recommendations:

4.3.1.1 Recommendations for All Town Departments:

The following recommendations apply to all Town Departments. Where policies are developed, KMA recommends ensuring information is disseminated to the public and staff as required:

A. Training:

Finding: The survey responses indicated a need for training of front-line Town personnel in several aspects of accessible program delivery, including:

- The Town's policy of non-discrimination.
- The Town's protocols for responding to requests for reasonable modifications.
- The Town's protocols for providing auxiliary communication aids and services.
- The Town's available resources for providing auxiliary aids and services.

- How to effectively communicate with people with disabilities.
- How to use of the Massachusetts Relay Service to make and receive calls.

Additional findings regarding training are included in other items listed below.

Recommendation: KMA recommends providing periodic training to all appropriate personnel – including part-time and seasonal employees, and especially front-line employees – in the Town’s nondiscrimination policy, how to respond to requests for reasonable modifications, auxiliary aids, and services (such as sign language interpreters, material in Braille and assistive listening systems) and documents in alternative formats, and in how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services to ensure that communication with people with disabilities is as effective as others. KMA recommends implementing these changes within the next year.

B. Surcharges:

Finding: In its survey responses, the Town confirmed that surcharges are not imposed to recover the cost of accommodations, effective communication services, or accessibility features. Further, the Public Notice lists that “The Town of Blackstone will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.”

Recommendation: None.

C. Meetings and Events at Accessible Locations:

Finding: The survey responses noted that most public meetings and events (including parties, flu clinics, etc.) are held in accessible Town buildings, most specifically the Municipal Building, though there is no formal written policy on the matter. On its [announcement of the Annual Halloween Trick-or-Treat Event](#) at the Municipal Building, the Town specified that “The first 30 minutes (4:30–5:00 PM) will be sensory-friendly, providing a welcoming environment for families with sensory sensitivities and other needs.”

Recommendation: KMA recommends that the Town establish procedures to assure all events open to the public, including but not limited to meetings, hearings, workshops, conferences, classes, parties, fairs, etc. are always held in accessible locations within the next six months.

D. Accessible Meetings and Events:

Finding: In addition to ensuring that public meetings are held in accessible venues, it is also important that Town staff planning and/or hosting public meetings (in-person, virtual, and hybrid) also do their part to ensure that all events are accessible to everyone.

Recommendation: KMA recommends developing written protocols for accessible events and distributing to all departments, boards, and commissions within the next six months. Helpful documents on how to write such protocols include:

- The Massachusetts Department of Public Health’s [‘Planning Accessible Meetings and](#)

Events

- The Massachusetts Office on Disability’s [‘Tips for Hosting Accessible Events and Meetings \(Guidance for In-person, Virtual, and Hybrid Events and Meetings\)’](#).
- Sample Event Language for Town Staff: “For additional information or to request accommodations to participate in this meeting (event), please contact (###) ###-#### or MA Relay 711 or email AppropriatePerson@address.org. Meeting materials in alternate formats can be made available upon request. Notification 72 hours prior to the meeting/event will allow the Town to make reasonable arrangements to ensure accessibility to this meeting/event. Note, the (meeting location) is an accessible facility.”

E. Licensing/ Certification:

Finding: Town licenses or certifications (i.e., liquor, restaurant, etc.) does not appear to have had the application process thoroughly reviewed to ensure qualified persons with disabilities are not screened out by the Town.

Recommendation: KMA recommends providing periodic training to all Departments engaged in application process reviews to ensure all Town licenses, permits, or certifications provide equal access to persons with disabilities – please refer to the programmatic recommendation for ‘Training’ in this report. KMA recommends implementing these changes within the next year.

F. Service Animal Policy:

Finding: While the Town welcomes service animals in Town offices on its Public Notice, the Town does not currently have a written policy regarding service animals in Town facilities.

Recommendation: KMA recommends developing a written service animal policy and posting it in Town facilities, including outdoor facilities, and on the Town’s website. For a sample policy and other useful information, please consult guidance developed by the [City of Newton](#) and by [Massachusetts Office on Disability](#). KMA also recommends disseminating and including routine training on the service animal policy once it is developed to all Town staff – see ‘Training’ above. KMA recommends implementing these changes within the next six months.

G. Reasonable Modifications of Policies:

Finding: The Town has a process for responding to requests for modifications to policies or practices if the modification is necessary for people with disabilities to participate. As determined by the response of the Administrative survey, requests are listed in the Public Notice and are reviewed by the ADA Coordinator for coordination with the appropriate Town department and the requestor.

Recommendation: KMA recommends developing and providing guidance on requests for reasonable modifications for all Town departments and new hires to ensure that everyone is aware of how to appropriately respond to requests within the next year. This guidance should also include criteria for determining whether a modification would fundamentally alter the nature of the program or a protocol by the Town department. Some examples of how to

improve the process for modifications to policies or practices can be found on the [U.S. Equal Employment Opportunity Commission's website](#).

