

## **RESOLUTION AGREEMENT**

Westminster College  
OCR Docket Number 07102031

The Westminster College (College), Fulton, Missouri, submits this Resolution Agreement (Agreement) to the U.S. Department of Education, Office for Civil Rights (OCR), to resolve the allegations of discrimination based on disability against the College in the above-referenced complaint, and to ensure compliance with Section 504 of the Rehabilitation Act of 1973 (Section 504), 29 United States Code (U.S.C.) § 794, and its implementing regulations.

### **ACCESSIBILITY STANDARDS**

1) The program accessibility requirements of Section 504 are found at 34 C.F.R. §§ 104.21 through 104.23. The Section 504 regulation at 34 C.F.R. § 104.21 provides generally that no qualified individual with a disability shall, because facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or denied the benefits of services, programs or activities, or be subjected to discrimination by a recipient of federal funds from the Department.

Section 504 provides a dual legal standard to assess program accessibility. Buildings constructed prior to June 3, 1977, the effective date of the regulation, are regarded as existing facilities and must comply with 34 C.F.R. § 104.22. This provision requires that a recipient's programs or activities in existing facilities, when viewed in their entirety, must be accessible to individuals with disabilities. Facilities constructed after June 3, 1977, and parts of existing facilities altered after that date, are deemed new construction and must comply with 34 C.F.R. § 104.23.

The recipient may comply with 34 C.F.R. § 104.22 through such means as redesign of equipment, reassignment of classes or other services to accessible buildings, assignment of aides to beneficiaries, alteration of existing facilities and construction of new facilities in conformance with the requirements of 34 C.F.R. § 104.23, or any other methods that result in making its programs or activities accessible to individuals with disabilities.

In determining the accessibility of programs operated in pre-1977 facilities, OCR first makes a determination regarding whether there are any physical barriers to access. OCR used the Uniform Federal Accessibility Standards (UFAS) as a guide in determining compliance for existing facilities, and significant departures from the particular requirements of UFAS are considered to be a barrier to access to a program that is being operated at that location. If a barrier to access is identified, OCR then makes a determination as to whether the University has met the requirements of the regulation by utilizing methods, as described in 34 C.F.R. § 104.22(b), to make its program or activity accessible to individuals with disabilities by other means, such as relocating programs or activities to accessible locations.

With regard to new construction, OCR uses both American National Standards Institute (ANSI) accessibility guidelines and UFAS to determine whether certain facilities comply with the regulations at 34 C.F.R. § 104.23. New construction includes each facility or part of a facility that has been designed and constructed or altered by, on behalf of, or for the use of a recipient after June 3, 1977. To the maximum extent feasible, if the alteration affects or could affect the usability of a facility or part of a facility, the altered portion of the facility must be readily accessible to and usable by individuals with disabilities.

Between June 3, 1977, and January 18, 1991, ANSI was the standard in effect for new construction. After January 18, 1991, UFAS was in effect for new construction. Departures from the particular requirements of these standards for new construction by the use of other methods are permitted when it is clearly evident that substantially equivalent or greater access to and usability of the facility or part of the facility is provided.<sup>1</sup>

2) The applicable accessibility standards for existing facilities or new construction are set forth in the attached Compliance Chart, which is incorporated by reference in this Agreement, for each of the following buildings that OCR surveyed at the College:

- a) Westminster Hall
- b) Westminster Historic Gym
- c) Champ Auditorium
- d) Reeves Library and Hazel Wing
- e) Church of St. Mary the Virgin Aldermanbury and the National Churchill Museum
- f) Newnham Hall

### **Remedial Measures and Plans**

3) By **June 30, 2015**, the College will submit, at a minimum, the following information for the remedial plans required in the attached Compliance Chart:

- a) A description of the specific architectural changes or actions to be performed by the College to achieve compliance with the facility, area, space, or element identified in the Chart;
- b) The expected start and completion dates; and
- c) The College employee or official responsible for implementation of the plan(s).

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<sup>1</sup> The College may also be subject to Title III of the Americans with Disabilities Act, unless the College is considered a religious entity and exempt from Title III.

OCR will notify the College in writing when OCR has approved the plans. The College will not implement the plans referred to in this paragraph prior to receiving written notification of OCR's approval.

### **ACCESSIBILITY NOTICE**

4) By **June 30, 2015**, the College shall adopt and implement procedures to ensure that interested persons, including persons with impaired vision or hearing, can obtain information as to the existence and location of services, activities, and facilities that are accessible to and usable by persons with disabilities, in accordance with 34 C.F.R. § 104.22(f) and 28 C.F.R. § 35.163. These procedures will include protocols for relocating programs, or activities to accessible locations to provide program access. In addition, these procedures will be published online and in student, parent and staff handbooks.

5) The College will provide OCR with a copy of the draft, revised accessibility notice **at least two weeks prior** to adopting or disseminating it.

### **REPORTING REQUIREMENT AND DOCUMENTATION**

6) By **June 30, 2016**, the College shall submit to OCR a monitoring report indicating the status of compliance with the requirements of this Agreement, including compliance or progress with remedial plans and published copies of (or links to) the College's accessibility notice and procedures. As part of the monitoring report, the College also will provide OCR with a current list of the College's hard-copy and online publications that contain the accessibility notice and procedures.

7) By **December 30, 2016**, the College shall submit to OCR a monitoring report indicating the status of compliance with the requirements of this Agreement, including compliance or progress with remedial plans and published copies of (or links to) the College's accessibility notice and procedures if not provided previously.

8) By **June 30<sup>th</sup> and December 30<sup>th</sup>** of every year until OCR determines all the items identified in the Compliance Chart have been completed, the College will submit a monitoring report indicating the status of compliance with the requirements of this Agreement, including compliance or progress with remedial plans.

### **OTHER PROVISIONS**

9) The College understands that OCR will not close the monitoring of this Agreement until OCR determines the College has fulfilled the terms of this Agreement and is in compliance with the regulations implementing Section 504 and Title II which were at issue in this case.

The College also understands that by signing this Agreement, it agrees to provide data and other information in a timely manner in accordance with the reporting requirements of this Agreement. Further, the College understands that during the monitoring of this Agreement, if necessary, OCR may visit the College, interview staff and students, and request such additional reports or data as are necessary for OCR to determine whether the College has fulfilled the terms of this Agreement and is in compliance with the regulations implementing Section 504 and Title II which were at issue in this case.

The College understands and acknowledges that OCR may initiate administrative enforcement or judicial proceedings to enforce the specific terms and obligations of this Agreement. Before initiating administrative enforcement (34 C.F.R. §§ 100.9, 100.10) or judicial proceedings to enforce this Agreement, OCR shall give the College written notice of the alleged breach and a minimum of sixty (60) calendar days to cure the alleged breach.

The person signing for the College represents that he is authorized to bind the College to this Agreement.

/s/George B. Forsythe  
President of Westminster College



2/25/15  
Date

**Compliance Chart**  
Westminster College, Fulton, Missouri  
OCR Docket #07102031

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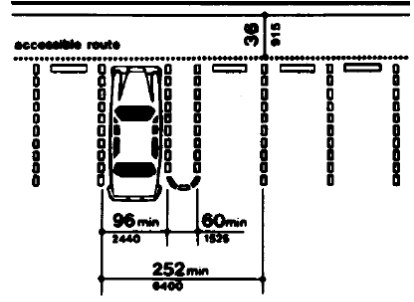

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## Westminster Hall



Location Surveyed: Westminster Hall	Uniform Federal Accessibility Standards (UFAS) <sup>2</sup> (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically )	Remedial Action <sup>3</sup> UFAS Standards (unless noted otherwise)
Front view of Westminster Hall	<p><u>Accessibility Standards:</u></p> <p>UFAS standards (34 C.F.R. § 104.23(c)) for exterior ramp (2008) and renovated areas in the lower level (2005)</p> <p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22) for remaining areas of Westminster Hall</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p>	<p><u>Construction/Alterations:</u></p> <p>Constructed: 1910</p> <p>Renovations: 1974: Major renovation to the building</p> <p>2005: Learning Opportunity Center &amp; Counseling/Health Center areas</p> <p>2008: Exterior ramp for lower level of the building</p>	 <p style="text-align: center;">Westminster Hall</p>	
Parking spaces for Westminster Hall	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Parking: 4.1.1(5)(a) &amp; 4.6:</p> <p>4.1.1(5)(a): Scope: 1-25 total parking spaces in a parking area require 1 accessible parking space (see table for additional spaces).</p> <p>4.6.2: Accessible parking spaces shall be located closest to the nearest accessible entrance on an accessible route.</p>	<p>Lot J in the back of Westminster Hall has 23 parking spaces, one of which is designated as accessible. There also is one designated parking space in the C.F. Lamkin Drive (or horseshoe drive) in front of Westminster Hall. Both parking areas are restricted to faculty and staff.</p> <p>The designated accessible parking space in front of Westminster Hall does not have a designated accessible aisle parallel to the parking space (see figure 9); an individual would have to exit in the street (the drive is one-way). This parking space exceeds a slope of 2%.</p> <p>The sign for the designated accessible parking space in front of Westminster Hall is too low and can be obscured by a</p>	 <p>The designated accessible parking space in front of Westminster Hall.</p>	<p>Ensure the designated accessible parking spaces in front of and behind Westminster Hall comply with 4.6, including compliance with the access aisle for a van, slope, and ensure the signs are at least 60” above the ground measured to the bottom of the sign. See Fig. 9, below. The College may move the designated accessible parking space on the horseshoe drive in front of Westminster Hall to the visitor parking area off the horseshoe drive by the flag near the other accessible parking space (across from the Westminster Historic Gym), since it may be difficult to ensure an accessible aisle on the one-way horseshoe drive.</p> <p>Allow students and other individuals</p>

<sup>2</sup> The citations in this column reference the Uniform Federal Accessibility Standards (UFAS) (Appendix A to 41 C.F.R. Subpart 101-19.6), unless otherwise noted. See 34 C.F.R. § 104.23(c).

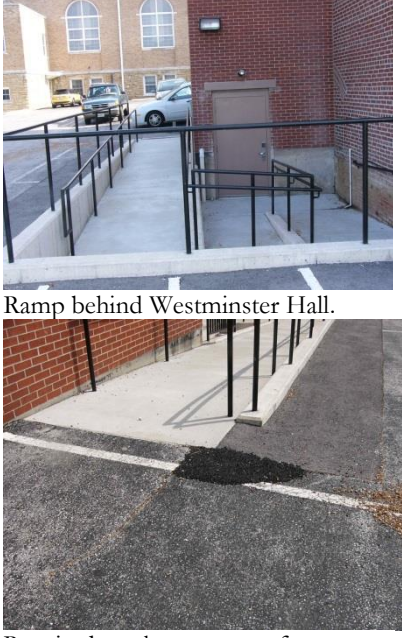


<sup>3</sup> The citations in this column reference the UFAS standards. However, the College may comply with Section 504 by using the 2010 Standards for new construction and alterations (but disregarding the exception at Section 206.2.3(1), as long as the College applies the 2010 Standards consistently throughout the College’s facilities. See *Notice of Interpretation for Section 504 Accessibility*, 77 Fed. Reg. 14,972 (3/14/12). The general anti-discrimination provisions of Section 504 (34 C.F.R. § 104.4) may also apply. This compliance chart does not necessarily address each and every possible instance of non-compliance with the access requirements of Section 504. In addition, departures from particular technical and scoping requirements of UFAS by the use of other methods are permitted where substantially equivalent or greater access to and usability of the facility or building is provided. See 34 C.F.R. § 104.23(c).




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	<p>4.6.3: Accessible space: 96" min. width.</p> <p>4.6.3: Accessible aisle: 60" min. width (96" min. width for van-accessible space)</p> <p>4.6.3: Accessible route: The access aisle shall be part of an accessible route to the facility entrance and shall comply with 4.3 (accessible route).</p> <p>4.6.3: Level Surface: The parking space and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.</p> <p>4.6.4: Sign: Accessible spaces shall be reserved with a sign showing the symbol of accessibility (4.30.5) and signs shall not be obscured by a vehicle parked in the space.</p>	<p>vehicle parked in the space.</p> <p>The aisle for the designated accessible parking space in the back of Westminster Hall in Lot J is 58" wide, but should be a minimum of 60" wide.</p> <p>The sign for the designated accessible parking space in the back of Westminster Hall in Lot J is too low and can be obscured by a vehicle parked in the space. The accessible parking space in Lot J is restricted to permit-holders only.</p>	 <p>The designated accessible parking space in front of Westminster Hall.</p>  <p>The designated accessible parking space in the back of Westminster Hall (lot J).</p>	<p>with mobility impairments/permits to access these accessible parking spaces in addition to faculty and staff (Lot J is designated for faculty and staff only), given the distance and slope from the horseshoe drive to Lot J in the back of Westminster Hall.</p>  <p><b>Fig. 9</b> <b>Dimensions of Parking Spaces</b></p>
<p><b>Lift for front entrance of Westminster Hall</b></p>	<p><u>Platform Lifts:</u> 4.11:</p> <p>4.11.3: Unassisted entry/exit: If a platform lift is used, the lift should facilitate unassisted entry and exit from the lift.</p> <p>4.5.1: Floor Surfaces: Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs, and curb ramps, shall be stable, firm, slip-resistant, and shall comply with 4.5.</p>	<p>The Museum lift cannot be operated independently; a Museum staff member must assist an individual with a disability to use the lift. Some students may be given a key to the lift, according to a College official, but members of the public and others must call for assistance.</p> <p>The sidewalk between the curb cut and the sidewalk to the lift has a slope of 8.1% to 8.8%. The running slope should not exceed 5% (or 1:20) and the cross slope should not exceed 2% (or 1:50). 4.3.7.</p>	 <p>Lift in front of Westminster Hall.</p>	<p>Ensure lift ramp is slip-resistant in compliance with 4.5.1.</p> <p>Ensure the sidewalk between the curb and the sidewalk to the lift has a slope that complies with 4.3.7 and 4.7.2.</p> <p>Ensure the lift can be used and operated independently by an individual with a disability. 4.11.3 and 34 C.F.R. §§ 104.4 and 104.21.</p>


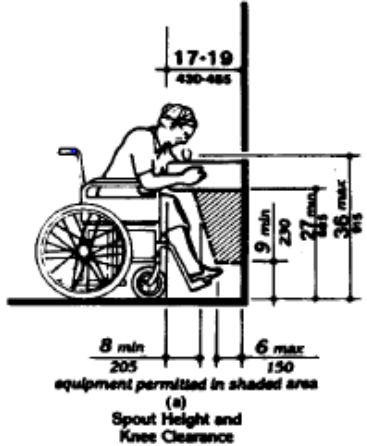






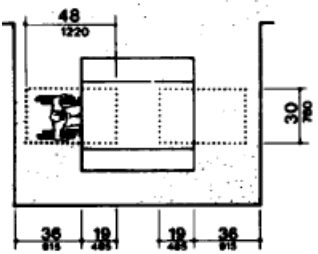
Location Surveyed: Westminster Hall	Uniform Federal Accessibility Standards (UFAS) <sup>2</sup> (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action <sup>3</sup> UFAS Standards (unless noted otherwise)
	<p>4.27: Controls: Clear floor space complying with 4.2.4 that allows a forward or a parallel approach by a person using a wheelchair shall be provided at controls and other operable equipment. 4.27.2. See also, 4.27.3 (Height) and 4.27.4 (Operation) of controls.</p> <p>Anti-discrimination standards: 34 C.F.R. §§ 104.4 and 104.21.</p>	<p>Curb ramps and ramps on existing sites may have slopes and rises complying with Table 2 in 4.1.6 if space limitations prohibit the use of a 1:12 slope or less.</p>	 <p>View of lift near the entrance.</p>	
<p><b>Accessible route to the back entrance of Westminster Hall</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Accessible Route: 4.3</p> <p>4.3.2(1): At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking, and accessible passenger zones, and public streets or sidewalks to the accessible building entrance they serve.</p> <p>4.3.2(2): At least one accessible route shall connect accessible buildings, facilities, elements, and spaces that are on the same site.</p> <p>See also 4.3.3-4.3.10.</p>	<p>The designated accessible route between the front and back entrance should comply with 4.3, including 4.3.3 (width), 4.3.4 (passing space), 4.3.5 (head room), 4.3.6 (surface textures), 4.3.7 (slope), 4.3.8 (changes in levels) and 4.3.9 (doors) requirements.</p>	 <p>Aerial view of Westminster Hall grounds, including sidewalks, drive behind Westminster Hall, and part of horseshoe drive.</p>	<p>Ensure there is an accessible route that complies with 4.3, including width, slope, and changes in level requirements, that connects the front and back accessible Westminster Hall entrances. 4.3.</p>




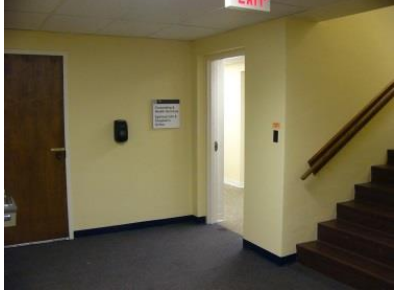

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<p><b>Ramp for back entrance of Westminster Hall</b></p>	<p><u>Ramps: 4.8:</u></p> <p>4.8.2: Max. slope: 1:12 (or 8.33%)</p> <p>4.8.3: Min. ramp width: 36"</p> <p>4.8.5: If a ramp run has a rise greater than 6" or a run greater than 72", then it shall have handrails on both sides.</p> <p>4.8.5(5): The top of handrail must be between 30" and 34" above ramp surface. At end of handrails, must be at least 12" of level handrail beyond the top &amp; bottom of the ramp segment.</p>	<p>The top of the handrail is 36" above the ramp surface, instead of between 30" and 34" above the surface. The bottom of the handrail also is too high: 35". See 4.8.5(5).</p>	 <p>Ramp behind Westminster Hall.</p> <p>Repaired cracks near top of ramp.</p>	<p>Ensure the top and bottom of the handrail is between 30" and 34" above the ramp surface.</p> <p>Maintain asphalt and cement of accessible route, including maneuvering areas, ramps, and landings, to promptly address any cracks and holes in the future.</p>
<p><b>Back entrance of Westminster Hall</b></p>	<p><u>Signs at Accessible Entrances: 4.1(7) and 4.30:</u></p> <p>4.1(7)(c): All signs shall comply with 4.30. Accessible entrances shall be identified with the international symbol of accessibility.</p> <p>4.30.2-5: See UFAS requirements for character proportion, color contrast, raised characters or symbols, and symbol of accessibility (see Fig. 43).</p>	<p>The back accessible entrance does not have a sign designating the accessible entrance.</p>	 <p>View of back entrance at the end of the ramp.</p>	<p>Install a sign that complies with 4.30, using the international symbol of accessibility. See Fig. 43, below. Also install directional signage to accessible entrance for lower level.</p>  <p>International Symbol of Accessibility</p>




