

MALDEN FINDINGS & RECOMMENDATIONS

KMA used the Survey responses to develop the following findings and recommendations. This document is meant to serve as a working file between KMA and City personnel. Columns highlighted in yellow are meant to be filled out by the City. KMA recommends reviewing this document along with the DRAFT Malden SETP Report and the Audit Reports found in the Appendix.

Prioritization Key:

- A. Immediate priority
- B. High Priority: 6 Months to 1 Year
- C. Medium Priority: 1 to 3 Years
- D. Long-term Priority: 3 to 5 Years

FINDINGS & RECOMMENDATIONS

#	Findings	Recommendations	Priority	Target Date	Responsible Party	Comments
Administrative (Policies/ Print Materials/ Staff Training/etc.)						
1.	<p>ADA Coordinator:</p> <p>Maria has been appointed to fulfill the responsibility of an ADA Coordinator and received training from the MOD in September 2019.</p>	None	--			
2.	<p>Alternative Formats:</p> <p>Where City documents are provided, department survey responses indicate that notification is not provided that documents can be requested in alternative formats. For examples, see https://www.cityofmalden.org/DocumentCenter/View/2670/Parks--Green-Spaces-Guidelines-Chart-Phase-IIPDF</p>	<p>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 City website.</p>	B	March 2022	ADA Compliance Officer, IT Department, Communications Director	Assess needs and establish protocols. Provide instruction to departments on how to produce printed information in alternative formats.



3.	<p>Auxiliary Aids and Services:</p> <p>The City has a process for responding to requests for auxiliary aids and services. Survey responses indicate that Department Heads have been instructed to contact HR or ADA Compliance Officer. However, responses to the department surveys indicate the need to establish the capacity across all City departments to provide auxiliary aids and services and then to disseminate information about their availability. Additionally, limited information was provided on what external auxiliary aid resources are available (i.e. interpreters).</p>	<p>KMA recommends assessing the needs of the community for auxiliary aids and services. Based on the assessment, establish 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. KMA also recommends ensuring that appropriate departments are aware of their obligations to inform the public regarding the availability of Auxiliary Aids for persons who are deaf or hard of hearing and people who are blind or have limited sight. Establish department wide guidance regarding the specific City communications requiring notice of the availability of Auxiliary Aids (e.g. meeting announcements, events, conferences, etc.). See https://nationaldisabilitynavigator.org/ndnr-c-materials/disability-guide/auxiliary-aids-and-services/</p>	B	March 2022	ADA Compliance Officer, IT Department, and Communications Director	Assess needs and establish protocols. Establish written guidance instructing departments of their obligations to inform the public regarding the availability of Auxiliary Aids for persons who are deaf or hard of hearing and people who are blind or have limited sight.
4.	<p>COVID-19 Response</p> <p>The Health Department is also tasked with managing the City's response to the current COVID-19 pandemic. Public Survey responses indicate that outdoor dining areas encroach onto the accessible routes along the public sidewalks.</p>	<p>KMA recommends reviewing the continuously changing guidance to ensure it is available in accessible formats and proposed policies are in line with the ADA. KMA recommends reviewing the current guidance and developing a policy for continued reviews within the next six months. For more information on ensuring emergency response plans are meeting their accessibility obligations please see the information on the ada.gov website. (https://www.ada.gov/emerg_prep.html).</p>	A	July 2021	Building Commissioner, Health Department, and Emergency Management	Provide guidance in accessible formats, review emergency preparedness guidelines to ensure that accessibility obligations are being met.