H. **Auxiliary Aids and Services:**

Finding: While the Town lists a process for responding to requests for auxiliary communication aids and services in the Public Notice – such as requestors alerting the ADA Coordinator in a timely manner before scheduled events when auxiliary communication aids and services are needed –, the process may be improved as determined by the response of the Administrative survey.

Recommendation: KMA recommends establishing the appropriate vendors and contractual agreements so that aids and services can be provided in a timely manner, for example: TTY or telephone relay services and ASL interpreters. Looking at population data and historical information on past auxiliary aid requests can help inform the types of vendors and contractual agreements for the Town of Blackstone. KMA also recommends ensuring that appropriate departments are aware of their obligations to inform the public regarding the availability of auxiliary aids for people with disabilities. Establish department-wide guidance regarding the specific Town communications requiring notice of the availability of auxiliary aids (e.g., meeting announcements, events, conferences, etc.). Useful information on auxiliary aids and services, can be found on the [National Disability Navigator Resource Collaborative's website](#). If the Town experiences difficulties with providing aids and services in a timely manner when meeting notices are posted 48 hours prior to meetings, KMA recommends the Town to consult with legal counsel for guidance on the requirements for public meetings – including remote and hybrid meetings in accordance with the [Open Meeting Law regulations governing remote participation](#) – and the possibility of extending the timeframe for meeting notices. KMA recommends implementing these changes within the next year.

I. **Alternative Formats:**

Finding: Where Town documents are provided, department survey responses indicate that notification is not provided that documents can be requested in alternative formats.

Recommendation: KMA recommends assessing the needs of the community for alternative formats. Based on the assessment, establish the appropriate vendors or protocols so that documents in alternative formats can be provided in a timely manner, for example: taped texts, audio recordings, Braille materials and large print materials. Include notification regarding the availability of alternative formats on the Town's website. If the Town experiences difficulties with providing alternative formats in a timely manner when meeting notices are posted 48 hours prior to meetings, KMA recommends the Town to consult with legal counsel for guidance on the requirements for public meetings – including remote and hybrid meetings in accordance with the [Open Meeting Law regulations governing remote participation](#) – and the possibility of extending the timeframe for meeting notices. KMA recommends implementing these changes within the next year.

J. **Title III Entities Using Town Facilities:**

Finding: The Town's policies on the reservation and use of Town facilities do not appear to

include information on the obligation of the Title III entity (i.e., sports leagues at athletic and recreation facilities, artisan groups, theater groups, fundraisers (including road races) to facilitate the participation of persons with disabilities.

Recommendation: KMA recommends developing language to be included in all Town rental agreements that ensure Title III entities of their obligations to facilitate the participation of persons with disabilities within the next six months.

K. Use of Contractors:

Finding: As determined by the response of the Administrative survey, the Town does not include language in its contracts to ensure that contractors are aware of their obligations to facilitate the participation of persons with disabilities in programs and activities the contractor operates on behalf of the Town. Additionally, the Town has not developed a procedure to disseminate information about ADA requirements to contractors, including in contracts for transportation services.

Recommendation: KMA recommends adding language to contracts to ensure contractors are aware of their obligations under the ADA. In addition, KMA recommends modifying the contract language, so it does not include stigmatizing language and disseminating to contractors within the next six months. For more information on stigmatizing language, please refer to the programmatic recommendation for 'Documents and Publications' in this report.

L. Documents and Publications:

Finding: While Town documents and announcements have not been comprehensively reviewed to ensure they do not use stigmatizing language, KMA found numerous instances of the word "handicap(ed)" on its Master Plan (from 2018) Open Space Plan (from 2024), the Animal Control by-laws, and webpages, meeting agendas and minutes posted on the Town's website.

Recommendation: KMA recommends ensuring the Town's policy on nondiscrimination includes information on patronizing or stigmatizing language and/or images. "People-first" or "person-first" language is a way of describing disability that involves putting the word "person" or "people" before the word "disability" or the name of a disability, rather than placing the disability first and using it as an adjective. Some examples of people-first language might include saying "person with a disability," "woman with cerebral palsy," and "man with an intellectual disability." The purpose of people-first language is to promote the idea that someone's disability label is just a disability label—not the defining characteristic of the entire individual. Many guides on disability language and etiquette may likely emphasize using person-first language, except, perhaps, when discussing certain disability cultural groups that explicitly describe themselves with disability-first language. Thus, while it is generally a safe bet to use people-first language, there are members of certain disability groups in the US who prefer not to use it, such as the American Deaf community and a number of Autistic people/ Autistics. The basic reason behind members of these groups' dislike for the application of people-first language to themselves is that they consider their disabilities to be inseparable parts of who they are. Using person-first language, some also argue, makes the disability into something negative, which can and should be separated from the person. For

useful information, please consult the Metropolitan Area Planning Council's [Language Access Guide](#). KMA recommends implementing these changes within the next six months.

