

# **ADA Self- Evaluation and Transition Plan**

**Prepared for:** 

The Mayor's Office of Diversity, Equity and Inclusion

# **FINAL REPORT**

December 30, 2020



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# **INTRODUCTION**

Milligan and Company has been engaged by the Mayor's Office of the City of Philadelphia to perform a Title II Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan. Title II of the ADA of 1990 prohibits public entities from excluding or denying persons with disabilities participation in and benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity. To ensure non-discriminatory access to all city services and programs, public entities must conduct a Self-Evaluation assessment and provide written policies and procedures that provide accessibility to programs, services, and activities. Public entities with 50 or more employees are also required to develop a Transition Plan detailing any structural changes that would be undertaken to achieve program access including a scheduled time frame for their completion.

#### What is the Americans with Disabilities Act?

The Americans with Disabilities Act (ADA) protects people with disabilities from being discriminated against in employment, local and state government, as well as public accommodations, such as stores or movie theaters.

## What does disability mean according to the ADA?

To be protected by the ADA, you must fit within the law's definition of disability:

- Have a physical or mental impairment that also substantially limits you in performing one or more major life activities;
- Have a record or history of an impairment;
- Are perceived to have a disability.

# 1. SCOPE

This assessment focuses solely on Title II of ADA, specifically 28 CFR Part 35, and does not include an assessment of Title I non-discrimination in employment.

To assist the City of Philadelphia (city) in fulfilling its Title II requirements, the ADA Self-Evaluation and Transition Plan project is divided into three phases:

Administrative Review: Review of city programs and services to determine gaps in ADA

compliance and to provide preliminary observations and findings

regarding policies and procedures.

Self-Evaluation: Physical barrier review of city facilities and development of the ADA

Self-Evaluation report identifying programmatic and physical barriers.

Transition Plan:

ADA Transition Plan development to guide the removal of barriers to accessibility including capital project prioritization, cost estimates, and a long-term schedule for improvements with public input and comment.

This report encompasses the ADA Self-Evaluation and Transition Plan phases of the project. The findings include the results from the ADA-focused administrative review of programs and services provided by the city as well as the physical barriers assessed at 537 city owned or leased facilities.

This report and the entire Self-Evaluation and Transition Plan project focuses primarily on departments under the Mayor's direct control. The Administrative Review portion of the project also included eight of the nine independently elected offices.<sup>1</sup> However, three independent offices located in City Hall were included in the physical barrier assessment conducted as part of the Self-Evaluation:

- Office of the Philadelphia City Commissioners
- Philadelphia City Council
- Register of Wills

## 2. SCOPE LIMITATIONS

This Plan does not include quasi-public agencies and authorities. As separate authorities which receive federal funding, they are directly responsible for maintaining compliance with federal laws and regulations governing accessibility.

Departments, Offices, and Agencies excluded from this Title II ADA project include:

- Human Resources (covered under Title I of the ADA)
- Transportation Services for Individuals with Disabilities (SEPTA)
- Fair Housing, Residential, and Long-term Care Facilities (PHA)
- Education (School District)
- Philadelphia Redevelopment Authority (PRA)
- Philadelphia Industrial Development Corporation (PIDC)

<sup>&</sup>lt;sup>1</sup> Independent elected offices who did not participate in the physical barrier review include: the Board of Ethics, Office of the Controller, Office of the District Attorney, First District of Pennsylvania and Philadelphia Courts, and the Philadelphia Sheriff's Office. The Board of Revision of Taxes chose not to participate in the administrative review or the physical barrier assessment.

The scope of this Plan also does not cover sidewalks, curb ramps, cross walks, and signals in the public Right of Way (Streets Department) *except* those directly associated with or contained within the 537 city facilities included in the physical assessment.<sup>2</sup>

# 3. REPORT ORGANIZATION

The report is presented in three parts and includes one appendix:

- Part I outlines the process for the Administrative Review of policies and programs and provides highlights of recommendations, implementation, and outcomes.
- Part II summarizes the results of the Self-Evaluation including programmatic and physical barriers revealed during the assessment.
- Part III encompasses the **Transition Plan** and provides a list of facilities requiring the removal of barriers to accessibility and includes project prioritization, cost estimates, and a long-term schedule for improvements with a focus on equity and urgency.
- Appendix I includes the city's ADA Policies and Procedures.
- Appendix II includes all Public Comments received during the public comment period on the draft report.

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<sup>&</sup>lt;sup>2</sup> The city is currently a party in a lawsuit regarding the accessibility of sidewalks and curb ramps. The outcome of the lawsuit will determine which actions regarding public right of ways that the city will be required to address.

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# I. ADMINISTRATIVE REVIEW

# 1. PROCESS AND METHODOLOGY OVERVIEW

In order to evaluate the city's current programs, services, and activities for accessibility, Milligan conducted a multi-step administrative review process to gather background information on how each department operates in regard to the Title II requirements. The evaluation included both an external assessment of the city's website from a public viewpoint and an internal questionnaire to gather the necessary baseline data on the programs and services provided by the city.

#### **ADA Coordinator**

In 2018, the Mayor's Office created a new Office of ADA Compliance and the position of Director of ADA Compliance who also serves as the city's ADA Coordinator. Prior to 2018, the role of ADA Coordinator was filled by the Executive Director of the Mayor's Commission for People with Disabilities (MCPD). The MCPD page on the city's official website, <a href="https://www.phila.gov/departments/mayors-office-for-people-with-disabilities/">https://www.phila.gov/departments/mayors-office-for-people-with-disabilities/</a>, is dedicated to the ADA activities of the city and includes official ADA policies of the city as well as provides links to related websites. The webpage includes the name, address and phone number of the designated ADA Coordinator.

#### **ADA Training Webinar**

Prior to the collection of department data, Milligan developed an ADA Training webinar with input from the Director of ADA Compliance to prepare departments for involvement in the ADA project. The ADA Training webinar outlined the city's ADA project and purpose, the Self-Evaluation and Transition Plan process with a focus on the essential requirements for Title II compliance, and provided examples of common accessibility issues in cities. The Office of Diversity and Inclusion requested that each department head identify mid-level staff to participate in the training and encouraged department managers to share the training with any additional staff who might benefit from the training. The ADA Coordinator also provided a series of live ADA Trainings in addition to the webinar. A total of 440 city staff participated in the ADA Training with at least one representative from each city department and independent elected office participating.

#### **Website Background Research**

Milligan conducted departmental website background research to assess the information available on the city's programs and services from the public point of view. If a person, with or without a disability, wanted to know the types of programs and services offered and how to access them, what information and in what format would they find it on the city's website or on

a specific department's webpage. Milligan gathered information not only on the programs and services offered by each department or independent office but also whether or not the webpage contained forms (downloadable and web-based fillable), reports, videos, or presentations.

#### **Departmental ADA Questionnaire**

A departmental ADA questionnaire was developed to gather internal information on the types of programs and services provided as well as departmental policies and procedures related to accessibility. The questionnaire included 37 questions on how departments interact with persons with disabilities, department specific programs and services provided to the disability community, and if there are any cases where exclusions or restrictions to programs or services may be necessary. The questionnaire also gathered information on departmental grievance procedures, as well as policies and procedures for service animals, non-discrimination in contracting with external organizations, wheelchair and other power-driven mobility devices, surcharges and costs to persons with disabilities, events and event ticketing, communication and telecommunication measures, auxiliary aids and services, and website accessibility. Departments were also asked to identify a Title II Departmental ADA Liaison to coordinate the department's ADA obligations to the public.

Milligan collected and assessed 90 questionnaires from 77 units within the City of Philadelphia's government. These units included cabinet level responses covering multiple departments (i.e. Planning and Development Cabinet and the Chief Administrative Officer), responses on behalf of multiple departments (such as the Commission on Human Relations and the Fair Housing Commission), individual department submissions, and independent elected office responses. Some departments, due to their size and complexity, opted to submit multiple questionnaires.

#### 2. SUMMARY OF ADMINISTRATIVE RECOMMENDATIONS AND OUTCOMES

The administrative review of department programs and services revealed areas of improvement needed to ensure the city's compliance with Title II of the ADA. The findings and recommendations were shared with city officials in November 2018. As a result of the administrative review, the city updated its ADA policies and procedures. All of the policies and procedures have been implemented and are available to the public with the exception of the Web Accessibility Guidelines which are being finalized.

Copies of the ADA policies and procedures are included in <u>Appendix I</u> and may be found on the City of Philadelphia's website at <a href="https://www.phila.gov/documents/ada-policies/">https://www.phila.gov/documents/ada-policies/</a>.

Table 1. ADA Administrative Review Recommendations and Status

Administrative Area	Recommendation	Status	Date
Policies and Procedures	Revise the ADA Non-Discrimination Public Notice	Complete	April 1, 2019
	Revise the Reasonable Modification Procedures and Request Form	Complete	April 1, 2019
	Revise the Grievance Procedures and Form	Complete	April 1, 2019
	Develop Website Accessibility policies and procedures	Complete	October 14, 2020
	Develop an Effective Communication policy and procedures	Complete	April 1, 2019
	Develop Event policies and procedures	Complete	October 21, 2019
Operational Improvements	Establish Departmental ADA Liaison network	Complete	April 1, 2019
	Determine the roles and responsibilities of departments in implementing policies and procedures	Complete	April 1, 2019
	Website Accessibility Guidelines training	Complete	October 2020

Additionally, in 2019 the Director of ADA Compliance formed an ADA liaison network for departments, developed and instituted an ADA Liaison Policy, and provides on-going training on ADA policies, procedures, and regulations.

The public is strongly encouraged to use the <u>Reasonable Modification Request Form</u>. In order to address individual needs it is important to submit a formal request. Formal requests can be tracked to ensure that an appropriate and timely modification is provided. Additionally, requests of similar nature can be tracked and documented to provide guidance on policy changes.

During the administrative review of department programs and services, Milligan noted the following positive ADA program highlights:

## **Emergency Services**

The Philadelphia Police Department has a **911 Program for People with Disabilities** to assist 911 dispatchers, police and other first responders when answering an emergency call: <a href="https://www.phila.gov/services/safety-emergency-preparedness/apply-for-the-911-program-for-people-with-disabilities/">https://www.phila.gov/services/safety-emergency-preparedness/apply-for-the-911-program-for-people-with-disabilities/</a>. The voluntary registration allows residents to provide important information for anyone in their household about physical and/or intellectual disabilities, preferred methods of communication, as well as any medical conditions and medications. Improvements to this program are currently being explored by the administration in conjunction with the police department.

# Free Library of Philadelphia

The variety of free programs, services, and activities provided by the Library for the Blind and Physically Handicapped (LBPH) is extensive: <a href="https://libwww.freelibrary.org/lbph/">https://libwww.freelibrary.org/lbph/</a>. Officially a division of the Free Library of Philadelphia, LBPH is also part of the National Library Service for the Blind and Physically Handicapped and serves Philadelphia and Pennsylvania residents. LBPH offers on-site services, services via the mail, and digital downloads including Braille, large-print, audio, and digital book machines, Braille and Audio Reading Download (BARD) support, and accessible computers. Access Technology Workstations are located in eight Library locations across the city. LBPH also provided awareness training in 2017 to other Free Library branch staff so that the entire Free Library system could better serve patrons with disabilities.

#### **Communications**

Since 2001 the city has had a Braille and Alternative Format Policy and Sign Language Policy. This policy was updated in 2019 and included as part of the city's **Effective Communication Policy** and the **Reasonable Modification Policy.** The city now also provides an on-line reasonable modification request form which can be accessed at <a href="https://www.phila.gov/services/diversity-inclusion-accessibility-immigration/submit-a-reasonable-modification-request/">https://www.phila.gov/services/diversity-inclusion-accessibility-immigration/submit-a-reasonable-modification-request/</a> or requests can be sent via email to ADA.Request@phila.gov.

# **Website Accessibility**

The city is currently finalizing the redesign of the entire city website. The new website easier to navigate with a clean, white background and a consistent design standard that will make it easier for persons with visual disabilities to read and follow. Additionally, the redesigned website focuses on the programs and services offered which is more user-friendly for the public.

#### **Accessible Curb Ramps**

The Streets Department has an ADA Unit which is responsible for overseeing a city-wide program for ADA compliant curb ramps: <a href="https://www.philadelphiastreets.com/highways/ada-unit">https://www.philadelphiastreets.com/highways/ada-unit</a>. Through the ADA Curb Ramp Partnership Program, anyone can submit a request to have a curb ramp which is located in the public right of way upgraded to the most current accessibility design standard: <a href="https://www.philadelphiastreets.com/report-a-problem/ada-ramp-request">https://www.philadelphiastreets.com/report-a-problem/ada-ramp-request</a>. The city receives many requests with all requests being reviewed and then prioritized based on greatest need. The ADA Unit also provides accessible curb ramp construction guidelines for design and construction professionals and manages the curb ramp approval process.<sup>3</sup>

# **Elections**

Although the result of a settlement with the federal government, the **Office of the City Commissioners** had implemented polling place policy and procedure reforms and multiple reasonable measures by which persons with disabilities and the elderly may cast a ballot for an election: <a href="https://www.philadelphiavotes.com/en/voters/mail-in-and-absentee-ballots">https://www.philadelphiavotes.com/en/voters/mail-in-and-absentee-ballots</a>. The city permits not only an alternate ballot for those who cannot access their designated polling place but also provides a procedure by which a voter with a disability may designate an agent to deliver their emergency alternate ballot to the County Board of Elections up to 8:00 pm on election day. This modification to increase accessibility of voting access exceeds both the federal settlement and the requirements of the Commonwealth of Pennsylvania.

Since the COVID-19 pandemic, the methods and options for voting have expanded even further for people with disabilities in Philadelphia and many other jurisdictions across the country. For the November 3, 2020 general election, in addition to voting in-person on election day, voters in Philadelphia were able to request a mail-in ballot or go to one of 17 satellite election offices to register to vote, request a mail-in ballot, receive a ballot, vote, and submit a completed ballot:

https://myvotemyway.philadelphiavotes.com/# ga=2.68147346.2036135958.1602094587-1426441229.1602094587. The satellite election offices opened on September 29 and remained open seven days per week until 8:00 pm on November 3, 2020.

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<sup>&</sup>lt;sup>3</sup> The city is currently a party in a lawsuit regarding the accessibility of sidewalks and curb ramps. The outcome of the lawsuit will determine which actions regarding public right of ways that the city will be required to address.

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# II. Self-Evaluation ADA Barrier Assessment

During 2019, Milligan conducted a physical barrier review of 537 city owned and leased facilities across the entire city. The assessments were limited to a review of the areas open to the public only. No employee areas or areas closed to the public were assessed. One these facilities was located on a contiguous property and was combined for the purposes of addressing overlapping corrective actions to barriers. Therefore the final number of facilities assessed and listed in the Plan totals 536 sites.

# 1. CATEGORIES OF PROPERTIES ASSESSED

For purposes of the self-evaluation, the Milligan assessment team inspected the following types of properties:

- Public Property: Administrative Buildings, Police, and Prisons totaling 48 sites.
- Health Centers totaling nine (9) sites.
- Free Library of Philadelphia: including the Rosenbach Library and Museum totaling 55 sites.
- Parks and Recreation totaling 391 sites.
- Parks and Recreation Historic sites totaling 33 sites.

Additionally, the Free Library and Parks and Recreation sites assessed overlap with the city's Rebuild program. A total of 72 Rebuild sites were assessed and are included in the Transition Plan. The complete list of sites is included in Part III ADA Transition Plan in this document.

# 2. SUMMARY OF SELF-EVALUATION OUTCOMES

The Milligan team reviewed structural, maintenance, and programmatic barriers. Philadelphia is an older city with many public facilities built between 1900 and 1960. Some of these facilities have been upgraded over the years to provide accessibility via ramps, wheelchair lifts, and where possible, elevators. A small number of library and recreation buildings are still not accessible for persons with limited mobility or users of wheelchairs. These sites are older or are historic buildings that pose structural challenges to accessibility. Until these sites can be made fully accessible, if structurally feasible, programmatic solutions have been recommended to address accessibility. These programmatic solutions are not intended to be a permanent solution to accessibility. However, the structural feasibility of any building modifications will need to be determined by a professional structural engineer to ensure the structural integrity of the building is not compromised. Many of these programmatic changes are no to low cost and can be achieved by moving or providing programs in an alternate location, often within the

same facility.<sup>4</sup> These sites are noted with a "Programmatic Option for Accessibility" in the list of facilities provided in Part III ADA Transition Plan in this document.

As a result of the Self-Evaluation review of facilities, Milligan noted the following positive highlights:

# **Sites with No ADA Issues**

Of the 537 facilities assessed, 55 sites were found to have no accessibility issues.

#### **Health Department**

Since the completion of the facility assessments, the Health Department has installed at least one accessible exam table in each of its nine Health Centers.

# Free Library of Philadelphia

As part of the renovations to the Parkway Central Library, new fully compliant all gender single toilet rooms and compliant multi-stall restrooms were installed on the main and lower library floors. Wood Street, located at the rear of the Library, was repaved and parked cars are no longer permitted to park on the sidewalk leading to the accessible entrance.

#### Parks and Recreation

Recently renovated playgrounds throughout the park system are not only accessible by the 2010 ADA Standards but also provide a more inclusive play experience, including sensory and interactive elements, for all abilities.

<sup>&</sup>lt;sup>4</sup> Alternatives to barrier removal. 28 Code of Federal Regulations (CFR) Part 36 Section 305: https://www.ada.gov/reg3a.html#Anchor-91481

# III. ADA TRANSITION PLAN

This Transition Plan serves as a data point of reference, representing the state of selected programs and facilities under the jurisdiction of the city as of 2020. Due to the city's efforts to make as many ADA modifications and corrective actions as possible on a continuing basis, some corrective actions listed are anticipated to be in progress or to be completed prior to implementation of the Transition Plan beginning in January 2021.

# 1. ADA PRIORITY LEVELS

Recognizing that the city has limited funds and cannot immediately make all programs and facilities fully accessible, ADA corrective actions had to be prioritized for Fiscal Year 2022 through Fiscal Year 2025<sup>5</sup>. Any corrective actions that have been noted as unfunded in this report will be re-reviewed and scheduled during the next three-year Transition Plan update in 2024. The applicable ADA priority levels have been established as follows in accordance with Department of Justice regulations in 28 Code of Federal Regulations (CFR) Part 36 Section 304(c):

**Priority 1** - Accessible approach and entrance, accessible path to and through the site, and safety

**Priority 2 -** Access to goods, services, programs, and activities

**Priority 3 -** Access to public toilet rooms

Priority 4 - Access to other public amenities such as water fountains and public telephones

In addition to ADA priority, facilities were prioritized by equity based upon location in low-income and minority neighborhoods as well as by cost for future budget planning. Accordingly, a site noted as a Priority 2 which is located in a low-income neighborhood that has been impacted by disinvestment may be listed higher on the Transition Plan prioritization than a site that is noted as a Priority 1 site located in higher income neighborhood. For the purpose of this report, any facility assessed as compliant at the time of the site visit and does not require ADA corrective action at this time was listed as Priority Zero (0). However, these facilities should be re-assessed for maintenance issues impacting accessibility when the Transition Plan is updated in 2024.

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<sup>&</sup>lt;sup>5</sup> The City of Philadelphia's Fiscal Year runs from July 1 to June 30. For example, Fiscal Year 2022 begins July 1, 2021 and ends on June 30, 2022.

# 2. BARRIERS TO ACCESSIBILITY

The following set of maps shows the locations of facilities assessed for ADA barrier issues. Each facility was assigned an ADA Priority 1 through 4 based upon the physical Self-Evaluation assessment results and the regulatory definitions. Facilities found to have no apparent ADA issues at the time of assessment are listed in Table 5 as Priority Zero (0). It is important to note that, although a site was found to have "no issues" at the time of the 2019 assessment, all facilities require on-going maintenance. The maps show that Priority 1 and Priority 2 sites are primarily clustered in West Philadelphia, North Philadelphia, and South Philadelphia. However each area of the city has at least one facility that is a Priority 2.

