

Town of Hingham

Part A – Executive Summary

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Introduction

The Institute for Human Centered Design (IHCD) has prepared this report on behalf of the Town of Hingham as part of the Town’s ongoing effort to assess the current level of Americans with Disabilities Act (ADA) compliance in programs, services and activities and Town-owned facilities. In preparing for this report, IHCD teams surveyed the Town’s portfolio of facilities and properties that were included in the Request for Proposal and discussed with the ADA Coordinator.

The facility survey set includes five (5) public schools and ten (10) municipal buildings and 16 outdoor facilities. At each of these facilities, the accessibility survey includes all the spaces where the Town offers programs, services and activities to members of the public. Buildings and outdoor areas surveyed include the following:

Municipal Buildings

Central Fire Station
Department of Public Works
Grand Army of the Republic Memorial Hall
Hingham Municipal Lighting Plant
Hingham Public Library
Hingham Town Hall
Lincoln School Apartments
Recreation Barn
South Shore Country Club
Transfer Station

Public School Buildings

East Elementary School
Hingham High School
Hingham Middle School
Plymouth River Elementary School
South Elementary School

Outdoor Facilities

0 Station Street Parking Lot
6 Mill Street and 8 North Street

Bare Cove Park
Barnes Wharf
Bradley Woods Park
Cronin Field
Haley Field
Hersey Field
Hull Street Playground
Kress Field
Lynch Field
Powers Field
Snack Shack, Parking, and Bathing Beach
Town Pier and Boat Launch
Whitney Wharf - Parking
Whitney Wharf

A Geographic Information System (GIS) survey of public rights-of-way was also performed. The GIS survey included sidewalks alongside Town Hall and downtown Hingham. To ensure the Town is in compliance with Title II of the Americans with Disabilities Act, IHCD uses the U.S. Access Board’s Proposed Public Rights-of-Way Accessibility Guidelines (PROWAG). The Rules and Regulations of the Massachusetts Architectural Access Board - 521 CMR are also part of the survey. The deliverable includes the *GIS Summary Report*, as well as a dashboard and a GIS map layer with the street and sidewalk accessibility issues provided to the Hingham GIS Coordinator.

In addition, IHCD conducted a high-level overview of the major accessibility conformance issues on the Town’s official website. The information is presented in the *Website Accessibility Executive Summary Report*.

Regarding facilities, IHCD has submitted separate narrative reports for each facility that was surveyed. To assist in prioritizing accessibility improvements necessary to ensure compliance with Title II of the ADA, each of the facility reports includes an overview that identifies the most substantial accessibility issues. Additionally, a detailed catalog that supplements the ADA Self-Evaluation narrative overview is also included. The catalog provides element-by-element photos of compliance issues, location, and measurements (when applicable) at each assessed facility accompanied by recommendations.

In addition, a set of spreadsheets detailing priorities for corrective action organized by survey location and including order-of-magnitude costs was provided to the Town. When the Town presents findings and recommendations to the community and receives feedback, some recommendations may need

cost adjustment. Once fully updated, these spreadsheets are a capital planning and budgeting resource – the “ADA Transition Plan” – and are intended as a long-term tool to update as work is completed. The Town should make a good faith effort to complete the work in a reasonable time (IHCD recommends a three to five-year period). The ADA regulations do not set out precise timeframes to complete the work; IHCD bases the recommended timeframes on conversations with the Department of Justice and their Project Civic Access settlement agreements with municipalities.

Together, the ADA Self-Evaluation and ADA Transition Plan will enable the Town to make substantial progress in meeting its ADA responsibilities. The recommendations for corrective action that apply to policies, practices and procedures of the Town as detailed in the ADA Self-Evaluation are not included in the ADA Transition Plan since the Transition Plan spreadsheet is limited to capital accessibility issues. Policy, practices and procedure recommendations are a blueprint for meeting compliance responsibilities other than capital expenses.