M. **Website:**

Finding: KMA conducted a cursory review of the Town's website to help identify any significant and recurring accessibility and usability problems. The basis for the review was the guidance from Section 508 of the Rehabilitation Act and W3C-WAI's WCAG 2.0. In collaboration with the Town, the following were selected as the five most visited webpages for review: [Collector/Treasurer](#), [Agendas](#), [Assessors](#), [Jobs](#), and [Bid Posting](#) – please refer to Appendix 8 of this report.

KMA found the Town's website to be accessible but identified instances of non-compliance on this sampling of webpages:

- All five webpages have instances of incorrectly-coded menus that can confuse users.
- Two webpages have search and filter fields that lack proper labels for screen reader users.
- One webpage has instances of empty headers.
- Two webpages contain multiple color contrast errors.

Further, the Town offers information regarding access to programs, services, and activities for people with disabilities on a centralized webpage on its [website](#), including useful resources such as the Town's compliance with the ADA's administrative steps (Public Notice, the Grievance Procedure and associated Complaint Form, and ADA Coordinator appointment letter), the process for requesting accommodations or auxiliary aids and services, and digital copies of all previous ADA Self-evaluation and Transition Plans.

Recommendation: KMA recommends reviewing and implementing all of the recommendations identified in the website report and performing a more comprehensive website analysis. Additionally, KMA recommends enhancing the information provided on its centralized webpage with the following information for people with disabilities:

- All accessibility policies (service animal, etc.) by the Town.
- The accessibility of Town facilities, including “know before you go” information about accessible parking, accessible entrances, accessible toilet rooms, accessible polling places, accessible outdoor facilities, and other accessible amenities to help people with disabilities plan to ahead when attending events.

KMA recommends implementing these changes within the next six months.

4.3.1.2 **Department-specific Recommendations:**

The following recommendations apply to the following Town departments, in alphabetical order. Where policies are developed, KMA recommends ensuring information is disseminated to the public and staff as required:

4.3.1.2.1 Building and Inspectional Services, Public Works, Parks and Recreation Departments:

N. Maintenance of Accessible Facilities:

Finding: In addition to providing programmatic access, the Town is obligated to maintain all accessible facilities in working order. The ADA Technical Assistance Manual II-3.10000 contains the following language regarding the maintenance of accessible features:

Maintenance of Accessible Features. Public entities must maintain in working order equipment and features of facilities that are required to provide ready access to individuals with disabilities. Isolated or temporary interruptions in access due to maintenance and repair of accessible features are not prohibited.

Where a public entity must provide an accessible route, the route must remain accessible and not blocked by obstacles such as furniture, filing cabinets, or potted plants. An isolated instance of placement of an object on an accessible route, however, would not be a violation, if the object is promptly removed. Similarly, accessible doors must be unlocked when the public entity is open for business.

Mechanical failures in equipment such as elevators or automatic doors will occur from time to time. The obligation to ensure that facilities are readily accessible to and usable by individuals with disabilities would be violated if repairs are not made promptly or if improper or inadequate maintenance causes repeated and persistent failures.

The Town offers the [Snow Angels Program](#), a volunteer service aimed at volunteers who can assist seniors and persons with physical disabilities with snow removal in their neighborhood.

Recommendation: Within the next year, KMA recommends conducting the following training for department staff to confirm that ongoing facility maintenance and operation ensures access for individuals with disabilities:

- Conduct periodic inspections and testing of automatic door openers, emergency phones, and assistive listening devices.
- Placement of furniture, trash cans, and other items so as not to obstruct accessible routes, clear floor spaces at accessible elements (including plumbing fixtures), and maneuvering clearances at doors.
- Placement of outdoor trash cans on accessible routes, trimming tree branches and other vegetation along and/or above accessible walkways and/or sidewalks, access aisles serving accessible parking spaces, and maneuvering clearances at entry doors.
- Snow removal at all Town facilities and public rights-of-way under the Town's control to ensure that accessible elements such as sidewalks, crosswalks, curb ramps, on- and off-street accessible parking, ramps, and stairs are properly clear in a timely manner. For useful information, consult the Massachusetts Office on Disability's ['Snow Removal and Accessibility in Massachusetts'](#).

O. Portable Toilets Units:

Finding: When portable toilet units (also known as "porta potties") are provided in Town

facilities, at least one in each facility must be accessible. Where multiple portable toilet units are clustered in a single location, no more than five percent of the toilet units at each cluster but at least one must be accessible. Accessible portable toilet units must be located on an accessible route and must be identified by the International Symbol of Accessibility. During the audit of Town facilities, KMA observed one portable toilet unit at Roosevelt Park; although the portable toilet unit itself appeared to be designated as accessible, it was not located on an accessible route due to the grass surface.

Recommendation: Within the next year, KMA recommends creating a policy for the procurement, rental, and installation portable toilets within Town facilities. Provide an accessible portable toilet at each location where they are provided and/or at each location where there are inaccessible toilet facilities. Ensure the accessible portable toilet unit is located on an accessible route.