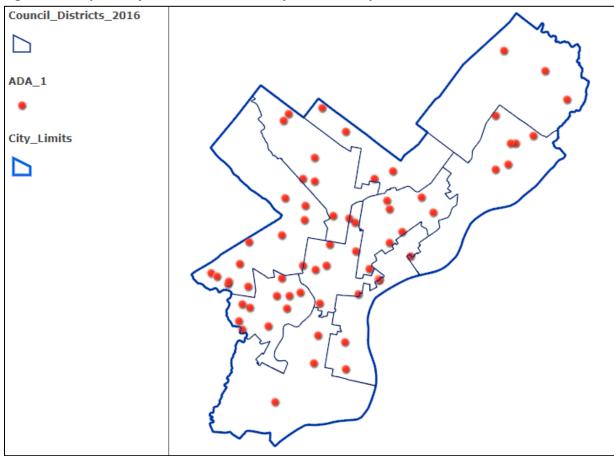


Figure 1. Map of City Facilities Assessed by ADA Priority 1

Figure 1 shows the locations of the facilities reviewed in 2019 and categorized as ADA Priority 1 as a result of the Self-Evaluation assessment. Priority 1, sites with the least accessibility, are shown as a large red circle. There are 66 facilities categorized as Priority 1.

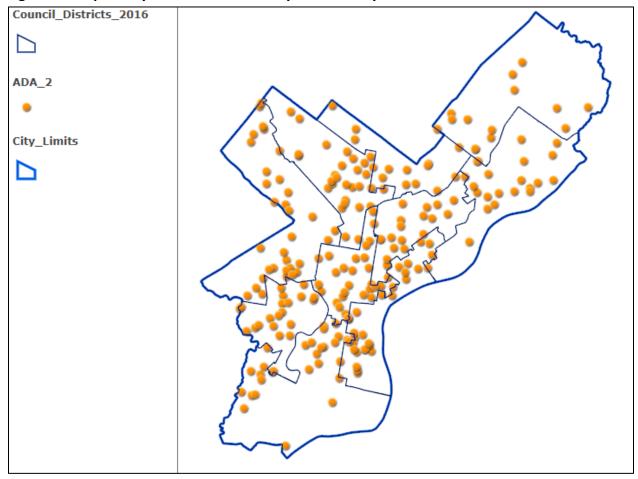


Figure 2. Map of City Facilities Assessed by ADA Priority 2

Figure 2 shows sites that are Priority 2, indicated by an orange circle. These Priority 2 facilities are sites with accessibility barriers to goods, service, programs, or activities. There are 237 facilities categorized as Priority 2.

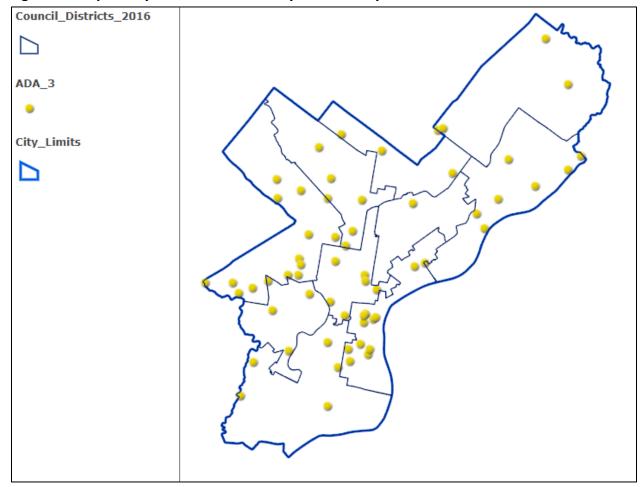


Figure 3. Map of City Facilities Assessed by ADA Priority 3

Figure 3 represents facilities assessed as Priority 3 with accessibility issues primarily related to public toilet rooms. ADA Priority 3 sites are indicated with a yellow circle. There are 61 facilities categorized as Priority 3.

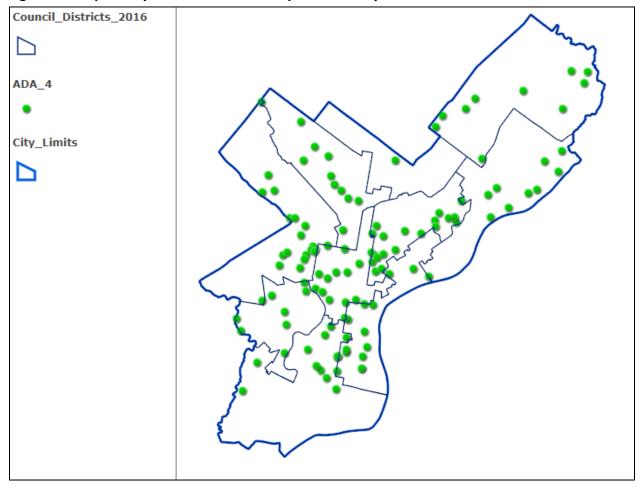


Figure 4. Map of City Facilities Assessed by ADA Priority 4

Figure 4 shows the locations of facilities that are Priority 4 as green circles. These are facilities that would otherwise be accessible except that they contain barriers to public amenities such as water fountains. There are 117 facilities categorized as Priority 4.

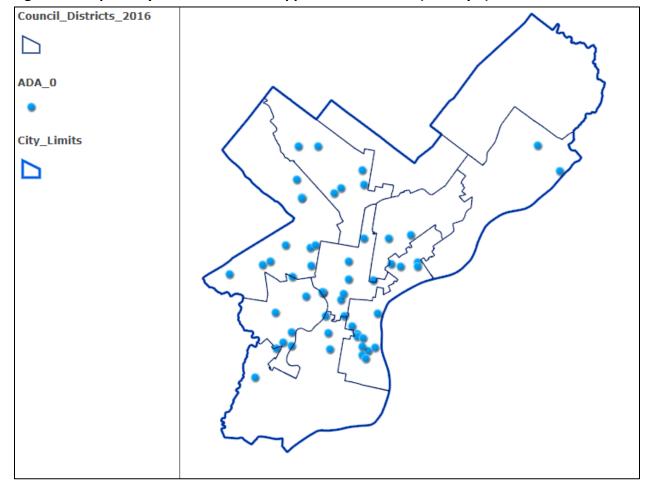


Figure 5. Map of City Facilities with No Apparent ADA Issues (Priority 0)

Figure 5 shows sites that are Priority 0, indicated by a blue circle. Priority 0 indicates that there were no apparent ADA corrective actions needed at the time of the site assessment. There are 55 facilities categorized as Priority 0.

# 3. UNDUE BURDEN

The ADA does not require any public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of its program or service, would create a hazardous condition for other individuals, or would represent an undue financial and administrative burden.<sup>6</sup>

<sup>&</sup>lt;sup>6</sup> 28 CFR Part 35 Section 150 (2010).

#### 4. RECOMMENDED ACCESSIBILITY IMPROVEMENTS

A summary of city-wide recommended upgrades to programs and facilities is listed below. These are early action items that are no to low cost and require primarily staff time. Facility-specific capital, maintenance, and programmatic recommendations were reviewed by the city's ADA project team and city departments for prioritization as part of the city's Transition Plan and are included below in Section 5 ADA Facility Barrier Assessment Results.

## **City-Wide Short-Term Programmatic Recommendations**

For facilities that are Priority 1 with no building accessibility or Priority 2 with limited accessibility between floors:

- Move programs and activities to the accessible level of the building or to the nearest accessible facility. This should be a temporary solution until a physical solution, where feasible, is implemented.
- Advertise to the community as well as provide information posted at the facility and on the department website that reasonable modification for access to programs and activities can be requested.
- Develop a departmental plan for providing accessibility to program and activities where accessibility is limited.
- Train staff on how to accept and process reasonable modification requests received at the facility.
- Provide alternate formats for programs and activities such a virtual programming. During the COVID-19 pandemic, some departments such as the Free Library, have already begun offering regular virtual programs and activities. Virtual offerings must accommodate all users.

#### **City-Wide Short-Term Maintenance Recommendations**

The Self-Evaluation assessment revealed several consistent ADA issues across facilities that can easily be corrected with no or low cost maintenance solutions:

- Accessible Path: Items and furniture stored at or near emergency exits and other doors; on or in front of counters, in particular the accessible portion of counters; on or along accessible routes; and in toilet rooms blocks the accessible path for people who have limited mobility or low vision. Any furniture or items blocking the accessible path, particularly at or near emergency exits, creates a safety issue. Each department should develop and regularly implement the inspection of facilities to ensure that items such as trash cans, recycle bins, boxes, and furniture do not impede access to emergency exits, doors, rooms, and counters.
- Door Closing Speed: Many doors across city facilities do not meet the door speed closing standard and close too quickly. All doors should be adjusted to so that from an

- open position of 90 degrees the time required to move a door or gate to an open position of 12 degrees shall be five seconds minimum.<sup>7</sup>
- **Door Hardware:** Noncompliant door hardware was noted as a frequent barrier that can be easily corrected. Door knobs that require grasping, twisting, or turning of the hand or wrist do not meet the ADA Standard. Lever type door hardware or any hardware that can be operated with one hand, a closed fist, or loose grip is recommended.<sup>8</sup>
- Mirrors and Coat Hooks: Although not encountered as frequently, there were a notable number of mirrors and coat hooks located in toilet rooms that were mounted too high for persons with limited mobility. Mirrors located at sinks in toilet rooms should be mounted with the lower edge of the reflecting surface, not the frame, at 40 inches maximum from the finished floor. A full length mirror can also be installed to accommodate a greater number of people. Coat hooks should be located 48 inches maximum from the finished floor and installed inside the accessible toilet compartment.

#### **Additional City-Wide Intermediate-Term Recommendations**

- Signage: Many city facilities lack compliant directional, tactile, or Braille signage as required by the 2010 Standards. Much of the existing signage was mounted too high, at more than 60 inches maximum from the finished floor, was worn, or covered with paper or tape because the signage was no longer correct. Covered signs were encountered most frequently at single toilet rooms previously designated as either for women or men. The city recently instituted a policy where all single restrooms are now to be designated as all gender. The city should develop a complete and compliant signage package that meets all of the 2010 Standards and should install or replace noncompliant signs across all facilities.<sup>11</sup>
- Maintenance of Building Features: One idea presented to the ADA project team that the city should consider exploring further was the creation of a city-wide ADA maintenance unit that would work across departments to ensure that basic maintenance items that can impact accessibility are addressed routinely.

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<sup>&</sup>lt;sup>7</sup> 2010 ADA Standards for Accessible Design, Chapter 4 Section 404.2.8.

<sup>&</sup>lt;sup>8</sup> 2010 ADA Standards for Accessible Design, Chapter 3 Section 309.4 and Chapter 4 Section 404.2.7 (Advisory)

<sup>&</sup>lt;sup>9</sup> 2010 ADA Standards for Accessible Design, Chapter 6 Section 603.3.

<sup>&</sup>lt;sup>10</sup> 2010 ADA Standards for Accessible Design, Chapter 3 Section 308.2 and Chapter 6 Section 603.4.

<sup>&</sup>lt;sup>11</sup> 2010 ADA Standards for Accessible Design, Chapter 2 Section 216 and Chapter 7 Section 703.

#### 5. Public Participation

The Self-Evaluation and Transition Plan process included two tiers of public involvement. The Mayor's Commission (Commission) on People with Disabilities was formally briefed on the project in December 2018 and October 2020. Between these two briefings, the Commission received regular project status updates from the Executive Director of the Commission.

The Mayor's Office released the draft Transition Plan for public comment on October 15, 2020 for a 30-day comment period that included both written and verbal comments. The release of the draft plan included a press release and a blog posting. The formal public comment period ended on November 15, 2020. The ADA project team received 22 written comments and 1 verbal comment left via voicemail.

Two public meetings were held on in the evening of November 17 and the afternoon of November 19, 2020. During the two public meetings, a total of 9 comments were made by the public. A summary of all public comment received are included in <a href="Appendix II">Appendix II</a>.

# **6. ADA FACILITY BARRIER ASSESSMENT RESULTS**

The following list represents the city owned or leased facilities assessed for physical barriers to access. As discussed earlier in this Part under section 1, the corrective actions for these sites are prioritized by ADA priority 1 through 4 as well as by equity, by cost, and by proposed fiscal year. For reference, the list also includes those sites determined to be priority zero (0), or those sites not requiring ADA corrective at the time of the physical assessment. The estimated order of magnitude cost for all corrective actions is approximately \$70 million to be undertaken in the next eight to ten years.

#### It is important to note the following:

Some sites are noted as included in the Rebuild program. This note is for reference only and does not indicate or guarantee that ADA corrective actions are included or will be included in the Rebuild scope for that facility.

The list of facilities is organized as follows:

- Number: indicates the Transition Plan priority number;
- Site Name: name of the facility that was assessed;
- Address: the street address of the facility;
- Type: the type of facility by department;
- Notes: includes any items or notes of interest regarding the facility;

- ADA Priority: indicates the ADA priority one through four assigned as a result of the physical barrier assessment. Facilities assigned a zero (0) priority have no corrective actions required at this time and are at the very end of the list;
- Major Results: a summary list of ADA barriers found during the physical assessment. The major results were used to determine the assigned ADA Priority. The list also indicates a potential programmatic options to address accessibility such as moving programs and activities to an accessible floor of the facility or providing audio and visual programming;
- **Fiscal Years:** indicated the city's fiscal year during which corrective actions are anticipated to be completed and are indicated as 2022-2025 or as 2025-2028. Facilities that have funding identified or are under construction are listed as 2021. The city's fiscal year commences on July 1 and ends on June 30 of each calendar year.

Table 2: Self-Evaluation Facility Assessment Results and Transition Plan Prioritization