5.	<p>Documents & Publication:</p> <p>City documents/ announcements are currently being reviewed to ensure they do not use stigmatizing language (e.g. “handicapped”).</p>	<p>KMA recommends ensuring the City’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.</p>	A	July 2021	ADA Compliance Officer, Human Resources (HR), Diversity, Equity and Inclusion (DEI) Coordinator, and Communications	Review City’s policy on non-discrimination, and city documents to ensure they do not use stigmatizing language. Work with departments to make sure stigmatizing wording is not used in announcements, etc.
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6.	<p>Emergency Preparedness:</p> <p>A formal emergency preparedness plan was not provided for review. Administrative survey responses indicate that an emergency preparedness plan has been established. However, department survey responses are unclear on emergency response plans that address the needs for individuals with disabilities at their facilities. KMA is following up with Captain Cronin.</p>	<p>KMA recommends confirming the following are provided in the existing emergency preparedness plan:</p> <ul style="list-style-type: none"> • 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. • Protocols and signage for such issues as: <ul style="list-style-type: none"> ○ Fire exits signage and maneuvering space; ○ Safe wait areas; ○ Evacuation Maps; ○ Locations of fire exits and safe wait areas serving each municipal space; • Public and employee orientation to the City 's emergency evacuation procedures. 	B	March 2022	ADA Compliance Officer, Emergency Management, Disability Commission and HR	Review of the existing Emergency Preparedness Plan. Add and revise the plan to accommodate individuals with disabilities. Provide protocols and signage for emergencies and orient employees and educate the public.
7.	<p>Grievance Policy:</p> <p>The City does have a Grievance Policy and Procedure to resolve disability related complaints (see Appendix). Survey responses indicate that the City is currently working with Public Facilities on having the policy displayed in lobby of new City Hall Building and other buildings. Survey responses also indicate that the policy has been distributed to Department Heads and the City will follow up with Boards and Commissions.</p>	<p>KMA recommends confirming that the Grievance Policy is posted in conspicuous locations in all City buildings and distributed to all departments</p>	A	April 2021	ADA Compliance Officer Public Facilities, and Communications Director	Post Grievance Policy and distribute to departments.

8.	<p>Licensing/ Certification:</p> <p>City licenses or certifications (i.e. liquor, restaurant, etc.) have had the application process thoroughly reviewed to ensure qualified persons with disabilities are not screened out by the City Building Commissioner and the Engineering Department.</p>	None	--			
9.	<p>Meetings at Accessible Locations:</p> <p>The Administrative Survey responses note that City Departments are aware that City sponsored events must be accessible. The City also makes note that an accommodation can be requested on public meeting and event notices. However, some of the Department Survey responses and our physical audit findings identified some inaccessible areas where meetings are held. For example, some of the exterior meeting locations for the Recreation Department.</p>	<p>KMA recommends that the City develop written protocols for accessible meetings and distribute to all departments, boards and commissions. Helpful documents on how to write such protocols can be found on the mass.gov website. See: https://blog.mass.gov/mod/access/5-ways-to-improve-event-accessibility/ and https://www.mass.gov/files/documents/2016/07/uy/planning-for-accessible-events.pdf</p>	A	July 2021	ADA Compliance Officer and Administrative Officer	<p>Develop guidelines to accommodate all participants when conducting a public meeting or event. Educate departments and Boards and Commissions.</p>
10.	<p>Public Notice:</p> <p>KMA reviewed the City's Public Notice of ADA Compliance (see Appendix). Survey responses indicate that the City is currently working with Public Facilities on having the Notice displayed in lobby of new City Hall Building and other buildings, but it is not yet posted on the City website homepage, or the Employee Handbook. Administrative Survey responses indicate that the Public Notice is included on event posters, flyers, program brochures and announcements. However, Department Survey responses indicate inconsistencies in where the Public Notice is provided.</p>	<p>KMA recommends ensuring the Notice is visibly posted at City buildings, on the City website homepage, and in the Employee Handbook. Additionally, KMA recommends developing a policy to ensure the Public Notice is consistently provided on all Departmental literature.</p>	A	July 2021	ADA Compliance Officer Public Facilities, Communications Director, and HR	<p>Public Notice of Compliance will be posted in City buildings, on website homepage, and included in Employee Handbook. Notice will also be distributed to all departments.</p>