P. New Construction and Alterations:

Finding: The design and construction associated with new Town facilities and alterations to existing Town facilities must be carefully reviewed and performed in compliance with the 2010 ADA Standards. During recent alterations performed to the Historical Museum – most specifically, the replacement of the ramp to the accessible entrance and improvements to exterior stairs –, KMA observed certain practices in place by the Building and Inspectional Services Department to ensure accessibility compliance in alterations to existing buildings.

Recommendation: Although KMA did not review the Town’s designer contracts to verify the existence of this language, within the next year, KMA recommends the Town to ensure that all future capital and maintenance projects of Town facilities (for both buildings and outdoor facilities, either alterations to existing facilities or new construction) are always designed and constructed in compliance with the 2010 ADA Standards and 521 CMR: The Rules and Regulations of the Massachusetts Architectural Access Board. When addressing accessibility for pedestrians within the public right-of-way, including sidewalks, crosswalks, curb ramps, pedestrian signals, on-street parking, and shared-use paths, KMA also recommends including the U.S. Access Board’s [Public Rights-of-Way Guidelines](#).

4.3.1.2.2 Town Administrator:

Q. Employment:

Finding: Along with the Department survey responses, KMA reviewed job postings and the employment application form available on the Town’s website. While the Town’s equal opportunity employment policy is listed on the Public Notice, the policy – as well as the contact information of the Town personnel responsible for accommodations, if accommodations are needed by the job applicant – is not included in the applications for employment.

Recommendation: KMA recommends reviewing the Town’s job postings and employment application process, job descriptions to distinguish between essential functions and marginal functions, developing protocols to ensure personnel files are managed so that information identifying disability is contained in a separate file, reviewing performance evaluation forms,

ensuring all staff who conduct interviews have received ADA training – please refer to the programmatic recommendation for ‘Training’ in this report –, and ensuring the Town’s employment documents are available in alternate formats. KMA also recommends staff to attend the Massachusetts Office on Disability’s [employment and workplace trainings](#).

KMA recommends implementing all recommendations noted above within the next year.

R. Access to the Historical Museum:

Finding: Despite recent accessibility improvements to the ramp and stairs to the Historical Museum, further accessibility improvements to the building interior – most specifically, renovating the toilet room, widening doors, and installing a wheelchair lift or elevator to the basement and the second floor – may not be feasible due to the building typology.

Furthermore, even if accessibility improvements to the first floor are accomplished, limiting access to the public to the first floor only may not be feasible as Historical Commission members who volunteer to operate the museum are also considered members of the public.

Recommendation: KMA recommends developing a written policy to limit access to the public to the first floor only within the next six months. Alternatively, KMA recommends the Town identify an alternative, accessible location where programs, services, and activities may be provided by the Historical Commission within the next year.

4.3.1.2.3 Emergency Management, Police, and Fire Departments:

S. Emergency Preparedness:

Finding: Although a formal emergency preparedness plan was not provided for review, the Town offer useful information on emergency management on [its website](#), mostly related to weather-related emergencies. Survey responses indicated conflicting information about emergency preparedness. While emergency personnel appears to be trained in effective communication with people with disabilities, most departments were unclear on emergency response plans that address the needs for individuals with disabilities at their facilities.

Recommendation: KMA recommends creating an emergency preparedness plan (or supplementing the existing emergency preparedness plan, if one exists) to include:

- Provisions to ensure that equal access to safe egress is provided for any visitor, member of the community or employee, including additional assistance if required to effectively evacuate and/or shelter them during an emergency.
- Emergency phones at the entrance of the Police Station and the Fire Stations to allow residents with mobility disabilities to quickly summon emergency personnel in an emergency.
- Protocols and signage for such issues as:
 - Public and employee orientation to the Town’s emergency evacuation procedures in buildings and outdoor facilities.
 - Evacuation maps with locations of egress doors and safe wait in the Municipal Building and the Public Library.

- All exit doors in buildings are identified by ADA-compliant, tactile signs.
- All accessible, at-grade exit doors in buildings are identified by an illuminated exit sign with the International Symbol of Accessibility, according to 521 CMRF 41.1.3(e).

In addition, KMA recommends emergency management personnel attend the Massachusetts Emergency Management Agency’s [‘Emergency Preparedness for Individuals with Disabilities and Access and Functional Needs’](#) training and the University of New Mexico’s [‘Tip Sheets for First Responders’](#). KMA recommends implementing these changes within the next year.

4.3.1.2.4 **Town Clerk Department:**

T. **Elections and Polling Places:**

Finding: The Town has three precincts where registered voters go to vote, each with a designated polling place: Precinct 1 in the Senior Center on the lower level of the Municipal Building, Precinct 2 at Fire Station 2, and precinct 3 at the main conference room on the upper level of the Municipal Building. Although the Town Clerk’s Office provides useful information about elections on the Town’s website, the webpage lacks information for people with disabilities such as information about accessible polling places, accessible voting procedures, and accessible voting equipment for voters with disabilities who require accommodations or assistance during elections.