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
1	Barrett Playground Building	641 LINDLEY AVE	Parks & Recreation	REBUILD Community Engagement & Design Site requires substantial building and playground area improvements overall	2	REBUILD Signage Issues Surface issues Missing play components and swings non-compliant restrooms Doors narrow non-compliant drinking fountain	2022-2025
2	McPherson Square Library	601 E INDIANA AVE	Library	REBUILD All issues will be incorporated into Condition Study: Site has numerous infrastructure and landscaping issues	1	REBUILD Noncompliant Ramp at main entrance No accessible restroom Signage Issues (some missing and some blocked by utility pipes) Emergency egress issues Noncompliant bathroom door opening (key and push) Handrail issues Noncompliant staircase Noncompliant door (closing speed is fast) One Drinking Fountain	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
3	Fishtown Community Library	1217 E MONTGOMERY AVE	Library	REBUILD Roof and new elevator under construction Still possibility of relocation?	1	REBUILD Not Accessible Elevator out of order (4 years) Emergency egress issues Signage issues Handrail issues (loose) No accessible route through aisles Noncompliant door (closing speed is fast) Noncompliant restrooms (grab bars missing)	2022-2025
4	11th and Venango	3600 N 11TH ST	Parks & Recreation	New Park Plan will address all Corrective Actions Construction Start 2020	1	No accessible route to the park Path surface issues Non-compliant benches Basketball court surface issues	2022-2025
5	Athletic Recreation Center	1401-55 N 27TH ST	Parks & Recreation	REBUILD Substantial renovation planned \$10-11 million	1	REBUILD  No accessible route to the building Doors narrow, fast and heavy Noncompliant and no accessible restrooms Emergency egress issues Signage issues Needs second drinking fountain Noncompliant door hardware Handrail issues Noncompliant staircase Not enough accessible elevated play components Hard to get on the playground surface	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
6	Shepard Recreation Center	5700 HAVERFORD AVE	Parks & Recreation	REBUILD Community engagement and design	1	REBUILD  No accessible entrance to building  Programmatic Option for Accessibility  Noncompliant equipment  No accessible bathrooms	2022-2025
7	Kingsessing Library	4901 KINGSESSING AVE	Library	REBUILD Structural issues will be incorporated into Condition Study: Site has numerous infrastructure issues which may take precedence	2	REBUILD Stair issues Handrail issues Signage issues Elevator too small and noncompliant Emergency egress issues	2022-2025
8	Paschalville Library	6942 WOODLAND AVE	Library	REBUILD All I issues will be incorporated into Condition Study: Site has numerous infrastructure issues	2	REBUILD  Emergency egress issues  Noncompliant staircase that leads to basement  No accessible counter at front desk  Noncompliant bathroom door opening (key & push)  Signage issues	2022-2025
9	8th & Diamond Playground Building	2032-62 N 8TH ST	Parks & Recreation	REBUILD In Construction	2	Rebuild Surface issues Noncompliant turning radius entering restrooms No accessible toilets; only ambulatory Door speed fast Signage issues Noncompliant drinking fountain	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
10	Kingsessing Recreation Center Building	4901 KINGSESSING AVE	Parks & Recreation	REBUILD Awaiting nonprofit selection	1	REBUILD  2nd floor and Basement not accessible Programmatic Option for Accessibility Playground surface issues Noncompliant handrails No accessible drinking fountain Noncompliant door handles Signage issues	2022-2025
11	Fotteral Square	2400 N 11TH ST	Parks & Recreation	REBUILD In design	2	REBUILD Accessible route issues Play equipment not compliant	2022-2025
12	Francis J. Myers Recreation Center Building	5800 CHESTER AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come; awaiting nonprofit section	2	REBUILD  No elevator or access to 2nd floor or basement  Programmatic Option for Accessibility  Accessible route issues around outside play area Handrail issues  Ramp's landing is too small  Multiple doorways too narrow	2022-2025
13	West Mill Creek Playground Building	5072 OGDEN ST	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	4	REBUILD  Noncompliant curb ramps  Sidewalk surface issues  Handrail issues  No access to basketball court  Fast door speed  Missing singe	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
14	Martin Luther King Recreation	2101-35 CECIL B MOORE AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	1	REBUILD  No accessible route to second floor  Programmatic Option for Accessibility  Door Issues  Noncompliant restrooms  Signage Issues  No accessible drinking fountain  Noncompliant elevated play components in playground	2022-2025
15	Cecil B. Moore Recreation Center	2020-50 W LEHIGH AVE	Parks & Recreation	REBUILD Community engagement and design	1	No elevator or access to 2nd floor or basement Programmatic Option for Accessibility Doors narrow, fast and heavy Emergency egress issues Handrail issues Noncompliant restrooms No access or chair lift for swimming pool	2022-2025
16	Nicetown-Tioga Library	3720-22 N BROAD ST	Library	REBUILD Potential Programmatic solution to close upper floor to the public	1	REBUILD No elevator to Meeting Room Non-compliant doors Emergency Exit Issues Signage issues	2022-2025
17	Blanche Nixon Library	5800 COBBS CREEK PKWY	Library	REBUILD Time-sensitive improvements, more to come Roof, Floor, AC replacement completed	1	REBUILD Carnegie library Main Library floor Not Accessible Meeting room level (Polling location) accessible via ramp at emergency exit on Cobbs Creek Pkwy Noncompliant bathroom door opening (key & push) lack of signage Non-compliant handrails	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
18	Lawncrest Recreation Center Building	6000 RISING SUN AVE	Parks & Recreation	REBUILD Community engagement and design	2	REBUILD Signage Issues Noncompliant restrooms Noncompliant door hardware Doors narrow, fast and heavy Noncompliant drinking fountain No hardware on pull side (inside) of women's restroom door	2022-2025
19	Lawncrest Library	6000 RISING SUN AVE	Library	REBUILD	2	REBUILD Emergency egress issues Signage issues Noncompliant doors (fast closing speed) Noncompliant single Drinking Fountain No landing on ramp exceeding 30 ft.	2022-2025
20	3rd & Norris Playground	273 W NORRIS ST	Parks & Recreation	In design	4	All play components missing Surface condition issues	2022-2025
21	McPherson Square	601 E INDIANA AVE	Parks & Recreation	REBUILD Community engagement and design	2	REBUILD  Accessible Route surface issues  Noncompliant benches not on accessible route  Noncompliant play equipment  Broken slide and missing swings  Noncompliant and deteriorated curb ramps  Few noncompliant curb cuts  No accessible route to benches  Not enough accessible elevated play components  Pavement issues	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
22	Cherashore Playground	851 W OLNEY AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come; awaiting nonprofit section	2	REBUILD  No chair lift for pool  No accessible toilet room  Play area and accessible path surface issues  Signage issues  Noncompliant play equipment  Children's swings missing	2022-2025
23	Heitzman Recreation	2136 CASTOR AVE	Parks & Recreation	REBUILD Community engagement and design	2	REBUILD Door fast and heavy Noncompliant restrooms Door threshold issues Signage Issues Noncompliant drinking fountain Noncompliant play equipment No chair lift for pool Surface issues Accessible portable toilet not on accessible path	2022-2025
24	Olney Recreation Center	100 E GODFREY AVE	Parks & Recreation	REBUILD Community engagement and design	2	REBUILD Signage Issues Doors fast Handrail issues Mirrors high Needs more ground play components Noncompliant drinking fountain	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
25	Waterloo Playground Building	2502-12 N HOWARD ST	Parks & Recreation	REBUILD Community engagement and design	2	REBUILD  Not accessible due to noncompliant ramp: too steep, noncompliant cross slope, no handrails  No accessible bathrooms  Noncompliant play equipment  Surface issues  No chair lift for pool	2022-2025
26	Murphy Recreation Center Building	300 SHUNK ST	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	1	REBUILD Signage Issues Doors too narrow Threshold issue No accessible path to the building No accessible restrooms Noncompliant door hardware Emergency egress issues Noncompliant drinking fountain Doors heavy and fast Not enough accessible play components	2022-2025
27	Rivera Recreation Center	3201 N 5TH ST	Parks & Recreation	REBUILD Under construction Includes Mann Older Adult Center	2	REBUILD Door Issues Noncompliant Restrooms Noncompliant exterior handrail One elevated play component has ramps. Two components have not transfer stations All the play equipment is very old Emergency stairs from gym are in need of replacement	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
28	Gifford Playground	575 TOMLINSON RD	Parks & Recreation	REBUILD New play equipment, play surface, new trees, and seating installed; Under construction	1	REBUILD  No accessible route to recreation center  Restrooms are not accessible  Elevated play component for 5-12 year is not compliant	2022-2025
29	Hancock/St John's Playground Building	147 MASTER ST	Parks & Recreation	REBUILD Playground renovation under construction Building locked at site visit	2	REBUILD Building locked at site visit Not enough accessible play components No chair lift for pool	2022-2025
30	East Poplar Playground	800 N 8TH ST	Parks & Recreation	REBUILD Playground renovation design complete Construction pending	2	REBUILD Signage Issues Not enough accessible play components Doors fast and heavy Noncompliant restrooms Play area surface issues	2022-2025
31	Happy Hollow Recreation Center Building	4740 WAYNE AVE	Parks & Recreation	REBUILD Selected	2	REBUILD  No access to 2nd floor in basketball court building  Programmatic Option for Accessibility  Signage Issues  Doors fast and heavy  Noncompliant drinking fountain  No accessible elevated play component	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
32	Belfield Recreation	2109 W CHEW AVE	Parks & Recreation	REBUILD Sidewalk replacement under construction	2	REBUILD  No lift for swimming pool  Accessible route surface issues  Play area issues  Accessible route surface issues  Lack of signage  No accessible pool restroom	2022-2025
33	James Finnegan Playground Building	6801 GROVERS AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	2	REBUILD  Noncompliant restrooms  Noncompliant elevated play components  Doors heavy and close too quickly  Noncompliant Drinking Fountain	2022-2025
34	Miles Mack Playground	732-66 N 36TH ST	Parks & Recreation	REBUILD Construction starting soon	3	REBUILD  Non-compliant ramp on far side  Bathrooms not accessible	2022-2025
35	Mander Playground Building	33RD & DIAMOND STS	Parks & Recreation	REBUILD Selected	2	REBUILD Picnic tables not on accessible route Not enough accessible elevated play components No chair lift at swimming pool Restroom doors are narrow No lift at swimming pool Main gate to swimming pool does not have straight approach	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
36	Marian Anderson Recreation Center Building	740 S 17TH ST	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	2	REBUILD  No elevator to 2nd floor  Programmatic Option for Accessibility  Signage Issues  Emergency egress issues  Doors too narrow, heavy and fast  Handrail issues  Mirrors are high  Grab bar issues  Needs second drinking fountain  Not enough accessible elevated play components  Noncompliant benches  No chair lift at swimming pool	2022-2025
37	11th & Columbia (Cecil B. Moore) Playground	1001-33 CECIL B MOORE AVE	Parks & Recreation	Restroom renovations and 11th St. sidewalk repair in 2020; remainder unfunded	3	No handrails on staircases Handrail issues Noncompliant and no accessible portable restroom	2022-2025
38	Russo Park Playground Building	7374 EDMUND ST	Parks & Recreation	REBUILD Building not included in Rebuild scope; structural issues unfunded	2	REBUILD Heavy and fast door Needs complaint drinking fountain Signage issues Noncompliant, non-accessible restrooms Noncompliant computer tables Noncompliant elevated play components	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
39	Vogt Recreation Center Building	4131 UNRUH AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	4	REBUILD  Doors narrow, fast and heavy Emergency egress issues Signage Issues Handrail issues Non-accessible and noncompliant restrooms No chair lift for swimming pool Curb ramp too steep No accessible route to play components (steep ramp)	2022-2025
40	Frank Glavin Playground	3267-81 ALMOND ST	Parks & Recreation	REBUILD Community engagement and design	1	REBUILD Building not accessible (step) No accessible toilet room Noncompliant play equipment Surface issues Lack of signage	2022-2025
41	Vare Recreation Center Building	2600 MORRIS ST	Parks & Recreation	REBUILD Community engagement and design Building closed and fenced at site visit	2	REBUILD  Not enough accessible elevated play components  Accessible route surface issues  No chair lift at swimming pool	2022-2025
42	Tip Top Playground	1036-66 N FRONT ST	Parks & Recreation	Major Improvements Planned 2023-2024 (estimated \$1.1m) Funding for Design Approved	2	Accessible entrance to park obstructed by cars parked on the sidewalk Play components do not have enough accessible components Play area surface issues	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
43	Blackwell Regional Library	125-33 S 52ND ST	Library	Elevator Modernization \$105,000 Funded	3	Non-compliant grab bars Non-compliant handrails Lack of signage	2022-2025
44	Glen Ford Mansion	5001 GRANT AVE	Parks & Recreation Historic	LEASED Historic House used for tours and events Self-Guided Virtual Tour available on-line but not fully accessible	3	Mansion currently not accessible Programmatic Option for Accessibility Noncompliant restrooms Signage issues Noncompliant handrails	2022-2025
45	Cohocksink Recreation Center	2901 CEDAR ST	Parks & Recreation	REBUILD Community engagement and design	3	REBUILD Egress issues No accessible bathroom stall	2022-2025
46	Cedars House Café	9001 LYKENS LN	Parks & Recreation Historic	Historic Needs further investigation	2	Noncompliant stairs Noncompliant handrails No accessible route to the café	2022-2025
47	Lederer Pool	1219-25 E MONTGOMERY AVE	Parks & Recreation	REBUILD (Fishtown Recreation) Pool replacement under construction	1	REBUILD  No Accessible Route to Pool, stairs only  Pool closed and not in use at time of site visit, restrooms not able to be accessed  No chair lift for swimming pool	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
48	Al Pearlman Sports Center	600 PORT ROYAL AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come Unable to access recreation center, restroom or concession stand at site visit	2	REBUILD  No accessible route to facility and restrooms  No accessible route to benches  Noncompliant benches  Noncompliant handrails  Noncompliant staircase	2022-2025
49	Piccoli Playground Building	1501 E BRISTOL ST	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	2	REBUILD  Doors fast  No access into swimming pool  Noncompliant playground equipment  Signage issues  Noncompliant drinking fountain	2022-2025
50	Ferko Playground	1101 E CAYUGA ST	Parks & Recreation		2	Noncompliant curb ramps Noncompliant doors in recreation center No compliant restrooms	2022-2025
51	Belmont Grove Picnic Area	BELMONT AND CHAMOUNIX	Parks & Recreation		2	No accessible picnic tables Accessible route issues	2022-2025
52	Zielher Playground	200-64 E OLNEY AVE	Parks & Recreation	REBUILD Community engagement and design	2	REBUILD Signage issues Not enough accessible play components Noncompliant pool restrooms No route to picnic benches Noncompliant Drinking Fountain Door knobs noncompliant	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
53	Harrowgate Park	3455 KENSINGTON AVE	Parks & Recreation	REBUILD Selected	2	REBUILD Surface Issues	2022-2025
54	Norris Square Park	2100-60 N HOWARD ST	Parks & Recreation	Design to start FY21	4	Ground surface issues Basketball court is not accessible tables are not accessible	2022-2025
55	Mantua James L Wright Recreation Center	3320-50 HAVERFORD AVE	Parks & Recreation		1	No elevator to multipurpose room on 2nd floor Programmatic Option for Accessibility Emergency egress issues Handrail issues Noncompliant restrooms No landing for long ramp Door speed fast	2022-2025
56	1418 S Taylor Park	1418-30 S TAYLOR ST	Parks & Recreation		2	Not maintained, small tot lot and basketball court new residential construction fencing impeding access broken benches play area surface deteriorated  Short-term Recommendation: Temporarily close access to park due to safety issues until park is renovated or repurposed	2022-2025
57	Belmont Ballfield	4201 MONTGOMERY DR	Parks & Recreation		2	No accessible route from parking lot	2022-2025
58	Fernhill Park	4600 MORRIS ST	Parks & Recreation		2	Accessible route doesn't reach play area or courts Non-compliant tables No accessible restroom	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
59	Philadelphia Fire Academy Campus	5200 PENNYPACK ST	Admin	Structural issues included in capital budget. Phase II Master Plan with address entire campus in 3 years	2	Hardware issues Noncompliant restrooms Narrow doors No sign for accessible parking spot Signage issues High mirrors	2022-2025
60	Carroll Park	5801 W GIRARD AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	2	REBUILD Accessible route issues Noncompliant drinking fountain Curb ramp issues	2022-2025
61	Gambrel Recreation Center	1900 WAKELING ST	Parks & Recreation		4	Missing signage door speed fast Door issues	2022-2025
62	Sayre Morris Recreation Center	5800 WALNUT ST	Parks & Recreation		1	No wheelchair access to second floor Programmatic Option for Accessibility Noncompliant stairway and handrails Main restrooms have noncompliant recessed doors Restrooms in changing areas have noncompliant turning radii Pool has been closed for two years due to roof condition	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
63	Franklin Square Park	200 N 6TH ST	Parks & Recreation	LEASED	3	Heavy door with broken lock to the accessible restroom Noncompliant restroom Doors fast Signage Issues Not enough accessible play components Threshold issues Handrail issues Non-accessible route through mini golf Counter too high	2022-2025
64	16th District	3900 LANCASTER AVE	Police		1	No accessible route to building Noncompliant restrooms High counter Handrails issues Door speed fast	2022-2025
65	Pennypack on the Delaware Park	8201 STATE RD	Parks & Recreation	Restroom Building at baseball fields locked at site visit	4	Non-compliant portable restroom Parking had no access aisles No accessible picnic tables	2022-2025
66	Frankford & Solly Playground	8300 FRANKFORD AVE	Parks & Recreation		1	No accessible route No railing on bridge Noncompliant handrail Inaccessible play components	2022-2025
67	Etting Park Tot Lot	3255 N MARSTON ST	Parks & Recreation		2	Play surface issues Noncompliant tables Missing swings	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
68	Betsy Ross House	239-47 ARCH ST	Parks & Recreation Historic	LEASED Historic House Museum	3	House is not accessible Doors too narrow and fast Handrail issues Signage Issues Emergency egress issues Noncompliant restrooms - being renovated in 2020 Noncompliant drinking fountain	2022-2025
69	Schmidt John Playground Building	113-23 W ONTARIO ST	Parks & Recreation		2	Signage Issues No accessible restrooms Doors narrow and heavy Noncompliant door hardware type Threshold issues No chairlift for swimming pool	2022-2025
70	Municipal Services Building	1400-30 ARCH ST	Admin	Accessible Restroom provided on each floor (all the same) are compliant	2	Noncompliant doors Signage missing Noncompliant handrails Noncompliant ramp Counters too high Visual contrast on escalators missing	2022-2025
71	Clemente Playground	1800 WALLACE ST	Parks & Recreation		2	Noncompliant restrooms Doors heavy Signage issues Change in level around the trees; need more soil Signage issues Noncompliant turning radii into restrooms Emergency exit would not open Sinks too high	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
72	Herron Playground & Rec Center	213 REED ST	Parks & Recreation	Building Not Open to the Public	3	Non-compliant restrooms Non-compliant chess tables and picnic tables	2022-2025
73	Fishtown Recreation Center Building	1202-32 E MONTGOMERY AVE	Parks & Recreation	REBUILD Under construction Playground replacement complete	2	REBUILD Signage Issues Noncompliant restrooms Doors heavy and fast Hardware missing on pull side Noncompliant drinking fountain	2022-2025
74	Independence Library	18-28 S 7TH ST	Library	LEASED Structural costs passed to landlord	3	Very heavy doors  Many book carts in aisles impede accessible path Water fountains out of order for four months Restrooms not ADA compliant	2022-2025
75	Laurel Hill Mansion	7201 N RANDOLPH DR	Parks & Recreation Historic	Historic	4	Not Accessible except to ambulatory persons	2022-2025
76	Northern Liberties Building	313-27 FAIRMOUNT AVE	Parks & Recreation		1	No accessible route into building 2nd floor not accessible Programmatic Option for Accessibility Stairways and handrails are noncompliant No access into swimming pool	2022-2025
77	Courtesy Stables	8601 WISSAHICKON AVE	Parks & Recreation		2	No accessible route Noncompliant curb ramp Surface condition issues	2022-2025
78	Kelly Drive Reviewing Stand Building	1700 JOHN B KELLY DR	Parks & Recreation		2	Noncompliant staircase Handrail issues Noncompliant benches	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
79	Feltonville Recreation Center	231-37 E WYOMING AVE	Parks & Recreation		2	No ramp on 20+ elevated play components Not enough accessible play components Signage Issues No chair lift for pool Doors heavy and fast Emergency egress issues High mirrors	2022-2025
80	Health Center 5	1900 N 20TH ST	Health	Capital project to completely reconstruct the front entrance way, from the building to the curb; Atrium no longer public	2	Exterior Accessible Route issues Sidewalk surface issues No curb ramp at building entrance loading zone Curb ramp issues at intersections Rear ramp missing handrail Passenger loading zone not striped Counters too high	2022-2025
81	Pleasant Playground	6750 BOYER ST	Parks & Recreation	Lift can be addressed	2	Surface issues Signage issues Handrail issues No lift for swimming pool	2022-2025
82	29th & Passyunk Park	2827 W PASSYUNK AVE	Parks & Recreation		2	Play area surface issues Curb Ramp issues	2022-2025
83	Finley Recreation Center Building	7701 MANSFIELD AVE	Parks & Recreation		3	Door speed fast and heavy Noncompliant Drinking Fountain High toilet seat Handrail issues	2022-2025
84	Lemon Hill Mansion	SEDGLEY DR AT LEMON HILL	Parks & Recreation Historic	Historic	4	Not accessible Programmatic Option for Accessibility	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
85	Panati Playground Building	3101-27 N 22ND ST	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	2	REBUILD Signage issues Emergency Egress Issues Noncompliant door hardware Noncompliant, non-accessible restrooms Doors fast	2022-2025
86	American Legion Playground	6201 TORRESDALE AVE	Parks & Recreation		2	Signage Issues No accessible drinking fountain No aisle for accessible parking Non-compliant restrooms Doors heavy, fast, and narrow No chair lift at swimming pool	2022-2025
87	Fort Mifflin	4701 FORT MIFFLIN RD	Parks & Recreation Historic	Historic	2	Historic Military Fort  Programmatic Option for Accessibility  No Accessible Parking  No Accessible Route  Plumbing is broken and restroom locked at site visit; staff reported that restrooms are noncompliant	2022-2025
88	Health Center 6	301 W GIRARD AVE	Health		3	Signage Issues High counter Noncompliant and non-accessible restroom Needs second drinking fountain	2022-2025
89	Pelbano Recreation Center/NE Recreation Center (Gym)	8101 BUSTLETON AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	2	REBUILD Door hardware issues Doors heavy and fast Noncompliant elevated play equipment Signage issues Handrail issues	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
90	Fluehr Park	4800 GRANT AVE	Parks & Recreation		4	No accessible route to baseball or soccer fields Benches not on accessible route Noncompliant benches Noncompliant portable restroom	2022-2025
91	Mann Older Adult Center	3201 N 5TH ST	Parks & Recreation	REBUILD Under construction Part of Rivera Recreation Center	2	REBUILD  Noncompliant restrooms  Signage Issues  Emergency egress issues  High counter  Handrail Issues  Locked gates blocking some doors  Doors narrow and close too quickly  There is a more compliant accessible restroom that is now currently reserved for staff	2022-2025
92	Orkney/Lawrence St Park	856 N LAWRENCE ST	Parks & Recreation		2	Noncompliant change of grade basketball court and play area surface issues Orkney Street entrance not accessible	2022-2025
93	Moss Playground Building	5700 TORRESDALE AVE	Parks & Recreation	REBUILD Playground replacement complete Sidewalk replacement complete Site improvements (basketball court, furnishings) complete	3	REBUILD Playground being replaced at time of site visit No accessible restroom Signage Issues Doors fast and heavy	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
94	Fireman's Hall Museum	147 N 2ND ST	Fire	Museum; not maintain by Public Property	3	Signage Issues Emergency egress issues Doors too narrow and fast Noncompliant and no accessible restrooms Handrail issues Noncompliant staircase No accessible counter portion Noncompliant elevator Fire Alarm Pull Stations too high	2022-2025
95	Buckley Park	HARTWELL & GERMANTOWN NEC	Parks & Recreation		2	Noncompliant accessible route/surface	2022-2025
96	Hart Playground	1315-21 N 4TH ST	Parks & Recreation		2	Broken play equipment No transfer stations	2022-2025
97	Bartrams Gardens House	2901 S 56TH ST	Parks & Recreation Historic	LEASED Historic House Museum and Gardens	4	House not accessible  Programmatic Option for Accessibility  Most of the surrounding gardens are accessible	2022-2025
98	Mount Pleasant Mansion	3800 MT PLEASANT DR	Parks & Recreation Historic	Historic	4	Not Accessible except to ambulatory persons Programmatic Option for Accessibility	2022-2025
99	Mallory Playground	100-70 E JOHNSON ST	Parks & Recreation		1	Lower level not accessible Programmatic Option for Accessibility Non-compliant bathrooms Non-compliant play equipment Surface issues Lack of signage	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
100	Jerome Brown Playground	1927-41 W ONTARIO ST	Parks & Recreation	REBUILD Time-sensitive improvements, more to come Also known as Kenderton	3	REBUILD  No handrails on stair entrance  Non accessible bathrooms  No accessible picnic table	2022-2025
101	John C. Anderson Cultural Center Building	5325 OVERBROOK AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	1	REBUILD Lower level not accessible Programmatic Option for Accessibility Noncompliant Doors No accessible restrooms Noncompliant handrails Noncompliant door hardware Door issues Signage issues	2022-2025
102	Burholme Golf Course Minigolf	401 COTTMAN AVE	Parks & Recreation	COMBINED w/ Golf Course	2	No accessible route through the miniature golf course	2022-2025
103	Weinburg Park	2201-09 S 6TH ST	Parks & Recreation		2	Accessible route issues	2022-2025
104	Simons Recreation Center	1601-35 E WALNUT LN	Parks & Recreation		2	Doors too heavy Needs second Drinking Fountain Signage issues Not enough accessible play components Benches not on accessible route	2022-2025
105	Bardascino Park	1000 S 10TH ST	Parks & Recreation		2	Bocce court is not accessible Surface condition issues No accessible picnic tables non-compliant curb ramp	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
106	Palumbo Recreation Center Building	700 S 9TH ST	Parks & Recreation		2	Curb Ramp too steep Emergency egress issues Signage Issues High fire alarm pull stations Mirrors high Toilet seats are low Noncompliant drinking fountain	2022-2025
107	Hamilton Park	547 RISING SUN AVE	Parks & Recreation	Passive small triangle park fenced as a green space	4	Noncompliant curb ramps Sidewalk surface issues	2022-2025
108	Lanier Park	1600 S 29TH ST	Parks & Recreation	Coordinate with Streets	4	New park is compliant but curb ramps and perimeter sidewalk not replaced Sidewalk surface issues	2022-2025
109	Guerin Recreation Center Building	2201 S 16TH ST	Parks & Recreation		3	Not accessible and noncompliant restrooms Not enough accessible play components Emergency egress issues Signage Issues Needs second drinking fountain Noncompliant tables	2022-2025
110	Dorsey Playground	6501 HEGERMAN ST	Parks & Recreation		2	No handrail for staircase Not enough accessible play components No compliant restrooms Threshold issues Door hardware issues No accessible toilets; ambulatory only Signage issues	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
111	Lonnie Young Recreation	1100 E CHELTEN AVE	Parks & Recreation		2	Pool not accessible Elevator issues: too dark, no hall or audible signals Play area accessibility issues Accessible route surface issues Lack of signage	2022-2025
112	Hank Gathers YAC Building	2501-59 DIAMOND ST	Parks & Recreation		3	No handrail at front stairs or at steps leading from emergency exit onto W. Diamond St.  No elevator; entrance to lower level could be arranged through gate on N 25th St.  No accessible toilets; men's and women's rooms have an ambulatory toilet but not accessible ones  Signage issues	2022-2025
113	Heritage Park	1517-33 W CLEARFIELD ST	Parks & Recreation	Restrooms locked at site visit	2	No handrails on ramp No accessible route to playground Not enough accessible play components Signage issues	2022-2025
114	Lanza Park	214 CATHARINE ST	Parks & Recreation	Community would need to raise funds for dog park path	2	Dog park surface (pea gravel) not wheelchair accessible sidewalk surface issues	2022-2025
115	Capitolo Playground	900 FEDERAL ST	Parks & Recreation	REBUILD Basketball court resurfacing complete Sprayground replacement under construction	2	REBUILD Younger kids swings high Signage Issues Emergency egress issues Noncompliant door hardware type Noncompliant men's restroom Grab bar issues High mirrors	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
116	David Cohen Ogontz Library	6017-35 OGONTZ AVE	Library		2	Access aisle is too small Cross Slope is too steep entering from parking lot Signage Issues Noncompliant bathroom door opening (key & push) Counters high	2022-2025
117	Fairhill Square	2601-61 N LAWRENCE ST	Parks & Recreation		4	Only minor issues	2022-2025
118	Bringhurst Park	200 E BRINGHURST ST	Parks & Recreation		2	Ground surface is extremely uneven, impossible to enter without step Sidewalk condition issues Non-compliant curb ramp	2022-2025
119	Pulaski Park	3001 E ALLEGHENY AVE	Parks & Recreation	Accessible parking corrected in August 2019; now compliant	4	Parking spots accessible but no aisle Non-compliant portable toilet Missing curb ramp	2022-2025
120	Cecil B. Moore Library	2320-34 CECIL B MOORE AVE	Library	REBUILD Time-sensitive improvements, more to come	2	Handrail issues Emergency egress issues Signage issues Door speed fast Counters high Noncompliant restrooms	2022-2025
121	Ryerss Mansion and Library	7370 CENTRAL AVE	Parks & Recreation Historic	LEASED Historic House Museum	3	No wheelchair accessible toilet room Signage issues Noncompliant handrails	2022-2025
122	48th & Spruce Play Lot	4801 SPRUCE ST	Parks & Recreation	Building closed, site locked: Is facility still being used?	2	Large field with construction Building closed, site locked No play equipment Broken benches Curb ramp issues	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
123	La Noce Park	5119 ROCHELLE AVE	Parks & Recreation		2	Accessible route on incline No accessible route to play components Curb Ramps too steep	2022-2025
124	Pretzel Park	4300 SILVERWOOD ST	Parks & Recreation		3	Stair issues Handrail issues	2022-2025
125	Wyoming Library	231-37 E WYOMING AVE	Library	Carnegie Library	1	Accessible route to lift blocked by furniture Signage issues Noncompliant restroom door opening (key and push) Doors speed (fast) Handrail issues	2022-2025
126	Franklinville Park	3432 N 7TH ST	Parks & Recreation		4	Non-compliant/missing equipment Play surface issues No ADA accessible picnic table	2022-2025
127	Overington Park	4600 LEIPER ST	Parks & Recreation		4	Sidewalk needs maintenance Missing handrails Play surface issues Noncompliant play equipment	2022-2025
128	Sacks Playground	400 WASHINGTON AVE	Parks & Recreation	Restrooms locked at site visit, step at each restroom	2	Noncompliant play equipment No chair lift for swimming pool Only one accessible entrance into large park	2022-2025
129	Clark Park	4301 CHESTER AVE	Parks & Recreation		4	Chess tables are low Paths become inaccessible at points	2022-2025
130	Penrose Playground Building	1101 W SUSQUEHANNA AVE	Parks & Recreation		4	Surface issues Fast door closing speed Two doors (one interior, one exterior) need maintenance	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
131	Holmesburg Recreation Center	4500 RHAWN ST	Parks & Recreation		2	Door hardware is not compliant No accessible drinking fountain	2022-2025
132	McVeigh Recreation Center Building	400-64 E ONTARIO ST	Parks & Recreation	REBUILD Time-sensitive improvements, more to come; awaiting nonprofit section	2	REBUILD  Noncompliant exterior handrails  Door issues  Many emergency doors were locked  Path to chair lift was obstructed  Noncompliant play equipment	2022-2025
133	2601 Pennsylvania Ave Play Lot	2601 PENNSYLVANIA AVE	Parks & Recreation		4	Pathway surface issues Bench not on accessible route	2022-2025
134	Philadelphia City Institute Library	1905 LOCUST ST	Library	LEASED Installation of internal wheelchair lift to lower level completed in Fall 2019 after site visit	2	Emergency egress issues no access to lower level meeting room and children's library Installation of a lift to access both floors planned Recommend: Resigning exit doors, reconfiguring entrance away from main stairs and moving children's library to main floor. Emergency procedures should be tested with staff at least annually.	2022-2025
135	Lindbergh Park at 63rd St	2800 S 63RD ST	Parks & Recreation		2	Accessible Route issues	2022-2025
136	Webb Street Play lot	2538 WEBB ST	Parks & Recreation		2	Play surface issues Curb Ramp issues	2022-2025
137	Inn Yard Park	4208-52 RIDGE AVE	Parks & Recreation		4	Play surface issues Accessible route issues	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
138	Santore Library	932 S 7TH ST	Library		3	Bathroom not compliant fire exit blocked stroller parking during children's programs need to be addressed so accessible path not temporarily blocked Signage issues	2022-2025
139	35th District	5960 N BROAD ST	Police	There is an accessible side entrance but staff on-site stated it is not used	2	Only stairs to public space (accessible side entrance but not used) High counter	2022-2025
140	Fox Chase Playground	601 BORBECK AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	2	REBUILD Elevated play component for 5-12 year is not compliant Noncompliant doors Noncompliant drinking fountain Signage issues	2022-2025
141	Frankford Arsenal Boat Launch	5625 TACONY ST	Parks & Recreation		3	Restroom door speed fast Hooks high Mirrors high Older non-compliant ADA portable toilet	2022-2025
142	Mifflin Square	500 WOLF ST	Parks & Recreation		2	Insufficient number of play components Tables not accessible Surface issues	2022-2025
143	Baker Playground	5431-43 LANSDOWNE AVE	Parks & Recreation	Funding for design but not construction	2	No accessible restroom stalls Restroom doors too heavy No accessible route into swimming pool No handrail for stairs at entrance	2022-2025
144	Hillside Recreation	201 FOUNTAIN ST	Parks & Recreation		2	Inaccessible pool Noncompliant ratio of accessible play equipment	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
145	Barry Playground Building	1800 JOHNSTON ST	Parks & Recreation		4	Doors fast Doors too narrow Handrail issues No lift for swimming pool	2022-2025
146	Chestnut Hill Library	8711 GERMANTOWN AVE	Library		2	Ramp issues Clutter impacting accessible route Handrail issues (missing returns and extensions, plus a loose handrail at the rear of the building) Noncompliant bathroom door opening (key and push) Signage issues Doors too fast	2022-2025
147	Walnut Lane Golf Club House	700 WALNUT LN	Parks & Recreation		3	Doorways narrow Non-compliant parking Signage missing Counter high	2022-2025
148	Bocce Building	6304 CASTOR AVE	Parks & Recreation		3	non-compliant restrooms Door hardware mounted high	2022-2025
149	Clara Muhammed Park	4700-30 LANCASTER AVE	Parks & Recreation		2	Inaccessible Ground Play Components Surface issues	2022-2025
150	Sherwood Park	5601 BALTIMORE AVE	Parks & Recreation		2	Play area surface issues One set of steps non-compliant and deteriorated handrail broken and missing	2022-2025
151	Pleasant Hill Park Building	9201 N DELAWARE AVE	Parks & Recreation	REBUILD Roofing purchase in progress Building locked and not in use at time of site visit	3	REBUILD Building closed Noncompliant portable restrooms	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
152	Junod Playground	3102 MECHANICSVILLE RD	Parks & Recreation		4	Play Area surface issues Noncompliant tables Signage issues Noncompliant drinking fountain Door speed fast Noncompliant sink faucet	2022-2025
153	Parkway Central Library	1901 VINE ST	Library	Path to accessible entrance reconfigured after site visit to prevent car parking on sidewalk. Ramp slope 9% due to space constraints: Explore long term possibility of creating a new or alternate accessible entrance. Due to building design and space limitations in several library rooms and through stacks, staff provides assistance to most if not all Library users.	2	Building access and ramp slope issues Lack of exterior directional signage Lack of handrails on main stairwell Door speed fast, some doors not operable	2022-2025
154	Shuler Playground Building	2901 N 29TH ST	Parks & Recreation		3	Missing swings Noncompliant restrooms Fast door speed noncompliant faucet	2022-2025
155	39th & Olive Recreation	714 N 39TH ST	Parks & Recreation		2	Pool not accessible Surface issues	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
156	Queen Memorial Library	1201 S 23RD ST	Library	\$34,000 previously spent to replace one lift	3	Two lifts, both function, one needs maintenance Wheel accessible stall insufficient turning diameter Non-compliant handrails lack of signage	2022-2025
157	One Parkway Building	1515 ARCH ST	Admin	1515 Arch Street	2	Handrail issues Signage issues Needs second drinking fountain No ramp from emergency issues Telephone was too high High mirror in accessible restroom	2022-2025
158	Belmont Stables	WEST RIVER DR	Parks & Recreation		3	Bathroom is inaccessible No accessible parking spots or signage No accessible route to seating/ table Surface issues	2022-2025
159	Fisher Park Playground Building	6000 N 5TH ST	Parks & Recreation		2	Signage Issues Grab bar issues Noncompliant handrails Noncompliant sink faucet Doors heavy No knee clearance for tables in pottery room No accessible route to pottery room Not enough accessible elevated play components	2022-2025
160	Mann Music Center	5201 PARKSIDE AVE	Parks & Recreation	LEASED	2	Signage Issues Steep slope of accessible pathway Handrail issues Grab bar missing for accessible restroom stall Counter height high No accessible concession	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
161	Burholme Golf Course Building	401 COTTMAN AVE	Parks & Recreation		3	Noncompliant restrooms Door Issues Accessible counter is currently obstructed	2022-2025
162	Clifford Park	6331 WISSAHICKON AVE	Parks & Recreation		1	No accessible route to the park Benches off the path	2022-2025
163	FDR Park Rest Rooms	3500 S BROAD ST	Parks & Recreation		3	Portable restrooms not on accessible route	2022-2025
164	Roxborough Library	6247 RIDGE AVE	Library		2	Sidewalk issues Signage issues Stair issues Fire Alarm Pull Stations obstructed Handrail issues Grab bar issues Inaccessible Restroom Non-compliant restroom door opening (key and push) Doors speed (fast) Emergency egress issues	2022-2025
165	Mount Airy Playground	7001 GERMANTOWN AVE	Parks & Recreation		4	Noncompliant women's restroom Signage issues Ramp too steep Handrails issues Door speed fast	2022-2025
166	Malcom X Memorial Park	5100 PINE ST	Parks & Recreation	REBUILD Selected	2	REBUILD Insufficient number of accessible play components restrooms locked at site visit	2022-2025
167	Girard Estates Park	2101 SHUNK ST	Parks & Recreation	Waiting for grant funding to be allocated	4	Sidewalk Surface issues	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
168	Connell Park	6401 ELMWOOD AVE	Parks & Recreation	Park building locked at Site Visit	2	No accessible elevated play components Play surface issues Tables not on accessible path Sidewalk issues	2022-2025
169	Garland and Bingham Playground	5153 E TABOR RD	Parks & Recreation		2	No accessible route to picnic table and chess table Not enough accessible play components	2022-2025
170	Ridgeway Pool	1301 CARPENTER ST	Parks & Recreation	Restrooms locked at time of site visit	2	No chair lift for swimming pool Tables not on accessible path Noncompliant curb ramps	2022-2025
171	Campbell Square	2525 E ALLEGHENY AVE	Parks & Recreation		3	Curb Ramp Surface issues Accessible tables too low	2022-2025
172	Cobbs Creek Recreation Center	12 COBBS CREEK PKWY	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	2	Signage issues Noncompliant handrails on interior stairs No accessible route into swimming pool	2022-2025
173	Mitchell Thomas Playground	3694 CHESTERFIELD RD	Parks & Recreation		2	Noncompliant Pool Play surface issues	2022-2025
174	Wissahickon Neighbors Recreation	3901 TERRACE ST	Parks & Recreation		2	Curb Ramps too steep Noncompliant handrails	2022-2025
175	Pastouis Park	201 W HARTWELL LN	Parks & Recreation		1	No accessible route into park No accessible route to theater area Steps to water fountain	2022-2025
176	Maguire Playground	155-59 W LEHIGH AVE	Parks & Recreation		4	Steep slope transition from asphalt to playground area	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
177	Curran-Fromhold Correctional Facility	7901 STATE RD	Prisons		2	Fast closing speed main entrance inside door Signage issues Counter height is high No access aisle for accessible Parking slot	2022-2025
178	22 <sup>nd</sup> & Catherine St Park	2200 CATHARINE ST	Parks & Recreation		4	Small tot lot Noncompliant benches Catherine St curb ramp centered on large storm water grate	2022-2025
179	Pennypack Community (Crispin Gardens) Building	2870 WILLITS RD	Parks & Recreation	LEASED	1	No accessible route to building/bathrooms Signage issues	2022-2025
180	Lemon Hill Playground	801 LEMON HILL DR	Parks & Recreation		2	Steep side walk to play area Noncompliant play equipment	2022-2025
181	Paolone Park	718 SEARS ST	Parks & Recreation		2	Path is level; however, one side of the street has no curb cuts and the other side of the street does not provide accessible route to the park	2022-2025
182	Torresdale Playground Building	9550 FRANKFORD AVE	Parks & Recreation		2	Under construction at time of site visit Unable to access building Noncompliant elevated play component for 5-12 year olds	2022-2025
183	Konrad Square Park	2200-26 E DAUPHIN ST	Parks & Recreation		4	Noncompliant curb ramps	2022-2025
184	Sturgis Playground Building	200-20 W 65TH AVE	Parks & Recreation		4	Accessible route maintenance issues Doors are fast	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
185	Veterans Playground	800 W CUMBERLAND ST	Parks & Recreation		1	Not Accessible due to noncompliant ramp: noncompliant cross slope, no handrails, no curb ramp for ramp access No pull bars on play equipment transfer stations Play area surfaces issues Curb ramp surfaces issues Handrail issues Stairs deteriorated	2025-2028
186	Winston Park	181-85 E WILLOW GROVE AVE	Parks & Recreation		4	All benches off accessible path Non-compliant curb ramp	2022-2025
187	Wolf Park	7018 MC CALLUM ST	Parks & Recreation		4	Curb ramp cross slope above 2%	2022-2025
188	Horticulture Center	4180 HORTICULTURAL DR	Parks & Recreation		2	Noncompliant restrooms (grab bars issues, high mirror) Doors fast and heavy No Aisle for accessible parking Handrail issues No route to butterfly garden No compliant benches/picnic tables in garden for blind	2022-2025
189	Ramp Playground Building	3300 SOLLY AVE	Parks & Recreation		2	Play surface issues One play structure has a step to it Signage issues	2022-2025
190	Daniel Boyle Recreation	13024 STEVENS RD	Parks & Recreation		3	Restrooms are not accessible Signage issues No handrails on steps	2022-2025
191	Houseman Recreation Center Building	802 E GODFREY AVE	Parks & Recreation		2	No handrails on entry steps Noncompliant doors Noncompliant elevated play components	2022-2025