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<p><b>Back entrance to Westminster Hall at the end of ramp</b></p>	<p><u>Doors: 4.13:</u></p> <p>4.13.9: Handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate. Lever-operated mechanisms, push-type mechanisms, and U-shaped handles are acceptable designs. Hardware must be mounted no higher than 48” above the floor.</p> <p>4.13.11: The maximum force for pushing or pulling open an interior hinged door is 5 lbs. No opening force is specified for exterior doors.</p>	<p>The door handle (inside) requires a high degree of dexterity and coordination and is not easy to grasp or use.</p> <p>The opening force of the exterior door was between 7 and 10 lbs. While there are no specific UFAS standards for maximum door opening force for exterior hinged doors, the opening force of 7 to 10 lbs. for the exterior door greatly exceeds the 5 lb. maximum force considered suitable for people with disabilities with respect to interior hinged doors. See 4.13.11.</p> <p>The opening force of the interior door leading to the lower level corridor was at least 7 lbs.</p>	 <p>Door for back entrance of Westminster Hall.</p>	<p>Install an automatic door opener for the outside door at the bottom of the ramp in accordance with 4.13.12. While there is no specific opening force standard in UFAS for an exterior hinged door, the existing opening force could exclude individuals with disabilities from accessing the lower level of the building, contrary to 34 C.F.R. § 104.4 (Section 504 general anti-discrimination provisions) and 34 C.F.R. § 104.21 (Section 504 anti-discrimination provision regarding accessibility).</p> <p>Ensure the interior door leading to the lower level corridor has a maximum opening force of 5 lbs.</p>
<p><b>Lower Level of Westminster Hall</b></p> <p><b>Unisex Restroom</b></p>	<p><u>Toilet Rooms: 4.1.2(10) and 4.22,</u> including 4.16 (water closets or toilets), 4.17 (toilet stalls), 4.18 (urinals), 4.19 (lavatories or sinks and mirrors), 4.26 (grab bars), and 4.27 (controls and operating mechanisms).</p> <p>4.30: Signage: See 4.30.2-5 requirements pertaining to character proportion, color contrast, raised characters or symbols, and symbols of accessibility.</p> <p>4.30.6: Interior signage shall be located alongside the door on the latch side and shall be mounted at a height of between 54” and 66” above the finished floor.</p>	<p>The College remodeled the unisex bathroom in the lower level of Westminster Hall after OCR’s initial onsite accessibility survey. The bathroom was still being altered when OCR returned to the College (see photo in next column).</p> <p>Please note: In toilet rooms with only one water closet and one lavatory, a clear floor space of 30” x 60” may be used in lieu of the unobstructed turning space. See exception to 4.22.3.</p>	 <p>Alterations were in progress in unisex bathroom during OCR’s return onsite survey at the College.</p>	<p>Ensure the remodeled unisex bathroom in the lower level complies with the UFAS standards for 4.22 &amp; 4.23, including 4.16, 4.17, 4.19, 4.26, and 4.27.</p> <p>Install a sign on the latch side of the unisex bathroom door that complies with 4.30, using the international symbol of accessibility. See Fig. 43, below:</p>  <p>International Symbol of Accessibility</p>




Location Surveyed: Westminster Hall	Uniform Federal Accessibility Standards (UFAS) <sup>2</sup> (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically )	Remedial Action <sup>3</sup> UFAS Standards (unless noted otherwise)
<p><b>Lower Level of Westminster Hall</b></p> <p><b>Drinking Fountain</b></p>	<p><u>Drinking Fountains: 4.15:</u></p> <p>4.15.5(1): Clearances: Wall and post mounted cantilevered units shall have a clear knee space between the bottom of the apron and the floor or ground at least 27" high, 30" wide, and 17" to 19" deep. Such units shall also have a minimum clear floor space 30" by 48" to allow an approach facing forward. See Fig. 27(a) and (b).</p>	<p>The height between the bottom of the apron and the ground is 25" high; it should be at least 27" high.</p>	 <p>Drinking fountain in lower level.</p>	<p>Ensure the wall-mounted drinking fountain complies with the requirements of 4.15, including complying height and clearances. See Fig. 27(a), below, for a wall-mounted cantilevered unit:</p>  <p>(a) Spout Height and Knee Clearance</p>
<p><b>Lower Level of Westminster Hall</b></p> <p><b>Corridor in Learning Opportunity Center</b></p>	<p><u>Accessible Route: 4.3:</u></p> <p>4.3.3: Width: The minimum clear width of an accessible route shall be 36" except at doors.</p>	<p>A table and cart obstruct the accessible route in the corridor of the Learning Opportunity Center.</p>	 <p>Corridor in Learning Opportunity Center</p>	<p>Ensure that objects such as tables and carts are not placed in the accessible route if those objects reduce the width of the accessible route less than 36".</p>

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<p><b>Lower Level of Westminster Hall</b></p> <p><b>Seating, Tables, and Work Surfaces</b></p>	<p><u>Seating, Tables, &amp; Work Surfaces:</u> <u>4.1.2(17) &amp; 4.32:</u></p> <p>4.1.2(17): If fixed or built-in seating, tables, or work surfaces are provided in accessible spaces, at least 5%, but always at least one, of seating spaces, tables, or work surfaces shall comply with 4.32.</p> <p>4.32.2: Seating: If seating spaces for people in wheelchairs are provided at tables, counters, or work surfaces, clear floor space complying with 4.2.4 shall be provided. Such clear floor space shall not overlap knee space by more than 19".</p> <p>4.32.3: Knee Clearances: If seating for people in wheelchairs is provided at tables, counter, and work surfaces, knee spaces at least 27" high, 30" wide, and 19" deep shall be provided.</p> <p>4.32.4: Height of Work Surfaces: The tops of tables and work surfaces shall be from 28" to 34" from the floor.</p> <p>34 C.F.R. § 104.4 (Section 504 general anti-discrimination provisions)</p>	<p>The dimensions for the table in Test Room #40 are as follows:</p> <p>Height: 25" from the bottom of the keyboard shelf to the floor. 30" from the top of the table to the floor, but the keyboard is below the table.</p> <p>Width: 25" wide underneath the table. Table top width is 36", but the width is reduced under the table because of the tower.</p> <p>Depth: 28" from the front of the table to the back, but depth is affected by objects under the table.</p> <p>Knee clearance should be at least 27" high, 30" wide, and 19" deep at accessible tables and work areas.</p> <p>The tables in the private test and study rooms do not comply with the knee clearance dimensions for an individual in a wheelchair. See 4.32.3. While these tables do not appear to be fixed or built-in, an individual using a wheelchair should not be excluded from the opportunity to take a test or study in a private room, pursuant to 34 C.F.R. §§ 104.4 and 104.21 (Section 504 anti-discrimination provisions).</p>	 <p>Test Room #40.</p>  <p>Test Room #39 (view under table)</p>  <p>Study Room #37 (view under table)</p>	<p>It appears these tables can meet the knee clearance requirements with some modifications, such as moving the computer tower and reconfiguring the keyboard and objects underneath the table.</p> <p>Ensure one private test room and one private study room is accessible with accessible tables, and ensure the rooms have sufficient clear floor space to maneuver with the door closed (or provide OCR with a plan to ensure students with disabilities are provided a private enclosed test and study area). Also provide audible and visual alarms that comply with 4.28 in each accessible private test and study room.</p> <p>Ensure a 36" accessible route to accessible elements, including tables, computer tables, and bookcases, is maintained within the study lab. See Fig. 45 (a portion is reprinted, below):</p> 



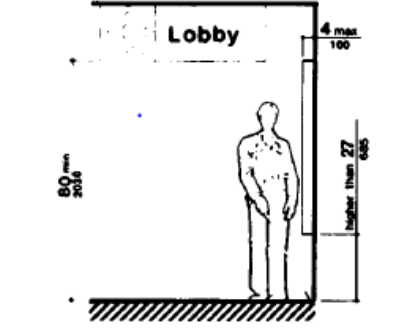


Location Surveyed: Westminster Hall	Uniform Federal Accessibility Standards (UFAS) <sup>2</sup> (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action <sup>3</sup> UFAS Standards (unless noted otherwise)
			 <p data-bbox="1186 544 1577 570">Study Lab</p>	
<p data-bbox="65 570 281 657"><b>Lower Level of Westminster Hall</b></p> <p data-bbox="65 690 281 777"><b>Door leading to Counseling &amp; Health Services</b></p>	<p data-bbox="281 570 709 609"><u>Signage: 4.30.6:</u></p> <p data-bbox="281 625 709 755">Interior signage shall be located alongside the door on the latch side and shall be mounted at a height of between 54” and 66” above the floor.</p>	<p data-bbox="709 570 1171 625">The sign is mounted 50” above the floor and is too low.</p>	 <p data-bbox="1186 868 1577 922">Door to the Counseling &amp; Health Services area</p>	<p data-bbox="1591 570 2032 625">Mount the sign at a height of between 54” and 66” above the floor.</p>
<p data-bbox="65 922 281 1010"><b>Lower Level of Westminster Hall</b></p> <p data-bbox="65 1042 281 1130"><b>Corridor in Counseling &amp; Health Services</b></p>	<p data-bbox="281 922 709 961"><u>Accessible Route: 4.3:</u></p> <p data-bbox="281 977 709 1075">4.3.3: Width: The minimum clear width of an accessible route shall be 36” except at doors.</p>	<p data-bbox="709 922 1171 1010">A water cooler obstructs the accessible route in the corridor of the Counseling &amp; Health Services area.</p>	 <p data-bbox="1186 1205 1577 1268">Corridor in the Counseling &amp; Health Services area</p>	<p data-bbox="1591 922 2032 1042">Ensure that objects such as the water cooler are not placed in the accessible route if those objects reduce the width of the accessible route less than 36”.</p>

Location Surveyed: Westminster Hall	Uniform Federal Accessibility Standards (UFAS) <sup>2</sup> (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action <sup>3</sup> UFAS Standards (unless noted otherwise)
<p><b>Lower Level of Westminster Hall</b></p> <p><b>2<sup>nd</sup> Exam Room</b></p>	<p><u>Doors: 4.1.2(7)(b) &amp; 4.13:</u></p> <p>4.1.2(7)(b): Within a building or facility, at least one door at each accessible space shall comply with 4.13.</p> <p>4.13.5: Clear Width: Doorways shall have a minimum clear opening of 32” with the door open 90 degrees, measured between the face of the door and the stop.</p>	<p>The door to the 2<sup>nd</sup> Exam Room is 30” wide, which is less than the required 32” depth at doorways.</p>	 <p>Door to 2<sup>nd</sup> Exam Room</p>  <p>2<sup>nd</sup> Exam Room under construction.</p>	<p>Increase the width of the door to the 2<sup>nd</sup> Exam Room if the College is using this space for students or others. At the time OCR surveyed this room, it was under construction (see below):</p>
<p><b>Main level of Westminster Hall</b></p> <p><b>Men’s and women’s restroom</b></p>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Toilet Rooms: 4.1.2(10) and 4.22, including 4.16 (water closets or toilets), 4.17 (toilet stalls), 4.18 (urinals), 4.19 (lavatories or sinks and mirrors), 4.26 (grab bars), and 4.27 (controls and operating mechanisms).</p> <p>Guidance: 4.30: Signage: See 4.30.2-5 requirements pertaining to character proportion, color contrast, raised characters or symbols, and symbols of accessibility. See also 4.30.6: Interior signage shall be located alongside the door on the latch side and shall be</p>	<p>The men’s and women’s restrooms on the main level (first floor) are public or common use restrooms that are not accessible to individuals in wheelchairs. For both restrooms the entrance doors exceed 5 lbs. and the toilet stall doors are less than 32” wide. The women’s entrance door is also less than 32” wide.</p> <p>In addition, both restrooms do not have adequate maneuvering spaces or clearance under sinks, there are no wall-mounted grab bars, and mirrors are not mounted high enough, and pipes under the sinks are not insulated.</p> <p>The signs on the restroom doors do not include international signs of accessibility or braille, and are not mounted on the latch side of the door (see photos, below).</p>	 <p>One of the men’s toilet stalls in the men’s restroom.</p>	<p>Alter the men’s and women’s restrooms on the main level in compliance with 4.22 and 4.30, so that individuals in wheelchairs or with mobility impairments can access accessible restrooms on the main level without exiting the building via the platform lift and traveling in the outside elements around the building (or driving a car and parking), and through the ramp and lower level to access the unisex restroom. 34 C.F.R. §§ 104.4 and 104.21.</p>




Location Surveyed: Westminster Hall	Uniform Federal Accessibility Standards (UFAS) <sup>2</sup> (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically )	Remedial Action <sup>3</sup> UFAS Standards (unless noted otherwise)
	mounted at a height of between 54” and 66” above the finished floor.	 <p>Sign on men’s restroom. A similar sign with the word “Ladies” is mounted on the women’s restroom door.</p>	 <p>One of the women’s toilet stalls in the women’s restroom.</p>	(see above)
<b>Main level of Westminster Hall</b>  <b>Service Counters</b>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Service Counters: 7.2: Where service counters exceeding 36” in height are provided for standing sales or distribution of goods to the public, an auxiliary counter or portion of the main counter shall be provided with a maximum height of between 28” to 34” above the floor.</p> <p>Guidance: Protruding objects: 4.4.1 &amp; 4.4.2: Wall-mounted objects with leading edges between 27” and 80” above the floor shall protrude no more than 4” into walks, halls, corridors, passageways, or aisles, and there shall be a minimum of 80” of clear head room.</p>	<p>The service counters for student accounts (photo in next column), and in the business office (below), the registrar’s office, and the academic affairs office, exceed 36” in height with no auxiliary counter between 28” to 34” above the floor.</p> <p>One of the service counters in the business office.</p> <p>The signs above service counter appear to be less than 80” above the floor.</p>	 <p>Service counter for student accounts.</p>	<p>For service counters where business is conducted, provide an auxiliary counter mounted between 28” to 34” above the floor, so individuals in wheelchairs can independently conduct business, including writing checks, signing documents, etc. (or provide OCR with a plan to provide equivalent accessibility). 34 C.F.R. §§ 104.4 and 104.21.</p> <p>In addition, ensure that service counters exceeding 4” in depth have a fixed cane-detectible barrier below the counters, and remove any objects that are less than 80” above the floor, such as the rectangle signs mounted above the service counters for student accounts and in the business office (see photos in third and fourth columns and Fig. 8(a) in protrusion section, below).</p>


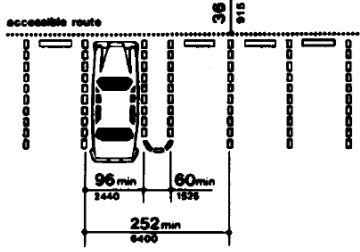




Location Surveyed: Westminster Hall	Uniform Federal Accessibility Standards (UFAS) <sup>2</sup> (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action <sup>3</sup> UFAS Standards (unless noted otherwise)
<p><b>Westminster Hall: All levels</b></p> <p><b>Interior doors and signage</b></p>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Doors: 4.13.11: The maximum force for pushing or pulling open an interior hinged door is 5 lbs.</p> <p>Guidance: Signage: 4.1.2(15) &amp; 4.30.6: Interior signage shall be located alongside the door on the latch side and shall be mounted at a height of between 54” and 66” above the floor.</p>	<p>On the main level of Westminster Hall, the opening force for the door to the business office is from 9 lbs. to 12 lbs.</p> <p>The door does not have a sign located on the latch side of the door.</p>	 <p>Entrance to Business Office.</p>	<p>Ensure the opening force for the business office door and all other interior doors in Westminster Hall have a maximum opening force of 5 lbs, to allow individuals with disabilities independent access. 34 C.F.R. §§ 104.4 and 104.21.</p> <p>Provide signage on the latch side of the door between 54” and 66” above the floor, in conformance with 4.30, for all permanent offices, rooms, and spaces in Westminster Hall with signs. OCR recommends including braille in the signage, so individuals with vision impairments can independently access the offices, rooms, and spaces. 34 C.F.R. §§ 104.4 and 104.21.</p>
<p><b>Westminster Hall: All levels</b></p> <p><b>Protrusions</b></p>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Protruding objects:</p> <p>4.4.1: Wall-mounted objects with leading edges between 27” and 80” above the floor shall protrude no more than 4” into walks, halls, corridors, passageways, or aisles.</p> <p>4.4.2: Walks, halls, corridors, passageways, aisles, or other circulation spaces shall have 80” minimum clear head room (see Fig. 8(a)).</p>	<p>The fire extinguisher and telephone in the entrance area are protrusions that pose safety hazards to individuals with vision impairments and should be reconfigured or eliminated.</p> <p>See OCR’s <i>Staff Memorandum</i> dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient’s programs).</p>	 <p>Protrusions near entrance to business office.</p>	<p>Provide a fixed barrier detectable by canes under the protruding objects or provide OCR with another plan to reconfigure or eliminate each protrusion. In addition, remove any objects that are less than 80” above the floor (such as the rectangular signs above the service counters), unless there is a can-detection area (where appropriate). See Fig. 8(a), below. 34 C.F.R. §§ 104.4 and 104.21.</p>  <p>Fig. 8(a): Objects mounted on walls.</p>




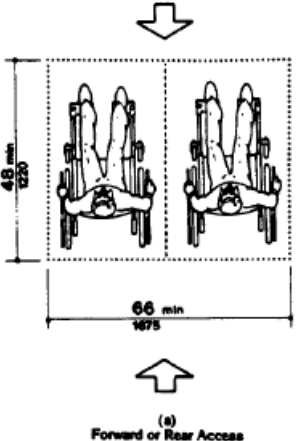
Location Surveyed: Westminster Hall	Uniform Federal Accessibility Standards (UFAS) <sup>2</sup> (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically )	Remedial Action <sup>3</sup> UFAS Standards (unless noted otherwise)
<b>Westminster Hall:</b>  <b>Stairs connecting all levels</b>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Stairs:</p> <p>4.1.2(4) and 4.9: Stairs connecting levels that are not connected by an elevator shall comply with 4.9.</p> <p>4.9.6: Outdoor stairs and their approaches shall be designed so that water will not accumulate on walking surfaces.</p>	<p>Ensure any holes or breaks in stairs and any loose or unstable handrails are repaired to prevent safety hazards.</p> <p>See OCR's <i>Staff Memorandum</i> dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient's programs).</p>	<p>[No photo]</p>	<p>Ensure any holes or chips/breaks in stairs and any loose or unstable handrails are promptly repaired and properly maintained to prevent safety hazards for individuals with visual or mobility impairments utilizing the stairs and handrails. 34 C.F.R. §§ 104.4 and 104.21.</p>
<b>Westminster Hall:</b>  <b>Alarms and Egress</b>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Alarms: 4.1.2(13) &amp; 4.28 If emergency warning systems are provided, then they shall include both audible alarms complying with 4.28.2 and visual alarms complying with 4.28.3.</p> <p>Guidance: Egress: 4.3.10: Accessible routes serving any accessible space or element shall also serve as a means of egress for emergencies or connect to an accessible place of refuge. See also 4.1.2(7)(d)(exception).</p>	<p>The College has emergency warning systems in every building OCR surveyed. However, not all classrooms and other areas had audible and visual alarms.</p> <p>Ensure the egress standards of 4.3.10 and 4.2.1(7)(d) are met for a multiple-story building.</p> <p>See OCR's <i>Staff Memorandum</i> dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient's programs).</p>	<p>[No photo]</p>	<p>Ensure alarms are provided and the egress standards of 4.3.10 and 4.2.1(7)(d) are met for a multiple-story building, or provide OCR with emergency procedures that allow for the safe notification and evacuation of individuals with disabilities. 34 C.F.R. §§ 104.4 and 104.21.</p>