Recommendation: Within the next year, KMA recommends:

- Mitigating all the barriers associated with voting activities listed in the access audit report for the Municipal Building and Fire Station 2 found in Appendix 9 of this report.
- Developing a policy to designate the Municipal Building and Fire Station 2 as the accessible polling places and disseminating information on the policy to Town staff and the public.

For more information on accessible polling places, please visit the [Secretary of the Commonwealth’s website](#) and [ADA.gov](#).

4.3.1.2.5 **Recycling Center Department:**

U. **Assistance with Trash and Recycling Disposal:**

Finding: At the Recycling Center, accessible parking is not provided, the trash and recycling dumpsters are not located on an accessible route, and the openings of the dumpsters are not within an accessible reach range.

Recommendation: Instead of undergoing expensive alterations to repave and regrade the area to lower the height of the dumpsters so that they are reachable by people with mobility disabilities – as listed in the access audit report for the Recycling Center found in Appendix 9 of this report –, KMA recommends creating a policy and training the facility attendant to assist residents with disabilities with handling their trash and recycling at a fully compliant, designated accessible van parking space within the next year.

4.3.1.2.6 Animal Control Department:

V. Assistance with Animal-related Services:

Finding: At Animal Control, accessible parking is not provided, and the office/shelter is completely inaccessible due to the step to the entrance, a narrow entry door, an excessively high counter, and lack of an accessible route throughout the building.

Recommendation: Instead of undergoing expensive alterations to the office/shelter so that the building is accessible to people with mobility disabilities – as listed in the access audit report for Animal Control found in Appendix 9 of this report –, KMA recommends creating a policy and training the Animal Control Officer and other Department staff to assist residents with disabilities with all animal-related services offered by this facility at a fully compliant, designated accessible van parking space within the next year.

4.3.2 Physical Recommendations:

KMA completed access audits of the following 14 Town facilities, including buildings and outdoor facilities, to determine whether there are physical barriers to access programs:

1. Municipal Building at 15 St. Paul Street.
2. Public Library at 86 Main Street.
3. Historical Museum at 23 Main Street.
4. Corrosion Control Facility Building at 53 Elm Street.
5. Recycling Center at 14 Chestnut Street.
6. Animal Control at 14 Chestnut Street.
7. Fire Station 2 at 666 Rathbun Street.
8. Fire Station 3 at 132 Elm Street.
9. Roosevelt Park at 15 Saint Paul Street.
10. Goulet Park at 175 Lincoln Street.
11. Turbesi Park at 667 Rathburn Street.
12. Valati Park at 8 Summer Street.
13. Elm Street Park at 132 Elm Street.
14. Town Common at Main and Butler Streets.

While these facilities were audited for physical barriers to program access, proposed mitigations to barriers identified in the access audit reports – please refer to Appendix 9 of this report – may be replaced by programmatic recommendations in this report – please refer to Programmatic Recommendations above for the Recycling Center and Animal Control.

Also, it is worth noting that unit costs included within the access audit reports reflect estimates of direct trade costs and are intended for preliminary planning purposes only. Unit costs do not include the following soft and hard costs, which can have a significant impact on overall project

costs:

- Existing conditions such as structure or building systems that may impact mitigation of a specific barrier.
- Abatement of hazardous materials.
- Other code-required alterations triggered by accessibility mitigations.
- Project administration.
- Professional fees for planning, design, and specialist consultants.
- Permits, certifications, and legal fees.
- Furniture, fixtures, and equipment.
- General conditions of the contract.
- General contractor's mark-up, including labor costs calculated at prevailing wage subject to public bidding.
- Estimating contingency.
- Escalation contingency.
- Change orders.

Unit costs provide an inventory of “in a vacuum” costs that enables a comparative analysis of barriers identified in the report for planning and prioritization. They do not, however, represent actual costs of shovel-ready projects. The Town will need to gather additional detail on a project-by-project basis before creating individual project budgets.

The Town of Blackstone has made progress removing structural barriers to programs, services, and activities in its facilities. Below is a list identifying the principal architectural barriers identified and recommended mitigations for both buildings and outdoor facilities. Both findings and recommendations for each building are listed with the highest priority items at the top and follow the Department of Justice's priorities for accessibility which are applicable to local government facilities: 1) Accessible approach and entrance, 2) Access to goods and services, 3) Access to public toilet rooms, and 4) Access to other items.

4.3.2.1 Buildings:

The following Town buildings are ordered by priority. For example, the Municipal Building and the Public Library are listed first as they appear to be Town buildings with the highest public use:

A. Municipal Building:

The Municipal Building is located at 15 St. Paul Street. The site consists of a two-story building, which includes department offices, public meeting rooms, toilet rooms, as well as the Council on Aging, the Police Department, and the Fire Department. Floors are connected by an elevator. Accessible multi-user toilet rooms are provided on both floors. The accessible entrance to the first floor is located on the southeast side of the building and the accessible entrance to the Police and Fire Department is on the second floor. Accessible parking is

provided for both accessible entrances.

