



Town of Grand Island

Physical Accessibility to Programs and Services

S9-24-44 | March 2025

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Report Highlights

Town of Grand Island

Audit Objective

Assess whether Town of Grand Island (Town) officials could take additional steps to increase physical accessibility to programs and services provided at selected Town facilities.

Key Findings

Of the 657 applicable physical accessibility components (components) we reviewed, we identified 103 components (16 percent) where Town officials could consider taking additional steps to increase physical accessibility at selected Town facilities. Specifically:

- 49 components at the Town Hall, such as carpets or mats at entrances and interior spaces securely attached to minimize tripping hazards and interior office signs with raised lettering and Braille.
- 20 components at the Grand Island Memorial Library (Library) such as accessible restroom stalls with an overall width of at least 60 inches and a door opening at least 32 inches wide.
- 18 components at the Senior Center, such as signs identifying van accessible parking spaces and grab bars mounted to the side and rear walls of accessible restroom stalls.
- 16 combined components at the Community Center, Highway Department and Recreation Department buildings, such as marked access aisles at the accessible parking spaces, signs identifying van accessible parking spaces, restroom doors that open with five pounds maximum force and pipes below lavatories insulated to protect against contact.

Recommendation

Town officials should assess the feasibility of taking additional steps to increase physical accessibility for the 103 components identified in this report. Town officials agreed with our findings and indicated they plan to initiate corrective action.

Audit Period

January 1, 2023 - June 30, 2024

Background

The Town is located in Erie County and is governed by an elected five-member Town Board (Board) composed of a Town Supervisor (Supervisor) and four Board members. The Supervisor is responsible for the overall administration of the Town's government.

The Town provides programs and services at the Town Hall, such as:

- The Town Clerk's Office (various licenses and permits, freedom of information act requests, etc.),
- The Assessor's Office (changes to tax rolls including adding or removing exemptions),
- The Building, Code Enforcement, Zoning Office (enforcement of various New York State and Town codes),
- The Town Court (small claims, traffic matters, etc.),
- The Water Billing Office (prepare water billing based on actual usage), and
- Public meetings of the Board and other Boards and Committees.

The Library, Senior Center, Community Center, Highway Department and Recreation Department buildings are also accessible to the public.

Quick Facts	
Population	21,389
2023 General Fund Expenditures	\$9.3 Million
Number of Employees	156

Physical Accessibility to Programs and Services

According to the Center for Disease Control and Prevention, more than one in four adults in the United States have some type of disability and more than one in 10 have a mobility disability with serious difficulty walking or climbing stairs.¹ It is important that someone with a disability can participate in their local government's decision-making process and be provided the same services and program opportunities as everyone else.

Title II of the 1990 Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability by state and local governments. Generally, under the ADA's implementing regulations, a public entity may not deny the benefits of its programs, activities, and services to individuals with disabilities because its facilities are inaccessible. While not required to make each existing facility accessible, public entities must operate each service, program, or activity so that, when viewed in its entirety, it is readily accessible to and usable by individuals with disabilities.

The 2010 ADA Standard for Accessible Design (Standards) set minimum scoping and technical requirements for newly designed and constructed or altered state and local government facilities, public accommodations and commercial facilities. For any new construction or alteration that began on or after March 15, 2012, the project must comply with the Standards. An alteration is defined as a change to a building or facility that affects or could affect the usability of the entire building or facility or a portion thereof.

Although the Standards apply to new construction and alterations that began on or after March 15, 2012, we used the Standards as a tool to help identify where Town officials could consider taking additional steps to increase physical accessibility to programs and services at selected existing structures within the Town, whether built before or after March 2012. The potential improvements to physical accessibility identified in this report, however, are intended for informational purposes only and should not be construed as the Office of the State Comptroller (OSC) opining as to the legality of the Town's compliance with ADA requirements.

Steps Identified to Potentially Increase Physical Accessibility to Programs and Services at Selected Town Facilities

We reviewed physical accessibility to programs and services provided at the Town Hall, Library, Senior Center, Community Center, Highway Department and Recreation Department, including access to Town department offices, public meeting spaces and restrooms located within these buildings.