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192	Lloyd Hall	KELLY & AQUARIUM DRS	Parks & Recreation		2	Signage Issues Doors heavy and fast Needs second drinking fountain Mirrors are high Not enough accessible parking No van accessible parking High counter	2022-2025
193	Donnelly Park	230-34 DICKINSON ST	Parks & Recreation		4	Non-compliant chess tables on a rough cobblestone surface	2022-2025
194	Hedge and Plum Playground	4610 HEDGE ST	Parks & Recreation		1	Path entrance is inaccessible with collapsed pavement Only steps into playground	2022-2025
195	Dendy Playground	1501-39 N 10TH ST	Parks & Recreation		3	Emergency egress issues Signage Issues Handrail issues High mirrors Grab bar issues Noncompliant drinking fountain	2022-2025
196	Francisville Playground Building	1737-39 FRANCIS ST	Parks & Recreation		2	Noncompliant elevated play components Slope on Francis Street entrance requires handrails No access into swimming pools Door hardware issues Women's restroom accessible toilet is too high Noncompliant drinking fountain Grab bars in men's restroom are different heights	2022-2025
197	Colony Castle Philly Canoe Club Building	4600 RIDGE AVE	Parks & Recreation	Unable to access building at Site Visit	4	No accessible route from parking lot to office Noncompliant ramp to office Noncompliant surface condition	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
198	Health Center 1	1930 S BROAD ST	Health	LEASED Structural Costs passed on to Landlord	2	1st Floor: High Counter (Landlord) Signage Issues 2nd Floor: Exit door closes too fast Automatic Door not working Toilet paper too far from toilet seat 3rd Floor: Non-accessible restroom (Landlord) No accessible route through exam rooms (access obstructed by desk right near to doors)	2022-2025
199	Jefferson Square	300 WASHINGTON AVE	Parks & Recreation		2	Accessible path surface issues	2022-2025
200	Reed Playground	213 W ONTARIO ST	Parks & Recreation	New play equipment installed in 2019; basketball court closed and not accessible	4	Sidewalk issues Curb ramp issues Handrail issues No pull bar for play equipment	2022-2025
201	Max Myers Recreation	1601 HELLERMAN ST	Parks & Recreation		2	Loose grab bar in accessible toilet in building Large site with only one accessible part No handrails on ramp into site Signage issues	2022-2025
202	8th District	10175 ACADEMY RD	Police		2	Noncompliant Restrooms Counter height is high Signage Issues Doors close fast	2022-2025
203	33rd & Wallace Playground	3300-26 WALLACE ST	Parks & Recreation		2	Non-Compliant ratio of accessible play equipment	2022-2025