## Westminster Historic Gym


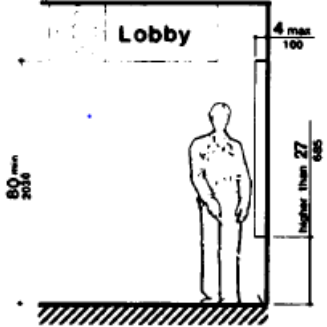

Location Surveyed: Westminster Historic Gym	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
Front view of Westminster Historic Gym (Gym)	<p><u>Accessibility Standards:</u></p> <p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22). Bleachers were replaced after the 1974 renovation, but the date is unknown.</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p>	<p><u>Construction/Alterations:</u></p> <p>Constructed: 1929</p> <p>Renovation: 1974 (major renovation). Bleachers were replaced later (date unknown).</p> <p>Historic Register: 5/2/1968</p>	 <p style="text-align: center;">Westminster Historic Gym</p>	
Gym Parking	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Parking: 4.1.1(5)(a) &amp; 4.6:</p> <p>4.1.1(5)(a): Scope: 1-25 total parking spaces in a parking area require 1 accessible parking space (see table for additional spaces).</p> <p>4.6.2: Accessible parking spaces shall be located closest to the nearest accessible entrance on an accessible route.</p> <p>4.6.3: Accessible space: 96" min. width.</p> <p>4.6.3: Accessible aisle: 60" min. width (96" min. width for van-accessible space).</p> <p>4.6.3: Accessible route: The access aisle shall be part of an accessible route to the facility entrance and shall comply with 4.3 (accessible route).</p>	<p>The Gym has a designated accessible parking space across from the Gym off the horseshoe drive with a curb cut on the west side of the drive. This parking area has 6 parking spaces, one of which is designated accessible.</p> <p>In addition, there is a designated accessible parking space in Lot K between the Washington West House and the Hunter Activity Center, which the College indicated could be used for the Gym. Lot K has 16 parking spaces, one of which is accessible for a car. However, the access aisle is only 56" wide, rather than a required width of 60" for a car (or 96" wide for a van).</p>	 <p>Accessible parking space across from the Gym off the horseshoe drive. See blue arrow in aerial picture, below:</p> 	<p>Lot K: Increase the access aisle to 60" width for a car (see Fig. 9, below) or 96" width for a van for the accessible parking space(OCR recommends at least one van-accessible parking space), and include a sign designating the space as van-accessible if designated as van-accessible.</p> <p>Allow students and other individuals with mobility impairments to access this accessible parking space in addition to faculty and staff (Lot K is designated for faculty and staff only), given the limited amount of parking available to several College buildings south of 7th street and west of Westminster Avenue.</p> <p>The College may consider converting the northeast parking space on the south side of the Gym near the front entrance in Lot J (see red arrow in aerial picture in the previous column) to an accessible parking space for the Gym, since the distance to the Gym would be significantly shorter than the distance from the designated accessible parking space in Lot K to the Gym entrance.</p>

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	<p>4.6.3: Level Surface: The parking space and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.</p> <p>4.6.4: Sign: Accessible spaces shall be reserved with a sign showing the symbol of accessibility (4.30.5) and signs shall not be obscured by a vehicle parked in the space.</p>		 <p>Designated accessible parking space in Lot K between the Washington West House and the Hunter Activity Center.</p>	 <p><b>Fig. 9</b> <b>Dimensions of Parking Spaces</b></p>
<p><b>Gym</b></p> <p><b>Stair Lift</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Platform Lifts: 4.11:</p> <p>4.11.3: Unassisted entry/exit: If a platform lift is used, the lift should facilitate unassisted entry and exit from the lift.</p> <p>4.5.1: Floor Surfaces: Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs, and curb ramps, shall be stable, firm, slip-resistant, and shall comply with 4.5.</p> <p>4.27: Controls: Clear floor space complying with 4.2.4 that allows a forward or a parallel approach by a person using a wheelchair shall be provided at controls and other operable equipment. 4.27.2. See also, 4.27.3 (Height) and 4.27.4 (Operation) of controls.</p>	<p>The front entrance of the Gym may only be accessed via stairs. No other entrances to the Gym have been designated as accessible by the College.</p> <p>The College utilizes the main floor of the Gym for basketball and volleyball games and other functions (Winston Churchill's famous speech, <i>The Sinews of Peace</i>, was given at the Gym in 1946). Restrooms, locker rooms, a swimming pool, and classrooms are located in the lower level.</p> <p>According to information provided by the College, a portable wheelchair lift (photo in next column) is used if the College is notified in advance that an individual with a mobility impairment plans to attend a program at the Gym. The portable wheelchair lift is stored in the Gym when not in use. If an individual with a mobility impairment unexpectedly arrives at the Gym, the staff in the student life office identifies men to lift the individual in a wheelchair to the Gym floor level (see the College's data response).</p>	 <p>Front entrance of Gym.</p>  <p>Portable wheelchair lift.</p>	<p>Provide a plan to OCR to allow access to the Gym via a platform lift, ramp, elevator, or another method to enable individuals with mobility impairments to independently access the Gym. Carrying an individuals with mobility impairments up and down stairs is not an acceptable method for providing access pursuant to OCR's <i>Staff Memorandum</i> dated 3/8/1991, pertaining to Section 504 program accessibility (17 IDELR 613, p. 7). See also Section 504's general anti-discrimination standards (34 C.F.R. § 104.4)</p>




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<p><b>Gym</b></p> <p><b>Court area in main level</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Assembly Areas: 4.1.2(18) and 4.33:</p> <p>4.1.2(18): Assembly areas: See table with the seating capacity and number of required wheelchair locations: For a seating capacity of 501-1,000 seats, 2% of the total, or 13 accessible wheelchair locations.</p> <p>4.33.2: Size of Wheelchair Locations: Each wheelchair location shall provide minimum clear ground or floor spaces as shown in Fig. 46.</p> <p>4.33.3: Placement of Wheelchair Locations: Wheelchair areas shall be an integral part of any fixed seating area. They shall adjoin an accessible route that also serves as a means of egress in case of emergency and shall be located to provide lines of sight comparable to those for all viewing areas.</p> <p>4.33.4: Surfaces: The ground or floor at wheelchair locations shall be level and shall comply with 4.5.</p> <p>4.13: Doors</p>	<p>There are 506 bleacher seats on the north side of the court and 144 bleacher seats on the south side, for a total of 650 bleacher seats. There are 6 designated accessible wheelchair seating areas on in the north bleachers, with companion seating for each accessible wheelchair seating location.</p> <p>4.1.2(18) requires 13 accessible wheelchair seating locations based on 2% of the total seating capacity of 650. The Gym has only 6 accessible wheelchair seating locations.</p> <p>The doors to the court area may have compliance issues concerning the handles, thresholds and opening force.</p>	 <p>Entrance to court area of Gym.</p>  <p>Bleachers on the north side of the court:</p>  <p>Bleachers on the south side of the court.</p>	<p>Ensure the accessible wheelchair seating locations comply with 4.33 when fully extended and the bleachers do not encroach on the accessible route (36" wide) when fully extended. See Fig. 46(a), below.</p> <p>Provide OCR with a plan to provide additional wheelchair seating locations (up to 7 additional wheelchair locations) if the need arises.</p> <p>If the doors to the court area are not kept open during business and event hours, ensure the doors comply with 4.13.</p>  <p>(a) Forward or Rear Access</p> <p>Fig. 46(a)</p>




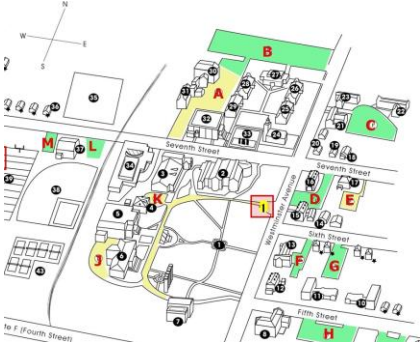
Location Surveyed: Westminster Historic Gym	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
<p><b>Gym</b></p> <p><b>Lower Level</b></p> <p><b>Swimming pool</b></p> <p><b>Restrooms</b></p> <p><b>Locker rooms</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance for pool: Section 1009 of the 2010 ADA Standards for Accessible Design (2010 Standards) at <a href="http://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards_pr_t.pdf">http://www.ada.gov/regs2010/2010ADASTandards/2010ADASTandards_pr_t.pdf</a>.</p> <p>Guidance for locker rooms: Sections 222 and 803.</p> <p>Guidance for Restrooms: Toilet Rooms: 4.1.2(10) and 4.22, including 4.16 (water closets or toilets), 4.17 (toilet stalls), 4.18 (urinals), 4.19 (lavatories or sinks and mirrors), 4.26 (grab bars), and 4.27 (controls and operating mechanisms).</p> <p>Guidance: 4.30: Signage: See 4.30.2-5 requirements pertaining to character proportion, color contrast, raised characters or symbols, and symbols of accessibility. See also 4.30.6: Interior signage shall be located alongside the door on the latch side and shall be mounted at a height of between 54" and 66" above the finished floor.</p>	<p>Access from the Gym's main level to the lower level (or basement) is via stairs only. The restrooms, locker rooms, swimming pool, and some classrooms are located in the lower level and are not accessible to individuals with mobility impairments. There are additional stairs to access the swimming pool from the locker rooms.</p> <p>The restrooms, locker rooms with restrooms, and swimming pool are not accessible for individuals with mobility impairments. The swimming is used for aquatics classes, recreational swimming, and occasional outside classes and programs, such as Red Cross classes.</p> <p>The swimming pool dimensions are: Length of pool: 60'8" Width of pool: 20'5" Raised lip around pool: 9" No sloped entry No pool lift</p> <p>Classes held in the lower level of the Gym could be relocated for an individual with a mobility impairment.</p> <p>OCR did not measure the locker rooms because those rooms, the restrooms and the swimming pool are inaccessible to individuals with mobility impairments. If the College chooses to make the pool accessible, there appear to be some compliance concerns (e.g. the raised walkway in the shower area).</p>	 <p>Inaccessible swimming pool in lower level of the Gym.</p>  <p>Stairs from women's locker room to access the swimming pool.</p>  <p>Non-complying shower in the men's locker room.</p>	<p>Provide OCR with a plan to provide lower level access to individuals with mobility impairments, and alter the existing restrooms, locker rooms, and swimming pool so these areas are accessible, or provide a plan to offer these facilities at another location on campus that is accessible and connects to an accessible route. In addition, if the College continues to utilize the main level of the Gym, and the lower level is not accessible, provide a plan to offer accessible restrooms (or a unisex restroom) on the main level.</p>







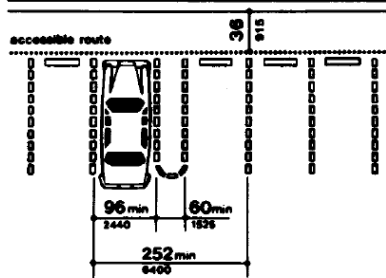
Location Surveyed: Westminster Historic Gym	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
<p><b>Gym: All levels</b></p> <p><b>Protrusions</b></p>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Protruding objects:</p> <p>4.4.1: Wall-mounted objects with leading edges between 27” and 80” above the floor shall protrude no more than 4” into walks, halls, corridors, passageways, or aisles.</p> <p>4.4.2: Walks, halls, corridors, passageways, aisles, or other circulation spaces shall have 80” minimum clear head room (Fig. 8(a)).</p>	<p>A hanging screen in a classroom in the lower level of the Gym appears to hang lower than 80” above the floor that poses a safety hazard to individuals with vision impairments and should be raised or eliminated.</p> <p>See OCR’s Staff Memorandum dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient’s programs).</p>	 <p>Ceiling-mounted hanging screen in a classroom in the lower level of the Gym.</p>	<p>Provide a fixed barrier detectable by canes under any protruding objects or provide OCR with another plan to reconfigure or eliminate each protrusion. In addition, remove any objects that are less than 80” above the floor (such as the hanging screen in the classroom), unless there is a cane-detection area (where appropriate). See Fig. 8(a), below. 34 C.F.R. §§ 104.4 and 104.21.</p>  <p>Fig. 8(a): Objects mounted on walls; walking parallel to a wall.</p>
<p><b>Gym:</b></p> <p><b>Stairs connecting all levels</b></p>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Stairs:</p> <p>4.1.2(4) and 4.9: Stairs connecting levels that are not connected by an elevator shall comply with 4.9.</p> <p>4.9.4. Handrails. Stairways shall have handrails at both sides of all stairs. Handrails shall comply with 4.26 and 4.9.4 (1) – (7).</p>	<p>Ensure any holes or breaks in stairs and any loose or unstable handrails are repaired to prevent safety hazards.</p> <p>See OCR’s Staff Memorandum dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient’s programs).</p> <p>Bottom stair leading to main Gym entrance is crumbling and needs repaired. (See photo in next column)</p> <p>Stairs to staff offices should have</p>		<p>Ensure any holes or breaks in stairs and any loose or unstable handrails are promptly repaired and properly maintained to prevent safety hazards for individuals with visual or mobility impairments utilizing the stairs and handrails. 34 C.F.R. §§ 104.4 and 104.21.</p>






Location Surveyed: Westminster Historic Gym	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically )	Remedial Action UFAS Standards (unless noted otherwise)
	4.9.6: Outdoor stairs and their approaches shall be designed so that water will not accumulate on walking surfaces.	handrails. (see photo in next column)		
<b>Westminster Hall:</b>  <b>Alarms and Egress</b>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Alarms: 4.1.2(13) &amp; 4.28 If emergency warning systems are provided, then they shall include both audible alarms complying with 4.28.2 and visual alarms complying with 4.28.3.</p> <p>Guidance: Egress: 4.3.10: Accessible routes serving any accessible space or element shall also serve as a means of egress for emergencies or connect to an accessible place of refuge. See also 4.1.2(7)(d)(exception).</p>	<p>The College has emergency warning systems in every building OCR surveyed. However, not all classrooms and other areas had audible and visual alarms.</p> <p>Ensure the egress standards of 4.3.10 and 4.2.1(7)(d) are met for a multiple-story building.</p> <p>See OCR's Staff Memorandum dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient's programs).</p>	[No photo]	Ensure alarms are provided and the egress standards of 4.3.10 and 4.2.1(7)(d) are met for a multiple-story building, or provide OCR with emergency procedures that allow for the safe notification and evacuation of individuals with disabilities. 34 C.F.R. §§ 104.4 and 104.21.



## Champ Auditorium



Location Surveyed: Champ Auditorium	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
South view of Champ Auditorium	<p><u>Accessibility Standards:</u></p> <p>UFAS standards (34 C.F.R. § 104.23(c)) for interior ramp (1996)</p> <p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22) for remaining areas of Champ Auditorium</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p>	<p><u>Construction/Alterations:</u></p> <p>Constructed: 1965</p> <p>Renovations:</p> <p>1974: Major renovation to the building</p> <p>1996: Interior ramp at front entrance</p>	 <p style="text-align: center;">Champ Auditorium; south side</p>	
Champ Auditorium  Parking	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Parking: 4.1.1(5)(a) &amp; 4.6:</p> <p>4.1.1(5)(a): Scope: 101 to 150 total parking spaces in a parking area require 5 accessible parking spaces. 201-300 total parking spaces in a parking area require 7 parking spaces (see table for additional spaces).</p> <p>4.1.1(5)(a): Exception: It is permissible to distribute accessible parking spaces among parking lots, if greater accessibility is achieved.</p> <p>4.1.1(5)(d): Parking spaces at accessible housing complying with 4.6 shall be provided in accordance with the following: (i) Where parking is provided for all residents, one accessible parking space shall be provided for each accessible dwelling unit.</p>	<p><b>Lot A</b> (or the Quad lot) is the closest parking lot to Champ Auditorium: it is located directly north of the Auditorium and has the following parking spaces (based on the College's 2010 parking allotment information):</p> <p>43 employee 29 student 17 visitor 4 other <b>8 accessible (5 near Champ)</b> 101 total parking spaces</p> <p><b>*5 accessible parking spaces are required by UFAS</b></p> <p><b>Lot B</b> (or the North lot) is located farther north behind North Hall (student housing) and is has the following parking spaces:</p> <p>241 student <b>2 accessible</b> 243 total parking spaces</p> <p><b>*7 accessible parking spaces are required by UFAS</b></p>	 <p>Lot A, north side of Champ: Two designated accessible parking spaces: Both exceed 2% slope and both signs too low. Repair hole in access aisle.</p>  <p>Lot A, west of Champ: No accessible sign and the surface exceeds a 2% slope. Not located on an accessible route.</p>	<p>Ensure the accessible parking and access spaces in Lots A and B comply with 4.6, including slopes that do not exceed 2% in any direction, stable, firm, and slip-resistant surfaces, and signs indicating accessible parking that are not obscured by a vehicle parked in the space (see specific non-complying issues with photos in the columns to the left). See map and satellite view of College campus with designated parking lots near Champ Auditorium, below.</p>  <p>Champ Auditorium is #33 on this map (see Lots A (yellow) and B (green)).</p>

Location Surveyed: Champ Auditorium	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
	<p>4.1.1(5)(d)(ii): Where parking is provided for visitors, 2% of the spaces, or at least one, shall be accessible.</p> <p>4.6.2: Accessible parking spaces shall be located closest to the nearest accessible entrance on an accessible route.</p> <p>4.6.3: Accessible space: 96" min. width.</p> <p>4.6.3: Accessible aisle: 60" min. width (96" min. width for van-accessible space).</p> <p>4.6.3: Accessible route: The access aisle shall be part of an accessible route to the facility entrance and shall comply with 4.3 (accessible route).</p> <p>4.6.3: Level Surface: The parking space and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.</p> <p>4.6.4: Sign: Accessible spaces shall be reserved with a sign showing the symbol of accessibility (4.30.5) and signs shall not be obscured by a vehicle parked in the space.</p>	 <p>Lot A, near front of Scott and Rice Halls: Two accessible parking spaces with shared access aisle: Both spaces and aisle exceed 2% slope [6.5% to 4.8%]. No connecting accessible route to north Champ entrance.</p>  <p>Lot B, in front of North Hall: Two designated accessible parking spaces sharing an aisle. The signs for both spaces are too low (obscured by parked cars) and the slope exceeds 2%.</p>	 <p>Lot A, with view of Leadership Hall: Two designated accessible parking spaces that share access aisle exceed 2% slope.</p>  <p>Lot A, in front of Student Center: Accessible parking space and aisle exceed 2% slope.</p>  <p>Lot A, across from Student Center: Sign too low. Slope exceeds 2%. No connecting route to north entrance.</p>	 <p>Partial view of Lot A north of Champ with green arrows identifying accessible parking areas closest to Champ.</p> <p>Add at least two more accessible parking spaces to Lot B in compliance with 4.6 (see Fig. 9, below). OCR recommends at least one van-accessible parking space in each parking lot with an aisle width of at least 96".</p>  <p><b>Fig. 9</b> Dimensions of Parking Spaces</p>