11.	<p>Reasonable Modifications of Policies:</p> <p>The City has a process for responding to requests for modifications to policies or practices for people with disabilities to participate. Survey responses indicate that Department Heads have been instructed to contact HR or ADA Officer and the ADA Compliance Officer consults with the department involved as well as the Building Commissioner, Controller and HR. The process includes criteria for determining whether a modification would fundamentally alter the nature of the program. However, responses to the department self-evaluation surveys indicate that personnel do not have a clear understanding of the City's ADA policy.</p>	<p>KMA recommends developing and providing guidance on requests for reasonable modifications for all City departments and new hires to ensure that everyone is aware of how to appropriately respond to requests. This policy should include criteria for determining whether a modification would fundamentally alter the nature of the program or a protocol, and it should ensure that all requests are reviewed by the ADA Coordinator. Some examples of how to develop this guidance can be found on the eeoc.gov website. See: https://www.eeoc.gov/policy/docs/accommodation.html.</p>	B	July 2021	ADA Compliance Officer, Disability Commission, Controller and HR	Educate departments on ADA policy. Provide guidance on request for accommodations and the procedure that should be followed.
12.	<p>Service Animal Policy:</p> <p>The City of Malden does not currently have a written policy regarding service animals in municipal facilities.</p>	<p>KMA recommends developing a written Service Animal policy and post it in City facilities and on the website.</p>	A	May 2021	ADA Compliance Officer, Disability Commission and Public Facilities	Develop a Service Animal Policy and post on website in buildings.
13.	<p>Staff Training on City's Policy of Nondiscrimination:</p> <p>The Administration Survey responses indicate that City personnel have received training in the City's policy of nondiscrimination through written materials. However, department survey responses indicate that some personnel have not received such a training.</p>	<p>KMA recommends ensuring all departments are included in a recurring training on the City's policy of nondiscrimination.</p>	A	July 2021	ADA Compliance Officer and HR	Set up a schedule of recurring training on policy of non-discrimination.



14.	<p>Surcharges:</p> <p>In the response to the Administrative Survey, the City confirmed that surcharges are not imposed to recover the cost of accommodations, effective communication services, or accessibility features.</p>	None	--			
15.	<p>Title III Entities Using City Facilities:</p> <p>The City's policies on the reservation and use of City Facilities do not include information on the obligation of the Title III Entity (i.e. sports leagues, theater groups, fundraisers) to facilitate the participation of persons with disabilities. For example, see https://www.cityofmaiden.org/DocumentCenter/View/718/Application-to-Rent-Macdonald-Stadium-PDF</p>	KMA recommends developing language to be included in City rental agreements that ensure Title III entities of their obligations to facilitate the participation of persons with disabilities.	A	July 2021	ADA Compliance Officer, Public Facilities, Recreation Department and Business Manager of Schools	Ensure that rental agreements for building space or recreational facilities advises Title III entities of their obligations to accommodate the participation of persons with disabilities.
16.	<p>Training:</p> <p>Submitted department worksheets indicated a need for training of front-line City personnel in several aspects of accessible program delivery.</p>	KMA recommends providing training to appropriate personnel in the City's nondiscrimination policy, how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls, and how to respond to requests for reasonable modifications, auxiliary aids and services, and documents in alternative formats.	B	December 2021	ADA Compliance Officer and HR	Train City staff that are front facing with the public in various aspects of accessible program delivery.

17.	<p>Transportation.</p> <p>The City contracts for transportation through the Senior Center and for the schools. Survey responses indicate that the City transportation services have procedures for responding to requests from persons with disabilities to provide schedule and route materials in a timely manner in an accessible form. The City transportation services also have procedures to provide information with no delay nor additional cost to persons with disabilities. The contracted transportation services are required to provide training and testing to assure employees are fully qualified to serve passengers with disabilities by their contracts with the City. Lastly, the transportation services have strict protocols to provide regular and frequent checks of lifts, as well as other access-related equipment or vehicles.</p>	None	--			
18.	<p>Use of Contractors:</p> <p>There is a statement of nondiscrimination included in the contract language. Additionally, the City's advertised request for proposals/invitation for bids include: "Accessible and reasonable accommodations will be provided to persons requiring assistance." KMA reviewed the City's invitation language and it included the word "handicap."</p>	KMA recommends modifying the contract language so it does not include stigmatizing language. See below for more information on stigmatizing language.	A	May 2021	ADA Compliance Officer, Controller and Procurement Officer	Modify contract language to eliminate stigmatizing language.