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204	Amos Playground	1817-59 N 16TH ST	Parks & Recreation		2	Signage Issues non-compliant door hardware Mirrors high Noncompliant faucet Noncompliant women's restroom Noncompliant drinking fountain	2022-2025
205	Health Center 9	131 E CHELTEN AVE	Health		2	Public telephone mounted too high Curb ramps are steep Walkways surface issues Door closing speeds too fast	2022-2025
206	Cedar/50 St Park	4917-53 BALTIMORE AVE	Parks & Recreation		2	Play area surface issues	2022-2025
207	Kelly Pool	42ND ST. & PARKSIDE AVE	Parks & Recreation		2	No chair lift at swimming pool Accessible parking spots not striped No van accessible parking spot Low parking signage	2022-2025
208	Wister Woods Park	1901 LINDLEY AVE	Parks & Recreation		2	All seating and tables off of the path Sidewalk surface issues	2022-2025
209	30th & Jefferson Playground	3001-15 JEFFERSON ST	Parks & Recreation		4	Curb Ramp issues	2022-2025
210	Hissey Playground	400-32 E INDIANA AVE	Parks & Recreation		4	Newer play equipment Sidewalk surface issues	2022-2025
211	Nichols Park	5430-46 RACE ST	Parks & Recreation		4	Deteriorated rubberized play surface No accessible picnic tables	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
212	Fox Chase Library	501 RHAWN ST	Library		2	Turning radius at restroom door too narrow Signage issues Emergency egress issues Noncompliant bathroom door opening (key and push) Noncompliant Grab Bars No Access Aisle for accessible parking Handrail issues Doors speed (fast)	2022-2025
213	Haddington Library	446-64 N 65TH ST	Library		1	Elevator out of service with no scheduled repair time at time of site visit Grab bar issues Handrail issues Signage issues	2022-2025
214	Dorothy Emanuel Recreation Center	8500 PICKERING AVE	Parks & Recreation		2	Signage Issues (only exit) Few doors close fast Needs compliant drinking fountain Mirrors high No transfer station for older children play component	2022-2025
215	Frankford Library	4634-38 FRANKFORD AVE	Library		2	Emergency egress issues Signage issues Noncompliant restroom door opening (key and push) Doors speed (fast) Non-compliant Drinking Fountain Handrail issues Hard to operate sink Faucet	2022-2025
216	Lillian Marrero Library	601 W LEHIGH AVE	Library	21st Century Library	4	High Counter Non-complaint emergency stairs Reconfigure accessible parking space Signage issues	2022-2025

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217	Bustleton Avenue Library	10153-99 BUSTLETON AVE	Library		2	Emergency egress issues Noncompliant bathroom door opening (key & push) DVD carts blocking aisles Signage issues	2022-2025
218	Wister Playground Building	4971 BAYNTON ST	Parks & Recreation		2	Signage Issues Doors close fast Needs compliant fountain Handrail missing on one side of ramp	2022-2025
219	Powers Park	2987 ALMOND ST	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	4	REBUILD Surface issues	2022-2025
220	Robin Hood Dell East Amphitheater	2499 STRAWBERRY MANSION BRIDGE DR	Parks & Recreation	In Design Construction to begin FY22 if additional funding is available	4	Accessible parking spaces missing signage Counters not accessible height	2022-2025
221	Falls of Schuylkill Library	3501 MIDVALE AVE	Library		2	Emergency egress issues Signage issues Non-compliant Drinking Fountain Noncompliant restroom door opening (key and push) Doors speed (fast) Obstructed access to Fire Alarm Pull Stations No accessible counter portion at circulation desk	2022-2025
222	Richmond Library	2987 ALMOND ST	Library	REBUILD Selected Carnegie Library	2	Signage Issues Noncompliant restroom features Noncompliant bathroom door opening (key and pull) Handrail issues Noncompliant Ramp at Emergency Exit	2022-2025

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223	Venice Island Performing Arts & Recreation Center	1 RECTOR ST	Parks & Recreation		2	Theater stairs have no Handrails Non-compliant handrails on outside stairs	2022-2025
224	Trumbette Playground	9050 TORRESDALE AVE	Parks & Recreation		4	Accessible route maintenance issues	2022-2025
225	Shot Tower Recreation Building	101-31 CARPENTER ST	Parks & Recreation		4	No pull bars on play equipment transfer stations Accessible toilet room needs maintenance (ceiling leak) Accessible entrance to park was locked	2022-2025
226	3rd District	1300 S 11TH ST	Police		4	Needs compliant Drinking Fountain Handrail issues Main entrance door is heavy Courtroom door speed is fast	2022-2025
227	O'Connor Memorial Pool	2601-13 SOUTH ST	Parks & Recreation	Restrooms locked at site visit	2	No chair lift for swimming pool Curb ramp issue	2022-2025
228	Wynnefield Library	5325 OVERBROOK AVE	Library	REBUILD Time-sensitive improvements, more to come Flooring and Roofing Complete	2	Emergency egress issues Signage issues Noncompliant restroom door opening (key and push) Doors speed (fast) High Fire Alarm Pull Stations (also some has obstructed access)	2022-2025
229	Sansom St Play lot	4700-4708 SANSOM ST	Parks & Recreation	·	2	Accessible path issues Tables not compliant	2022-2025
230	Strawberry Mansion Playground /Ridge Avenue Park	3369 RIDGE AVE	Parks & Recreation		4	Surface issues Insufficient number of ground play components	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
231	Wadsworth Library	1500-08 WADSWORTH AVE	Library		1	No accessible route through aisles Noncompliant restrooms Noncompliant restroom door opening (key and pull) Signage issues Handrail issues Door speed (fast)	2022-2025
232	South Philadelphia Older Adult Center	1430 E PASSYUNK AVE	Parks & Recreation		4	Doors fast Signage Issues Noncompliant drinking fountain	2022-2025
233	Penn Treaty Park	1227-37 BEACH ST	Parks & Recreation		2	No accessible parking in lot Play equipment is not on the accessible route Tables are not accessible	2022-2025
234	Chamounix Equestrian Center Building	3250 CHAMOUNIX DR	Parks & Recreation		4	No accessible route	2022-2025
235	AID Unit	2525-45 MASTER ST	Police		4	Sidewalk issues Non-compliant door hardware Signage issues	2022-2025
236	Picariello Playground	3325 RED LION RD	Parks & Recreation		4	Noncompliant toilet rooms No accessible drinking fountain Signage issues	2022-2025
237	Fitzpatrick Playground	3500 ACADEMY RD	Parks & Recreation		4	Emergency Egress issue Door speed fast Needs compliant drinking fountain Signage Issues	2022-2025

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238	12th & Cambria Playground	1127-33 W CAMBRIA ST	Parks & Recreation		2	Not enough accessible play components No chair lift for pool Door speed fast Signage issues Noncompliant drinking fountain	2022-2025
239	Kay Park	4712 PULASKI AVE	Parks & Recreation		2	No curb cut Block blocking accessible entrance into park	2022-2025
240	22nd & Ontario Street Park	3400-02 N 22ND ST	Parks & Recreation		4	Accessible route surface issues	2022-2025
241	Dauphin Street Playground	2326 N 5TH ST	Parks & Recreation		4	Fill/ replace deteriorated rubberized play surface Extend handrail and or remove step at base/ end of handrail	2022-2025
242	Loudoun Park	4650 GERMANTOWN AVE	Parks & Recreation		4	Non-compliant stairs Handrails missing	2022-2025
243	Carousel House Recreation Center	1701 BELMONT AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	3	REBUILD  No van accessible parking (total 9 accessible parking)  Signage issues  Mirrors and hooks high in restrooms  Doors fast and heavy	2022-2025
244	Chew Playground	1800 WASHINGTON AVE	Parks & Recreation	REBUILD In design	2	REBUILD  No chair lift for swimming pool Signage Issues Items stored in ADA restroom Door and sink hardware not compliant Not enough accessible ground play components	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
245	Wissinoming Playground Building	5801 FRANKFORD AVE	Parks & Recreation		4	Signage Issues Doors fast No handrails for staircase Needs second drinking fountain Benches off the route	2022-2025
246	Overbrook Park Library	7422 HAVERFORD AVE	Library		1	No Accessible Route to Basement Meeting Room Programmatic Option for Accessibility Emergency egress issues Signage issues	2022-2025
247	Riverside Correctional Facility	8151 STATE RD	Prisons		2	Heavy Doors Mirror height is high Obstructed access to telephone	2022-2025
248	Vernon Park	5710-18 GERMANTOWN AVE	Parks & Recreation	REBUILD Time-sensitive improvements, more to come	2	1/3 picnic tables on accessible route No handrails on stair that leads to play components	2022-2025
249	61st & Baltimore Playground	6300 SPRUCE ST	Parks & Recreation		4	Play area surface issues one swing missing path into play area too steep no handrails broken benches and inaccessible picnic tables	2022-2025
250	Madison Triangle War Memorial	563-65 N 2ND ST	Parks & Recreation		4	Wooden planks on bridge are rotted and need to be replaced	2022-2025
251	Columbus- DiProspero Playground Building	1200 WHARTON ST	Parks & Recreation		3	Signage Issues Doors heavy and fast Noncompliant door hardware	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
252	Health Center 3	555 S 43RD ST	Health	Substantial renovation budgeted for 2023-2024	2	Signage Issues Emergency egress issues Aisles too narrow that leads to exam rooms Exam room doors too narrow No accessible portion on few counters Grab bar issues Toilet paper dispenser within 12" of the top of the grab bar Noncompliant staircase	2022-2025
253	Laura Sims Skatehouse	12 COBBS CREEK PKWY	Parks & Recreation		2	There is a step to get onto the rink from the entry ramp Floor Surface non-compliant Fast door speed	2022-2025
254	Strahl Barn (Pegasus Riding Academy)	8295 BUSTLETON AVE	Parks & Recreation	LEASED	2	Noncompliant grab bars in restrooms Threshold issues at doorways Although the facility is intended for persons with disabilities, there is only one designated accessible parking space Signage issues Emergency egress issues Benches not on accessible route	2022-2025
255	Coleman NW Regional Library	68-76 W CHELTEN AVE	Library		2	Missing signage Accessible Route issues Non-compliant handrails Non-compliant doorknobs Storage in emergency stairwells	2022-2025
256	Fumo Family Library	2419-37 S BROAD ST	Library		4	Lack of signage No accessible drinking fountain	2022-2025

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257	Lardner's Point Park	6301 MILNOR ST	Parks & Recreation		4	Not enough width for van accessible parking Drinking Fountain not working Fast restroom door speeds	2022-2025
258	Strawberry Mansion	STRAWBERRY MANSION DR	Parks & Recreation Historic	Historic	4	Mostly ground level with only one to two steps Accessible by wheelchair but only with assistance Could be made more easily accessible with temporary ramps	2022-2025
259	Inheritance Tax Payment & Filings Office	1401 JOHN F KENNEDY BLVD	Admin	Located in City Hall First Floor	2	Located First Floor City Hall High counters Door hardware issues Door speed fast Signage issues	2022-2025
260	Northwestern Stables	140 NORTHWESTERN AVE	Parks & Recreation	LEASED from City; Cost passed on to Tenant	4	Pavement issues	2022-2025
261	Ohio House	4700 STATES DR	Parks & Recreation Historic	Historic Vacant café (looking for new lessee) at time of site visit	4	Currently vacant café (looking for new lessee) Accessible path surface issues Accessible parking space on loose stone Ramp needs maintenance	2022-2025
262	Horton Street Play Lot	231 HORTON ST	Parks & Recreation		2	Play surface issues	2022-2025
263	Burke Playground	200 SNYDER AVE	Parks & Recreation		4	Newer playground with a broken slide	2022-2025
264	Champions Playground/ Pennypack Park	SUSQUEHANNA RD AND VERREE RD	Parks & Recreation		4	Benches off the accessible route Noncompliant handrails Noncompliant elevated play equipment	2022-2025

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265	Register of Wills	1401 JOHN F KENNEDY BLVD	Admin	Independent Office	4	Located in City Hall High counters Door hardware issues Door speed fast	2022-2025
266	Market Square War Memorial	5501 GERMANTOWN AVE	Parks & Recreation		4	4 benches off the path No handrails on all 3 stairs	2022-2025
267	2nd/15th District	2831 LEVICK ST	Police	2nd District has moved to a new location and is now combined with 15th District	2	No wheelchair accessibility to 2nd Floor Signage Issues Door hardware issues Turning radius into accessible restroom is too narrow Non-compliant handrails Protruding AC Unit missing cane detection	2022-2025
268	Logan Library	1333 WAGNER AVE	Library		2	Ramp handrail not secure Emergency Exit issues Non-compliant handrails Signage issues	2022-2025
269	Conestoga Playground	1452 N 53RD ST	Parks & Recreation		3	Noncompliant handrail on entry stairs No handrail on entry ramp Men's restroom grab bars are reversed	2022-2025
270	Kensington Library	104-06 W DAUPHIN ST	Library		2	Turnstile at entrance/exit impeded wheelchair access Step up to the rear emergency exit Furnishing blocking exit door Non-compliant doorknob in the rear meeting room Tables are too low Signage issues	2022-2025

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271	Bushrod Library	6304 CASTOR AVE	Library		2	Noncompliant restroom door opening (key and push) Handrail issues Fire Alarm Pull Station obstructed access Noncompliant door speed (fast) Signage issues— No "Exit" signs in meeting room Elevator does not provide audible chime for down Light is out in second floor emergency staircase	2022-2025
272	Cobbs Creek/Karakung Golf Course	740 Lansdowne Ave	Parks & Recreation	LEASED Renovation planned by lessee - tentative start 2021	3	Signage Issues Not enough accessible parking spots No aisle at accessible parking spots Handrail issues Toilet paper too far from toilet seat	2022-2025
273	Eastwick Library	2851 ISLAND AVE	Library		2	Emergency egress issues Noncompliant bathroom door opening (key & push), speed (fast) Low toilet seat Low drinking fountain with no side approach Handrail issues Signage issues	2022-2025
274	Cobbs Creek Environmental Center	6300 SPRUCE ST	Parks & Recreation		4	Threshold steps at emergency exits No accessible aisles through the laboratory room Handrail is high Handrail extension is short Toilet paper dispensers in bathroom stalls are not spaced properly	2022-2025
275	Fish Hatchery Playground Equipment	9201 N DELAWARE AVE	Parks & Recreation	Located at Pleasant Hill Park	4	Accessible route surface issues from main parking lot Play area surface issues	2022-2025

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276	Hawthorne Park	750 S 12TH ST	Parks & Recreation		4	Handrail issues	2022-2025
277	Chamounix Mansion	3250 CHAMOUNIX DR	Parks & Recreation Historic	LEASED Historic House used a Hostel Only First Floor of Mansion is Accessible; Carriage House is Accessible	3	Two buildings used for hostel (mansion) and group camps (carriage house) Accessible route surface issues from parking to mansion Showers have a step (carriage house) Signage issues	2022-2025
278	Bartrams Welcome Center and Classrooms	2901 S 56TH ST	Parks & Recreation Historic	LEASED Historic	3	Handrail issues (either missing or noncompliant) Path to classroom had a slope that would require a handrail No rear grab bar in the men's restroom Signage issues	2022-2025
279	Katherine Drexel Library	11099 KNIGHTS RD	Library		1	Lack of signage at parking and back entrance Accessible counter blocked by book carts Emergency egress issues Noncompliant bathroom door opening (key & push) Signage issues	2022-2025
280	Beck & 2nd St Park	839 S 2ND ST	Parks & Recreation		2	Sidewalk, curb ramp, and ramp access issues Broken seating	2022-2025
281	Burholme Park	7370 CENTRAL AVE	Parks & Recreation		4	Install compliant ADA parking signage mounted at 80in Min from ground Tables not on accessible path	2022-2025
282	Health Center 10	2230 COTTMAN AVE	Health	On-going exterior improvements	2	Emergency egresses to stairs and a step Signage issues	2022-2025
283	Cedar Grove	4001 LANSDOWNE DR	Parks & Recreation Historic	Historic	3	Toilet Rooms not accessible No Accessible designated parking Signage Issues	2022-2025

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284	River Field Clubhouse	302 N 24TH ST	Parks & Recreation		3	Restroom issues Door threshold issues	2022-2025
285	7th District	1701 BOWLER STREET	Police		2	Noncompliant handrails Counter height is high Obstructed access to Fire Alarm Pull Station	2022-2025
286	Strawberry Mansion Health Center	2840 W DAUPHIN ST	Health	HVAC replacement on- going through 2021; adding Dental Suite and expanding pharmacy; downsizing Records Room	2	Accessible parking signs too high and faded Passenger loading area not striped Noncompliant curb ramp at front entrance loading area Signage issues	2022-2025
287	Valley Green Inn	7 VALLEY GREEN RD	Parks & Recreation Historic	LEASED- Inn Only Park Area - Parks & Recreation Historic	2	Handrail issues Signage issues Mirrors and hooks high in restrooms Twisting door knobs	2022-2025
288	One Penn Center (DHS Academy)	1617 JOHN F KENNEDY BLVD	Admin	LEASED Cost passed to Landlord	3	High Counters Signage Issues Doors fast Hardware issues Men's accessible stall has high toilet	2022-2025
289	Philadelphia Juvenile Justice Services Center	91 N 48TH ST	Human Services	Public Property/HEALTH will work on addressing these issues	2	Doors fast Telephone too high 2nd Floor counter too high	2022-2025
290	Andorra Library	705 CATHEDRAL RD	Library		2	Signage issues Noncompliant restroom door opening (key and push) Handrail issues Restrooms access obstructed by carts Emergency egress issues	2022-2025

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291	Pennypack Environmental Center	8600 VERREE RD	Parks & Recreation Historic	Historic	4	No accessible parking Ramp handrails missing returns Missing signage Noncompliant exit door hardware	2022-2025
292	Philadelphia Safety Collaborative	300 E HUNTING PARK AVE	Human Services	LEASED from Ironstone Cost passed on to landlord	2	Insufficient number of accessible parking spots Some doors were too fast No accessible counter in PCA reception area	2022-2025
293	Greater Olney Library	435-39 W TABOR RD	Library		1	No Access to Second Floor Programmatic Option for Accessibility Signage Issues Need second handrail for exterior access ramp Emergency Exit Issues	2022-2025
294	Whitman Library	200 SNYDER AVE	Library		4	Operational issues with furniture and other movable objects blocking access Signage issues	2022-2025
295	Hope Park	201-19 E INDIANA AVE	Parks & Recreation		2	Noncompliant curb ramps	2022-2025
296	Tugboat House	1399 WEST RIVER DR	Parks & Recreation Historic	Historic	2	No handrails on ramp No edge protection for ramp	2022-2025
297	Barnes & Loney Park/ Lion's Park	7966 OXFORD AVE	Parks & Recreation		4	Gazebo not accessible non-compliant drinking fountain	2022-2025
298	City Line Sports Complex	7800 CITY LINE AVE	Parks & Recreation		3	Signage Issues Door fast No grab bars in accessible restroom Noncompliant hardware type High counter	2022-2025