Finding: Principal barriers identified include:

- The parking spaces have slightly excessive slopes, and a van-accessible parking space is not provided.
- The accessible route between St. Paul Street and the entrance is too narrow and has excessive cross slopes.
- Both ramps to the accessible entrance on the first floor and the police and fire stations have excessive slopes.
- The multi-user toilet rooms have accessible elements that are not mounted in the correct locations.
- Certain counters in the offices on the second floor are too high.

Recommendation: Due to the high traffic of the Municipal Building, KMA recommends mitigating all the barriers identified in the audit report within the next three years. In the next year, KMA recommends prioritizing the following mitigations due to their high visibility and use:

- 1) Regrade and restripe the accessible parking spaces and add one van-accessible parking space, as well as its associated sign and access aisle.
- 2) Widen and regrade the walkway to the accessible entrance.
- 3) Rebuild the ramp to the first-floor entrance and the ramp to the police and fire stations.
- 4) Reposition several elements in the toilet rooms.
- 5) Lower a portion of the counter at each office.

B. Public Library:

The Public Library is a one-story building located at 86 Main Street. Accessible multi-user toilet rooms are provided, as well as an accessible single-user toilet room for children's use. An accessible entrance is provided along Austin Street, with parking North of the building. Two accessible parking spaces are provided.

Finding: Principal barriers identified include:

- The parking spaces have slightly excessive slopes and changes in level.
- The passenger loading zone has several instances of non-compliance.
- Curb ramps serving the accessible parking spaces and the passenger loading zone have excessive slopes.
- The single-user and multi-user toilet rooms have a few accessible elements that are not mounted in the correct locations.

Recommendation: Due to the high traffic of the Public Library, KMA recommends mitigating all the barriers identified in the audit report within the next three years. In the next year, KMA

recommends prioritizing the following mitigations due to their high visibility and use:

- 1) Regrade and restripe the accessible parking spaces and associated access aisles.
- 2) Restripe the passenger loading zone.
- 3) Rebuild the curb ramps serving the parking spaces and the passenger loading zone.
- 4) Reposition several elements in the toilet rooms.

C. Historical Museum:

The Historical Museum is located at 23 Main Street. This two-story, former single-family residence operates as a museum and hosts related community events. One designated accessible parking space is located off Main Street, directly adjacent to a ramp leading to the first-floor entrance. Although the Museum functions occur on all floors, including the basement and the second floor, vertical access is not provided. One inaccessible single-user toilet room is provided on the first floor. Alterations to the parking space and ramp to the accessible entrance were being implemented at the time of the audits.

Finding: Principal barriers identified include:

- The parking space off Main Street has excessive slopes, the parking sign is too low, and a van-accessible parking space is not provided.
- The recently built ramp has excessive slopes at the bottom and lacks a level landing on the sidewalk.
- The interior doors are too narrow and thresholds have abrupt changes in level on the first floor.
- The single-user toilet room does not have any accessible elements, and its footprint is too small to be made accessible.

Recommendation: KMA recommends mitigating all the barriers identified in the audit report within the next three years. In the next year, KMA recommends prioritizing the following mitigations due to their high visibility and use:

- 1) Regrade and restripe the accessible parking space to add one van-accessible parking space, as well as its associated sign and access aisle.
- 2) Regrade the bottom of the ramp.
- 3) Enlarge the interior doors and remove thresholds on the first floor.
- 4) Renovate the toilet room.

Please refer to Programmatic Recommendations for the Town Administrator above for additional information.

D. Corrosion Control Facility:

The Corrosion Control Facility is a one-story building located at 53 Elm Street. While the building is mostly used by Town staff, including the Department of Public Works, administrative spaces, and vehicles and maintenance garages, a public service counter and

accessible toilet rooms are located near the building entrance. An accessible parking space is provided near the accessible entrance.

Finding: Principal barriers identified include:

- The parking space has excessive slopes, the parking sign is too low, and a van-accessible parking space is not provided.
- The walkway between the accessible parking and to the accessible entrance has excessive slopes and changes in level.
- The counter in the lobby is too high and narrow.
- The single-user toilet rooms have elements that are not mounted in the current locations, and doors lack maneuvering clearances.

Recommendation: KMA recommends mitigating all the barriers identified in the audit report within the next three years. In the next year, KMA recommends prioritizing the following mitigations due to their high visibility and use:

- 1) Regrade and restripe the accessible parking space to add one van-accessible parking space, as well as its associated sign and access aisle.
- 2) Regrade the walkway to the accessible entrance.
- 3) Lower and widen a portion of the counter in the lobby.
- 4) Renovate both toilet rooms and install automatic door openers.

E. Recycling Center:

The Recycling Center is located at 14 Chestnut Street. Residents dispose of their trash and recycling during days and hours of operation, as directed by the facility attendant. A temporary, designated accessible parking space is provided directly next to the attendant's booth.