19.	<p>Website:</p> <p>The Carroll Center identified instances of non-compliance on a small sampling of City webpages. See <i>Appendix</i> for the full report from the Carroll Center.</p> <p>Administrative survey responses indicate that the City has made efforts to make the website accessible. However, there is little information on the website regarding access to programs and services for people with disabilities. Additionally, Public Survey comments indicate difficulties finding information on the City's website.</p>	<p>KMA recommends reviewing and implementing all of the recommendations identified in the Carroll Center report. KMA also recommends performing a more comprehensive website analysis within the next year.</p> <p>KMA recommends including more information on the accessibility page regarding access to programs and services for people with disabilities. Information on the accessibility of facilities, information on the City's accessibility policies (nondiscrimination, service animal, grievance procedure) communication materials, and the process for requesting accommodations or auxiliary aids/services would be helpful. Additionally, include how to request an accommodation in all meeting announcements posted to the City's website.</p>	B	March 2022	ADA Compliance Officer, Disability Commission and Director of Communications	<p>Implement the recommendations of the Carroll Center.</p> <p>Update and provide additional information on the accessibility page, and include how to request an accommodation.</p>
Department Specific						
20.	<p>Engineering Department – Construction Sites</p> <p>Survey responses indicate that the Engineering Department has received feedback regarding concerns about accessibility within construction sites including road and sidewalk construction.</p>	<p>KMA also recommends developing a policy within the next six months to ensure all City construction sites do not obstruct required accessible facilities.</p>	A	July 2021	ADA Compliance Officer, Disability Commission and City Engineer	<p>Draft a written policy to ensure that construction sites do not impede accessibility.</p>

21.	Engineering Department - Sidewalks Survey responses indicate that the Engineering Department is aware of old and non-compliant sidewalk wheelchair ramps throughout the City. Public Survey responses also had many comments regarding the current sidewalk condition.	Although sidewalks were not included as part of this review, KMA recommends the City perform a sidewalk analysis for accessibility compliance within the next year.	B		ADA Compliance Officer and City Engineer	Engineering Department is aware of those sidewalks needing ADA upgrade. All new infrastructure upgrades include ADA improvements.
22.	Inspectional Services 521 CMR was not reviewed as part of the SETP process, however it should be considered with planned architectural barrier removal projects.	KMA recommends that the Inspectional Services Department be involved in any planned architectural barrier removal projects, as there will likely be overlapping 521 CMR requirements that should be considered.	A	Current	Building Commissioner, Inspectional Services	Building Commissioner is involved in all of the City's planned architectural barrier removal.
23.	MRA Survey responses indicate that some programs funded with CDBG funds, such as youth sports programs, may not be accessible for people with disabilities. Other programs, such as an adaptive swim program, are designed specifically for people with disabilities.	KMA recommends a review of the programs funded with CDBG funds to ensure they are compliant with the ADA. Develop a policy to ensure future programs funded by CDBG funds are aware of their obligations under the ADA.	B	August 2021	ADA Compliance Officer and Community Development Director (MRA)	Ensure that future programs are aware of their obligations pursuant to ADA.
24.	Public Facilities – Maintenance of Accessible Features Policy Public Survey responses indicate concerns related to the maintenance of accessible features, such as elevators and automatic door openers.	KMA recommends developing a policy to ensure accessible elements are regularly serviced within the next six months.	A	September 2021	ADA Compliance Officer and Public Facilities	Draft a service and maintenance plan as to accessibility.
25.	Public Works – Snow Removal Policy Public survey responses indicate concerns with snow removal and accessibility.	KMA recommends reviewing the snow removal policies to ensure they prioritize clearing required accessible routes within the next six months.	A		ADA Compliance Officer, Health Department and Disability Commission	Snow removal ordinance was recently updated.



26.	<p>Recreation Department</p> <p>The Recreation Department offers a wide array of programs to the residents of Malden. It is unclear whether all the programs have been reviewed for accessibility requirements and whether associated staff/ volunteers are aware of the ADA obligations.</p>	<p>KMA recommends a review of each program the Recreation Department provides, paying particular attention to the adaptive/ unified leagues. Ensure all programs are provided in an accessible manner, at accessible locations, and all staff/ volunteers are made aware of the accessibility requirements within the next six months.</p>	A	September 2021	ADA Compliance Officer, Pubic Facilities and Recreation Department	Review programming for accessibility and educate staff and volunteers.
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Employment