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299	1234 Market St	1234 MARKET ST	Admin	Leased from SEPTA COST PASSED ON TO LANDLORD	4	OIT, OHCD, & PRA High reception counter Short rear grab bar Handrails in emergency exit stairs lacked extensions and returns	2022-2025
300	Nelson Playground Building	2500-34 N 3RD ST	Parks & Recreation	REBUILD Construction starting soon	4	REBUILD BUILDING EXPANSION No major issues	2022-2025
301	Lovett Memorial Library	6923-45 GERMANTOWN AVE	Library	21 <sup>st</sup> Century Library with recent renovations	3	21st Century Library; mostly compliant Ramp issues Non-compliant bathroom door opening (key and push) Elevator needs audible alerts for landing and one button does not illuminate Signage Issues	2022-2025
302	24th/25th District	3827-37 WHITAKER AVE	Police		2	Needs second Drinking Fountain Not enough width for ramp in courtroom Signage issues	2022-2025
303	Ridgeland Mansion	4100 CHAMOUNIX DR	Parks & Recreation Historic	Leased Historic	4	Leased to non-profit Signage issues Accessible parking restriping needed	2022-2025
304	South Philadelphia Health & Literacy Center	1700 S BROAD ST	Library		4	New facility Overall accessible with minor issues easily corrected	2022-2025
305	19th District	1201 N 61ST ST	Police		3	Obstructed access to telephone Telephone protruding 13" Low toilet seat	2022-2025

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306	Solly Stables	1140 SOLLY AVE	Parks & Recreation		2	No accessible route Noncompliant door knob for toilet room Noncompliant sink Non accessible route to toilet room	2022-2025
307	L&I North Service Center	60-86 E HAINES ST	Admin		4	Formerly Morton Rec Building No handrail extensions on ramp No accessible portion of counter	2022-2025
308	Tree House Northwestern Ave	9001 LYKENS LN	Parks & Recreation Historic	Historic	2	Doors too narrow No markings for parking lot No accessible aisle for accessible parking	2022-2025
309	Princeton Avenue/Tacony Boat Launch	7071R MILNOR ST	Parks & Recreation		4	No signage at parking Striping for accessible space faded	2022-2025
310	Woodford Mansion	2300 N 33RD ST	Parks & Recreation Historic	Leased Historic	4	Exterior lift added to access first floor in November 2019 Need to identify at least one accessible parking spot	2022-2025
311	1st District	2301-10 S 24TH ST	Police		4	Twisting Door knobs Ground floor drinking fountain not operable Doors are heavy No audible chime in elevator upon ascending	2022-2025
312	Warehouse/Gun Permits	660 E ERIE AVE	Police		4	Not enough knee clearance depth at booth tables Fast door speed Signage issues	2022-2025
313	West Oak Lane Library	2000-20 E WASHINGTON LN	Library	REBUILD Selected	2	REBUILD Signage issues Noncompliant restroom door opening (key and pull) Table issues (not enough height)	2022-2025

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
314	Northeast Older Adult Center	8101 Bustleton Ave	Parks & Recreation		4	Doors are heavy and close too quickly Signage issues	2022-2025
315	Haverford Library	5543-57 WESTMINSTER AVE	Library		2	Emergency egress issues Grab bars short Signage issues	2022-2025
316	Library For Blind/Physically Handicapped (LBPH)	1500 SPRING GARDEN	Library	Leased	4	Leased space: Landlord issues with directional signage	2022-2025
317	Townsend Senior Center/ Rosemary Montagno Senior Center	12601 TOWNSEND RD	Parks & Recreation	LEASED	4	Doors fast Noncompliant door hardware Threshold issues Egress issues Signage issues Not enough turning radius in accessible restroom because of furniture that's been brought in High mirrors	2022-2025
318	RCF Visitors Waiting Area	7901 STATE RD	Prisons		4	Door maneuvering clearance blocked by furnishings Non-compliant handrails Counter too low Lack of signage	2022-2025
319	Tacony Library	6742 TORRESDALE AVE	Library	Recent renovations	3	Non-compliant restroom door opening (key and push) Handrail issues No Hall Signals (Audible) for Elevator Signage issues	2022-2025

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320	CASE Building	4400 S CONCOURSE DR	Parks & Recreation Historic	Historic Maintenance and Programmatic options need to be investigated further: Park Permits likely moving out of building. RFP issued for on-line Parks permitting	2	Parks Permit Office Not Accessible except to ambulatory persons Programmatic Option for Accessibility Entrance door too narrow	2022-2025
321	Geary Park	3551 S BROAD ST	Parks & Recreation		4	Steps only to benches	2022-2025
322	Department of Records	1401 JOHN F KENNEDY BLVD	Admin		2	Located in City Hall Signage Issues Ticket dispenser and the display of required paperwork were too high No maneuvering clearance for recessed door High reception counter Door speed	2022-2025
323	Towing Facility	4290 MACALESTER ST	Police		1	No accessible route to building Fast door speed	2022-2025
324	Belmont Mansion Building	2000 BELMONT MANSION DR	Parks & Recreation Historic	Historic LEASED from City; Cost passed on to Tenant	4	No signage for accessible parking spaces Only first floor of mansion accessible Furniture needs to be moved to improve first floor access in mansion	2022-2025
325	Oak Lane Library	6622 N 12TH ST	Library	Carnegie Library	3	Signage issues Loose Handrails Noncompliant restroom door opening (key and pull) Accessible portion of counter blocked Doors speed (fast)	2022-2025

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326	14th District	5928-30 GERMANTOWN AVE	Police		3	High counter Grab bar issues	2022-2025
327	Gustine Recreation Center Building	4540 RIDGE AVE	Parks & Recreation		4	Fast door speed Mirrors high Non accessible emergency egress	2022-2025
328	Rosenbach Library/Museum	2008-2010 DELANCEY PL	Library	Historic	4	Not technically part of the city's library system Needs directional signage to accessible entrance	2022-2025
329	Health Center 2	1700 S BROAD ST	Health		4	Signage Issues Toilet paper too far from toilet seat	2022-2025
330	Record Department Archive Center	548 SPRING GARDEN ST	Admin	LEASED Cost Passed on to Landlord	4	Newer facility No major issues	2022-2025
331	Zoo Admissions Bldg & Gift Shop	3400 W GIRARD AVE	Parks & Recreation	Leased	4	Signage Issues Door speed fast	2022-2025
332	Widener Library	2808-26 W LEHIGH AVE	Library		4	Furniture blocking door access Lack of signage	2022-2025
333	Disston Recreation Center	4423 LONGSHORE AVE	Parks & Recreation	REBUILD Under construction Phase I: Reopened with a new playground, tree plantings, walkways, and site landscaping Phase II will provide building improvements Verify if second floor of building is accessible	2	REBUILD Unable to assess building due to construction	2022-2025
334	Trenton & Auburn Park	2226 E AUBURN ST	Parks & Recreation	REBUILD Selected	2	REBUILD Site under construction at site visit	2022-2025

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335	22nd District	1727 N 17TH ST	Police		4	Fast door speed	2022-2025
336	Bradford Park	10153-99 BUSTLETON AVE	Parks & Recreation		4	Passive Park Broken bench- remove bench	2022-2025
337	DiSilvestro Playground Building	1700 S BROAD ST	Parks & Recreation		4	Door speed fast	2022-2025
338	Gilbert Stuart Park	5132 GERMANTOWN AVE	Parks & Recreation		4	Surface issues at entrance (loose brick)	2022-2025
339	Hagert Playground	2024-40 E HAGERT ST	Parks & Recreation	Newly renovated	4	Chess tables are too low	2022-2025
340	M. L. King Older Adult Center	2101-35 CECIL B MOORE AVE	Parks & Recreation		4	Doors close too fast Automatic door not working	2022-2025
341	Lee Cultural Center Building	4310 HAVERFORD AVE	Parks & Recreation	\$110,000 budgeted to repair southern accessible entrance into park near pool; remainder unfunded	1	Severe surface issues, currently no accessible route into park  No pool lift for swimming pool Noncompliant Restrooms (both boys and girls) Ramp slope too steep at playground Handrail issues Stairs to higher floors Noncompliant seating and tables Surface issues No accessible parking	2025-2028
342	West Oak Lane Older Adult Center	7210-18 OGONTZ AVE	Parks & Recreation	Needs Further Investigation Facility Owned by City and staffed by Parks & Recreation	1	Signage Issues Handrail Issues Emergency Egress Issues No accessible route to basement level Needs accessible drinking fountain Grab bar issues	2025-2028

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343	Donatucci Library	1935 SHUNK ST	Library	Active community interest having building be fully ADA accessible. Options need investigation. No funding identified.	1	Carnegie library, <b>Not Accessible</b> non-compliant doorknobs lack of signage	2025-2028
344	Ramonita de Rodriguez Library	600-16 W GIRARD AVE	Library	Major Improvements Planned including HVAC, roof, and restrooms. Budget TBD	2	Emergency egress issues Non-compliant stairs and handrails No grab bars in either public toilet Accessible counter is blocked	2025-2028
345	John Byrne Golf Club	9550 LEON ST	Parks & Recreation	LEASED by City Cost pass on to Tenant	1	No accessible parking No accessible route to the site No accessible ramps Non-compliant handrail Non-compliant doors Non-compliant counter Signage issues Drinking fountain not working Narrow restroom doors Emergency exit issues	2025-2028
346	Holmesburg Library	7720-24 FRANKFORD AVE	Library	Carnegie Library	1	No accessible route to building Signage issues Non-Accessible route through front check out desk Emergency egress issues Noncompliant bathroom door opening (key and push) Handrail issues Noncompliant staircase that leads to basement Noncompliant doors (heavy and fast closing speed)	2025-2028

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347	Nicetown Park	4301 GERMANTOWN AVE	Parks & Recreation	Playground renovations recently completed	2	Accessible route issues Noncompliant Play surface No transfer station No accessible benches or tables	2025-2028
348	Mcilvain Playground Rec Building	5200 N PENN ST	Parks & Recreation		2	Emergency egress issues Signage issues Noncompliant and no accessible restrooms Doors fast Threshold issue Door hardware height too high Needs second drinking fountain Surface issues	2025-2028
349	Water Tower Recreation Center	209-99 E HARTWELL LN	Parks & Recreation		1	Not accessible Programmatic Option for Accessibility Noncompliant staircases Handrail issues Signage Issues Emergency egress issues Noncompliant drinking fountain Doors heavy, fast and too narrow Noncompliant door hardware type Exit doors obstructed and blocked Telephone not working Noncompliant and non-accessible restrooms Surface issues Picnic tables off the path	2025-2028

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350	Daisy Field	5000 HERMIT LN	Parks & Recreation		1	No accessible route through the park No accessible route to play components No accessible portable toilet No accessible route to benches Noncompliant benches	2025-2028
351	82nd & Lyon Park	8200 LYONS AVE	Parks & Recreation	Is site still in use?	2	Overgrown, not maintained and completely unusable Path blocked with jersey barriers Broken play equipment Broken benches	2025-2028
352	Northeast Regional Library	2230 COTTMAN AVE	Library		2	Accessible Elevator out of service 2+ years Non-compliant handrails Lack of signage	2025-2028
353	Eastwick/Suffolk Park	7401 LINDBERGH BLVD	Parks & Recreation		2	Accessible route issues Play area surface issue Curb Ramp issues Insufficient ground play components	2025-2028
354	Stenton Mansion	4601 N 18TH ST	Parks & Recreation Historic	LEASED Historic Bathroom accessibility can be resolved with permanent maintained ADA accessible portable toilet	3	Limited accessibility to first floor via temp ramp Bathrooms not accessible	2025-2028
355	Kelly Park	440-42 PARKER AVE	Parks & Recreation	Play area in design; basketball court may be removed	2	2/4 Curb Ramps not compliant No accessible route to play components and basketball court No accessible elevated play component	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
356	Ford Road Playground	3905 FORD RD	Parks & Recreation		1	No accessible route to park No transfer station Not enough accessible elevated play components All benches and table on non-accessible route Noncompliant benches (low)	2025-2028
357	Bridesburg Recreation Center	2320-34 CECIL B MOORE AVE	Parks & Recreation		2	Lower level not accessible Programmatic Option for Accessibility Accessible route surface issues Lack of signage	2025-2028
358	Mcdevitt Recreation Center Building	3500 CRAWFORD ST	Parks & Recreation		1	Not accessible Programmatic Option for Accessibility Stair issues walking and play surface issues	2025-2028
359	Hunting Park Recreational Center Building	4101 OLD YORK RD	Parks & Recreation		2	No access to second floor Programmatic Option for Accessibility Door Issues Noncompliant restrooms Handrail Issues Signage Issues	2025-2028
360	Police Training Center	2838 WOODHAVEN RD	Police	No Elevator to 2nd Floor	1	Second Floor Not Accessible  No elevator and all accessible bathrooms and training classrooms on second floor  Signage issues Insufficient number of accessible parking spaces	2025-2028
361	Hammond & Nedro Building	5821 HAMMOND AVE	Parks & Recreation	Located near Olney Rec Center which is Rebuild site	1	No accessible route to the building Handrail issues Noncompliant benches	2025-2028
362	Leverington Park	4605 UMBRIA ST	Parks & Recreation		4	Noncompliant stairs and handrails	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
363	New Northeast Municipal Center	7522-24 CASTOR AVE	Admin	Leased	2	Doors fast and heavy Handrail issues Noncompliant hardware Signage issues No elevator/lift to basement level High counter High toilets in restrooms No compliant accessible parking	2025-2028
364	Monkiewicz Playground	3201 RICHMOND ST	Parks & Recreation	Site Requires Significant Investment	2	Building not open, pool permanently closed Noncompliant play equipment Surface issues	2025-2028
365	Pavilion In The Trees	4160 HORTICULTURAL DR	Parks & Recreation		2	Accessible Path surface issues (unpaved) No handrail on ramp to the Pavilion One side guardrail missing at small bridge (no edge protection)	2025-2028
366	18th District	5510 PINE ST	Police	Structural issues can be addressed by closing public access to 2nd floor and providing all programs and service on 1st floor	1	Second Floor not accessible Programmatic Option for Accessibility Door speed fast Vertical changes at front door not compliant Grab bar issues Telephone protruding more than 4" Handrail issues Noncompliant stairs (short tread)	2025-2028
367	Coxe Park	2132-34 CHERRY ST	Parks & Recreation		1	No accessible route to play components Older non-compliant elevated and ground play components non-compliant staircase Handrail issues	2025-2028