Finding: At the Recycling Center, accessible parking is not provided, the trash and recycling dumpsters are not located on an accessible route, and the openings of the dumpsters are not within an accessible reach range.

Recommendation: Restripe a portion of the parking to add one van-accessible parking space, as well as its associated sign and access aisle in the next year. Please refer to Programmatic Recommendations for the Recycling Center Department above for additional information.

F. Animal Control:

The Animal Control facility is a one-story building located at 14 Chestnut Street. While calls are handled through the Police Department, animal-related services are offered at this facility. Parking spaces are located directly adjacent to the entrance to the building.

Finding: At Animal Control, accessible parking is not provided, and the office/shelter is completely inaccessible due to the step to the entrance, an entry door that lacks compliant hardware and maneuvering clearances, an excessively high counter, and lack of an accessible

route throughout the building.

Recommendation: Pave and stripe a portion of the parking lot to add one van-accessible parking space, as well as its associated sign and access aisle in the next year. Please refer to Programmatic Recommendations for the Animal Control Department above for additional information.

G. Fire Station 2:

Fire Station 2 is a one-story building located at 666 Rathbun Street. The building consists of two bay doors leading to the apparatus bay and one public entrance to the dayroom, with a step between both spaces. Although a sign indicates the entrance as accessible, a non-compliant ramp leads to the building entrance. While a partially accessible, single-user toilet room is provided inside the apparatus bay, inaccessible multi-user toilet rooms are provided near the kitchen. A designated accessible parking space in the adjacent parking lot.

Finding: Principal barriers identified include:

- The accessible parking space has excessive slopes and lacks the required access aisle adjacent to it.
- The walkway between the accessible parking and to the building entrance has excessive slopes due to the driveway to the apparatus bay.
- The ramp to the building entrance has excessive slopes and lacks a level landing.
- The entry door lacks the maneuvering clearance required on the push side.

Recommendation: KMA recommends mitigating all the barriers identified in the audit report within the next three years. Within the next year, KMA recommends prioritizing the following mitigations due to their use associated with voting activities at this polling place:

- 1) Abandon the current accessible parking space (remove the parking sign and paint over the icon on the ground) and install a new van-accessible parking space, as well as its associated sign and access aisle, directly near the building entrance and from either Rathburn Street or Champlain Avenue.
- 2) Rebuild the ramp to the entrance to the day room. Coordinate with the new location for the accessible parking space.
- 3) Install an automatic door opener.

Please refer to Programmatic Recommendations for the Town Clerk Department above for additional information.

H. Fire Station 3:

Fire Station 3 is a one-story structure located at 132 Elm Street. The building has been decommissioned as a Fire Station and currently serves as storage for Town staff use. The building consists of an apparatus bay with two doors, a storage room and single user toilet room, and an office with an exterior door. There is no parking offered at this facility.

Finding: Fire Station 3 was listed in the scope of work, but it was found to be not open to the

public during our audit. Therefore, no programs, services, or activities are offered to the public at this facility.

Recommendation: N/A.

4.3.2.2 Outdoor Facilities:

While recent accessibility improvements have been implemented at the parking lot and playground of both Roosevelt Park and Turbesi Park for the great benefit of residents with disabilities, KMA did not observe any fully accessible athletic/recreational facilities in the Town of Blackstone:

I. Roosevelt Park:

Roosevelt Park is located behind the Municipal Building on St. Paul Street and is along the Blackstone River. The site consists of two baseball fields with bleachers (Little League and Babe Ruth fields), concession stands and a free-standing press box, a playground, a picnic pavilion, two basketball courts, planting beds, and a parking area with two accessible parking spaces. Toilet rooms are located in a small structure between the fields. Because the press box is elevated and smaller than 500 square feet, it is exempt from being located on an accessible route.

Finding: Principal barriers identified include:

- The accessible parking space has slightly excessive slopes and lacks the required van-parking sign.
- An accessible route is not provided between the accessible parking and the basketball court.
- An accessible route is not provided between the accessible parking and the baseball fields (and associated team player and spectator seating), as well as the concessions and the toilet rooms.
- All concession stand counters are too high.
- The toilet rooms are completely inaccessible.

Recommendation: KMA recommends mitigating all the barriers identified in the audit report within the next three years. Within the next year, KMA recommends prioritizing the following mitigations due to their high visibility and use:

- 1) Regrade and restripe the accessible parking space and add one van-accessible parking sign.
- 2) Pave a small section of the landscaped area to provide an accessible route between the accessible parking space and the basketball court.
- 3) Regrade the existing path and extend it to both baseball fields (and associated team player and spectator seating) as well as the concessions and the toilet rooms.
- 4) Lower the concession counter.

- 5) Renovate both toilet rooms.

J. Goulet Park:

Goulet Park is located behind John F. Kennedy Elementary School, along Mendon Street. The park consists of a baseball field, a softball field, a basketball court, three sizes of soccer fields, a playground, a concession stand, toilet rooms, and a parking area with no accessible parking spaces. In addition to activities associated with the Elementary School, this park is an important facility for the local community.