27.	<p>Human Resources</p> <p>A review of the Employment Survey responses indicates that some of the City's employment practices, procedures, and personnel have not been thoroughly reviewed for accessibility. An employee manual was not provided for review. Additionally, the <i>Job Posting Example and Employment Application</i> document included stigmatizing language and none of the submitted documents included information on how to request the application in alternative formats.</p>	<p>KMA recommends reviewing the City'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, and ensuring the City's employment documents are available in alternate formats.</p>	B	March 2022	ADA Compliance Officer and HR	Review procedure for postings so that job descriptions distinguish between essential functions and marginal functions. Develop protocols and guidance for maintenance of personnel files, establishing interview panels and providing documents in alternate formats.
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Buildings						
28.	114 Centre Street - Fire Services KMA did not review this facility as part of our accessibility audits.	KMA recommends reviewing the facility for accessibility requirements within the next 6 months.	A	September 2021	Building Commissioner	Review of facility for accessibility.

30.	<p>City Yards (Public Works)</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • Lack of accessible parking • The public entry door is not located on an accessible route, due to the slopes, and lacks level door maneuvering clearances. • The mail slot at the public entry door is too high. • The threshold at the entry vestibule is too high. • The reception bell and desk are too high. • The door at the stairwell along the accessible route to the toilet rooms and employee breakroom lacks the required maneuvering clearances. • The multiuser toilet rooms lack accessible elements. • The employee entry door is not accessible due to the step. • The employee breakroom table lacks the required knee clearance. 	<p>Recommendation: Due to the relatively low traffic of this building and limited public access, KMA recommends prioritizing mitigations to the areas open to the public. KMA recommends mitigating all other barriers identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as City budget permits.</p>	D	2026	<p>Building Commissioner, Public Facilities Director, City Engineer, DPW Director, Controller, and outside vendors and contractors</p>	<p>Items identified that can be mitigated in the short term and have a high level of public use will be addressed first. Those that require design and major construction are deferred to later years and depend on budget constraints. Any work will be in coordination with the Malden River Works project. It is envisioned as a two-part project, one phase involving the redesign of the DPW site.</p>
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31.	<p>Fire Stations:</p> <p>The principal barriers identified at the fire stations include:</p> <ul style="list-style-type: none"> • Lack of accessible parking spaces. • Lack of tactile/ braille signage. • There is no accessible route to the second floor of the District 1 station. • Entry doors lack maneuvering clearances. • Toilet rooms and locker rooms lack the required footprints, clearances, and/or accessible elements. • Thresholds are too high. • Coat hooks are mounted too high. • Door hardware requires tight grasping and twisting of the wrist to operate. • Doors do not provide the required clear width. • Employee common use spaces are not located on an accessible route, due to things like slope issues, changes in level, and door maneuvering clearance issues. • The District 4 accessible parking spaces have slopes >2% and lack the required signage. • The District 4 walkways and apparatus entrance have slopes issues. • The District 1 reception counter is too high. • The District 1 apparatus bay lacks an interior accessible route and the route through the garage doors has slope issues. 	<p>Recommendation: Due to the moderate traffic at the Fire Stations, KMA recommends prioritizing mitigations to the areas open to the public – including spaces used for tours within the one to three years.</p> <p>Within the next 6 months, KMA recommends developing a policy to ensure all programs offered on the second floor of Fire Station 1 can be provided in an alternative accessible location and that the tours at Fire Station 3 are routed along the accessible route through the main entrance.</p> <p>KMA recommends mitigating all other barriers identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as City budget permits.</p>	C A D	2022 to 2026	Building Commissioner, Public Facilities Director, Fire Chief, Controller, and outside vendors and contractors	<p>Items identified that can be mitigated in the short term and have a high level of public use will be addressed first. Those that require major construction are deferred to later years and depend on budget constraints.</p> <p>Accommodations and alternative accessible locations can be arranged for programs offered on the second floor and during tours.</p>
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	<ul style="list-style-type: none"> • The employee kitchens lack knee clearance for a forward approach at the sink, controls are mounted too high, lack accessible seating, and not enough storage is provided within an accessible reach range. • There is a change in level >1/4" vertical at the District 3 apparatus bay, which is used by the public for tours. • The District 4 drinking fountain lacks knee clearance for a forward approach and is not a hi-lo type. 					
32.	<p>Forest Dale Cemetery Office</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • Lack of accessible parking. • Lack of accessible entrances. • Lack of tactile/ braille signage. • Door hardware requires tight grasping and twisting of the wrist to operate. • The toilet rooms lack the required footprint and accessible elements for an accessible toilet room. 	<p>Due to the moderate traffic at the Forest Dale Cemetery Offices and Garage, KMA recommends mitigating all the barriers identified in the audit report within the next three to five years. KMA recommends prioritizing the areas open to the public, especially the exterior areas due to their high visibility.</p>	D	March 2026	<p>Building Commissioner, Public Facilities Director, City Engineer, Cemetery Director and Board of Trustees, Controller, and outside vendors and contractors</p>	<p>Items identified that can be mitigated in the short term will be addressed in the next 3 years. Those that require design and major construction are deferred to later years and depend on budget constraints.</p>