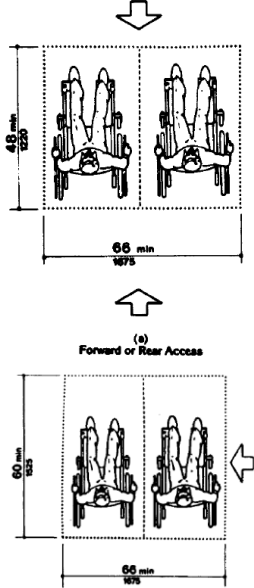



Location Surveyed: Champ Auditorium	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
<p><b>Champ</b></p> <p><b>Accessible route to Champ entrances</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Accessible Route: 4.3</p> <p>4.3.2(1): At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking, and accessible passenger zones, and public streets or sidewalks to the accessible building entrance they serve.</p> <p>4.3.2(2): At least one accessible route shall connect accessible buildings, facilities, elements, and spaces that are on the same site.</p> <p>See also 4.3.3-4.3.10.</p>	<p>The slopes of parking lots where individuals in wheelchairs must travel to get to an accessible route exceed 2%.</p> <p>The crack in front of the grate at the top of the ramp is along the accessible route and exceeds .5" in height.</p> <p>The slope of the sidewalk to the south accessible entrance door is 4.5%</p> <p>The designated accessible route from accessible parking spaces, aisles, and sidewalks from other buildings on campus should comply with 4.3, including 4.3.3 (width), 4.3.4 (passing space), 4.3.5 (head room), 4.3.6 (surface textures), 4.3.7 (slope), and 4.3.8 (changes in levels) requirements.</p>	 <p>Lot A: Designated accessible parking space on west side of Champ.</p>  <p>Elevation change of more than 5" in front of the grate at the top of the ramp leading to the north Champ entrance.</p>	<p>Provide an accessible route that complies with 4.3, including width, slope, and changes in level requirements, that connects the accessible entrances of Champ Auditorium to accessible parking spaces. 4.3.</p> <p>The designated accessible parking space on the west side of Champ is not located close to the north or south designated accessible entrances of Champ and requires traveling on a route that is too steep. Consider relocating this designated accessible parking space near the south entrance and ensure the space complies with 4.6, and the route from the parking space to the south entrance complies with 4.3, including the slope requirement of 5% or less. The College may provide an alternative plan to OCR.</p> <p>Repair the beveled cement around the grate at the top of the north ramp.</p>
<p><b>Champ Auditorium</b></p> <p><b>Ramp leading to accessible entrance on the north side</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Ramps: 4.8</p> <p>4.8.2: Max. slope: 1:12 (or 8.33%)</p> <p>4.8.5(5): The top of handrail must be between 30" and 34" above ramp surface. At end of handrails, must be at least 12" of level handrail beyond the top &amp; bottom of the ramp.</p>	<p>The slope of the ramp exceeds 8.33% near the top (8.8%) and bottom (9.1%).</p> <p>The handrail near the top is 35 1/8" high, but should be mounted between 30" and 34" above the ramp surface.</p>	 <p>Ramp to designated accessible north entrance of Champ Auditorium.</p>	<p>Lower the handrail and adjust slope of ramp to comply with 4.8.</p>



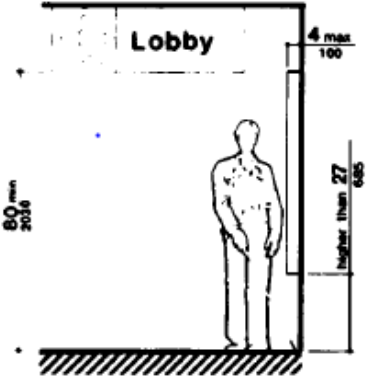
Location Surveyed: Champ Auditorium	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically )	Remedial Action UFAS Standards (unless noted otherwise)
<p><b>Champ Auditorium</b></p> <p><b>North entrance doors (exterior and interior)</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Doors: 4.1.1(7) and 4.13:</p> <p>4.13.5: Doorways shall have a minimum clear opening of 32” with the door open 90 degrees, measured between the face of the door and the stop.</p> <p>4.13.11: The maximum force for pushing or pulling open an interior hinged door is 5 lbs. No opening force is specified for exterior doors.</p> <p>4.1.1(7)(c): All signs shall comply with 4.30. Accessible entrances shall be identified with the international symbol of accessibility.</p>	<p>Each independently operated exterior door’s opening was less than 32”.</p> <p>The opening force for both doors is 6-8 lbs. While there are no specific UFAS standards for maximum door opening force for exterior hinged doors, an opening force up to 8 lbs. for the exterior doors significantly exceeds the 5 lb. maximum force considered suitable for people with disabilities with respect to interior hinged doors. See 4.13.11.</p> <p>There is no sign with the international symbol of accessibility for the north entrance door.</p> <p>The opening force of the interior door leading to the auditorium was 11 lbs.</p>	 <p>Designated accessible north entrance doors at the bottom of the ramp landing.</p>	<p>Ensure at least one of the exterior door leaves has a 32” clear opening width and appropriate maneuvering space.</p> <p>Install an automatic door opener for the exterior door at the bottom of the ramp in accordance with 4.13.12. While there is no specific opening force standard in UFAS for an exterior hinged door, the existing opening force could exclude individuals with disabilities from accessing the lower level of the building, contrary to 34 C.F.R. § 104.4 (Section 504 general anti-discrimination provisions) and 34 C.F.R. § 104.21 (Section 504 anti-discrimination provision regarding accessibility).</p> <p>Adjust interior door leading to auditorium so the maximum opening force is 5 lbs. Check all interior doors for complying opening force.</p> <p>Install a sign with the international symbol of accessibility for the north entrance door and provide directional signage to the accessible north entrance for auditorium access.</p>
<p><b>Champ Auditorium</b></p> <p><b>South entrance doors</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Signs at Accessible Entrances: 4.1(7) and 4.30:</p> <p>4.1(7)(c): All signs shall comply with 4.30. Accessible entrances shall be identified with the international symbol of accessibility.</p>	<p>There is no sign with the international symbol of accessibility near the door for the south entrance.</p>	 <p>Designated accessible south entrance of Champ Auditorium.</p>	<p>Install a sign with the international symbol of accessibility for the south entrance door.</p>

Location Surveyed: Champ Auditorium	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
<p><b>Champ Auditorium</b></p> <p><b>Interior ramp inside the south entrance</b></p>	<p><u>Ramps: 4.8:</u></p> <p>4.8.2: Max. slope: 1:12 (or 8.33%). The max. rise for any run shall be 30". Ramps constructed on existing sites or in existing buildings or facilities may have slopes and rises as shown in Table 2 if space limitations prohibit the use of a 1:12 slope or less (see 4.1.6).</p> <p>4.8.3: Min. ramp width: 36"</p> <p>4.8.5: If a ramp run has a rise greater than 6" or a run greater than 72", then it shall have handrails on both sides.</p> <p>4.8.5(5): The top of handrail must be between 30" and 34" above ramp surface. At end of handrails, must be at least 12" of level handrail beyond the top &amp; bottom of the ramp segment.</p>	<p>The interior ramp inside the south entrance of Champ was constructed in 1996 and is subject to UFAS. The interior ramp dimensions are:</p> <p>Length of ramp: 10'2" Rise: 21" Width: 44 ¾" Slope using slope tool: 18.1% Handrail height: 38"</p> <p>The interior ramp exceeds the maximum slope of 1:12 or 8.33% pursuant to 4.8.2. In addition, the ramp exceeds the permissible slopes for ramps constructed in an existing building where space limitations prohibit the use of a 1:12 slope or less (see Table 2 slope standards in 4.1.6(4)(a)).</p> <p>The ramp requires handrails on both sides since the rise is greater than 6". The existing handrail is too high (38" but should be mounted between 30" and 34" above the ramp surface).</p>	 <p>Interior ramp near south entrance of Champ.</p>	<p>Provide OCR with a plan to provide a complying ramp, lift or another method to provide access from the south entrance in compliance with UFAS standards.</p>
<p><b>Champ Auditorium</b></p> <p><b>Auditorium seating and performing areas</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Assembly Areas: 4.33:</p> <p>4.1.2(18): Assembly areas: See table with the seating capacity and number of required wheelchair locations. For a seating capacity over 1,000 seats, 20 seats plus 1 seat for each 100 seats over 1,000 is required.</p> <p>4.33.2: Size of Wheelchair Locations:</p>	<p>Auditorium seating capacity:</p> <p>938 seats on the main level <u>370 seats in the balcony</u> 1,308 seats total</p> <p>Of the total seats, 4 are designated accessible (see picture in next column). The designated accessible seats are not dispersed and there are no companion seats.</p> <p><b>23 accessible seats are required. 4.1.2</b></p> <p>The stage is only accessible via stairs. Access to other performing areas,</p>	 <p>Designated accessible seating in the auditorium.</p>	<p>Provide OCR with a plan to increase and disperse the number of accessible seats in the auditorium so that the accessible seats are an integral part of the seating plan and adjoin an accessible route that also serves as a means of egress in case of emergency. Ensure that the accessible seats are located to comply with Fig. 46, below, and provide lines of sight comparable to those for all viewing areas.</p> <p>In addition, ensure an accessible route connects wheelchair seating locations with performing areas, including stages, dressing rooms, restrooms, and other</p>







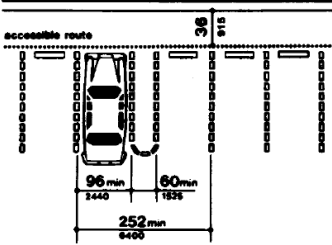
Location Surveyed: Champ Auditorium	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
	<p>Each wheelchair location shall provide minimum clear ground or floor spaces as shown in Fig. 46.</p> <p>4.33.3: Placement of Wheelchair Locations: Wheelchair areas shall be an integral part of any fixed seating area. They shall adjoin an accessible route that also serves as a means of egress in case of emergency and shall be located to provide lines of sight comparable to those for all viewing areas.</p> <p>4.33.4: Surfaces: The ground or floor at wheelchair locations shall be level and shall comply with 4.5.</p> <p>4.3.8: Accessible Route: Stairs shall not be part of an accessible route.</p>	<p>including the dressing rooms and restrooms used by performers near the back of the stage, is only via stairs as well.</p> <p>The restrooms near the stage are non-complying (see photos, below):</p> 	 <p>View of auditorium from the back (looking at the stage).</p>  <p>Stairs leading to the stage and other performing areas, such as the dressing rooms and restrooms.</p>	<p>spaces used by performers, and ensure those performing areas are accessible.</p>  <p>Fig. 46 Space Requirements for Wheelchair Seating Spaces in Series</p>
<p><b>Champ Auditorium</b></p> <p><b>Unisex Restroom on main level</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Toilet Rooms: 4.1.2(10) and 4.2.2, including 4.13 (doors), 4.16 (water closets or toilets), 4.17 (toilet stalls), 4.18 (urinals), 4.19 (lavatories or sinks and mirrors), 4.26 (grab bars), and 4.27 (controls and operating mechanisms).</p>	<p>The unisex door is less than 32" wide. In addition, there is not adequate maneuvering space(53 1/2") or clearance under the sink (27 1/2"), grab bars are not mounted correctly, the centerline of the toilet is too far from the wall (24 1/2"), the mirror is mounted too high (40"), and the toilet paper dispenser is mounted too high (48").</p> <p>The sign on the restroom door is not mounted on the latch side of the door.</p>	 <p>Unisex restroom door with signage.</p>	<p>Alter the unisex restroom on the main level to comply with 4.2.2 and 4:30</p>



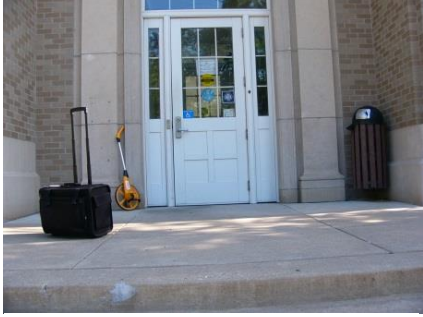
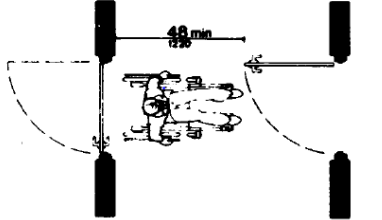


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	<p>Guidance: 4.30: Signage: See 4.30.2-5 requirements pertaining to character proportion, color contrast, raised characters or symbols, and symbols of accessibility. See also 4.30.6: Interior signage shall be located alongside the door on the latch side and shall be mounted at a height of between 54" and 66" above the finished floor.</p>		 <p>Unisex restroom.</p>	(see above)
<p><b>Champ Auditorium:</b> <b>All levels</b></p> <p><b>Protrusions</b></p>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Protruding objects:</p> <p>4.4.1: Wall-mounted objects with leading edges between 27" and 80" above the floor shall protrude no more than 4" into walks, halls, corridors, passageways, or aisles.</p> <p>4.4.2: Walks, halls, corridors, passageways, aisles, or other circulation spaces shall have 80" minimum clear head room (Fig. 8(a)).</p>	<p>The wall-mounted speakers in the music room and the paper towel dispenser in the unisex restroom are protruding objects that protrude more than 4" into the rooms.</p> <p>See OCR's Staff Memorandum dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient's programs).</p>	 <p>Wall-mounted speakers in the music room.</p> <p>[Photograph redacted]</p> <p>Paper towel dispenser is a protrusion in the unisex restroom in Champ.</p>	<p>Provide a fixed barrier detectable by canes under any protruding objects or provide OCR with another plan to reconfigure or eliminate each protrusion. In addition, remove any objects that are less than 80" above the floor (such as the hanging screen in the classroom), unless there is a can-detection area (where appropriate). See Fig. 8(a), below. 34 C.F.R. §§ 104.4 and 104.21.</p>  <p>Fig. 8(a): Objects mounted on walls; walking parallel to a wall.</p>


Location Surveyed: Champ Auditorium	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically )	Remedial Action UFAS Standards (unless noted otherwise)
<p><b>Champ Auditorium</b></p> <p><b>Stairs connecting all levels</b></p>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Stairs:</p> <p>4.1.2(4) and 4.9: Stairs connecting levels that are not connected by an elevator shall comply with 4.9.</p> <p>4.9.6: Outdoor stairs and their approaches shall be designed so that water will not accumulate on walking surfaces.</p>	<p>Ensure any holes or chips in stairs and any loose or unstable handrails are repaired to prevent safety hazards. See OCR's Staff Memorandum dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient's programs).</p>	<p>[No photo]</p>	<p>Ensure any holes or chips in stairs and any loose or unstable handrails are promptly repaired and properly maintained to prevent safety hazards for individuals with visual or mobility impairments utilizing the stairs and handrails. 34 C.F.R. §§ 104.4 and 104.21.</p>
<p><b>Champ Auditorium:</b></p> <p><b>Alarms and Egress</b></p>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Alarms:</p> <p>4.1.2(13): If emergency warning systems are provided, then they shall include both audible alarms complying with 4.28.2 and visual alarms complying with 4.28.3.</p> <p>Guidance: Egress:</p> <p>4.3.10: Accessible routes serving any accessible space or element shall also serve as a means of egress for emergencies or connect to an accessible place of refuge. See also 4.1.2(7)(d)(exception).</p>	<p>The College has emergency warning systems in every building OCR surveyed. However, not all classrooms and other areas had audible and visual alarms.</p> <p>Ensure the egress standards of 4.3.10 and 4.2.1(7)(d) are met for a multiple-story building.</p> <p>See OCR's Staff Memorandum dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient's programs).</p>	<p>[No photo]</p>	<p>Ensure alarms are provided and the egress standards of 4.3.10 and 4.2.1(7)(d) are met for a multiple-story building, or provide OCR with emergency procedures that allow for the safe notification and evacuation of individuals with disabilities. 34 C.F.R. §§ 104.4 and 104.21.</p>



## Reeves Library and Hazel Wing





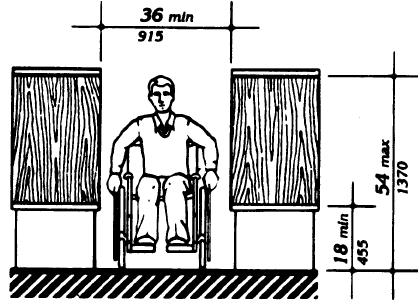
Location Surveyed: Reeves Library & Hazel Wing	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
Front view of Reeves Library and Hazel Wing (Library)	<p><u>Accessibility Standards:</u></p> <p>UFAS standards (34 C.F.R. § 104.23(c))</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p>	<p><u>Construction/Alterations:</u></p> <p>Constructed: 1951</p> <p>Renovations:</p> <p>1981: Major renovation to the building</p> <p>1996: Major renovation and construction of Hazel Wing</p>	 <p style="text-align: center;">Reeves Library and Hazel Wing</p>	
Library  Parking	<p><u>Parking: 4.1.1(5)(a) &amp; 4.6:</u></p> <p>4.1.1(5)(a): Scope: 1-25 total parking spaces in a parking area require 1 accessible parking space (see table for additional spaces).</p> <p>4.6.2: Accessible parking spaces shall be located closest to the nearest accessible entrance on an accessible route.</p> <p>4.6.3: Accessible space: 96” min. width.</p> <p>4.6.3: Accessible aisle: 60” min. width (96” min. width for van-accessible space)</p> <p>4.6.3: Accessible route: The access aisle shall be part of an accessible route to the facility entrance and shall comply with 4.3 (accessible route).</p> <p>4.6.3: Level Surface: The parking space and access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.</p> <p>4.6.4: Sign requirements.</p>	<p>There is a designated accessible parking space in Lot K between the Washington West House and the Hunter Activity Center, which the College indicated could be used for the Gym. Lot K has 16 parking spaces, one of which is accessible for a car (designated by a red arrow in the aerial picture in the next column). However, the access aisle is too short, as noted in the table for the Gym.</p> <p>There also is a faculty parking area closer to the Library with two parking spaces near the southwest corner of the Library (See picture, below and designated by the blue arrow in the aerial picture in the next column). The Library is located at the top center of the aerial view.</p>  <p>Parking area with two parking spaces.</p>	 <p>Designated accessible parking space in Lot K.</p>  <p>Aerial view of Library and parking areas.</p>	<p>Lot K (also addressed in the table for the Gym, above): Increase the access aisle to 60” width for a car (see Fig. 9, below) or 96” width for a van for the accessible parking space (OCR recommends at least one van-accessible parking space), and include a sign designating the space as van-accessible if designated as van-accessible.</p> <p>Provide OCR with a plan to convert one of the parking spaces into an accessible parking space in the faculty parking area (with two parking spaces) near the southwest corner of the Library. Ensure the accessible parking space, aisle, and connecting route comply with 4.6 and 4.3.</p>  <p style="text-align: center;"><b>Fig. 9</b> Dimensions of Parking Spaces</p>