With the *Part B – Evaluation of Nondiscriminatory Policies & Practices in Programs, Services & Activities* report, IHCD has provided a complete assessment of Hingham’s policies, practices and procedures. The ADA administrative requirements help ensure that the needs of people with disabilities are addressed in all programs, services, and activities that the Town operates.

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

- The Town of Hingham has hired a consultant (IHCD) to undertake its ADA self-evaluation (as the basis for the Town’s Transition Plan).
- The Town of Hingham has named Art Robert as the ADA Coordinator.
- The Town of Hingham has a Notice of Nondiscrimination included on the Commission on Disability webpage and document center webpage.

IHCD’s review and recommendations for Town-owned facilities is based on compliance with the 2010 ADA Standards for Accessible Design if an element or elements are not compliant with the 1991 ADA Standards and/or 521 CMR of the Massachusetts Architectural Access Board. Best practice and inclusive design recommendations are also provided for most properties. Inclusive design

recommendations include elements that are *not* required in the accessibility standards but may create enhanced experiences for all users.

Many key facilities are generally usable by people with disabilities but are not in full compliance with current accessibility requirements. Hingham Town Hall, for instance, provides access to many programs and can be accessed by most people because the building features largely accessible entrances and has accessible routes throughout most of the building. Yet some of the key areas, such as the police station and the planning board office lack accessible service counters. Knee or toe clearance is not provided at work surfaces in eight (8) locations. There is no accessible means of vertical circulation between the recreation department gym in the basement of building C and the first floor of building D. Doors in many areas lack maneuvering clearance due to furniture, are recessed a greater amount than allowed, have a clear width that is less than allowed, or require a greater amount of opening force than is allowed.

The Lincoln School Apartments is another example of a facility that provides access to most programs. It has three (3) accessible entrances, and five (5) accessible one-bedroom units are provided. However, the apartment complex lacks mobility accessible apartments that are dispersed to provide the same range of sizes and amenities to people with disabilities as are provided to residents who do not require an accessible unit. A mobility accessible studio and a two-bedroom unit should be provided. Additionally, two (2) communication accessible apartments should be provided. Other issues at this facility include lack of adequate clear width at washing machines and dryers in the laundry room and routes that are narrower than allowed in the Kersey Community Room kitchen.

The Town may comply with the requirements of Title II of the ADA through means such as reassignment of programs or services to accessible buildings or delivery of services at alternate accessible sites. The Town may also comply with the requirements by renovation or alteration of existing facilities and/or construction of new facilities, or any other methods that result in making the Town's programs, services or activities readily accessible to and usable by individuals with disabilities. Note that a public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with its Title II obligations.

In choosing among available methods for meeting the requirements of the ADA, the Town of Hingham should give priority to those methods that offer programs, services, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

In order to comply with ADA Title II program accessibility obligations, the Town of Hingham should consider:

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1. Relocation of programs, services, and activities to an accessible location within a current facility.

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

2. Relocation of programs, services, and activities to an accessible location in another facility.

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

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

The Town may consider the renovation of its facilities or the provision of new accessible facilities to ensure that programs, services, and activities are offered in the most integrated setting appropriate.

Note that any corrective actions needed to ensure program accessibility must comply with the requirements of the 2010 ADA Standards and/or 521 CMR, the Regulations of the Massachusetts Architectural Access Board (MAAB).

Furthermore, when completing alterations/renovations, keep in mind that an alteration that decreases the accessibility of a building below the requirements for new construction at the time of the alteration is prohibited.

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

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

Key Recommendations for Municipal Facilities:

- Ensure there is an accessible route from all arrival points to areas in the building where public programs, services, and activities are provided. For example, in Hingham Town Hall, there is no accessible means of vertical circulation between the recreation department gym in the basement

of building C and the first floor of the recreation building (building D). At the Lincoln School Apartments, there is no accessible route provided to the patio on the fourth floor due to a step.