<p>33. Parking Department</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • Accessible parking spaces lack an access aisle. • The accessible route from the accessible parking to the entrance has cross slopes >2%. • The curb ramp is too steep. • The entrance ramp is too steep, lacks a 60" landing at the bottom, lacks edge protection, and has abrupt changes in level. • Several doors lack the required maneuvering clearances. • The sidewalk entrance door has a threshold too is too high. • The drop box and doorbell are too high. • The entrance to the Parking Department lacks a level landing and is too heavy. • Office door hardware requires tight grasping and twisting of the wrist to operate. • Office door glazed panels are too high. • TVs and hand sanitizers protrude into the circulation space. • Accessible elements in the toilet rooms are missing and/ or not mounted in the correct locations. 	<p>Due to the high traffic at the Parking Department, KMA recommends mitigating all the barriers identified in the audit report. KMA recommends prioritizing the areas open to the public, especially the parking areas due to their high visibility.</p>	<p>B</p>	<p>2022 to 2024</p>	<p>Building Commissioner, Public Facilities Director, Parking Department Director, Controller, and outside vendors and contractors</p>	<p>Items identified that can be mitigated in the short term and have a high level of public use will be addressed first. Those that require major construction are deferred to later years and depend on budget constraints.</p>
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<p>route due to the drain, and lacks an accessible bench.</p> <ul style="list-style-type: none"> • There are no accessible juvenile cells. • Accessible cell and employee holding area toilet room sinks and flush controls require more than 5lbs of force to operate. • The employee breakroom has controls mounted too high, lacks the required knee space at the sink, and lacks the minimum amount of storage within an accessible reach range. • The accessible route to the elevator is too narrow. • Employee locker rooms have accessible elements that are missing and/ or not mounted in correct locations. 					
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35.	<p>Polling Locations</p> <p>According to the City’s website, voting takes place at the following locations (some of which were not reviewed as part of our facility audits):</p> <ul style="list-style-type: none"> • Ferryway School • 89 Pearl Street Community Room (Malden Housing Authority) – not audited • Irish American Club – not audited • Beebe School Gym and Music Room • Early Learning Center Gym • Senior Center Auditorium • Salemwood School • Forestdale School • MVR Charter School Multipurpose Room – not audited • 630 Salem Street Community Room (Malden Housing Authority) – not audited • Suffolk Manor Community Room – not audited • Linden School 	KMA strongly recommends a review of the voting locations that were not previously reviewed for accessibility compliance.	A		Building Commissioner, City Clerk, ADA Compliance Officer	All polling locations will be assessed for accessibility and adaptations and accommodations made as needed.
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36.	<p>Public Facilities Workshop</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • Lack of accessible parking • Lack of accessible entrances. • Lack of accessible toilet rooms. 	<p>Due to the relatively low traffic of this building and no public access, KMA recommends mitigating barriers identified in the audit report as part of routine maintenance, planned alterations or in response to a specific request and as City budget permits within the next three to five years.</p>	D	March 2026	Building Commissioner, Public Facilities Director, Controller, and outside vendors and contractors	<p>This facility currently has no public access. The items identified that can be mitigated in the short term will be addressed first if use of the building changes. Those that require major construction are deferred to later years and depend on use of the building and budget constraints.</p>
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<p>37. Public Library</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • The main entrance lacks a level landing, has controls mounted too high, and lacks a door that provides minimum 32" of clear width. • Tactile/ braille signage is mounted too high. • Tables and desks lack the required knee clearance for a forward approach. • The information desk is mounted too high. • The floor lacks hi-lo drinking fountains. • Thresholds are too high. • Toilet rooms have hand dryers that protrude into the circulation space, and lack some of the required door maneuvering clearances. • The program room sink is mounted too high. • The children's room toilet room has accessible elements that are missing and/ or mounted in incorrect locations. • The Quiet Study Room door lacks the required maneuvering clearances. • The ramp to the special collections is too steep, lacks a level landing, and lacks the required handrail extensions. • The meeting room stage is not located on an accessible route. • The vertical lift lacks a level landing and the required door maneuvering clearances. 	<p>Due to the high traffic of the Library, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years.</p> <p>In the next year, KMA recommends modifying the main entrance, lowering the tactile/ braille signage, providing accessible tables/ desks in each separate location, designating the toilet rooms as unisex and modify at least one per floor to be fully accessible, and developing a policy that ensures the public is not required to travel along the inaccessible ramp or use the lift. KMA understands the Library received a grant in February 2020 to install automatic doors at the entry. This project is expected to be completed by the end of 2020 and would address some of the entry concerns identified in our audit report.</p> <p>KMA recommends completing a parking study within the next 6 months to see whether providing closer accessible parking spaces at the Library is feasible.</p>	<p>C</p> <p>B</p> <p>A</p>	<p>2023 to 2026</p>	<p>Building Commissioner, Public Facilities Director, Library Director, Library Board of Trustees, and outside vendors and contractors</p>	<p>There have been several recent upgrades to areas of the Library. The items identified that can be mitigated in the short term will be addressed first as funding becomes available. Those that require major construction are deferred to later years and depend on budget constraints and whether they are part of the architecture of the historic part of the building.</p> <p>Parking studies have been completed of the downtown. Closer accessible parking will be reviewed.</p>