Finding: Principal barriers identified include:

- The parking spaces are not accessible due to the gravel and sand surface.
- An accessible route is not provided between the parking spaces and the baseball field, softball field, basketball court, soccer fields, and the playground and their surrounding elements.
- The multi-user toilet rooms lack accessible elements.

Recommendation: KMA recommends mitigating all the barriers identified in the audit report within the next three years. Within the next year, KMA recommends prioritizing the following mitigations due to their high visibility and use:

- 1) Pave and stripe a portion of the parking lot to add the required number accessible parking spaces, including at least one van-accessible parking space.
- 2) Provide an accessible route between the accessible parking spaces/school driveway and at least one of each of the fields and courts (and associated team player and spectator seating) as well as concessions and toilet rooms.
- 3) Lower the concession counter.
- 4) Renovate both toilet rooms.

K. Turbesi Park:

Turbesi Park is located along Rathbun Street and directly across from Fire Station 2, with a secondary entry point off Miller Street. The site consists of a playground, a basketball court, a picnic pavilion, two baseball fields (Little League Fields), and a parking area with two marked accessible parking spaces.

Finding: Principal barriers identified include:

- An accessible route is not provided between the accessible parking and the basketball court, the picnic pavilion, or the baseball fields (and associated team player and spectator seating).
- Seating areas are not provided along the accessible route of the playground.

Recommendation: KMA recommends mitigating all the barriers identified in the audit report within the next three years. Within the next year, KMA recommends prioritizing the following mitigations due to their high visibility and use:

- 1) Provide an accessible route between the accessible parking spaces and at least one of each of the baseball fields and the basketball courts (and associated team player and spectator seating) as well as the picnic pavilion and the playground.
- 2) Resurface the area serving at least one bench within the playground.

L. Valati Park:

Valati Park is located off Summer Street, and along the Mill River. It provides benches, and several picnic tables along the riverside for seating, as well as a flagpole and memorial.

Finding: Principal barriers identified include:

- The surface of the parking area is not accessible, due to the gravel surface.
- An accessible route is not provided to the memorial, picnic tables, benches, or trash receptables, due to the grass.

Recommendation: KMA recommends addressing the following accessibility issues found at Valati Park within the next three years, due to its unique program features:

- 1) Pave and stripe a portion of the parking lot to add one van-accessible parking space, as well as its associated sign and access aisle.
- 2) Provide an accessible route between the accessible parking and at least one of each type of site amenity (memorial, picnic tables, benches, and trash receptacles).

M. Town Common/Gazebo:

The Town Common/Gazebo is located along Main Street, intersected by County Street. The site consists of two military memorials and a gazebo. The sidewalk passes through the southeast corner of the site.

Finding: Principal barriers identified include:

- There is not an accessible route to the gazebo and historic military memorial due to the grass, and the stairs up to the gazebo.
- The memorial plaza has a few instances of excessive slopes.

Recommendation: KMA recommends addressing the following accessibility issues found at Town Common/Gazebo within the next three years, due to its unique program features:

- 1) Provide an accessible route between the site arrival point and the gazebo and historic military memorial.
- 2) Regrade the memorial plaza.

Further, KMA recommends the Town to refrain from hosting Town events at the Town Common until this outdoor facility is fully accessible.

N. Elm Street Park:

Elm Street Park is located directly behind Fire Station 3 and without a dedicated connection

from Elm Street. The site consists of a play area with a woodchip surface adjacent to a half basketball court. The site is fenced on three and a half sides, with the opening at the corner nearest to the fire station.

Finding: An accessible route is not provided between Elm Street and the playground or the basketball court due to the grass surface.

Recommendation: KMA recommends providing an accessible route between the site arrival point and the playground and basketball court within the next five years.

5 SUMMARY OF PUBLIC SURVEY RESPONSES

KMA developed an online survey to solicit input from citizens of the Town of Blackstone regarding their experiences and opinions of accessibility about the accessibility in the Town. The survey was comprised of five questions that ranged from asking about the ease of use of Town facilities and programs to whether residents understand how to request an accommodation. The survey was posted on the Town's website on October 23, 2025, and received a total 34 online responses within one month. For a copy of the survey announcement, please refer to Appendix 7 of this report.

The principal issues raised in the survey responses include:

1. 18% of respondents noted that there are Town buildings/facilities (building structures, parks, playgrounds, trails, docks, recycling centers, etc.) that they have had difficulty using.
2. 9% of respondents noted that they have had difficulty getting information about a Town program, service, or event.
3. 65% of respondents do not know how to request Town materials in alternate formats (for example, large print or Braille).
4. 62% of respondents do not know how to request an accommodation (for example, ASL interpreters or assistive listening systems) for Town services and events.

For a complete record of all responses in SurveyMonkey – please refer to Appendix 6 of this report.