We performed site visits at each of these buildings and their respective parking lots (together "facilities") and used the ADA Checklist for Existing Facilities² (ADA Checklist), which incorporates the Standards, as a tool to assess the accessibility at the sampled facilities.

1 https://www.cdc.gov/disability-and-health/articles-documents/disability-impacts-all-of-us-infographic.html?CDC_AAref_Val=https://www.cdc.gov/ncbddd/disabilityandhealth/infographic-disability-impacts-all.html

2 Produced by the New England ADA Center, the checklist was created to review existing facilities using the 2010 Standards for Accessible Design: <https://www.adachecklist.org/checklist.html>. Similar to the use of the Standards, the checklist was used as a tool to identify potential improvements to physical accessibility. The use of the checklist, however, is for informational purposes only and should not be construed as OSC opining on the legality of the Town's compliance with ADA requirements.

We reviewed 657 applicable physical accessibility components at the selected facilities and identified 103 components (16 percent), where Town officials could consider taking additional steps to increase physical accessibility, including 49 at the Town Hall, 20 at the Library, 18 at the Senior Center, eight at the Community Center building, six at the Highway building, and two at the Recreation building (Figure 1).

FIGURE 1

Potential Physical Accessibility Improvements Identified at Selected Town Facilities



Town Hall: 49 potential improvements, such as at least one van accessible parking space, accessible parking spaces with access aisles at least 5 feet wide, carpets or mats at entrances and interior spaces securely attached to minimize tripping hazards, interior office signs with raised lettering and Braille, and signs identifying accessible restrooms.



Library: 20 potential improvements, such as a level landing at the top of accessible curb ramps, pipes below the restroom lavatories insulated or otherwise configured to protect against contact and accessible restroom stalls with an overall width of at least 60 inches and a door opening at least 32 inches wide.



Senior Center: 18 potential improvements, such as signs identifying van accessible parking spaces, properly secured carpets at the entrance, a portion of the service counter at an accessible height and grab bars mounted to the side and rear walls of accessible restroom stalls.



Community Center: Eight potential improvements, such as properly secured carpets at the entrance to minimize tripping hazards, restroom doors that open with five pounds maximum force and pipes below lavatories insulated or otherwise configured to protect against contact.



Highway Department: Six potential improvements, such as at least one van accessible parking space, marked access aisles at the accessible parking spaces, a portion of the service counter at an accessible height, and the drinking fountain outlet at an accessible height.



Recreation Department: Two potential improvements, including signs identifying van accessible parking spaces and a level landing at the top of accessible curb ramps.

Examples of the potential improvements we identified and photographed at the facilities, along with a complete table of potential accessibility improvements, are included in Appendix B.

What Do We Recommend?

1. Town officials should assess the feasibility of taking additional steps to increase physical accessibility for the 103 components identified in this report.

Appendix A: Response From Town Officials



OFFICE OF THE TOWN SUPERVISOR
PETER J. MARSTON

February 27, 2025

Comptroller Thomas P. Dinapoli
Office of the New York State Comptroller
Division of Local Government and School Accountability
110 State Street, 12th Floor
Albany, New York 12236

Dear Comptroller DiNapoli and Interested Parties,

After reviewing the Physical Accessibility to programs and Services Audit, we are providing the following response.

Location 1 – Town Hall:

- Our parking area is due to be sealed and restriped this coming summer and have contacted our vendor to reconfigure handicapped car and van spots with access aisles, in line with your findings and recommendations.
- We have contacted our floor mat provider regarding better alternatives for high traffic area carpets and mats. If we cannot come up with a viable alternative, we will investigate a treatment of the floor with a non-skid/slip coating that can be applied to these areas.
- We are investigating increased and new signage for the facility including the addition of braille.

Location 2 – Grand Island Library

- We are in the process now of measuring to have all under fixture pipes insulated to protect users. Also looking at potential reconfiguring bathroom accessibility.
- As time and budgets allow, we will investigate outdoor upgrades including level landing spots at the top of ADA compliant ramps to be more user friendly.

Location 3 – Grand Island Senior Center

- We are currently in process of redesigning drainage in the Senior Center Parking Lot, upon the completion of that project we will appropriately redesign parking spaces to allow van accessible parking spaces as recommended.
- As stated earlier we are investigating an alternative for our high traffic area rugs.
- We intend to come up with a better solution for grab bars inside the bathrooms.