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	Public Survey responses also indicate that the accessible parking serving the Library (although not owned by the Library) requires extensive travel and is not accessible to people with disabilities.					
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38.	<p>Senior Community Center & Teen Center</p> <p>Principal barriers identified include:</p> <ul style="list-style-type: none"> • The building lacks an accessible drop off area. • The curb ramp lacks a level landing. • The accessible parking spaces have signage mounted too low and slopes >2%. • The gym entrance lacks a level landing. • The exterior walkway at the entrance on Washington Street has cross slopes >2%. • Stairs lack the required extensions. • Controls such as intercoms, information centers, fire extinguisher boxes, and paper towel dispensers are mounted too high. • Interior doors lack the required minimum 10" of smooth surface along the bottom of the push side and require >5lbs of force to open. • Tables and workstations lack the required knee/ toe clearance below for a forward approach. • Drinking fountains are mounted too low and protrude into the circulation space. • Toilet rooms have accessible elements that are missing and/ or not mounted in correct locations. Some toilet rooms lack the required door maneuvering clearances. • The staff office toilet room and the dining multiuser toilet room lack the required footprint for an accessible toilet room. • The auditorium has a ramp with some minor non-compliant features, has stairs to 	<p>Due to the high traffic of the Senior Community Center and the age of its intended users, KMA recommends mitigating all the barriers identified in the audit report within the next one to three years.</p> <p>KMA recommends prioritizing the exterior parking, exterior accessible routes, and the auditorium areas used for voting due to their high visibility within the next year.</p> <p>In the next six months, develop a policy and provide directional signage at the inaccessible toilet rooms to notify the public of the nearby accessible toilet rooms and provide accessible tables in each unique space with priority going to those spaces with the highest use. Also consider exploring how to provide more adjacent accessible garage parking spaces, as there have been complaints regarding the distance to the building from the adjacent garages. KMA does not believe these garages are municipally owned.</p>	C B A	March 2022 to 2026	Building Commissioner, Public Facilities Director, Senior Center Director, Teen Center Director, Controller, and outside vendors and contractors	A policy and directional signage will be implemented to notify public of accessible restrooms. Items identified that can be mitigated in the short term will be addressed first. Those that require major construction are deferred to later years and depend on budget constraints.
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	<p>the stage that lack handrails, has headroom clearance issues at the angled walls, and has ticket windows mounted too high.</p> <ul style="list-style-type: none"> • The arts and crafts room door lacks the required maneuvering clearances. 					
Parks						
39.	<p>Parks</p> <p>When provided, the parks lacked accessible parking, accessible routes to amenity features, and accessible seating.</p>	<p>Recommendation: KMA recommends mitigating all the barriers identified in at least one park per district within the next one to three years with priority going to the park that has the highest use/ traffic and parks with unique amenity features, especially the memorials that are utilized for City events, skateparks, and dog parks.</p>	C	2022 to 2024	<p>Building Commissioner, Public Facilities Director, Recreation Department, DPW Director, Controller, and outside vendors and contractors</p>	<p>Items identified will be mitigated as funding becomes available. Any park renovations and upgrades must address accessibility.</p>
Playgrounds						
40.	<p>Playgrounds</p> <p>KMA did not observe any fully accessible play areas in the City of Malden. Additionally, many of the Public Survey responses indicated concerns with City playground accessibility. The play areas lacked an accessible route, an accessible play surface, accessible play features, accessible seating, and accessible parking spaces. It is also unclear which department oversees the City's playgrounds and whether they are aware of the accessibility obligations.</p>	<p>KMA recommends providing at least one fully accessible playground within each district in the next one-three years with priority going to the one with the highest use. Trafton Park & Dog Park had a playground under construction at the time of our audit. Ensure any modifications to existing play areas or newly constructed play are done in compliance with the 2010 ADA Standards. Information regarding the accessible playgrounds should be disseminated to residents and available on the City website. For information on accessible play area requirements please see: https://www.access-board.gov/attachments/article/1369/play-guide.pdf.</p>	C	2022 to 2024	<p>Building Commissioner, Public Facilities Director, Recreation Department, DPW Director, Controller, School Business Manager and outside vendors and contractors</p>	<p>Items identified will be mitigated as funding becomes available. Any playground renovations and upgrades must address accessibility.</p>