Location Surveyed: Reeves Library & Hazel Wing	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
<b>Library</b>  <b>Accessible Route</b>	<u>Accessible Route: 4.3</u>  4.3.2(1): At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking, and accessible passenger zones, and public streets or sidewalks to the accessible building entrance they serve.  4.3.2(2): At least one accessible route shall connect accessible buildings, facilities, elements, and spaces that are on the same site.  See also 4.3.3-4.3.10, including 4.3.8: Changes in level greater than .5" along an accessible route shall comply with 4.5.2 (bevel or provide a ramp).  4.8.1: Ramps: Any part of an accessible route with a slope greater than 1:20 (5%) shall be considered a ramp and shall comply with 4.8.	The route from Lot K to the west and south entrances of the Library have slopes that are too steep (greater than 5%) in several sections: ranging from 6% to 30% slopes.  The distance from the accessible parking space in Lot K to the west entrance of the Library is 298'.	 <p>07/28/2010 08:53</p> <p>Route from Lot K to west entrance of Library.</p>  <p>07/28/2010 08:54</p> <p>Crack in sidewalk near Library which results in a level change greater than .5".</p>	Provide an accessible route that complies with 4.3, including width, slope, and changes in level requirements, that connects the accessible entrances of the Library to accessible parking spaces. 4.3.  Any slope greater than 1:20 (5%) along an accessible route needs to have a ramp that complies with 4.8.
<b>Library</b>  <b>South entrance (front entrance)</b>	<u>Doors: 4.1.1(7) and 4.13:</u>  4.13.5: Doorways shall have a minimum clear opening of 32" with the door open 90 degrees, measured between the face of the door and the stop.  4.13.7: Two Doors in Series: The minimum space between two hinged or pivoted doors in series shall be 48" plus the width of any door swinging into the space. Doors in series shall swing either in the same direction or away from the space between doors.	The clear opening of the entrance door is 31". There is 66.25" between the outside and inside doors (in closed positions) and the doors swing in the same direction.	 <p>South entrance to Library.</p>	Ensure the door width is at least 32" and ensure there is adequate space between the outside and inside doors based on Fig. 26, below.   <p>Fig. 26: Two hinged doors in series, swinging the same direction.</p>
<b>Library</b>	4.19.2: Lavatories: Height:	The lavatory (or sink) rim is 34.5"	[Photograph redacted]	Sink: Mount the sink rim or counter



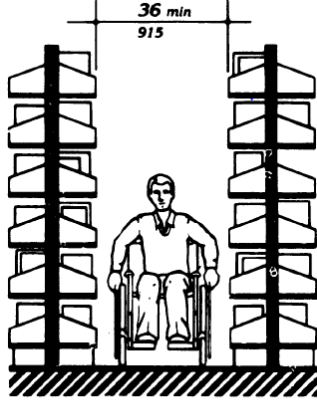



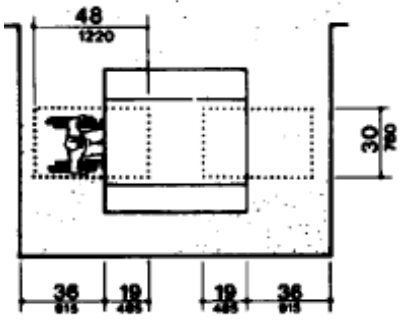



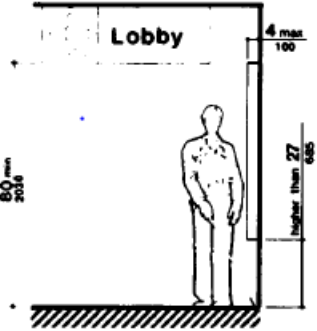
Location Surveyed: Reeves Library & Hazel Wing	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
<b>Men's Restroom: 1<sup>st</sup> Floor</b>	<p>Lavatories (or sinks within toilet rooms) shall be mounted with the rim or counter surface no higher than 34" above the finished floor.</p> <p>4.4.1: Wall-mounted objects with leading edges between 27" and 80" above the floor shall protrude no more than 4" into walks, halls, corridors, passageways, or aisles.</p> <p>4.22.5 &amp; 4.18.2: Urinals: If urinals are provided, then at least one shall comply with 4.18. Urinals shall be stall-type or wall-hung with an elongated rim at a maximum of 17" above the floor.</p>	<p>above the floor.</p> <p>The elongated rim of the urinal is 23.25" above the floor.</p> <p>The paper towel dispenser is a protrusion.</p>	<p>Sink in men's restroom on 1<sup>st</sup> floor.</p> <p>[No photo of urinal]</p>	<p>surface no higher than 34" above the floor.</p> <p>Paper Towel Dispenser: Provide a fixed barrier detectable by canes under any protruding objects or provide OCR with another plan to reconfigure or eliminate the protrusion.</p> <p>Urinal: Mount the urinal with the elongated rim at a maximum of 17" above the floor.</p>
<b>Library Women's Restrooms: 1<sup>st</sup> Floor</b>	<p>4.16.5: Flush controls: Flush Controls: The flush controls shall be hand-operated or automatic and shall comply with 4.27.4. Controls for flush valves shall be mounted on the wide side of the toilet areas no more than 44" above the floor. See also, 4.1.2(12) (Scope).</p> <p>4.19.2: Lavatories: Height and Clearances: Lavatories (or sinks within toilet rooms) shall be mounted with the rim or counter surface no higher than 34" above the finished floor. Provide a clearance of at least 29" from the floor to the bottom of the apron. Knee and toe clearance shall comply with Fig. 31.</p> <p>4.4.1: Protrusions: Wall-mounted objects with leading edges between 27" and 80" above the floor shall protrude no more than 4" into walks, halls, corridors, passageways, or aisles.</p>	<p>The flush controls are not installed on the wide side of the toilet area.</p> <p>The lavatory (or sink) rim is 34.5" above the floor.</p> <p>The paper towel dispenser is a protrusion.</p>	 <p>Toilet in women's restroom on 1<sup>st</sup> floor.</p> <p>Sink in women's restroom on 1<sup>st</sup> floor.</p>	<p>Flush controls: The flush controls need to be installed on the wide side of the toilet area.</p> <p>Sink: Mount the sink rim or counter surface no higher than 34" above the floor.</p> <p>Paper Towel Dispenser: Provide a fixed barrier detectable by canes under any protruding objects or provide OCR with another plan to reconfigure or eliminate the protrusion.</p>

Location Surveyed: Reeves Library & Hazel Wing	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
<p><b>Library</b></p> <p><b>Men's Restroom: 2<sup>nd</sup> Floor</b></p>	<p>4.16.3: Toilet height: The height of the toilet shall be 17" to 19" measured to the top of the toilet seat from the floor (see Fig. 29(b)). Seats shall not be sprung to return to a lifted position.</p> <p>Fig. 30(a): Centerline: The centerline of the toilet should be 18" from the side wall or partition.</p> <p>4.18.2: Urinal height: Urinals shall be stall-type or wall-hung with an elongated rim at a maximum of 17" above the floor.</p> <p>4.19.2: Lavatories: Height and clearance: Lavatories (or sinks within toilet rooms) shall be mounted with the rim or counter surface no higher than 34" above the finished floor. Provide a clearance of at least 29" from the floor to the bottom of the apron. Knee and toe clearance shall comply with Fig. 31.</p> <p>4.4.1: Protrusions: Wall-mounted objects with leading edges between 27" and 80" above the floor shall protrude no more than 4" into walks, halls, corridors, passageways, or aisles.</p>	<p>The top of the toilet seat is mounted 21" above the floor.</p> <p>The centerline of the toilet is 20.75" from the side wall.</p> <p>The urinal elongated rim is 24" above the floor.</p> <p>The lavatory (or sink) rim is 34.5" above the floor.</p> <p>The paper towel dispenser is a protrusion.</p>	 <p>Toilet in men's restroom on the 2<sup>nd</sup> floor.</p> 	<p>Toilet: Mount the top of the toilet seat 17" to 19" from the floor.</p> <p>Centerline: Install the toilet so that the centerline is 18" from the side wall.</p> <p>Urinal: Mount the urinal with the elongated rim at a maximum of 17" above the floor.</p> <p>Sink: Mount the sink rim or counter surface no higher than 34" above the floor. Ensure adequate knee and toe clearance under the sink.</p> <p>Protrusion: Provide a fixed barrier detectable by canes under any protruding objects or provide OCR with another plan to reconfigure or eliminate each protrusion.</p>
<p><b>Library</b></p> <p><b>Women's Restroom: 2<sup>nd</sup> Floor</b></p>	<p>4.16.3: Toilet height: The height of the toilet shall be 17" to 19" measured to the top of the toilet seat from the floor (see Fig. 29(b)). Seats shall not be sprung to return to a lifted position.</p> <p>Fig. 30(a): Centerline: The centerline of the toilet should be 18" from the side wall or partition.</p>	<p>The top of the toilet seat is mounted 20.25" above the floor.</p> <p>The centerline of the toilet is 20.5" from the side wall.</p> <p>The flush controls are not installed on the wide side of the toilet area.</p>	<p>[No photo of toilet]</p>	<p>Toilet: Mount the top of the toilet seat 17" to 19" from the floor.</p> <p>Centerline: Install the toilet so that the centerline is 18" from the side wall.</p> <p>Flush controls: The flush controls need to be installed on the wide side of the toilet area.</p>

Location Surveyed: Reeves Library & Hazel Wing	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
	<p>4.16.5: Flush controls: Flush Controls: The flush controls shall be hand-operated or automatic and shall comply with 4.27.4. Controls for flush valves shall be mounted on the wide side of the toilet areas no more than 44" above the floor. See also, 4.1.2(12) (Scope).</p> <p>4.4.1: Protrusions: Wall-mounted objects with leading edges between 27" and 80" above the floor shall protrude no more than 4" into walks, halls, corridors, passageways, or aisles.</p>	Shelf in women's restroom is a protrusion. (see photo in next column)		Protrusion: Provide a fixed barrier detectable by canes under any protruding objects or provide OCR with another plan to reconfigure or eliminate each protrusion.
<p><b>Library</b></p> <p><b>All levels</b></p>	<p><u>Libraries:</u></p> <p>8.1: General: In addition to the requirements of 4.1 to 4.33, the design of all public areas of a library shall comply with 8, including reading and study areas, stacks, reference rooms, reserve areas, and special facilities or collections. As provided, elements such as public toilet rooms, telephones, and parking shall be accessible.</p> <p>8.2: Reading and Study Areas: At least 5% or a minimum of one of each element of fixed seating, tables, or study carrels shall comply with 4.2 and 4.32. Clearances between fixed accessible tables and study carrels shall comply with 4.3.</p> <p>8.3: Check-out Areas: At least one lane at each checkout area shall comply with 4.32. Any traffic control or book security gates or turnstiles shall comply with 4.13.</p>	<p>The pictures in this and the next column are examples of some areas in the Library that do not have complying stack or magazine/reference display width or reaches.</p>  <p>Several stack aisles are less than 36" width on the left side of the west wing.</p>	 <p>The top shelf for magazines is too high (64") in magazine room for reach allowance (54" maximum reach height, 48" maximum preferred in UFAS).</p>  <p>Several stack aisles are less than 36" width on the right side of the west wing.</p>	<p>Ensure that all areas of the Library comply with 8, including reading and study areas, stacks, reference rooms, reserve areas, and special facilities or collections.</p> <p>See Figures 55 and 56, below, for minimum clear aisle space and maximum reach heights.</p>  <p><b>Fig. 55</b> <b>Card Catalog</b></p>




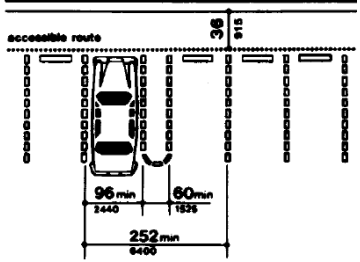


Location Surveyed: Reeves Library & Hazel Wing	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
	<p>8.4: Minimum clear aisle space at card catalogs, magazine displays, or reference stacks shall comply with Fig. 55. Maximum reach height shall comply with 4.2, with a height of 48" preferred, irrespective of reach allowed.</p> <p>8.5: Stacks: Minimum clear aisle width between stacks shall comply with 4.3, with a minimum clear aisle width of 42" preferred where possible. Shelf height in stack areas is unrestricted (see Fig. 56).</p>	 <p>Several stack aisles are less than 36" width on the 3<sup>rd</sup> floor.</p>	 <p>Several stack aisles a 36" width on the 4<sup>th</sup> floor.</p>	 <p><b>Fig. 56 Stacks</b></p>
<p><b>Lower Level of Westminster Hall</b></p> <p><b>Seating, Tables, and Work Surfaces</b></p>	<p>Seating, Tables, &amp; Work Surfaces: 4.1.2(17) &amp; 4.32:</p> <p>4.1.2(17): If fixed or built-in seating, tables, or work surfaces are provided in accessible spaces, at least 5%, but always at least one, of seating spaces, tables, or work surfaces shall comply with 4.32.</p> <p>4.32.2: Seating: If seating spaces for people in wheelchairs are provided at tables, counters, or work surfaces, clear floor space complying with 4.2.4 shall be provided. Such clear floor space shall not overlap knee space by more than 19".</p> <p>4.32.3: Knee Clearances: If seating for people in wheelchairs is provided at tables, counter, and work surfaces, knee spaces at least 27" high, 30" wide, and 19" deep shall be provided.</p> <p>4.32.4: Height of Work Surfaces: The tops of tables and work surfaces shall be from 28" to 34" from the floor.</p>	<p>The computer tables had the tower installed underneath the table, which does not comply with adequate knee and toe clearances for an individual in a wheelchair.</p> 	 <p>Area in library near west entrance with book shelves and tables that encroach the minimum width of 36" of the accessible route.</p>  <p>Computers near circulation desk area.</p>	<p>Ensure a 36" accessible route to accessible elements, including tables, computer tables, bookcases, stacks, etc. is maintained in the library areas.</p> <p>While the computer tables do not appear to be fixed or built-in, an individual using a wheelchair should be able to independently access at least one computer table with adequate knee and toe clearances below the table, pursuant to 34 C.F.R. §§ 104.4 and 104.21 (Section 504 anti-discrimination provisions).</p> 



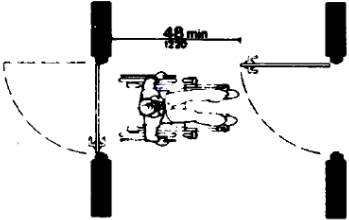
Location Surveyed: Reeves Library & Hazel Wing	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
Library All levels	<p><u>Doors: 4.13:</u></p> <p>4.13.9: Handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate. Lever-operated mechanisms, push-type mechanisms, and U-shaped handles are acceptable designs. Hardware must be mounted no higher than 48" above the floor.</p> <p>4.13.11: The maximum force for pushing or pulling open an interior hinged door is 5 lbs. No opening force is specified for exterior doors.</p>	<p>Some interior doors, including bathroom doors, may exceed an opening force of 5 lbs.</p> <p>Some door hardware may be mounted higher than 48" above the floor and floors have complying signage.</p>	[No photo]	<p>Ensure interior doors, including bathroom doors, do not exceed an opening force of 5 lbs.</p> <p>Ensure door hardware is mounted no higher than 48" above the floor and doors have complying signage.</p>
Library All levels  Protrusions	<p><u>Protruding objects:</u></p> <p>4.4.1: Wall-mounted objects with leading edges between 27" and 80" above the floor shall protrude no more than 4" into walks, halls, corridors, passageways, or aisles.</p> <p>4.4.2: Walks, halls, corridors, passageways, aisles, or other circulation spaces shall have 80" minimum clear head room (Fig. 8(a)).</p>	<p>The beam below the ceiling in the Library is 79" above the floor and is therefore a protrusion.</p> <p>See OCR's Staff Memorandum dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient's programs).</p>	 <p>The beam below the ceiling is less than 80" the floor.</p>	<p>Provide a fixed barrier detectable by canes under any protruding objects or provide OCR with another plan to reconfigure or eliminate each protrusion. In addition, remove any objects that are less than 80" above the floor (such as the hanging screen in the classroom), unless there is a can-detection area (where appropriate). See Fig. 8(a), below.</p>  <p>Fig. 8(a): Objects mounted on walls; walking parallel to a wall.</p>

Location Surveyed: Reeves Library & Hazel Wing	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically )	Remedial Action UFAS Standards (unless noted otherwise)
<b>Library</b>  <b>Stairs connecting all levels</b>	<u>Stairs:</u>  4.1.2(4) and 4.9: Stairs connecting levels that are not connected by an elevator shall comply with 4.9.  4.9.6: Outdoor stairs and their approaches shall be designed so that water will not accumulate on walking surfaces.	Ensure any holes or chips in stairs and any loose or unstable handrails are repaired to prevent safety hazards.	[No photo]	Ensure stairs connecting levels that are not connected by an elevator shall comply with 4.9.  Ensure any holes or chips in stairs and any loose or unstable handrails are promptly repaired and properly maintained to prevent safety hazards for individuals with visual or mobility impairments utilizing the stairs and handrails.
<b>Library:</b>  <b>Alarms and Egress</b>	<u>Alarms:</u>  4.1.2(13): If emergency warning systems are provided, then they shall include both audible alarms complying with 4.28.2 and visual alarms complying with 4.28.3. Guidance: Egress: 4.3.10: Accessible routes serving any accessible space or element shall also serve as a means of egress for emergencies or connect to an accessible place of refuge. See also 4.1.2(7)(d)(exception): In multiple-story buildings where at-grade egress from each floor is impossible, either of the following is permitted: the provision within each story of approved fire and smoke partitions that create horizontal exits, or the provision within each floor of areas of refuge approved by agencies having authority for safety.	The College has emergency warning systems in every building OCR surveyed. However, not all classrooms and other areas had audible and visual alarms.  Ensure the egress standards of 4.3.10 and 4.2.1(7)(d) are met for a multiple-story building.	[No photo]	Ensure alarms are provided and the egress standards of 4.3.10 and 4.2.1(7)(d) are met for a multiple-story building, or provide OCR with emergency procedures that allow for the safe notification and evacuation of individuals with disabilities.