Location 4 – Grand Island Community Center

- As stated above regarding the carpets we are investigating a Townwide solution.

Town of Grand Island • 2255 Baseline Road, Grand Island, New York 14072
(716) 773-9600 x616 • Fax: (716) 773-9618 • E-mail: pmarston@grand-island.ny.us

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- As stated with the library we are looking at the under-fixture pipe insulation.
 - Also, we will conduct an investigation into the weight of the doors for a remedy to follow audit recommendation.

Location 5 – Grand Island Highway Department

- As stated above with other locations van accessible parking spaces will be addressed.
- We will investigate altering the service counter and public drinking fountain to an accessible height.

Location 6 – Recreation Department

- As stated above the parking lot is shared with the Grand Island Senior Center, therefore, parking spaces will be included in the above remedy.
- Furthermore, as we design our drainage upgrades, we will investigate landing areas at the top of our ramps to align with accessibility standards.

We will refer all of these initiatives to the respective custodian of these facilities and our townwide Safety Committee to ensure implementation.

If you have any further concerns or comments, please feel free to contact my office.

Best Regards,

Peter Marston
Town Supervisor

Cc: Dick Crawford, Highway Superintendent/Safety Committee

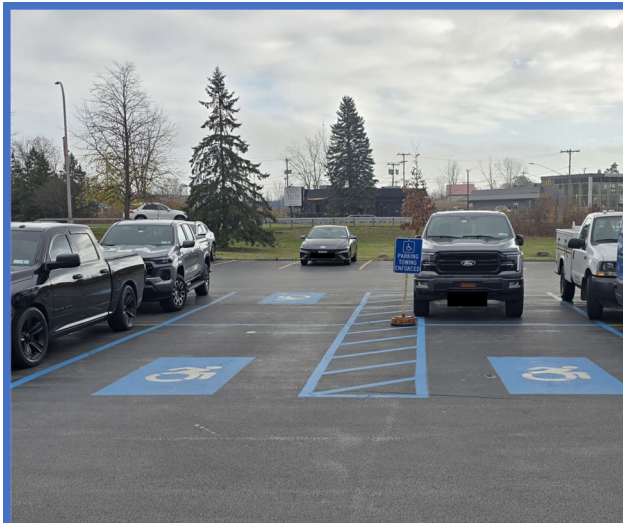
Cc: Jim Linenfelser, Town Hall Caretaker

Cc: Robert Westfall, Town Engineer

Appendix B: Potential Physical Accessibility Improvements

FIGURE 2

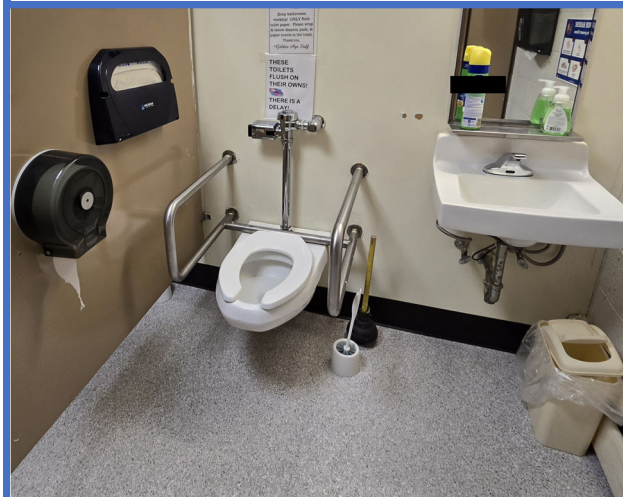
Potential Physical Accessibility Improvement Examples^a



The accessible parking spaces at the Town Hall are not van accessible.



Mats at the Highway Department entrance should be secured or removed to minimize tripping hazards.



Grab bars in the Senior Center accessible restroom stalls are not mounted on the back and side walls to provide proper accessibility.



There are no level landings at the top of the curb ramps on the accessible route from the Library parking lot.

a) Photos taken by OSC auditors in November 2024 with permission from local officials.