- If parking is provided, ensure fully accessible parking spaces are provided in the correct manner, number and location. There are issues with accessible parking at multiple locations such as lack of or noncompliant accessible parking spaces, access aisles and signs. For example, at the Lincoln School Apartments, there is the lack of one (1) car accessible and one (1) van accessible parking space. At Grand Army of the Republic (GAR) Memorial Hall, the access aisle of the van accessible parking space is narrower than allowed, it lacks a sign with the International Symbol of Accessibility (ISA), and signage is mounted lower than allowed. At Hingham Town Hall, there is lack of one (1) van accessible parking space with the International Symbol of Accessibility (ISA) and the designation “Van Accessible” in the north lot, and there is lack of signage with the designation “Van Accessible” at the van accessible parking space by the senior center.
- Ensure that fully accessible toilet rooms are provided in each building that has a toilet room or toilet rooms available for use by members of the public. Where it is technically infeasible to provide accessible multi-user toilet rooms, provide an accessible single-user toilet room usable by all genders in the same area as the existing multi-user toilet rooms.
- Ensure that where programs, services, or activities are offered that there is a sufficient number of accessible features (accessible counters, accessible work surfaces, etc.). For example, tables in the courtyard, student project rooms and young adult section of the Hingham Public Library either lack toe or knee clearance or have a higher surface than allowed. In addition, two (2) service counters are not compliant in the South Shore Country Club and one (1) service counter is not compliant in the Department of Public Works.
Particular attention should be given to facilities where key services are being offered to many members of the community like the Town Hall or the library.
- If audible communication is integral to the use of the space, provide a compliant assistive listening system. This should be a priority in the north and south hearing rooms of Town Hall. Additionally, signage denoting the availability of an assistive listening system that includes the International Symbol of Access for Hearing Loss should be provided in Sanborn Auditorium in Town Hall.
- Ensure that those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities are maintained in operable working condition (e.g., elevators or automatic door openers, assistive listening systems).
- At the Police Station in the Town Hall complex, the holding cells are not fully accessible. However,

making them compliant may be technically infeasible. The Town should ensure that program accessibility is provided as needed by transferring detainees to an accessible holding location such as a County Correctional Facility.

- Assembly areas such as Sanborn Auditorium in Hingham Town Hall should have accessible routes provided to the stage and contain designated aisle seats that are identified by the International Symbol of Accessibility (ISA) and have folding or retractable armrests.

Key Recommendations for Public Schools:

For program accessibility purposes, IHCD surveyed one classroom per grade and all the classrooms that provide unique programs such as art classrooms, labs, etc.

IHCD is pleased with the level of accessibility provided at many public schools in Hingham and the responsiveness of the school administration. Many of the schools provide accessible features such as assistive listening systems (e.g., East Elementary School, Plymouth River Elementary School).

IHCD recommends continuing renovations and/or alterations as necessary to ensure that the Town is meeting its obligations under Title II of the ADA.

Some key issues to emphasize at Hingham Public Schools include the following:

- Ensure the minimum maneuvering clearance at classroom doors is maintained. Most schools have the space to provide the minimum 18” pull-side maneuvering clearance on the latch side of doors, but in many cases, the space is obstructed by the location of cabinets, furniture, or trash cans.
- Ensure that specialized classrooms (e.g., labs, art rooms, photography room, etc.) have accessible work surfaces.
- Ensure that accessible sinks (with knee and toe clearance) are provided in at least one classroom per grade, if a sink or sinks are provided in those rooms. If accessible sinks are already provided, ensure they have insulated pipes and that no stored items are placed underneath the sink. If a panel is provided under the lavatory or sink to protect the pipes, ensure the required knee and toe clearance is maintained.
- Ensure that fully accessible toilet rooms are provided in each school building. As mentioned before, where it is technically infeasible to provide accessible multi-user toilet rooms, provide an

accessible single-user toilet room available to all genders in the same area as the existing multi-user toilet rooms.