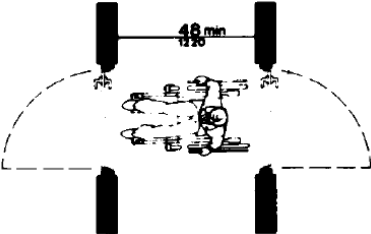
**Church of St. Mary the Virgin, Aldermanbury & the National Churchill Museum**




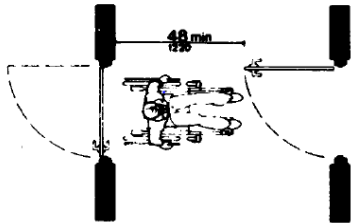
Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
South view of Church	<p><u>Accessibility Standards:</u></p> <p>Church: Program accessibility (34 C.F.R. §§ 104.21 and 104.22) and UFAS for ramp (2000).</p> <p>Museum: UFAS (34 C.F.R. § 104.23(c))</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p>	<p><u>Construction/Alterations:</u></p> <p>Church constructed: 1968 Museum constructed: 2006</p> <p>Renovations: 2000 (ramp for Church)</p> <p>2006 (major interior renovation of basement for construction of Museum)</p> <p>Historic Designation: Church on the Historic Register</p>	 <p align="center">Church of St. Mary the Virgin</p>	
<p><b>Church:</b></p> <p><b>Parking space near ramp on the north side of the Church</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Parking: 4.6</p> <p>4.1.1(5)(a): Scope: 1-25 total parking spaces require 1 accessible parking space (see table for additional spaces).</p> <p>4.6.2: Accessible parking spaces shall be located closest to the nearest accessible entrance on an accessible route.</p> <p>4.6.3: Accessible space: 96” min. width</p> <p>4.6.3: Accessible aisle: 60” min. width (96” min. width for van-accessible space)</p> <p>4.6.3: Accessible route: The access aisle shall be part of an accessible route to the facility entrance and shall comply with 4.3.</p> <p>4.6.3: Level Surface: The parking space and</p>	<p>The parking space at the top of the hill on the north side of the Church is not designated as an accessible parking space, yet this is the closest location to the designated accessible entrance of the Church (see photo in the next column). While there is a designated accessible parking space on the west side of Westminster Avenue near Seventh Street (see the second photo in the next column), that parking space does not comply with 4.6.</p>	 <p align="center">North parking space.</p>  <p align="center">Designated accessible parking street on Westminster Avenue near Museum entrance with no access aisle.</p>	<p>Provide OCR with a plan to create at least one accessible parking space and aisle on the north side of the Church that complies with 4.6, including, but not limited to, proper signage, surface, the provision of an accessible route to the north accessible entrance of the Church, and directional signage indicating the location of the north designated accessible space.</p> <p>See UFAS Fig. 9, below, for required dimensions of accessible spaces and aisles.</p>  <p align="center"><b>Fig. 9</b> Dimensions of Parking Spaces</p>


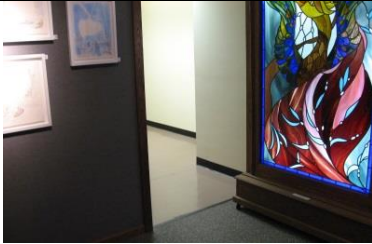








Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
	<p>access aisles shall be level with surface slopes not exceeding 1:50 (2%) in all directions.</p> <p>4.6.4: Sign: Accessible spaces shall be reserved with a sign showing the symbol of accessibility (4.30.5) and signs shall not be obscured by a vehicle parked in the space.</p>			
<p><b>Church:</b></p> <p><b>Ramp on north side of Church</b></p>	<p><u>Ramps: 4.8</u></p> <p>4.8.2: Max. slope: 1:12</p> <p>4.8.2: Max. rise for any run: 30"</p> <p>4.8.3: Min. ramp width: 36"</p> <p>4.8.5: If a ramp run has a rise greater than 6" or a run greater than 72", then it shall have handrails on both sides.</p> <p>4.8.5(5): The top of handrail must be between 30" and 34" above ramp surface. At end of handrails, must be at least 12" of level handrail beyond the top &amp; bottom of the ramp segment.</p>	<p>Handrails are not provided on both sides of the ramp. See 4.8.5.</p> <p>The top of the ramp handrail is 40" above the ramp surface, instead of between 30" and 34" above the ramp surface. See 4.8.5(5).</p>	 <p>Ramp on north side of Church.</p>	<p>Mount a handrail on the other side of the ramp in compliance with 4.8.5.</p> <p>Adjust or replace the existing ramp handrail so that the top of the handrail is between 30" and 34" above the ramp surface, in compliance with 4.8.5(5).</p>
<p><b>Church:</b></p> <p><b>Designated Accessible entrance on the north side of the Church</b></p>	<p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p> <p>Guidance: Entrances (4.11) and Doors (4.13):</p> <p>4.14.1: Minimum Number: Entrances required to be accessible by 4.1 shall be part of an accessible route and shall comply with 4.3. Such entrances shall be connected by an accessible route to public transportation stops, to accessible parking and passenger loading zones, and to public streets or sidewalks if available (see 4.3.2(1)).</p>	<p>Door leaves: The outside door leaves are 27.5" wide each. However, at least one leaf should be 32" wide at a minimum. See 4.13.4. The inside door leaves are 24" wide each (one leaf should be 32" wide).</p> <p>Two Doors in Series: The two doors in series do not swing either in the same direction or away from the space between the doors.</p> <p>Threshold: The threshold for the outside door leaves is .75" in height, but should be no higher than .5". See 4.13.8.</p> <p>Door knob: The door knobs on the outside door leaves require tight grasping to open.</p>	 <p>Designated accessible entrance on north side of Church.</p>	<p>Provide OCR with a plan to ensure the outside and inside doors at the north accessible entrance comply with 4.13, including minimum width, threshold, hardware, and space requirements. See UFAS Fig. 26, below.</p>  <p>Fig. 26: Two hinged doors in series, swinging the same direction.</p>

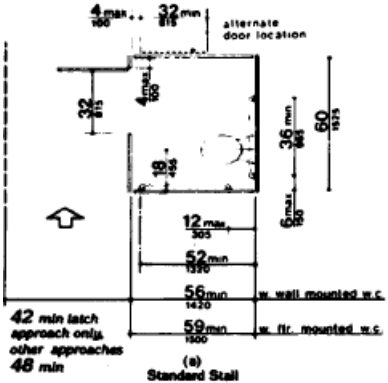
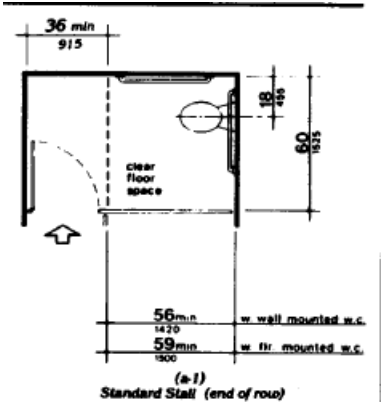


Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
	<p>4.13.4: Double-Leaf Doorways: If doorways have two independently operated door leaves, then at least one leaf shall meet the specifications in 4.13.5 and 4.13.6. That leaf shall be an active leaf.</p> <p>4.13.5: Clear Width: Doorways shall have a minimum clear opening of 32" with the door open 90 degrees, measured between the face of the door and the stop.</p> <p>4.13.7: Two Doors in Series: The minimum space between two hinged or pivoted doors in series shall be 48" plus the width of any door swinging into the space. Doors in series shall swing either in the same direction or away from the space between the doors (see Fig. 26).</p> <p>4.13.8: Threshold: Thresholds at doorways shall not exceed .75" in height for exterior sliding doors or .5" for other types of doors. Raised thresholds and floor level changes at accessible doorways shall be beveled with a slope no greater than 1:2.</p> <p>4.13.9: Door Hardware: Handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate. Hardware must be mounted no higher than 48" above the floor.</p>		 <p>Designated accessible entrance with doors open.</p>  <p>Threshold in front of outside door at north accessible entrance.</p>	 <p>Fig. 26: Two hinged doors in series, swinging away from space.</p> <p>Ensure the entrance is connected by an accessible route.</p>

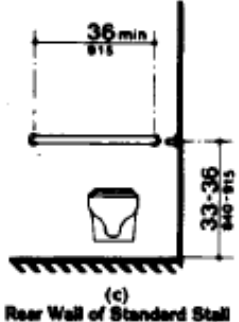

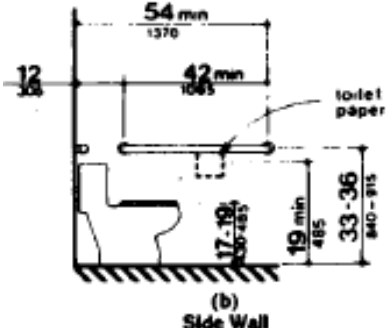
Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
<p><b>Accessible route to Church and Museum entrances</b></p>	<p><u>Accessible Route: 4.3</u></p> <p>4.3.2(1): At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking, and accessible passenger zones, and public streets or sidewalks to the accessible building entrance they serve.</p> <p>4.3.2(2): At least one accessible route shall connect accessible buildings, facilities, elements, and spaces that are on the same site.</p> <p>See 4.3.3 (Width), 4.3.4 (Passing Space), 4.3.5 (Head Room), 4.3.6 (Surface Textures), 4.3.7 (Slope), 4.3.8 (Changes in Levels), 4.3.9 (Doors), and 4.3.10 (Egress) requirements.</p>		 <p>Sidewalk near Church.</p>	<p>Ensure there is an accessible route that complies with 4.3, including width, slope, and changes in level requirements, that connects the accessible Church and Museum entrances to other other accessible buildings, facilities, elements, and spaces within the College site. 4.3.</p>
<p><b>Museum Entrance</b></p>	<p><u>Entrances (4.14) and Doors (4.13):</u></p> <p>4.14.1: Minimum Number: Entrances required to be accessible by 4.1 shall be part of an accessible route and shall comply with 4.3. Such entrances shall be connected by an accessible route to public transportation stops, to accessible parking and passenger loading zones, and to public streets or sidewalks if available (see 4.3.2(1)).</p> <p>4.13.7: Two Doors in Series: The minimum space between two hinged or pivoted doors in series shall be 48” plus the width of any door swinging into the space. Doors in series shall swing either in the same direction or away from the space between the doors (see Fig. 26).</p>	<p>The space between the Museum inside door (in the open position) and outside entrance door is less than 48”. See 4.13.7.</p>	 <p>Outside entrance to Museum.</p>  <p>Space between the Museum outside and inside doors (2 doors in series).</p>	<p>Ensure the space between the Museum inside door and the outside entrance door is 48” plus the width of the inside door swinging into the space, in compliance with 4.13.7. See UFAS Fig. 26, below. The College should consider the option of a power or automatic door opener.</p>  <p>Fig. 26: Two hinged doors in series, swinging the same direction. Ensure the entrance is connected by an accessible route.</p>


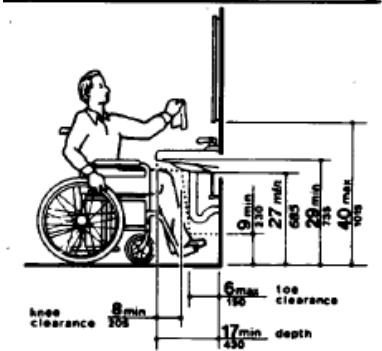
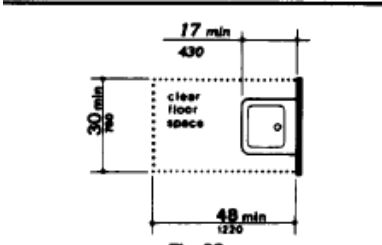
Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
<b>Museum Lift</b>	<p><u>Platform Lifts: 4.11</u></p> <p>4.11.3: Unassisted entry/exit: If a platform lift is used, the lift should facilitate unassisted entry and exit from the lift.</p> <p>4.5.1: Floor Surfaces: Ground and floor surfaces along accessible routes and in accessible rooms and spaces, including floors, walks, ramps, stairs, and curb ramps, shall be stable, firm, slip-resistant, and shall comply with 4.5.</p> <p>4.27: Controls: Clear floor space complying with 4.2.4 that allows a forward or a parallel approach by a person using a wheelchair shall be provided at controls and other operable equipment. 4.27.2. See also, 4.27.3 (Height) and 4.27.4 (Operation) of controls.</p> <p>Section 504 regulation: 34 C.F.R. §§ 104.4(a) (Anti-discrimination provision).</p>	<p>The Museum lift cannot be operated independently; a Museum staff member must assist an individual with a disability to use the lift.</p> <p>The non-slip material is torn in places.</p>	 <p>Museum lift near entrance.</p>	<p>Ensure the lift can be used and operated independently by an individual with a disability, including entering and exiting the lift without assistance, or provide OCR with a plan for providing a lift that can be operated independently.</p> <p>Ensure the lift complies with 4.11.2, including 4.2.4, 4.5, 4.27, and repair any torn non-slip material on the lift surface.</p>
<b>Museum: Entry into restroom area</b>	<p>4.3.2(3): Accessible Route. Location: At least one accessible route shall connect accessible building entrances with all accessible spaces and elements.</p> <p>4.13.5: Clear Width: Doorways shall have a minimum clear opening of 32” with the door open 90 degrees, measured between the face of the door and the stop.</p>	<p>The doorway leading to the restroom area is obstructed by a large piece of furniture.</p>	 <p>Doorway leading to restroom area.</p>	<p>Move the large piece of furniture for an unobstructed passage through the doorway, in accordance with 4.13.5.</p>
<b>Museum: Men’s restroom door</b>	<p><u>Toilet Rooms (4.22): Doors (4.13)</u></p> <p>4.22.2: Doors: All doors to accessible toilet rooms shall comply with 4.13 and shall not swing into the clear floor space for fixtures.</p> <p>4.13.5: Clear Width: Doorways shall have a minimum clear opening of 32” with the door open 90 degrees, measured between the face of the door and the stop.</p>	<p>The door width is 29.5”.</p> <p>The threshold is 7/8” high.</p> <p>The door requires 9-10 lbs. of opening force.</p>	 <p>Men’s restroom doorway.</p>	<p>Ensure door width has a minimum clear opening of 32” in accordance with 4.13.5.</p> <p>Adjust the threshold at the doorway so that it does not exceed .5” in height or provide a beveled threshold with a slope no greater than 1:2. 4.13.8.</p>


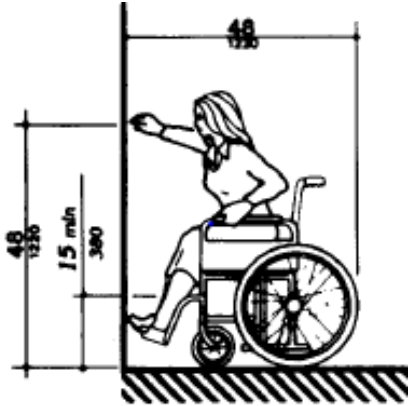

Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
	<p>4.13.8: Threshold: Thresholds at doorways shall not exceed .75" in height for exterior sliding doors or .5" for other types of doors. Raised thresholds and floor level changes at accessible doorways shall be beveled with a slope no greater than 1:2.</p> <p>4.13.11: Opening Force: Interior doors must have an opening force of 5 lbs. or less.</p>		 <p>Threshold to men's restroom is 7/8" high.</p>	<p>Adjust the opening force of the door to 5 lbs. or less. 4.13.11.</p>
<p><b>Museum:</b></p> <p><b>Signage for men's restroom door</b></p>	<p>4.1.1(7): All signs shall comply with 4.30 and accessible toilet facilities shall be identified with the international symbol of accessibility.</p> <p>4.30.2, 4.30.3, and 4.30.4: Signs shall comply with the character proportion, color contrast, and raised or indented characters or symbols.</p> <p>4.30.6: Interior signage shall be located alongside the door on the latch side and shall be mounted at a height of between 54" and 66" above the finished floor.</p>	<p>The sign is mounted on the door, instead of alongside the door on the latch side.</p> <p>The sign does not include the international symbol of accessibility and does not comply with the required character proportion.</p>	 <p>Sign on Men's restroom.</p>	<p>Mount a sign with the international symbol of accessibility on the latch side of the door between 54" and 66" above the finished floor. 4.30.6</p> <p>Ensure the sign complies with 4.30.2, 4.30.3, and 4.30.4.</p>  <p>International Symbol of Accessibility</p>
<p><b>Museum:</b></p> <p><b>Men's restroom:</b></p> <p><b>Toilet Stalls</b></p>	<p><u>Toilet Rooms (4.22.4): Toilet Stalls (4.17)</u></p> <p>4.17.3: Size and Arrangement: The arrangement of toilet stalls shall comply with Fig. 30(a). The stall must be at least 60" wide per Fig. 30(a). Toilet stalls with a min. depth of 56" shall have wall-mounted water closets (toilets). If the depth of toilet stalls is increased at least 3", then a floor-mounted water closet may be used. Arrangements shown for stalls may be reversed to allow either a left or right-handed approach. Stall door must be located at the open side of toilet per Fig. 30(a). See exception.</p> <p>4.17.4: Toe Clearances: In standard stalls, the front partition and at least 1 side partition shall provide a toe clearance of at least 9" above the floor. If the depth of the</p>	<p>Stall doorway width: 22.5".</p> <p>Dimensions of stall: 56" deep x 34" wide.</p> <p>Toilet is floor-mounted, not wall-mounted.</p> <p>The stall does not have mounted or complying grab bars as required by 4.17.6.</p> <p>Coat hook is mounted 65.5" from the floor on the stall door, which is too high for a forward reach and side reach. 4.2.5 and 4.2.6.</p>	 <p>Toilet stalls in men's restroom.</p>  <p>Toilet in stall is floor-mounted.</p>	<p>Designate an accessible toilet stall and reconfigure that stall in the men's restroom to comply with each requirement of 4.17, including maximum stall width, minimum doorway width, minimum toe clearance, requirements of wall-mounted toilet, requirements of grab bars and coat hook heights. See also, Figures 28-32.</p>

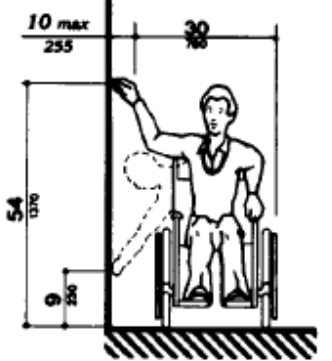


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	<p>stall is greater than 60", then the toe clearance is not required.</p> <p>4.17.5: Doors: Toilet stall doors shall comply with 4.13. If toilet stall approach is from the latch side of the stall door, clearance between the door side of the stall and any obstruction may be reduced to a minimum of 42".</p> <p>4.17.5/4.13.5: Clear Width: Doorways shall have a min. clear opening of 32" with the door open 90 degrees, measured between the face of the door and the stop (see Fig. 24(a)-(d)). Openings more than 24" in depth shall comply with 4.2.1 (clear floor/ground space; 30"x48") and 4.3.3 (min. clear width of an accessible route; 36")</p> <p>4.17.5/4.13.6 (Fig. 25): Minimum maneuvering clearances at doors that are not automatic or power-assisted shall be as shown in Fig. 25. The floor or ground area within the required clearances shall be level and clear.</p> <p>4.13.9: Door Hardware</p> <p>4.17.6: Grab bars: Grab bars shall comply with 4.26 and the length and positioning shall comply with Fig. 30(a)-(c).</p>			 <p>Fig. 30(a): A standard toilet stall, above.</p>  <p>Fig. 30(a-1): A standard toilet stall at the end of a row.</p>