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368	Philadelphia Industrial Correction Center	8301 STATE RD	Prisons		2	Signage issues Heavy Doors and fast speed Drinking Fountain not operable Obstructed access to Drinking Fountains High mounting height of hardware for door Mirror height is too high	2025-2028
369	Tustin Recreation Center	5901-29 W COLUMBIA AVE	Parks & Recreation		1	No wheelchair access to second floor Programmatic Option for Accessibility Noncompliant stairs and handrails Noncompliant doors Noncompliant restrooms No accessible route to the computer room No accessible route into swimming pool Noncompliant play equipment	2025-2028
370	Philadelphia Detention Center	8201 STATE RD	Prisons	No complaint signage in building	3	Signage issues No handrails for stairs No landing for long ramp Mirror height is too high Twisting Door Knob for restrooms doors	2025-2028
371	Allens Lane Park	621 W ALLENS LN	Parks & Recreation		2	No compliant accessible parking No accessible route to and through the park Not enough accessible elevated play components	2025-2028
372	Whitby Avenue Playground	COBBS CREEK PKWY AND WHITBY AVE	Parks & Recreation		1	Not Accessible All of equipment is off of the accessible path No accessible designated parking No accessible picnic tables	2025-2028
373	Buist Park	2528 HOBSON ST	Parks & Recreation		2	Being used as Water Dept. construction staging area Steep slopes and deteriorated pathways	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
374	East Parkside Tot Lot	1102-04 N 41ST ST	Parks & Recreation		1	Not Accessible Curb ramp too steep	2025-2028
375	East Passyunk Community Center Building	1025 MIFFLIN ST	Parks & Recreation		3	Signage Issues Emergency egress issues Noncompliant benches No wheelchair accessible stall Noncompliant sink faucet Fire Alarm Pull Station too high Noncompliant door hardware Needs second drinking fountain	2025-2028
376	Scanlon Recreation Center	1099 E TIOGA ST	Parks & Recreation		1	Accessible route issues: persistent flooding on route due to poor drainage Steep curb ramps Pool not accessible Lack of signage Noncompliant play equipment Surface issues	2025-2028
377	Black, Coyle & McBride Playground	2150-72 E HUNTINGDON ST	Parks & Recreation		2	No transfer stations on equipment Surface issues	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
378	FDR Park Playground Equipment	3500 S BROAD ST	Parks & Recreation		2	Not enough accessible play components Broken ground play components No accessible parking spot No marking at parking lot Handrail missing on ramp Noncompliant benches Noncompliant and no accessible picnic areas Surface issues at tennis court Needs second drinking fountain Non-accessible skate board Portable restrooms not on accessible route No route to basketball court	2025-2028
379	Von Colln Memorial Field	2250 PENNSYLVANIA AVE	Parks & Recreation	Building locked at site visit Restroom were open	4	Steep ramp Mirror high Restroom doors heavy	2022-2025
380	Kendrick Recreation Center	5822-24 RIDGE AVE	Parks & Recreation		2	No accessible route to the second floor auditorium or karate room  Programmatic Option for Accessibility Compliant ramps in the front and rear of the building provide access to the ground level and the basement floors Doors fast and narrow Not enough accessible elevated play components No accessible route to basketball courts Accessible parking issues Signage Issues Ground floor drinking fountains are noncompliant Non-accessible pool Handrail issues Non-accessible and noncompliant restrooms	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
381	Cliveden Park	501 E JOHNSON ST	Parks & Recreation		2	No handrails on one side of staircase Steep side walk Surface condition issues Handrail issues (no extension, return)	2025-2028
382	Deni Playground	1381 RUAN ST	Parks & Recreation		4	Newly installed playground equipment (playground was not open yet) Noncompliant handrails Noncompliant curb ramp No accessible route to baseball field	2025-2028
383	Japanese House Ticket Window	4301 LANSDOWNE DR	Parks & Recreation Historic	Historic Needs further investigation on options	2	No route to ticket counter or into site (step before main entrance staircase) Programmatic Option for Accessibility	2025-2028
384	Marconi Plaza	2701 S BROAD ST	Parks & Recreation		2	WEST SIDE: Surface issues Stairs issues No handrails for stairs 1/8 accessible playground equipment EAST SIDE: No handrails for stairs No accessible playground equipment	2025-2028
385	Morton Playground	88 E HAINES ST	Parks & Recreation	Recreation building now used by L&I	2	Not maintained Non-compliant play equipment Swings missing Surface issues	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
386	City Hall	1401 JOHN F KENNEDY BLVD	Admin	Court Rooms not included in site assessment	2	Exterior Surface conditions deteriorated at public entrances, City Hall Courtyard, and in Portals Handrail at security entrance ramp (northeast) non- compliant Noncompliant curb ramps Automatic door issues First Floor Noncompliant restrooms Improper door opening clearances Door hardware not compliant Floor surface issues Protruding objects Temporary ramp at Visitors Center too narrow 2nd Floor Fire alarm pull station too high Signage issues 4th Floor Council members doors are too narrow Noncompliant hardware Counters in council offices are too high Signage Issues 7th Floor No accessible route to City Hall tour Programmatic Option for Accessibility Signage Issues Noncompliant handrails	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
387	Merritt Square Park	1321 STEINBER ST	Parks & Recreation	Is park still in use? Researching	4	Not maintained Being used by neighborhood as a parking lot	2025-2028
388	Granahan Playground	338-50 N 65TH ST	Parks & Recreation		1	Not Accessible Playground entrance only accessible via steps No access to recreation center No accessible restrooms in recreation center	2025-2028
389	Price Street Play Lot (177-85 W Price Street Park)	177-83 W PRICE ST	Parks & Recreation	Park locked at site visit	1	Not Accessible Park was locked at time of site visit Older non-compliant play components Accessible route issues	2025-2028
390	Clayborn-Lewis Playground	1101 N 38TH ST	Parks & Recreation		2	No accessible toilet room Play areas for 5 and under and 5-12 are separate No access to basketball courts (stairs) Lack of signage non-compliant benches and tables	2025-2028
391	Carmella Playground	2100 WAKELING ST	Parks & Recreation		4	Plan Review Building will be undergoing construction Cracking and noncompliant cross-slope on the accessible route from the skate park Noncompliant playground equipment Noncompliant play surface	2025-2028
392	Pickett Pool (at Mastery Charter)	5700 WAYNE AVE	Parks & Recreation	Located inside Mastery Charter School Indoor Pool Managed by Water View Parks & Recreation staff	2	No accessible route to pool - either through school or by stairs Was closed at site visit due to maintenance and electrical issues No accessible restrooms	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
393	Wharton Square	1300 S 23RD ST	Parks & Recreation		2	Sidewalk surface issues Noncompliant drinking fountain Doors fast and heavy High mirror Noncompliant faucet Signage Issues	2025-2028
394	Ross Park	1000 W GLENWOOD AVE	Parks & Recreation	Is site still in use?	2	Not maintained Non-compliant steps Sidewalk and steps deteriorated	2025-2028
395	Winchester Playground Building	2324 N 15TH ST	Parks & Recreation		2	Noncompliant ramp for building access: too steep, no handrails Accessible path and play area surface issues Emergency egress issues: doors are stuck shut Noncompliant handrails	2025-2028
396	McMichael Park	3201-45 MIDVALE AVE	Parks & Recreation		1	No accessible route into park Non-Compliant benches and tables Steps to Memorial	2025-2028
397	Ormiston Mansion	2000 RESERVOIR DR	Parks & Recreation Historic	Historic Potential for wheelchair lift installation at rear of house	4	Not accessible Programmatic Option for Accessibility Possibility for adding a wheelchair lift to rear of house Needs designated accessible parking space	2025-2028
398	Wingohocking Playground	4101 OLD YORK RD	Parks & Recreation		2	Play surface noncompliant Curb ramp issues	2025-2028
399	Reyburn Park	1950 W LEHIGH AVE	Parks & Recreation		4	Surface issues	2025-2028
400	Stiles Park	1608 W STILES ST	Parks & Recreation	Is site still in use?	2	No accessible play components or safety surface Very small with old metal play equipment	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
401	Waterview Recreation	5826 MC MAHON AVE	Parks & Recreation		2	Second floor not accessible Programmatic Option for Accessibility Play area accessibility issues Non-compliant bathrooms Accessible route surface issues Lack of signage	2025-2028
402	Rhawn Street Picnic Pavilion	3100 RHAWN ST	Parks & Recreation		3	Picnic tables not on accessible route No accessible parking Noncompliant picnic tables and benches	2025-2028
403	Cione Playground	2600 ARAMINGO AVE	Parks & Recreation		2	Toilet Rooms not accessible No chair lift for pool Sidewalk surface issues Lack of signage	2025-2028
404	Jacobs Playground Building	9050 TORRESDALE AVE	Parks & Recreation		2	Bathroom building noncompliant Play equipment noncompliant No accessible parking spaces Signage issues	2025-2028
405	Gorgas Park	6300 RIDGE AVE	Parks & Recreation		3	Non-compliant Bathrooms Sidewalk issues	2025-2028
406	Lindbergh Park/63rd & Eastwick Play Lot	2901-19 S 63RD ST	Parks & Recreation		2	No accessible route to swings Surface issues 1/3 curb ramp is too steep Broken Bench	2025-2028
407	Shissler Recreation Center	1800-56 BLAIR ST	Parks & Recreation		2	No accessible play equipment Needs more accessible parking spaces	2025-2028
408	Mullin Playground	4301 PRINCETON AVE	Parks & Recreation	Building closed and appears to be vacant	4	Building locked Non-compliant handrails Play area surface issues	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
409	Butler Street Play Lot	917 W BUTLER ST	Parks & Recreation		2	Non-compliant curb ramps All swings were missing Accessible route surface issues Cars parked on sidewalk	2025-2028
410	48th & Woodland Playground Building	4740 WOODLAND AVE	Parks & Recreation		2	Accessible route issues Noncompliant toilet rooms No accessible play components for older children Signage issues Noncompliant drinking fountain	2025-2028
411	Cruz Recreation Center	1400-52 N 5TH ST	Parks & Recreation		2	Emergency egress issues Signage Issues Noncompliant door hardware type Doors heavy and fast Noncompliant faucet No chair lift at swimming pool Not enough accessible elevated play components Surface issues Hard to get onto playground surface	2025-2028
412	60th & Baltimore/Square Seat Park	5961 BALTIMORE AVE	Parks & Recreation		2	Not maintained Damaged benches Sidewalk deteriorated	2025-2028
413	Stinger Square Playground Building	1400 S 32ND ST	Parks & Recreation		2	Noncompliant and non-accessible restroom Doors heavy and fast No chair lift at swimming pool No accessible route to the building Public area of buildings are only noncompliant restrooms	2025-2028
414	Clearview Park	7600 BUIST AVE	Parks & Recreation		4	Accessible Route surface issues Curb ramp issues	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
415	Cibotti Recreation Center Building	2500 S 77TH ST	Parks & Recreation		2	Doors closed quickly Surface issues in the playground Signage issues No compliant accessible restroom	2025-2028
416	Lower Mayfair Playground Building	3001 ROBBINS ST	Parks & Recreation		2	Signage Issues Emergency egress issues Noncompliant restrooms Doors fast and heavy Handrail issues Grab bar issues Needs second drinking fountain Not enough accessible elevated play components	2025-2028
417	29th & Chalmers	3001 W LEHIGH AVE	Parks & Recreation		2	Noncompliant curb ramp Not enough accessible play components Picnic tables not on accessible route Handrails issues	2025-2028
418	McArdle Recreation Center Building	8930 ASHTON RD	Parks & Recreation		2	Noncompliant play equipment Accessible route issues Signage issues	2025-2028
419	Allens Lane Art Center	621 W ALLENS LN	Parks & Recreation		2	Non-compliant accessible parking No accessible route to the theater Signage Issues	2025-2028
420	39th District	2201 W HUNTING PARK AVE	Police		1	No accessible route to building Only stairs to public space noncompliant handrails	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
421	17th District	1200 S 20TH ST	Police		1	No accessible route to building Handrails issues Door width not enough and speed is fast	2025-2028
422	26th District	611-17 E GIRARD AVE	Police		1	No accessible route to building Only Stairs to Public area High counter	2025-2028
423	Walnut Street West Library	3948-50 WALNUT ST	Library	Carnegie Library	1	Emergency egress and area of refuge issues; emergency exit to 40 <sup>th</sup> street: interior emergency exit stairs to access exterior ramp on 40 <sup>th</sup> St. Exit stair towers not fire rated No area of refuge for second floor (main Library floor) Noncompliant restroom door opening (key and pull) Lack of signage Recommend: Emergency procedures should be tested with staff at least annually.	2025-2028
424	Stenton Recreation	4600 N 16TH ST	Parks & Recreation		4	New building and play area Accessible route surface issues	2025-2028
425	Northwood Park	999 ARROTT ST	Parks & Recreation		1	No accessible route through the park Benches not on accessible route Noncompliant benches	2025-2028
426	Rose Playground Building	7401 LANSDOWNE AVE	Parks & Recreation	Unable to access building at site visit	1	Accessible route issues Not enough accessible elevated play components Ramp too steep No handrails at ramp and stairs	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
427	Morris Estate Recreation	1610 CHELTEN AVE	Parks & Recreation	Historic	2	Historic Building Second floor not accessible Programmatic Option for Accessibility Non-compliant handrails Pool not accessible No access to basketball courts Surface issues Lack of signage	2025-2028
428	45th & Sansom St	4501 SANSOM ST	Parks & Recreation		4	Entire park on 4-5% slant Slope is too steep Benches and tables not compliant	2025-2028
429	Eastwick Regional Park	2500 S 77TH ST	Parks & Recreation		3	Noncompliant toilet rooms Fast door speed Play are surface issues Signage issues	2025-2028
430	Hawthorne Cultural Center	1200 CARPENTER ST	Parks & Recreation		2	Accessible route and play surface issues No chair lift for swimming pool Noncompliant play equipment Tables not on accessible route Door hardware issues Noncompliant Drinking Fountain Computer tables are an inch too low to provide proper knee clearance No compliant signage at most doors	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
431	Houston Playground Building	8601 WISSAHICKON AVE	Parks & Recreation		2	No accessible route to hockey ring and baseball field Noncompliant restrooms Doors heavy and fast No handrails for stairs Tread surface issues Noncompliant Drinking Fountains	2025-2028
432	Samuel Recreation Center	2501 E TIOGA ST	Parks & Recreation		2	Play surface issues Pool not accessible Access to bathrooms is via exterior ramp No access to gym	2025-2028
433	Seger Park Playground Building	1000-42 LOMBARD ST	Parks & Recreation		2	No accessible restrooms Doors speed fast Noncompliant restrooms Door hardware issues No accessible route to water play component	2025-2028
434	Womrath Park	4098 FRANKFORD AVE	Parks & Recreation		4	Table not on accessible path Sidewalk surface issues Curb ramp issues	2025-2028
435	Woodside Park/ Conshohocken Playground	3910-18 CONSHOHOCKEN AVE	Parks & Recreation		2	Non-compliant restrooms Not enough accessible play components Non-compliant picnic tables All benches and tables on non-accessible route No handrail for ramp Signage Issues	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
436	Towey Recreation Center	1832-50 N HOWARD ST	Parks & Recreation		1	No accessible route to 2nd floor Programmatic Option for Accessibility Emergency egress issues Signage Issues Noncompliant hardware type Doors heavy and fast Needs second drinking fountain Surface Issues Not enough accessible play components	2025-2028
437	Lackman Playground	800 BARTLETT ST	Parks & Recreation		2	No access to swimming pool Noncompliant ramp Accessible parking issues Missing signage	2025-2028
438	Strawberry Green Driving Range Trailer	3300 RESERVOIR DR	Parks & Recreation	Leased	1	No accessible route to the trailer Counter is high Noncompliant staircase Handrail issues	2025-2028
439	Fairview Park	4418 MANAYUNK AVE	Parks & Recreation	Community group raising funds for design	4	Depressed concrete blocks Noncompliant Drinking Fountain Curb ramp issues	2025-2028
440	Starr Garden Playground Building	600-44 LOMBARD ST	Parks & Recreation		2	Signage Issues Emergency egress issues Non-compliant and non-accessible restrooms Handrail issues Surface Issues Noncompliant drinking fountain Not enough accessible play components Noncompliant door hardware type	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
441	Markward Playground	338-46 S 26TH ST	Parks & Recreation		2	Doors fast Threshold issues Not enough accessible play components Signage issues Emergency egress issues Handrail issues Noncompliant drinking fountain Noncompliant tables Door hardware issues Front door too narrow	2025-2028
442	10th & Lemon Playground	1015 MOUNT VERNON ST	Parks & Recreation		4	Surface condition issues Broken swings	2025-2028
443	Palmer Playground	11701 THORNTON RD	Parks & Recreation		3	Non-compliant toilet rooms	2025-2028
444	Parkside-Evans Recreation Center Building	5301 PARKSIDE AVE	Parks & Recreation	All issues identified are associated with Rec Center not the new Parkside Fields	2	Surface issue near only curb ramp Signage issues No knee clearance for tables Noncompliant restrooms Path surface issues No accessible parking designated	2025-2028
445	Mill Creek Recreation	743-81 N 48TH ST	Parks & Recreation		2	Pool not accessible Noncompliant amount of accessible play components	2025-2028
446	Tarken Rec Center	6250 FRONTENAC ST	Parks & Recreation		3	Noncompliant restroom Grab Bar issues Missing signage Play surface issues	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
447	Donald Finnegan Playground	1231 S 30TH ST	Parks & Recreation		2	No accessible entrance to younger kids playground Signage Issues Noncompliant restrooms No turning radii in restrooms Low toilets Hardware issues Emergency egress issues Doors fast	2025-2028
448	Kemble Park	5650 N 16TH ST	Parks & Recreation		2	Play surface material issues Steep walkway	2025-2028
449	Christy Recreation Center	728 S 55TH ST	Parks & Recreation		2	No chair lift for swimming pool All emergency exits from the gymnasium have narrow doors and require a step down to the ground level Sidewalk and path surface issues Signage issues	2025-2028
450	Jardel Recreation	1400 COTTMAN AVE	Parks & Recreation		2	Internal chair lift on stairs to circulate between floors Stairs to upper level and gym currently blocked with storage Several emergency exit stairwells used for storage and are blocked External toilet rooms for basketball courts not accessible Signage issues Play equipment noncompliant Play surface issues	2025-2028
451	Kelly Comfort Station	1701 JOHN B KELLY DR	Parks & Recreation	Is site still in use?	3	Building locked at site visit No accessible route	2025-2028

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452	Awbury Recreation Center	6101 ARDLEIGH ST	Parks & Recreation		2	Signage issues Mirrors high Doors fast Handrails missing on stairs at tennis courts No lift for swimming pool Swimming pool not accessible non-compliant drinking fountain Play area surface issues Accessible parking designation	2025-2028
453	Cloverly Park	5425 WISSAHICKON AVE	Parks & Recreation		1	Not Accessible  No accessible route into the park  No accessible route to benches  No accessible route to play components	2025-2028
454	Chalfont Playground	4430 DEERPATH LN	Parks & Recreation		2	Noncompliant toilet rooms Insufficient play components for older children Signage issues Noncompliant drinking fountain	2025-2028
455	Juniata Park Older Adult Center	1231 E SEDGLEY AVE	Parks & Recreation		2	Signage Issues Noncompliant restrooms Door speed fast Noncompliant door hardware type Handrail issues Curb ramp from parking too steep No aisle for accessible parking	2025-2028

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456	Ford Recreation Center	609-29 SNYDER AVE	Parks & Recreation		2	No handrails for steep slope pool No chair lift for swimming pool Door Issues Signage Issues Missing handrail on emergency exit No accessible restrooms	2025-2028
457	Rizzo Ice Rink	1201-99 S FRONT ST	Parks & Recreation		2	Ice rink only accessible by stairs No wheelchair accessible toilet room Signage issues	2025-2028
458	Papa Park	6839 LANSDOWNE AVE	Parks & Recreation		3	No accessible restrooms in the recreation center Recreation center doors close too quickly Park sign is broken	2025-2028
459	Mayfair Playground	2901 PRINCETON AVE	Parks & Recreation		2	Broken spring hinge at rear emergency door in the gym Computer tables in computer room do not provide knee clearance Noncompliant elevated play equipment	2025-2028
460	Mccreesh Playground Building	6744 REGENT ST	Parks & Recreation		3	Bathroom are inaccessible	2025-2028
461	Wilmot Park Playground	1801 MEADOW ST	Parks & Recreation		4	Play surface issues Curb Ramp issues	2025-2028
462	Simpson Recreation Center Building	1010 ARROTT ST	Parks & Recreation		2	Noncompliant restrooms Noncompliant doors Noncompliant benches No access into swimming pools	2025-2028
463	Charles Durham Library	3320-50 HAVERFORD AVE	Library		2	Accessible route issues Bathroom and water fountain issues Signage issues	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
464	Smith Playground Building	2100 S 24TH ST	Parks & Recreation		2	Emergency egress issues Signage Issues Doors too narrow, fast and heavy No handrail for ramp Non-accessible and noncompliant restrooms	2025-2028
465	Juniata Golf Club Building	4501 E FISHERS LN	Parks & Recreation		2	No accessible parking Noncompliant countertops Noncompliant signage Noncompliant restrooms Stairs to deck have no handrails	2025-2028
466	Roosevelt Playground Building	4301 LEVICK ST	Parks & Recreation	Playground renovations recently completed	2	Signage Issues Doors too narrow Noncompliant restrooms No accessible restrooms Noncompliant drinking fountain Fire Alarm Pull Station high Noncompliant door hardware height Playground surface issues Not enough accessible elevated play components	2025-2028
467	Mummers Museum	200-10 WASHINGTON AVE	Museum	LEASED by City; Tenant must address issues Building not renovated since opening in 1976 Estimated cost \$54,000	3	No wheelchair accessible toilet room Signage issues	2025-2028
468	Lauritha Vaird Boys And Girls	4800 WHITAKER AVE	Parks & Recreation		3	No accessible bathrooms Door Speed issues	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
469	Torresdale Library	3079 HOLME AVE	Library		1	Noncompliant Ramp at main entrance (Slope: 12.7)  Non-Accessible enter and exit route through front check out desk  Emergency egress issues (also, >1 ft. step and greenfield outside emergency doors)  Noncompliant bathroom door opening (key and push)  Noncompliant doors (passage door knob (twisting knob) and fast closing speed)  Grab Bars missing	2025-2028
470	Welsh Road Library	9233R E ROOSEVELT BLVD	Library	Located In Shopping Center off Welsh Road	1	No Accessible Route to Basement Meeting Room Programmatic Option for Accessibility Pavement issues from parking area to the library entrance Noncompliant restrooms: door opening (key and pull) door speed (fast) low toilet seat high baby changing station faucets (needs twisting) No grab bars no accessible turning space Emergency egress issues Handrail issues Fire Alarm Pull Station obstructed access	2025-2028

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
471	Health Center 4	4400 HAVERFORD AVE	Health	Renovations scheduled for summer 2020	2	Emergency egress issues Signage Issues No accessible counter portion No accessible route to exam rooms Needs second drinking fountain Handrails issues Broken baby changing station Garb bar issues	2021
472	Gold Star Park	613 WHARTON ST	Parks & Recreation	Construction commencing in 2020 Need full Budget	1	No accessible route into park Playground equipment IS accessible	2021
473	Delancey St/Three Bears Park	311-17 DELANCEY ST	Parks & Recreation	Corrective Actions will be addressed in Spring 2020	4	Play area surface issues	2021
474	Hayes Playground	9850 E ROOSEVELT BLVD	Parks & Recreation	REBUILD Under construction; Reopened with a new sprayground and playground	4	Under construction at time of site visit New Building Addition	2021
475	12th District	6440-48 WOODLAND AVE	Police	Corrective Actions Included in Capital Budget. Facility Improvements to Commence in Feb 2020	4	Handrail too high at entrance stairs Fire Alarm Pull Station access obstructed Counter high	2021
476	North Philadelphia Municipal Services Center/ L&I East District Office	2761 N 22ND Street	Admin	Moving Service Center in Mid-2020	3	High Counters Signage Issues Doors fast Noncompliant, non-accessible restrooms High mirror	2021

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477	5th District	6666 RIDGE AVE	Police		4	Under Construction at time of site visit Accessible entrance added in 2019	2021
478	Police Administration Building	700-34 RACE ST	Police	Moving out of building in 2021	3	Noncompliant Restrooms Door speed fast No railing for stairs at entrance Signage issues	2021
479	9th District	401 N 21ST ST	Police	Moving to 400 N. Broad in July 2021 Lease to purchase	2	Fast door speed Twisting Knob for meeting room door Drinking Fountain not operable Signage issues	2021
480	6th District	235 N 11TH ST	Police	Moving to 400 N. Broad in July 2021 Lease to purchase	2	Non-continuous railing for ramp at accessible entrance High mounting height for door hardware at accessible entrance Signage issues	2021
481	Auto Impound Lot	7990 PENROSE FERRY RD	Police	Major capital project planned for 2020; included new office trailers	1	No accessible aisle at parking No handrail for stairs and ramp at entrance Open tread wooden stairs Not enough turning space at front door Counter is high	2021
482	105 Reed & Howard Park	107 REED ST	Parks & Recreation		0	No Issues	n/a
483	1729 Diamond Street Park	1729 W DIAMOND ST	Parks & Recreation		0	No issues	n/a
484	37th & Mt. Vernon Playground	614 N 37TH ST	Parks & Recreation		0	Newer Park No issues	n/a
485	47th and Gray's Ferry Park	4700 PASCHALL AVE	Parks & Recreation		0	Passive park No issues	n/a