- If there is a toilet room in unique rooms such as a nurse’s office, ensure that a fully accessible toilet room is provided. This includes maintaining the clear floor space at all fixtures by keeping the required clear space free of any storage.
- Ensure that all elements in the classrooms are within reach range (e.g., emergency showers, first aid kits and dispensers).
- If audible communication is integral to the use of a space, provide a compliant assistive listening system and a sign with the International Symbol of Access for Hearing Loss to inform visitors of its availability.
- Ensure that fully accessible locker rooms are provided. This includes accessible shower facilities, compliant benches, accessible lockers, and compliant changing rooms if these elements are provided in the locker rooms.

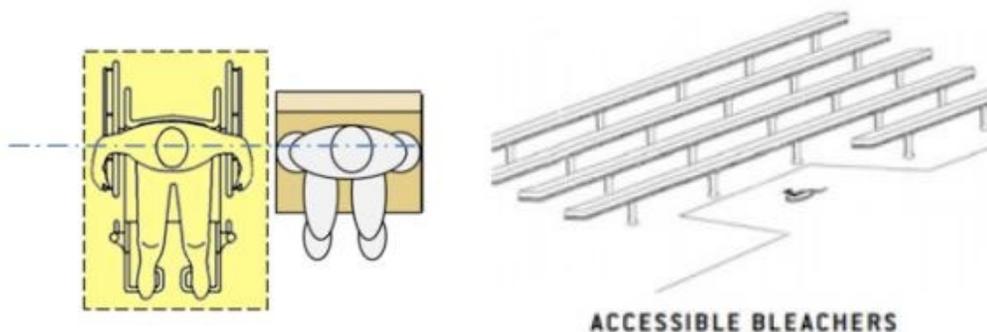
Issues were often encountered with signage. Below are recommendations regarding the most common signage accessibility issues.

1. Signs that designate permanent rooms and spaces, such as classrooms and conference rooms and egress signs should:
 - have raised characters duplicated in braille;
 - have braille located below the corresponding text;
 - have a minimum 18” by 18” clear floor space centered on the tactile characters;
 - be located on the wall, alongside the door, on the latch (door handle) side of the door;
where a tactile sign is provided at double doors with one (1) active leaf, the sign should be located on the inactive leaf; where a tactile sign is provided at double doors with two (2) active leafs, the sign should be located to the right of the right hand door; where there is no wall space at the latch side of a single door or at the right side of double doors, signs should be located on the nearest adjacent wall.
2. Inaccessible entrances and exits should have directional signs indicating the location of the nearest accessible entrances/exits.
3. When not all entrances are accessible, accessible entrances should have signage containing the International Symbol of Accessibility (ISA).

4. Inaccessible toilet rooms should have directional signs indicating the location of the nearest accessible toilet room.
5. When not all toilet rooms in a facility are accessible, accessible toilet rooms should have signage containing International Symbol of Accessibility (ISA).

Key Recommendations for Outdoor Facilities:

- Ensure there is an accessible route to all elements in the parks/outdoor spaces (baseball fields, basketball courts, playgrounds, picnic areas, toilet facilities, etc.).
- Ensure there is a stable and firm clear floor space adjacent to the bench at team seating areas and spectator seating areas at the baseball fields, softball fields, soccer fields, basketball courts, etc., and that there is an accessible route to the seating. See the following diagrams:



- Ensure that accessible routes are provided to and around playgrounds; in addition, ensure that an impact-attenuating accessible route is provided in the play area to each play component.

Note that the Massachusetts Architectural Access Board (MAAB) does not consider engineered wood fiber (EWF) to comply with its regulation requiring an accessible route to and around playground equipment.

- Provide an accessible route to at least one bench in each distinct area of each park where benches are provided.

Ensure that at least 5% but no less than one amenity, such as picnic tables, is accessible and is located on an accessible route.