Figure 3: Potential Physical Accessibility Improvements by Component

Accessibility Checklist Component Category	Applicable Checklist Components Reviewed	Potential Improvements Identified	Percentage With Potential Improvements Identified
Accessible Route	58	0	0%
Curb Ramps	15	2	13%
Drinking Fountains	43	2	5%
Elevators	7	0	0%
Entrance	111	9	8%
Interior Doors	47	2	4%
Lavatories	56	8	14%
Parking	53	10	19%
Rooms and Spaces	13	1	8%
Sales and Service Counters	26	5	19%
Seating	11	1	9%
Signs	15	13	87%
Soap Dispensers and Hand Dryers	16	4	25%
Toilet Compartments (Stalls)	60	11	18%
Toilet Rooms	50	15	30%
Water Closets	76	20	26%
Totals	657	103	16%

Appendix C: Audit Methodology and Standards

We conducted this audit pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law. We obtained an understanding of internal controls that we deemed significant within the context of the audit objective and assessed those controls. Information related to the scope of our work on internal controls, as well as the work performed in our audit procedures to achieve the audit objective and obtain valid audit evidence, included the following:

- We selected the Town from a list of all cities, towns and villages (excluding NYC) not currently in OSC's audit process at the time of selection. We divided the list into seven regions and used expenditure data reported in the 2023 fiscal year to judgmentally select cities, towns and villages from these regions for an even representation across the State for this multi-unit audit.
- We reviewed applicable laws and regulations, as well as any policies and procedures the Town had regarding accessibility. The potential improvements to physical accessibility identified in the report, however, are intended for informational purposes only and should not be construed as OSC opining as to the legality of the Town's compliance with ADA requirements.
- We interviewed Town staff and reviewed Board meeting minutes to gain an understanding of accessibility for the Town's programs and services.
- We reviewed accessibility to programs and services provided at Town facilities, excluding recreational programs and services provided by third parties. We used the ADA Checklist for Existing Facilities, which uses the 2010 ADA Standards, as a tool to review accessibility at the sampled facilities. We reviewed the accessibility components applicable at each sampled facility including accessible parking, approaches to buildings, building entrances, accessibility within buildings including to meeting rooms, offices providing programs and services, restrooms, and water fountains.

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Unless otherwise indicated in this report, samples for testing were selected based on professional judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or size of the relevant population and the sample selected for examination.

The Board has the responsibility to initiate corrective action. A written corrective action plan (CAP) that addresses the findings and recommendations in this report should be prepared and provided to our office within 90 days, pursuant to Section 35 of General Municipal Law. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. We encourage the Board to make the CAP available for public review in the Town Clerk's office.

Appendix D: Resources and Services

Regional Office Directory

www.osc.ny.gov/files/local-government/pdf/regional-directory.pdf

Cost-Saving Ideas – Resources, advice and assistance on cost-saving ideas

www.osc.ny.gov/local-government/publications

Fiscal Stress Monitoring – Resources for local government officials experiencing fiscal problems

www.osc.ny.gov/local-government/fiscal-monitoring

Local Government Management Guides – Series of publications that include technical information and suggested practices for local government management

www.osc.ny.gov/local-government/publications

Planning and Budgeting Guides – Resources for developing multiyear financial, capital, strategic and other plans

www.osc.ny.gov/local-government/resources/planning-resources

Protecting Sensitive Data and Other Local Government Assets – A non-technical cybersecurity guide for local government leaders

www.osc.ny.gov/files/local-government/publications/pdf/cyber-security-guide.pdf

Required Reporting – Information and resources for reports and forms that are filed with the Office of the State Comptroller

www.osc.ny.gov/local-government/required-reporting

Research Reports/Publications – Reports on major policy issues facing local governments and State policy-makers

www.osc.ny.gov/local-government/publications

Training – Resources for local government officials on in-person and online training opportunities on a wide range of topics

www.osc.ny.gov/local-government/academy

Contact

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Tel: (518) 474-4037 • Fax: (518) 486-6479 • Email: localgov@osc.ny.gov

<https://www.osc.ny.gov/local-government>

Local Government and School Accountability Help Line: (866) 321-8503

STATEWIDE AUDITS – Dina M.L. Thompson, Chief of Municipal Audits

State Office Building, Suite 1702 • 44 Hawley Street • Binghamton, New York 13901-4417

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