<ul style="list-style-type: none"> • Tables, workstations, and desks lack the required knee clearance for a forward approach. • Sinks lack the required knee/toe clearance for a forward approach. Some sinks are mounted too high. • Doors lack the required maneuvering clearances. • Auditoriums and gyms lack accessible seating. • Drinking fountains are missing and/ or not mounted in compliant locations. • Tactile/ braille signage is mounted too high, the braille is not mounted in the correct location, and the signage is not always mounted on the latch side of the door. • Toilet rooms and locker rooms have accessible elements that are missing and/ or not mounted in correct locations. Some toilet rooms lack the required door maneuvering clearances. • Gate hardware is mounted too high. • The future School Administrative Office building lacks accessible entrances due to slopes, lack of door maneuvering clearances, and changes in level. • The future School Administrative Office building elevator and lift are not compliant. • There is no accessible route to the lower level of the School Administrative Office building. • Multiuser toilet rooms in the future School Administrative Office building are not on an 					
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Miscellaneous Exterior Areas						
44.	<p>Community Garden</p> <p>The principal barriers identified include:</p> <ul style="list-style-type: none"> • The garden entrances, planters, and picnic tables are not located on an accessible route. • The picnic table lacks the required knee/toe clearance for a forward approach. • The gates lack the required 10" of smooth surface along the bottom of the push side. <p>According to the City's website, the Community Garden is managed by members of the City. Residents have the opportunity to adopt a planting bed for a small fee per year. It is unclear whether the Community Garden is managed by a City Department and whether they are aware of their accessibility obligations.</p>	<p>Recommendation: KMA recommends reviewing the ADA obligations and including Community Garden personnel in departmental trainings within the next six months.</p> <p>Since the Community Garden is a unique program and used by many residents of the City, KMA recommends providing at least one garden on an accessible route within the next one to three years. This can be achieved through architectural barrier removal at the existing Community Garden or by providing an additional accessible garden area in an alternate location. For example, providing raised beds at the Senior Center that are located on an accessible route available for community use. KMA recommends ensuring that the information on the policy and the process for implementation is disseminated.</p>	A	2021 to 2024	DPW Director, City Engineer, Recreation Department, Community Garden Personnel and ADA Compliance Officer	<p>ADA obligations will be reviewed with staff within the next six months.</p> <p>Current area will be reviewed for the possibility of an additional bed or an alternate location found.</p>
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