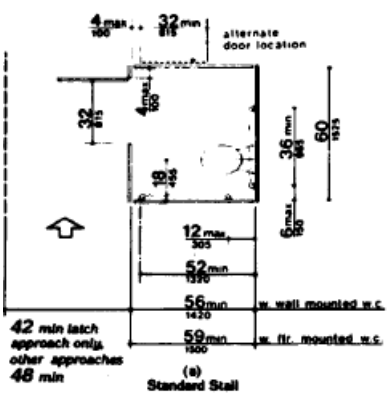


Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
				 <p>(c) Rear Wall of Standard Stall</p> <p>Fig. 30(c): Grab bar height and width on rear wall of a standard stall.</p>
<p><b>Museum:</b></p> <p><b>Men's restroom:</b></p> <p><b>Toilet (Water Closet)</b></p>	<p><u>Toilet Rooms (4.22.4): Toilets (or Water Closets; 4.16):</u></p> <p>4.16.3: Height: The height of the toilet shall be 17" to 19" measured to the top of the toilet seat from the floor (see Fig. 29(b)). Seats shall not be sprung to return to a lifted position.</p> <p>Fig. 30(a): The centerline of the toilet should be 18" from the side wall or partition.</p> <p>4.16.5: Flush Controls: The flush controls shall be hand-operated or automatic and shall comply with 4.27.4. Controls for flush valves shall be mounted on the wide side of the toilet areas no more than 44" above the floor. See also, 4.1.2(12) (Scope).</p> <p>4.27.4. Operation: The flush controls must be operable without tight grasping, pinching or twisting.</p> <p>4.16.6: Dispensers: Toilet paper dispensers shall be installed within reach, as shown in Fig. 29(b). Dispensers that control delivery, or that do not permit continuous paper flow, shall not be used.</p>	<p>The height of the toilet from the floor to the top of the toilet seat is 16"</p> <p>The centerline of the toilet is less than 18" from a side wall.</p> <p>Toilet paper dispenser is installed 58" from the floor to the push lever, which exceeds the maximum control height of 44" above the floor.</p>	 <p>Toilet in stall of men's restroom.</p>	<p>Provide a toilet that complies with the height range of 17" to 19" required by 4.16.3 (see Fig. 29(b), below), and a centerline of 18" from the side wall with a grab bar (Fig. 30(a)).</p> <p>Ensure that once grab bars are installed, the toilet paper dispenser is installed within the required reach, as shown in Fig. 29(b), below, and that large dispensers that do not fit below the grab bar are not used.</p>  <p>(b) Side Wall</p> <p>Fig. 29(b) indicates toilet height range of 17" to 19" and location of toilet paper dispenser.</p>

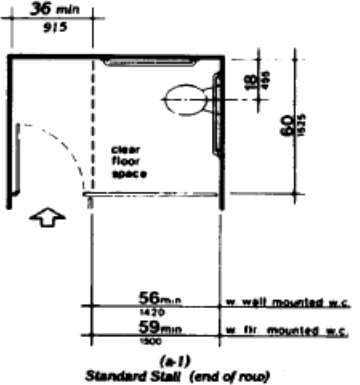
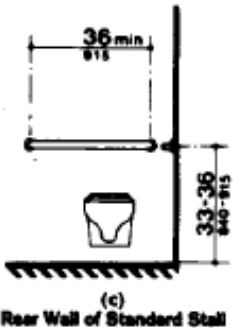

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<p><b>Museum:</b></p> <p><b>Men's restroom:</b></p> <p><b>Lavatories &amp; mirrors</b></p>	<p><u>Toilet Rooms (4.22.6); Lavatories and Mirrors (4.19):</u></p> <p>4.19.2: Height and Clearances: Lavatories (or sinks within toilet rooms) shall be mounted with the rim or counter surface no higher than 34" above the finished floor. Provide a clearance of at least 29" from the floor to the bottom of the apron. Knee and toe clearance shall comply with Fig. 31.</p> <p>Fig. 31: Knee clearance height: At least 29" from the floor to the bottom of the apron, and at least 27" from the floor to the u of the lavatory. Knee clearance depth: 8" min. from front edge of lavatory counter to bottom of the lavatory, and 17" min. from front edge of lavatory to the back wall.</p> <p>Fig. 31: Toe clearance: 9" min. height from floor, and 6" max. toe depth of the 17" min. depth.</p> <p>4.19.3: Clear Floor Space: A clear floor space of 30" x 48" complying with 4.2.4 shall be provided in front of a lavatory to allow a forward approach. Such clear floor space shall adjoin or overlap an accessible route and shall extend a max. of 19" underneath the lavatory (see Fig. 32).</p> <p>4.22.6: If mirrors are provided, at least one shall comply with 4.19.6. Mirrors shall be mounted with the bottom edge of the reflecting surface no higher than 40" from the floor (see Fig. 31).</p>	<p>The knee clearance height from the floor to the bottom of the apron is 25".</p> <p>The maximum depth for knee clearance is 2.5" deep.</p> <p>The bottom edge of the mirror's reflecting surface is mounted 49" above the floor.</p>		<p>Provide one designated accessible lavatory that complies with the requirements of 4.19, including knee and toe clearances and clear floor space. See Figures 31 and 32, below.</p> <p>Provide a mirror for the designated accessible lavatory that is mounted no higher than 40" above the floor. 4.19.6.</p>  <p><b>Fig. 31 Lavatory Clearances</b></p>  <p><b>Fig. 32 Clear Floor Space at Lavatories</b></p> <p>Fig. 31: Lavatory clearances.</p> <p>Fig. 32: Clear floor space at lavatories.</p>

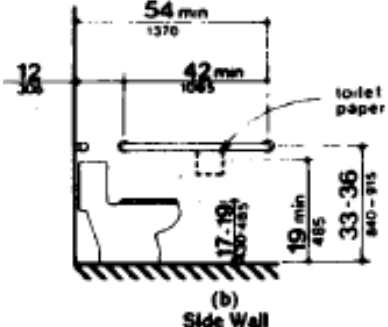

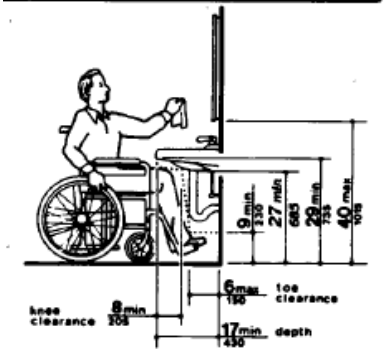
Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
<p><b>Museum:</b></p> <p><b>Men's restroom:</b></p> <p><b>Urinals</b></p>	<p><u>Toilet Rooms (4.22.5): Urinals (4.18):</u></p> <p>4.22.5: If urinals are provided, then at least one shall comply with 4.18.</p> <p>4.18.2: Height: Urinals shall be stall-type or wall-hung with an elongated rim at a maximum of 17" above the floor.</p> <p>4.18.3: Clear Floor Space: 30" x 48" in front of urinals to allow a forward approach, which shall adjoin or overlap an accessible route and comply with 4.2.4.</p> <p>4.18.4: Flush Controls: Flush controls shall be hand-operated or automatic, and shall comply with 4.27.4, and shall be mounted no more than 44" above the floor.</p>	<p>The flush controls are mounted 47" above the floor.</p>	 <p>Two urinals in the men's restroom.</p>	<p>Designate an accessible urinal and mount the flush controls no higher than 44" above the floor, in accordance with 4.18.4.</p> <p>Ensure the designated accessible urinal complies with the required clear floor space. 4.18.3.</p>
<p><b>Museum:</b></p> <p><b>Men's restroom:</b></p> <p><b>Controls and Dispensers</b></p> <p><b>Protrusions</b></p>	<p><u>Toilet Rooms (4.22.7): Controls and Operating Mechanisms (4.27):</u></p> <p>4.22.7: If controls, dispensers, receptacles, or other equipment are provided, at least one of each shall be on an accessible route and shall comply with 4.27.</p> <p>4.27.2: There must be at least 30 x 48" clear floor space which allows either a forward or parallel approach to the dispensers, receptacles etc.</p> <p>4.27.3: The highest operable part of all controls, dispenser, receptacles, and other operable equipment shall be placed within at least one of the reach ranges specified in 4.2.5 and 4.2.6. Except where the use of special equipment dictates otherwise, electrical and communications system receptacles on walls shall be mounted no less than 15" above the floor.</p>	<p>The paper towel dispenser is mounted 56.5" from the floor to the paper delivery area, which is too high for a forward reach or a side reach.</p> <p>The paper towel dispenser also is a protrusion unless a permanent garbage receptacle is mounted under the dispenser.</p> 	 <p>Paper towel dispenser</p>	<p>Mount the paper towel dispenser to comply with 4.27, including front or side reaches. See Figure 5(a), in third column, and Figure 6(b), below.</p> <p>Provide a fixed barrier detectable by canes under the paper towel dispenser (such as a complying wall-mounted garbage receptacle or other barrier) or provide OCR with another plan to reconfigure or eliminate the protrusions in compliance with 4.4.1.</p>

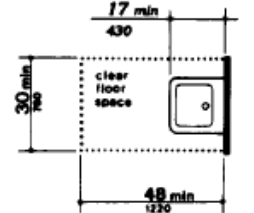


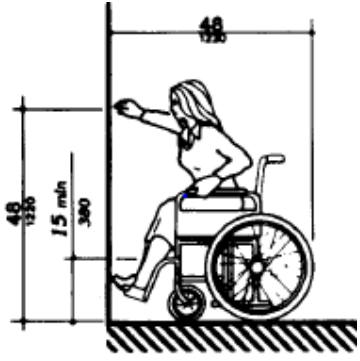
Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
	4.4.1: Protrusions: Wall-mounted objects with leading edges between 27" and 80" above the floor shall protrude no more than 4" into walks, halls, corridors, passageways, or aisles.	Fig. 5(a): High forward reach.		 <p>High and Low (b) Side Reach Limits</p> <p>Fig. 6(b): High side reach.</p>
<b>Museum:</b>  <b>Women's restroom door</b>	<u>Toilet Rooms (4.22): Doors (4.13)</u>  4.22.2: Doors: All doors to accessible toilet rooms shall comply with 4.13 and shall not swing into the clear floor space for fixtures.  4.13.5: Clear Width: Doorways shall have a minimum clear opening of 32" with the door open 90 degrees, measured between the face of the door and the stop.  4.13.8: Threshold: Thresholds at doorways shall not exceed .75" in height for exterior sliding doors or .5" for other types of doors. Raised thresholds and floor level changes at accessible doorways shall be beveled with a slope no greater than 1:2.  4.13.9. Door Hardware: Handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate.  4.13.11: Opening Force: Interior doors must have an opening force of 5 lbs. or less.	The door width is 29.5".  The threshold is .75" high.  The door requires 10 lbs. of opening force.  The door handle requires grasping, which is not permitted.	 <p>Women's restroom doorway.</p>  <p>Threshold at doorway to women's restroom.</p>	Ensure door width has a minimum clear opening of 32" in accordance with 4.13.5.  Adjust the threshold at the doorway so that it does not exceed .5" in height, or provide a beveled threshold with a slope no greater than 1:2. 4.13.8.  Adjust the opening force of the door to 5 lbs. or less. 4.13.11.  Replace the door handle with a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching, or twisting of the wrist to operate. 4.13.9.

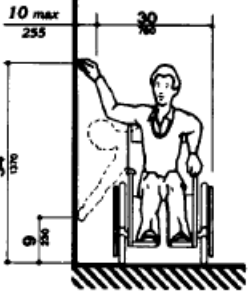
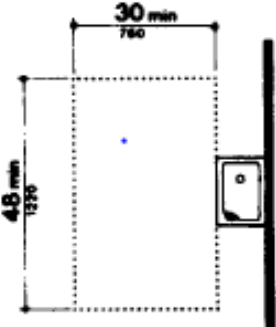

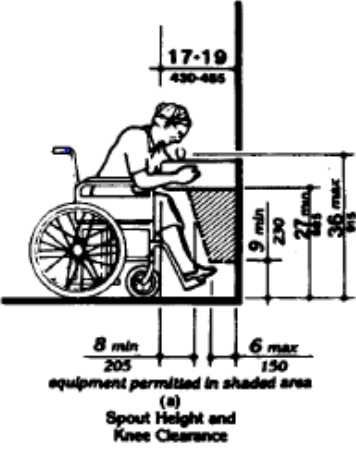
Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
<b>Museum:</b>  <b>Signage for women's restroom door</b>	<p>4.1.1(7): All signs shall comply with 4.30 and accessible toilet facilities shall be identified with the international symbol of accessibility.</p> <p>4.30.2, 4.30.3, and 4.30.4: Signs shall comply with the character proportion, color contrast, and raised or indented characters or symbols.</p> <p>4.30.6: Interior signage shall be located on the latch side and shall be mounted at a height of between 54" and 66".</p>	<p>The sign is mounted on the door, instead of alongside the door on the latch side, and is not mounted between 54" and 66" above the floor.</p> <p>The sign does not include the international symbol of accessibility and does not comply with the required character proportion.</p>	 <p>Sign on women's restroom.</p>	<p>Mount a sign with the international symbol of accessibility on the latch side of the door between 54" and 66" above the finished floor. 4.30.6</p> <p>Ensure the sign complies with 4.30.2, 4.30.3, and 4.30.4.</p>  <p>International Symbol of Accessibility</p>
<b>Museum:</b>  <b>Women's restroom:</b>  <b>Toilet Stalls</b>	<p><u>Toilet Rooms (4.22.4): Toilet Stalls (4.17)</u></p> <p>4.17.3: Size and Arrangement: The arrangement of toilet stalls shall comply with Fig. 30(a). The stall must be at least 60" wide per Fig. 30(a). Toilet stalls with a min. depth of 56" shall have wall-mounted water closets (toilets). If the depth of toilet stalls is increased at least 3", then a floor-mounted water closet may be used. Arrangements shown for stalls may be reversed to allow either a left or right-handed approach. Stall door must be located at the open side of toilet per Fig. 30(a). See exception.</p> <p>4.17.4: Toe Clearances: In standard stalls, the front partition and at least 1 side partition shall provide a toe clearance of at least 9" above the floor. If the depth of the stall is greater than 60", then the toe clearance is not required.</p> <p>4.17.5: Doors: Toilet stall doors shall comply with 4.13. If toilet stall approach is from the latch side of the stall door, clearance between the door side of the stall and any obstruction may be reduced to a minimum of 42".</p>	<p>Stall doorway width: 22.5" (the stall opening should be a min. width of 32" per 4.17.5 and 4.13.5).</p> <p>Dimensions of stall: 56" deep x 33" wide (the stall width should be at least 60" wide).</p> <p>Toilet is floor-mounted, not wall-mounted. A wall-mounted toilet is required for a stall depth of 56" per 4.17.3.</p> <p>The stall does not have mounted or complying grab bars as required by 4.17.6.</p>	 <p>Three toilet stalls in women's restroom.</p>  <p>Toilet in stall is floor-mounted.</p>	<p>Designate an accessible toilet stall and reconfigure that stall in the women's restroom to comply with each requirement of 4.17. See also, Figures 28-32.</p>  <p>Fig. 30(a): A standard toilet stall.</p>



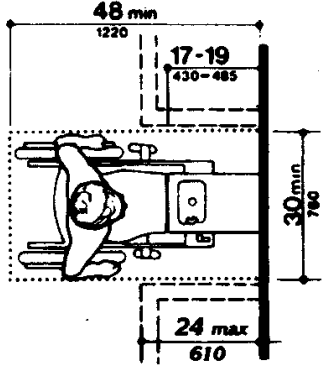

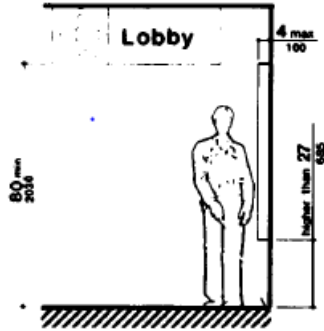
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	<p>4.17.5/4.13.5: Clear Width: Doorways shall have a min. clear opening of 32" with the door open 90 degrees, measured between the face of the door and the stop (see Fig. 24(a)-(d)). Openings more than 24" in depth shall comply with 4.2.1 (clear floor/ground space; 30"x48") and 4.3.3 (min. clear width of an accessible route; 36")</p> <p>4.17.5/4.13.6 (Fig. 25): Minimum maneuvering clearances at doors that are not automatic or power-assisted shall be as shown in Fig. 25. The floor or ground area within the required clearances shall be level and clear.</p> <p>4.17.6: Grab bars: Grab bars shall comply with 4.26 and the length and positioning shall comply with Fig. 30(a)-(c).</p>			 <p>Fig. 30(a-1): A standard toilet stall at the end of a row.</p>  <p>Fig. 30(c): Grab bar height and width on rear wall of a standard stall.</p>
<p><b>Museum:</b></p> <p><b>Women's restroom:</b></p> <p><b>Toilet (Water Closet)</b></p>	<p><u>Toilet Rooms (4.22.4): Toilets (or Water Closets; 4.16):</u></p> <p>4.16.3: Height: The height of the toilet shall be 17" to 19" measured to the top of the toilet seat from the floor (see Fig. 29(b)). Seats shall not be sprung to return to a lifted position.</p> <p>Fig. 30(a): The centerline of the toilet should be 18" from the side wall or partition.</p>	<p>The height of the toilet from the floor to the top of the toilet seat is 16"</p> <p>The centerline of the toilet is 16.5" from either side wall.</p>	 <p>Toilet in stall of women's restroom.</p>	<p>Provide a toilet that complies with the height range of 17" to 19" required by 4.16.3 (see Fig. 29(b), below), and a centerline of 18" from the side wall with a grab bar (Fig. 30(a)).</p> <p>Ensure that once grab bars are installed, the toilet paper dispenser is installed within the required reach, as shown in Fig. 29(b), below, and that large dispensers that do not fit below</p>





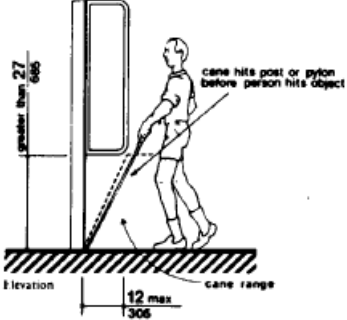
Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
	<p>4.16.6: Dispensers: Toilet paper dispensers shall be installed within reach, as shown in Fig. 29(b). Dispensers that control delivery, or that do not permit continuous paper flow, shall not be used.</p>			<p>the grab bar are not used. Also ensure that the placement of the sanitary napkin receptacle does not impede use of the toilet or grab bar. Fig. 29(b):</p>  <p>(b) Side Wall</p>
<p><b>Museum:</b></p> <p><b>Women's restroom:</b></p> <p><b>Lavatories &amp; mirrors</b></p>	<p><u>Toilet Rooms (4.22.6): Lavatories and Mirrors (4.19):</u></p> <p>4.19.2: Height and Clearances: Lavatories (or sinks within toilet rooms) shall be mounted with the rim or counter surface no higher than 34" above the finished floor. Provide a clearance of at least 29" from the floor to the bottom of the apron. Knee and toe clearance shall comply with Fig. 31.</p> <p>Fig. 31: Knee clearance height: At least 29" from the floor to the bottom of the apron, and at least 27" from the floor to the u of the lavatory. Knee clearance depth: 8" min. from front edge of lavatory counter to bottom of the lavatory, and 17" min. from front edge of lavatory to the back wall.</p> <p>Fig. 31: Toe clearance: 9" min. height from floor, and 6" max. toe depth of the 17" min. depth.</p> <p>4.19.3: Clear Floor Space: A clear floor space of 30" x 48" complying with 4.2.4 shall be provided in front of a lavatory to allow a</p>	<p>The knee clearance height from the floor to the bottom of the apron is 25.5".</p> <p>The maximum depth for knee clearance is 2" deep.</p> <p>The bottom edge of the mirror's reflecting surface is mounted 48" above the floor.</p>	 <p>Sinks in women's restroom.</p>	<p>Provide one designated accessible lavatory that complies with the requirements of 4.19, including knee and toe clearances and clear floor space. See Figures 31 and 32, below.</p> <p>Provide a mirror for the designated accessible lavatory that is mounted no higher than 40" above the floor. 4.19.6.</p>  <p>Fig. 31 Lavatory Clearances</p>





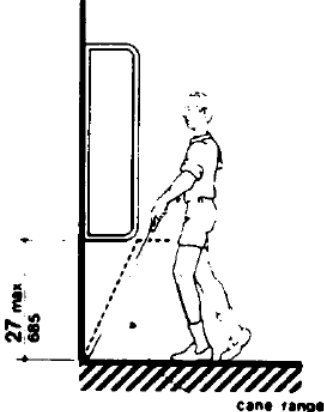
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	<p>forward approach. Such clear floor space shall adjoin or overlap an accessible route and shall extend a max. of 19" underneath the lavatory (see Fig. 32).</p> <p>4.22.6: If mirrors are provided, at least one shall comply with 4.19.6. Mirrors shall be mounted with the bottom edge of the reflecting surface no higher than 40" from the floor (see Fig. 31).</p>			 <p><b>Fig. 32</b> Clear Floor Space at Lavatories</p>
<p><b>Museum: Women's restroom: Controls and Dispensers</b></p>	<p><u>Toilet Rooms (4.22.7): Controls and Operating Mechanisms (4.27):</u></p> <p>4.22.7: If controls, dispensers, receptacles, or other equipment are provided, at least one of each shall be on an accessible route and shall comply with 4.27.</p> <p>4.27.2: There must be at least 30 x 48" clear floor space which allows either a forward or parallel approach to the dispensers, receptacles etc.</p> <p>4.27.3: The highest operable part of all controls, dispenser, receptacles, and other operable equipment shall be placed within at least one of the reach ranges specified in 4.2.5 and 4.2.6. Except where the use of special equipment dictates otherwise, electrical and communications system receptacles on walls shall be mounted no less than 15" above the floor.</p> <p>4.27.4: Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls shall be greater than 5 lbs.</p>	<p>The paper towel dispenser is mounted 56.5" from the floor to the paper delivery area, which is too high for a forward reach (maximum high forward reach is 48") or a side reach (maximum high side reach is 54").</p> <p>The paper towel dispenser also is a protrusion unless a permanent garbage receptacle is mounted under the dispenser.</p> <p>The sanitary napkin dispenser is mounted 51" from the floor to the coin drop, but too high to operate the levers. A side approach obstructs the toilet stall next to the dispenser.</p> <p>The sanitary napkin dispenser also is a protrusion, with a depth of 7" and mounted between 27" and 80" above the floor.</p>	 <p>Paper towel dispenser in women's restroom.</p>  <p>Sanitary napkin dispenser.</p>	<p>Mount the paper towel and sanitary napkin dispensers to comply with 4.27, including front or side reaches. See Figures 5(a) and 6(b), below.</p> <p>Provide fixed barriers detectable by canes under the paper towel and sanitary napkin dispensers (such as a complying wall-mounted garbage receptacle or other barrier) or provide OCR with another plan to reconfigure or eliminate the protrusions in compliance with 4.4.1.</p>  <p><b>Fig. 5(a):</b> High forward reach.</p>




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	<p>4.4.1: Protrusions: Wall-mounted objects with leading edges between 27" and 80" above the floor shall protrude no more than 4" into walks, halls, corridors, passageways, or aisles.</p>			 <p>High and Low Side Reach Limits Fig. 6(b): High side reach.</p>
<p><b>Museum:</b></p> <p><b>Corridor leading to restrooms:</b></p> <p><b>Drinking Fountain</b></p>	<p><u>Drinking Fountains/Water Coolers:</u> 4.15:</p> <p>4.1.2(9): Scope: If drinking fountains or water coolers are provided, approximately 50% of those provided on each floor shall comply with 4.15 and shall be on an accessible route. If only one drinking fountain or water cooler is provided on any floor, it shall comply with 4.15.</p> <p>4.15.2: Spout Height: The spout shall be no higher than 36", measured from the floor to the spout outlet.</p> <p>4.15.3: Spout Location: The spout shall be at the front of the unit and direct the water flow in a trajectory that is parallel to the front of the unit. The spout shall provide a flow of water at least 4" high.</p> <p>4.15.4: Controls: Controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate controls shall be no greater than 5 lbs.</p>	<p>The free-standing water cooler allows a parallel approach (see Fig. 27(c), below) but is moveable and requires two hands, instead of one, to operate the controls and hold the water cup simultaneously. In addition, the removal of the paper cup requires grasping and pinching to pull it from the cup holder. Therefore, the wall-mounted drinking fountain will need to be altered or replaced to comply with 4.15.</p>  <p>(c) Free-Standing Fountain or Cooler</p>	 <p>Free-standing water cooler near wall-mounted drinking fountain.</p>	<p>Ensure the wall-mounted drinking fountain complies with the requirements of 4.15, including complying clearances. See Fig. 27(a) and (b), below, for a wall-mounted cantilevered unit:</p>  <p>(a) Spout Height and Knee Clearance</p>



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	<p>4.15.5(1): Wall and post mounted cantilevered units shall have a clear knee space between the bottom of the apron and the floor or ground at least 27" high, 30" wide, and 17" to 19" deep. Such units shall also have a minimum clear floor space 30" by 48" to allow an approach facing forward. See Fig. 27(a) and (b).</p> <p>4.15.5(2): Free-standing or built-in units not having a clear space under them shall have a clear floor space at least 30" x 48" that allows a parallel approach to the unit. See Fig. 27(c).</p>			 <p>(b) Clear Floor Space</p>
<p><b>Museum:</b></p> <p><b>Corridor leading to restrooms:</b></p> <p><b>Protrusions</b></p>	<p><u>Protrusions (4.1.1(3) and 4.4):</u></p> <p>4.1.1(3): Protrusions: All objects that protrude from surfaces or posts into circulation paths shall comply with 4.4.</p> <p>4.4.1: General: Wall-mounted objects with leading edges between 27" and 80" above the floor shall protrude no more than 4" into walks, halls, corridors, passageways, or aisles. Free-standing objects mounted on posts or pylons may overhand 12" max. from 27" to 80" above the floor or ground. Protruding objects shall not reduce the clear width of an accessible route or maneuvering space.</p>	<p>The fire extinguisher is a protrusion since it is mounted 40.5" above the floor with a depth of 5", and the garbage can below it is not fixed.</p>	 <p>Fire extinguisher protrusion.</p>	<p>Provide a fixed barrier detectable by canes under the fire extinguisher (such as a complying wall-mounted garbage receptacle or other barrier) or provide OCR with another plan to reconfigure or eliminate the protrusion in compliance with 4.4.1. See Fig. 8(a), below.</p>  <p>Fig. 8(a): Objects mounted on walls; walking parallel to a wall.</p>

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<b>Museum Exhibits:</b>	<p><u>Protrusions (4.1.1(3) and 4.4) (see text, above):</u></p> <p>4.1.1(3): Scope: Protruding objects            4.1.2(2): Scope: Overhanging objects            4.4.1: General            4.4.2/4.3.5: Head room</p>	<p>Wall-mounted protrusion: The dimensions for "The Latest Bulletin" exhibit in the Relevance Room: 29" H x 14" D.</p> <p>Post-mounted protrusion: The dimensions for the "Cold Warriors" exhibit in the Relevance Room: 29.5" H, 23.5" W x 13" D. Base of post: 1" H.</p> <p>Column-mounted protrusion: Dimensions for shelf with briefcase in the Cold War Room: 30" H x 11" D.</p> <p>Wall-mounted protrusion: Dimensions for 17<sup>th</sup> Century Bible display case in the Tradition Corridor: 36" H x 7" D.</p>	 <p>The Latest Bulletin exhibit.</p>  <p>Cold Warriors exhibit.</p>  <p>Shelf with briefcase.</p>  <p>17<sup>th</sup> Century Bible display.</p>	<p>Provide a complying fixed barrier detectable by canes under the protruding object or provide OCR with another plan to reconfigure or eliminate each protrusion in compliance with 4.4. See Fig. 8(a) (wall-mounted objects), above, and Fig. 8(d) (post-mounted objects), below.</p> <p>In addition, ensure compliance with Fig. 7 (width of accessible route), when applicable.</p>  <p>Fig. 8(d): Objects mounted on posts or pylons.</p> <p>See also Fig. 8(b), below:</p>



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		<p>Wall-mounted protrusion: Dimensions for shelf with 3 churches display in the Chris Wren Hallway: 27.5" H x 19.5" D.</p> <p>Wall-mounted protrusion: Dimensions for the "Putting It All Together" display in the Chris Wren Hallway: 28.75" H x &gt;4" D.</p> <p>Wall-mounted protrusion: Dimensions for "The Church Today" display in the Chris Wren Hallway (to the right of the "Putting It All Together" display): 30" H x 4.75" D.</p> <p>Wall-mounted protrusion: Dimensions for the shelf with books for the "Reading and Riding" exhibit in the Churchill Formative Years area: 28.5" H x 12" D.</p> <p>Wall-mounted protrusion: Dimensions for the periscope exhibit in the Trenches Room: 48" H x 14.5" D. The step stool below is not fixed and it obstructs the min. clear width of the accessible route (31.5" width with step stool).</p>	 <p>Shelf with 3 churches.</p>  <p>"Putting It All Together" and "The Church Today" exhibits.</p>  <p>Shelf with books.</p>  <p>Periscope exhibit.</p>	 <p>Wall-mounted objects: walking perpendicular to a wall.</p>

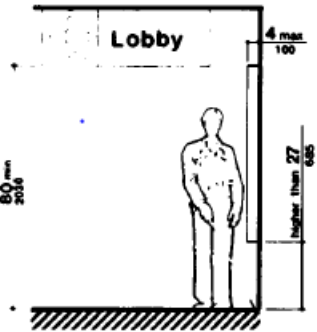
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		<p>Wall-mounted protrusion: Dimensions for the “A Thousand Words a Day” book display case in the Wilderness Room: 30.5” H x 5.5” D.</p> <p>Wall-mounted protrusion: Dimensions for the “Fearful Convulsions” book display case in the Gathering Storm Room: 32” H x 7.5” D.</p>	 <p>“A Thousand Words a Day” book.</p>  <p>“Fearful Convulsions” book display.</p>	
<b>Museum Theatre</b>	<p><u>Seating, Tables, &amp; Work Surfaces: 4.1.2(17) &amp; 4.32:</u></p> <p>4.1.2(17): If fixed or built-in seating, tables, or work surfaces are provided in accessible spaces, at least 5%, but always at least one, of seating spaces, tables, or work surfaces shall comply with 4.32.</p> <p>34 C.F.R. § 104.4 (Section 504 general anti-discrimination provisions)</p>	<p>The theater in the Sinews of Peace Room does not have a designated accessible wheelchair space. It appears the theater has fixed seating for at least 16 individuals.</p>	 <p>Theater in the Sinews of Peace Room.</p>	<p>Provide at least one accessible wheelchair seating space in the theater so individuals with mobility impairments are not excluded from the exhibit.</p> <p>See also 34 C.F.R. §§ 104.4 and 104.21.</p>
<b>Museum Exhibits, Programs, Publications, and Videos</b>	<p>34 C.F.R. § 104.4 (Section 504 general anti-discrimination provisions)</p> <p>34 C.F.R. § 104.21 (Section 504 anti-discrimination provision regarding accessibility)</p>	<p>Ongoing museum exhibits and programming access and maintenance.</p>		<p>Ensure that alternate formats for current printed brochures and program materials (e.g., Braille, CD-Rom, large print) are available and easy to find by the public.</p> <p>Also ensure that auxiliary aids and services (e.g., assistive listening, audio description tours, and closed-captioning controls in exhibitions) are available and remain operable.</p>



Location Surveyed: Church & Museum	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically )	Remedial Action UFAS Standards (unless noted otherwise)
				See the U.S. Department of Justice publication entitled <i>Maintaining Accessibility in Museums</i> at <a href="http://www.ada.gov/business/museum_access.htm">http://www.ada.gov/business/museum_access.htm</a> .
<b>Museum: Alarms and Egress</b>	Alarms: 4.1.2(13) & 4.28: If emergency warning systems are provided, then they shall include both audible alarms complying with 4.28.2 and visual alarms complying with 4.28.3.  Egress: 4.3.10: Accessible routes serving any accessible space or element shall also serve as a means of egress for emergencies or connect to an accessible place of refuge. See also 4.1.2(7)(d)(exception).	Ensure adequate alarms and the egress standards are met.	[No photo]	Ensure adequate alarms and the egress standards are met.  See also 34 C.F.R. §§ 104.4 and 104.21.

## Newnham Hall

Location Surveyed: Newnham Hall	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically)	Remedial Action UFAS Standards (unless noted otherwise)
Front view of Newnham Hall	<p><u>Accessibility Standards:</u></p> <p>Existing facility standards (34 C.F.R. §§ 104.21 and 104.22)</p> <p>Anti-discrimination standards (34 C.F.R. § 104.4)</p>	<p><u>Construction/Alterations:</u></p> <p>Constructed: 1901</p> <p>Renovation: 1974 (major renovation)</p>	 <p style="text-align: center;">Front view of Newnham Hall</p>	
<p><b>Newnham Hall:</b></p> <p><b>Parking and Accessible Route</b></p>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Parking 4.6 and Accessible Route: 4.3</p> <p>4.3.2(1): At least one accessible route within the boundary of the site shall be provided from public transportation stops, accessible parking, and accessible passenger zones, and public streets or sidewalks to the accessible building entrance they serve.</p> <p>4.3.2(2): At least one accessible route shall connect accessible buildings, facilities, elements, and spaces that are on the same site.</p> <p>See 4.3.3 (Width), 4.3.4 (Passing Space), 4.3.5 (Head Room), 4.3.6 (Surface Textures), 4.3.7 (Slope), 4.3.8 (Changes in Levels), 4.3.9 (Doors), and 4.3.10 (Egress) requirements.</p>	<p>There are no accessible parking spaces for Newnham Hall. The closest accessible parking space is up the hill outside of Westminster Hall. The distance from that accessible space to the Newnham Hall designated accessible entrance in the back of the building is at least 450'4" (see satellite view in next column).</p> <p>However, the UFAS appendix section for accessible routes states that many individuals with disabilities can move at only very slow speeds; for many, traveling 200 ft. could take about 2 minutes, assuming the ground is level. On trips over 100 ft., individuals with disabilities are apt to rest frequently, which substantially increases their trip times, and in inclement weather, slow progress and resting can greatly increase the individual's exposure to the elements.</p> <p>In addition to the long distance, the accessible route from the parking areas near Westminster Hall to the Newnham Hall designated accessible entrance has several sections that significantly exceed a 5% slope (exceeding 10%).</p>	 <p>The blue arrows point to existing designated accessible parking spaces for Westminster Hall in the satellite photo. The red arrow points to the designated accessible entrance in the back of Newnham Hall (on the south side). A long sidewalk that is too steep in several sections wraps around Newnham Hall on the east side for the accessible route to the south entrance. Only the lower level is accessible.</p>	<p>The College provided OCR information indicating that when students with mobility impairments are scheduled for classes, events, or to meet with faculty members housed in the first or second floors of Newnham Hall, the College classes or events are moved to an accessible classroom.</p> <p>The Career Services Office is located in the lower level of Newnham Hall. However, the existing route from parking spaces near Westminster Hall to Newnham Hall is too steep and the distance is too long for an individual in a wheelchair. The entrance door and restrooms do not fully comply with the requirements of UFAS.</p> <p>Therefore, please provide OCR with a plan to 1) create a complying route and accessible parking closer to Newnham Hall, 2) relocate the Career Services Office to an accessible building on campus, or 3) propose an alternative plan.</p>

Location Surveyed: Newnham Hall	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically )	Remedial Action UFAS Standards (unless noted otherwise)
<p><b>Newnham Hall: All levels</b></p> <p><b>Protrusions</b></p>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Protruding objects:</p> <p>4.4.1: Wall-mounted objects with leading edges between 27” and 80” above the floor shall protrude no more than 4” into walks, halls, corridors, passageways, or aisles.</p> <p>4.4.2: Walks, halls, corridors, passageways, aisles, or other circulation spaces shall have 80” minimum clear head room (see Fig. 8(a)).</p>	<p>The fire extinguisher in the 1<sup>st</sup> floor (main) hallway is a protrusion. This protrusion poses a safety hazard to individuals with vision impairments and should be reconfigured or eliminated.</p> <p>See OCR’s Staff Memorandum dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient’s programs).</p>	<p>[No photo]</p>	<p>Provide a fixed barrier detectable by canes under the protruding objects or provide OCR with another plan to reconfigure or eliminate each protrusion. In addition, remove any objects that are less than 80” above the floor (such as the rectangular signs above the service counters), unless there is a can-detection area (where appropriate). See Fig. 8(a), below. 34 C.F.R. §§ 104.4 and 104.21.</p>  <p>Fig. 8(a): Objects mounted on walls.</p>
<p><b>Newnham Hall: Stairs connecting all levels</b></p>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Stairs:</p> <p>4.1.2(4) and 4.9: Stairs connecting levels that are not connected by an elevator shall comply with 4.9.</p> <p>4.9.6: Outdoor stairs and their approaches shall be designed so that water will not accumulate on walking surfaces.</p>	<p>Ensure any holes or breaks in stairs and any loose or unstable handrails are repaired to prevent safety hazards.</p> <p>See OCR’s Staff Memorandum dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient’s programs).</p>	<p>[No photo]</p>	<p>Ensure any holes or breaks in stairs and any loose or unstable handrails are promptly repaired and properly maintained to prevent safety hazards for individuals with visual or mobility impairments utilizing the stairs and handrails. 34 C.F.R. §§ 104.4 and 104.21.</p>

Location Surveyed: Newnham Hall	Uniform Federal Accessibility Standards (UFAS) (unless noted otherwise)	Existing Measurements or Summary of Non-compliance	Photographs, if Available (enlarge electronically )	Remedial Action UFAS Standards (unless noted otherwise)
<b>Newnham Hall:</b>  <b>Alarms and Egress</b>	<p>Existing building standards: 34 C.F.R. §§ 104.21 and 104.22</p> <p>Anti-discrimination standards: 34 C.F.R. § 104.4.</p> <p>Guidance: Alarms: 4.1.2(13) &amp; 4.28 If emergency warning systems are provided, then they shall include both audible alarms complying with 4.28.2 and visual alarms complying with 4.28.3.</p> <p>Guidance: Egress: 4.3.10: Accessible routes serving any accessible space or element shall also serve as a means of egress for emergencies or connect to an accessible place of refuge. See also 4.1.2(7)(d)(exception).</p>	<p>The College has emergency warning systems in every building OCR surveyed. However, not all classrooms and other areas had audible and visual alarms.</p> <p>Ensure the egress standards of 4.3.10 and 4.2.1(7)(d) are met for a multiple-story building.</p> <p>See OCR's Staff Memorandum dated 3/8/1991 pertaining to Section 504 program accessibility (17 IDELR 613, p. 6) (individuals with disabilities should be provided equal protection from risk while participating in the recipient's programs).</p>	<p>[No photo]</p>	<p>Ensure alarms are provided and the egress standards of 4.3.10 and 4.2.1(7)(d) are met for a multiple-story building, or provide OCR with emergency procedures that allow for the safe notification and evacuation of individuals with disabilities. 34 C.F.R. §§ 104.4 and 104.21.</p>