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
486	Barkan Park	4936-58 SPRUCE ST	Parks & Recreation		0	No issues, well kept	n/a
487	Bartrams Garden Boat Launch	2901 S 56TH ST	Parks & Recreation		0	No issues	n/a
488	Benson Park	1442R-44 N 4TH ST	Parks & Recreation		0	No issues	n/a
489	Buttercup Cottage	7700 CRESHEIM RD	Parks & Recreation Historic	Historic	0	Historic ruin, building no longer exists	n/a
490	Centennial Commons	4200 PARKSIDE AVE	Parks & Recreation	Newly renovated park space	0	No Issues	n/a
491	Cianfrani Park	721 S 8TH ST	Parks & Recreation		0	No issues	n/a
492	Cricket/Archery Field Clubhouse Building	4105 EDGELY AVE	Parks & Recreation	Historic	0	Site cannot be located, according to Parks & Recreation site has very specific use and very limited hours	n/a
493	Daly Park	3100 N 12TH ST	Parks & Recreation		0	Passive park, not maintained	n/a
494	Deritis Playground	5655 GRAYS AVE	Parks & Recreation	Historic	0	Site locked, park no longer exists	n/a
495	Dickinson Square Playground Building	1600 E MOYAMENSING AVE	Parks & Recreation		0	BUILDING LOCKED, were unable to assess at multiple visits No exterior or playground issues	n/a
496	Discovery Center	3401 RESERVOIR DR	Parks & Recreation	Historic	0	No issues	n/a
497	East Fairmount Park Canoe House	KELLY DR AND STRAWBERRY	Parks & Recreation Historic	Historic	0	Toilet Rooms only No issues	n/a
498	Edward J. McBride Sports Complex	138 MOORE ST	Parks & Recreation		0	PRIVATE FACILITY	n/a
499	Elmwood Park	7101 DICKS AVE	Parks & Recreation		0	No issues	n/a

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500	Harpers Hollow Park	5850 OGONTZ AVE	Parks & Recreation		0	Passive park, no seating tables or path	n/a
501	Hartranft Pool	800 W CUMBERLAND ST	Parks & Recreation		0	Facility closed for 2 plus years, no longer in use	n/a
502	Hermitage Mansion	5000 HERMIT LN	Parks & Recreation Historic	Historic	0	Not open to the public	n/a
503	Hermitage Stage	5000 HERMIT LN	Parks & Recreation Historic	Historic	0	Gravel path, no longer in use All grass stone stairway to stage	n/a
504	Holme Playground	9152 ACADEMY RD	Parks & Recreation		0	Small unmanned building Newer playground, No issues	n/a
505	Howell Park	5215 GREENE ST	Parks & Recreation	Natural Park located at end of unpaved private lane; Passive with no amenities	0	No issues Passive park	n/a
506	Ingersoll Park	1608 MASTER ST	Parks & Recreation		0	No issues, newer park	n/a
507	Jose Manuel Collazo Playground	3261 MASCHER ST	Parks & Recreation		0	No issues Newly renovated playground	n/a
508	Julian Abele Park	917-19 S 22ND ST	Parks & Recreation		0	No issues	n/a
509	Kensington Ramblers Building	851 E TIOGA ST	Parks & Recreation		0	Permanently closed; no longer used by Parks	n/a
510	Linden Ave Boat Ramp at Pleasant Hill Park	9201 N DELAWARE AVE	Parks & Recreation		0	Dock under construction at time of site visit No issues	n/a
511	Louis Kahn Park	328-38 S 11TH ST	Parks & Recreation		0	No issues	n/a
512	Lovett Park	6923-45 GERMANTOWN AVE	Parks & Recreation		0	Newer park, No issues	n/a

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
513	Manton Street Park and Community Garden	405 MANTON ST	Parks & Recreation		0	No issues	n/a
514	Matthias Baldwin Park	423-33 N 19TH ST	Parks & Recreation		0	No issues	n/a
515	Monastery Stables	WISSAHICKON CREEK AND KITCHENS LN	Parks & Recreation		0	Gravel path but no issues	n/a
516	Morris Park	68TH ST AND LANSDOWNE AVE	Parks & Recreation		0	Wooded natural park with unpaved trails	n/a
517	Newhall Park	5322-34 NEWHALL ST	Parks & Recreation		0	Empty lot	n/a
518	Palumbo Sr. Park	723 CATHARINE ST	Parks & Recreation		0	No issues	n/a
519	Parkside Fields	5301 PARKSIDE AVE	Parks & Recreation	New Facility	0	No Issues	n/a
520	Pier 11- Race Street Pier	121 N CHRIS COLUMBUS BLVD	Parks & Recreation		0	No issues	n/a
521	Pier 53 & Pier 68- Washington Avenue Green	1301 S CHRIS COLUMBUS BLV	Parks & Recreation		0	Newer linear trail and pier park No issues	n/a
522	Ralph Brooks Playground	1601-13 S 20TH ST	Parks & Recreation		0	No Issues	n/a
523	Revenue Office - 8 Penn Center	1500-42 MARKET ST	Admin		0	NOT A PUBLIC SITE There is just a mail room here	n/a
524	Rizzo PAL	2518 E CLEARFIELD ST	Parks & Recreation		0	Not a city facility; it was sold to the PAL in 2016	n/a
525	Stokely Playground	3000 EDGEMONT ST	Parks & Recreation		0	New facility, no issues	n/a

Number	Site Name	Address	Туре	Notes	ADA Priority	Major Results	Fiscal Years
526	Strawberry Mansion Music Pavilion	3502 STRAWBERRY MANSION BRIDGE DR	Parks & Recreation		0	Historic ruin, No longer in use	n/a
527	Thomas Eakins House (Mural Arts)	1729 MOUNT VERNON ST	Parks & Recreation Historic	Historic	0	No public programs held at this building	n/a
528	Triangle Park	5425R-65 UPLAND WAY	Parks & Recreation		0	No issues	n/a
529	Tucker Street Play Lot	2308-24 E TUCKER ST	Parks & Recreation		0	This park no longer exists	n/a
530	Wakefield Park	5100 N 16TH ST	Parks & Recreation		0	Passive Park	n/a
531	Walnut Landing	2427-31 WALNUT ST	Parks & Recreation		0	No issues	n/a
532	Water Works	640 WATER WORKS DR	Parks & Recreation Historic	Historic	0	No issues	n/a
533	Water Works Engine House	640 WATER WORKS DR	Parks & Recreation Historic	Historic	0	Leased as event space No issues Houses elevator for Waterworks Interpretive Center Wheelchair Access to 'bridal room' from exterior door	n/a
534	Water Works South Entrance House	640 WATER WORKS DR	Parks & Recreation Historic	Historic	0	Water Works Interpretive Center (Water Dept) Access from Elevator in Engine House No issues	n/a
535	Grays Ave Park	5301 GRAYS AVE	Parks & Recreation		0	Not maintained, passive park	n/a
536	Weccacoe Playground Building	405-25 QUEEN ST	Parks & Recreation	Building to be demolished	0	Building being demolished No playground issues	n/a

## **APPENDIX I: ADA POLICIES AND PROCEDURES**

Milligan and Company 117

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### THE AMERICANS WITH DISABILITIES ACT'S DEFINITION OF DISABILITY

#### What is the Americans with Disabilities Act?

The Americans with Disabilities Act (ADA) protects people with disabilities from being discriminated against in employment, local and state government, as well as public accommodations, such as stores or movie theaters.

#### What does disability mean according to the ADA?

To be protected by the ADA, you must fit within the law's definition of disability. These definitions are explained below.

## A. Have a physical or mental impairment that also substantially limits you in performing one or more major life activities.

You are protected from being discriminated against under this part of the ADA if you have a physical or mental impairment that substantially limits you in one or more major life activity. Examples of physical and mental impairments include but are not limited to: cerebral palsy, visual impairment, epilepsy, autism, intellectual disability (formerly called mental retardation), bipolar disorder, diabetes, cancer, etc.

Examples of major life activities include but are not limited to: caring for yourself, walking, seeing, hearing, reading, lifting, bending, thinking, communicating, etc.

It is important to remember that to be protected under the ADA under the first definition you must have (1) a physical or mental impairment that (2) substantially limits you in performing one or more of the major life activities listed above.

#### B. Have a record or history of an impairment

You are protected from being discriminated against under this part of the ADA if you have a record or history of a disability. The disability must have substantially limited one or more major life activities at the time it was diagnosed.

For example, if you have a history of bipolar disorder and it substantially limited your ability to concentrate, a record of cancer treatment which substantially limited your ability to care for yourself or record of drug use which, while seeking treatment, substantially limited your ability to think then you will meet this definition of the ADA and be protected from discrimination.

#### C. Are perceived to have a disability

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You are protected from being discriminated against under this part of the ADA if someone thinks you have a disability even if you don't. For example, if someone, based on myths or stereotypes, thinks you have a disability because you behave, act or look a certain way then you are protected from discrimination.



#### **NOTICE OF NONDISCRIMINATION**

The City of Philadelphia ("City") does not discriminate against qualified individuals with disabilities in its services, programs or activities and complies with Title II of the Americans with Disabilities Act ("ADA"). The City does not discriminate based on disability in hiring or employment practices and complies with all Equal Employment Opportunity Commission regulations under the ADA.

The City provides effective communication and reasonable modifications for qualified persons with disabilities, so they can equally take part in City programs, services, and activities. Changes include alternative formats and case-by-case changes to programs, services or activities to ensure equal access. Effective communication and reasonable modifications are provided free of charge.

If alternative communication or modifications are needed for an event, allow as much time as possible, but at least five (5) business days prior to the event to process your request. The ADA does not require the City to take action that would impose an undue financial or administrative burden or fundamentally alter the nature of its programs or services.

Complaints of discrimination by a City owned or operated program, service, or activity to persons with disabilities should be directed to the Director of ADA Compliance.

Director of ADA Compliance, City of Philadelphia

ADA.Request@Phila.gov

1400 John F Kennedy Blvd. City Hall, Philadelphia, PA 19107

Submit a reasonable modification request: <a href="mailto:phila.gov/reasonable-modification">phila.gov/reasonable-modification</a>

Submit a grievance: <a href="mailto:phila.gov/ADA-grievance">phila.gov/ADA-grievance</a>

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# WEBSITE AND ACCESSIBLE VIRTUAL MEETINGS/ EVENTS POLICY

Mayor's Office For People with Disabilities

Milligan and Company 123

## 1) Purpose

Under Title II of the Americans with Disabilities Act (ADA), the City of Philadelphia is responsible to ensure that its website, virtual meetings/events, and applications, including documents used and posted online are accessible to everyone, including people with disabilities, to ensure equal access to all users and to avoid subjecting people with disabilities to discrimination. The City of Philadelphia is committed to ensuring accessibility of its digital assets to people with disabilities.

## 2) Scope

This policy applies to any web content and applications authored by the City of Philadelphia, and includes vendor applications contracted by the City.

## 3) Policy

This policy incorporates federal law and reinforces its commitment to accessibility of all its services, buildings and activities to people with disabilities. Therefore, web content and applications will be required to meet W3C WAI's <a href="www.w3.org/WAI/standards-guidelines/wcag">www.w3.org/WAI/standards-guidelines/wcag</a> (Web Content Accessibility Guidelines) Level AA conformance. PDF file format accessibility is included in this policy. Departments responsible for developing and managing websites and applications, including those sites created and/or maintained by consultants, must:

- 1. Provide the same or equivalent access to individuals with disabilities and
- 2. Test and validate websites, applications, posted documents, and video/audio sources. Agencies are to test external websites using one or more of the following methods in conjunction with end-user assistive technologies:
  - Accessibility testing and validation features of free tools, like the WAVE toolbar
  - Manual testing and validation

## 4) Creating Accessible Documents

#### Microsoft Word

An accessible document is created to be as easily readable by a sighted reader as a low vision or non-sighted reader. The best way to accomplish making a document accessible is during the original stages of creating one. The basic core accessibility principles for creating an accessible Word document are below:

## Use Headings

Headings can help individuals without eyesight to understand how the document is organized. Navigation is more efficient for individuals that may use screen readers or Braille. It is

important to use the built-in Heading styles in the *Home* tab because making text larger and bold does not make it a header.

#### Use Lists

Microsoft Word has built-in tools for ordered (numbered) and unordered (bulleted) lists. A list is not really a *list* without using these tools which makes the content more difficult for screen readers to fully understand.

## Recommended Fonts

The following fonts are recommended when creating an accessible document: Times New Roman, Verdana, Arial, Tahoma, Helvetica, and Calibri. These are basic, simple fonts without any extra decorations. Serif fonts are preferred for printed items, such as books and newspapers however, those fonts do not display well on computers and mobile devices because they take up a larger amount of space on a screen than on a printed page.

## Add Alternate Text for Images

Microsoft Word allows users to enter alternate text by right clicking an image and selecting *Format Picture*. Within the *Format Picture* drop box, select *Alt Text* and enter information in the *Description* field.

## Use Accessibility Checker

Microsoft products have a built-in accessibility checker to help test the overall accessibility of a document. The accessibility checker provides feedback and tips on how to repair any issues.

## 5) Creating Accessible PDFs

Adobe Acrobat is the best way to make an accessible PDF from a Word document. This allows the user to view, create, print and manage files in Portable Document Format (PDF). Choose the Acrobat tab and then select Create PDF. Once the dialog box opens, select the options button and make sure the box is checked for "Enable Accessibility and Reflow" with tagged Adobe PDF.

## 6) Creating Accessible PowerPoint Slides

Microsoft PowerPoint is widely used for presentations. Below are some key tips to ensure that PowerPoint is accessible to individuals with disabilities:

- Use Alt text on graphics
- Use provided templates (they are pre-approved for screen readers and accessibility devices), and can be easily navigated
- Have a digital copy of the slides available for people in the audience

- Check to ensure that links to external content such as websites or videos are accessible
- Use the accessibility checker that is built-in to PowerPoint software to verify that the presentation is accessible to people with disabilities

## 7) Creating Accessible Excel Spreadsheets

- Use accessible templates for Office
- Remove blank columns, rows and sheets
- Avoid blank cells and if you must have them, enter "no data"
- Create clear labels for columns and rows
- Do not use hidden columns and rows
- Provide links to other sheets when there are multiple sheets in the file
- Use text wrap or adjust the columns and rows manually

## 8) Creating Virtual Events: Preparation

- Choose an accessible platform (see below)
- Accessible materials and advertisements
- Setting up accommodations with optional attendee requests

## 9) Virtual Platforms

The process to select a virtual platform is important because it should support accessibility for individuals that may have vision, hearing, mobility and cognitive disabilities. Be sure to select a platform that supports accessibility features. The need for access is not universal and may require different tools and technology for each event. Individuals may use different devices or resources to enhance accessibility such as:

- Screen reader software for Low vision
- Keyboards instead of the mouse for mobility issues

Determine the scope of the event and potential access limitations for attendees. Offer dial-in by phone to those without internet or computer access. Provide information on how to access the event through various methods including online and offline if required. Consider other technology resources that may be required for social media events (i.e., Facebook Live, Instagram Live/Stories, YouTube). During the planning phase, be sure to connect with the disabled community to include speakers, performers and other talent if they are available for the event. Some popular platforms for virtual meetings with accessibility features such as support for screen readers, American Sign Language (ASL), keyboard shortcuts and manual captioning include:

Microsoft Teams\* www.microsoft.com/en-us/microsoft-365/Microsoft-

teams/group-chat-software

Zoom Meetings\* <a href="https://zoom.us/meetings">https://zoom.us/meetings</a>

Google Meet <u>www.gsuite.google.com/meet</u>

GoToMeetings <u>www.gotomeeting.com</u>

Disclaimer: The City of Philadelphia does not endorse any of these products. This information presented in this application is a culmination of feedback from the disabled community and applicable websites. Please practice safety when using conferencing platforms.

\*Only Zoom and Microsoft Teams platforms are currently licensed by the City and supported through the Office of Innovation and Technology.

## 10) Virtual Disability Etiquette

- Start with an access check
- Establish rules for participation
- Describe all images and videos
- Use plain language

## 11) Access Check

It is good practice in the disability community to start every meeting with an access check. This is a good way to check in with attendees and share valuable information about accessibility features during the event. Include the following in the access check:

- Ask if you are speaking loudly enough
- Ask if you are speaking too fast
- Inform attendees that only one person should speak at a time and that individuals should mute themselves when they are not speaking

## 12) Accommodations and Requests

- Provide attendees the ability to request specific access needs prior to the event (anonymously, with their name and RSVP options)
- Important to factor in budget costs for ASL Interpretation and other potential accommodations
- Ensure the platform for the virtual event is compatible with assistive technology such as screen reader software
- Ensure the platform allows for computer-based or phone-based listening/speaking
- Events should be accessible to augmentative and alternative (AAC) users (i.e., multiple ways for attendees to participate, answer questions, and interact)

- Offer training sessions with event or and volunteers on how to use the platform prior to the event
- Provide accessibility information publicly to attendees
- Provide format and timeline for the event to allow attendees to plan breaks, arrive late, leave early, etc.
- Provide materials ahead of the event of possible to attendees with an accessible format with any visual or written material
- Allow attendees to send questions or comments in advance
- Provide a glossary of terms used during the event
- Ensure all attendees have access to login codes and links ahead of the event
- Take all precautions to prevent security issues such as "Zoom bombing" (See below)

## 13) ASL Interpretation

If an individual requests American Sign Language interpretation (ASL), you can hire an ASL Interpreter to join and sign during the video conferencing event.

## 14) Captioning

Captioning is used to include people with hearing disabilities in a virtual meeting or event. Whenever possible, select a virtual platform that can provide the ability for attendees to enter live captions or enable automated captions. Both methods have pros and cons in terms of cost and efficiency. Select the best one for your specific event.

## 15) Access for People Who Are Deaf or Hard of Hearing or Have Sensory Disabilities

- Make sure audio is clear prior to the event and use apps that may help reduce background noise on calls such as Krisp
- Speakers should use a headset whenever possible to improve audio if this is accessible to them
- Hosts and presenters should use a quiet space whenever possible so they won't be disturbed
- Use the mute feature to keep background noise to a minimum for all attendees except for those speaking or presenting
- Ask attendees to say their name every time they speak so that all attendees including captioners will know who is speaking

## 16) Access For People Who are Blind, Have Low Vision or a Visual Impairment

• Make sure the speaker's face is well-lit and can be clearly seen

- Use a platform that is accessible and has features such as screen reader software
- Make sure all attendees can access any method used to vote or flag who can speak next
- Describe live scenarios whenever possible
- Describe any images and read any text that appears on the screen
- Describe any gestures as if you were explaining it to someone who is not in the same room

## 17) Screen Reader Software

Screen readers are primarily used by blind or visually impaired individuals who do not have useful vision to read text on the computer screen. The text will be displayed on the screen with a speech synthesizer or Braille display. Below are some software products that can be used. There are many more software products available that can be utilized for a specific experience.

- CDesk Compass
- COBRA
- IMax for Mac
- Speakup

## 18) Access For People Who Are Intellectually or Developmentally Disabled

- Select a presenter who can be patient with attendees especially if they are new to the platform
- Repeat information if necessary
- Use accessible or everyday language during the event
- Avoid using jargon
- Include processing time and breaks into the event
- Leave ample time for questions and comments
- Offer attendees the option to use chat boxes so that messages can be read aloud to everyone during the event
- Omit unneeded words
- Keep sentences short
- Presenters should state major points first before going into details
- Use pronouns when possible
- Speak using active voice

## 19) Virtual Invitations and Presentations

- Use good color contrast
- Use large and easy to read fonts

- Use plain language
- Include detailed step-by-step directions of how to get on the event or platform
- Use images where possible in PowerPoint to avoid cluttered slides
- Avoid flashing or strobing animations
- Use alternative text and image descriptions for any images that are used for the presentation

## 20) Advertising A Virtual Event

- Provide accessibility accommodations being provided (i.e. ASL, Captioning, etc.) in any advertisements and to attendees prior to the event
- Provide at least two methods to join the event
- Include a point of contact to request accommodations with both a phone number and email address
- Include any links or dial-in information
- Provide accessibility information about the specific platform that will be used for the event
- Request accommodations typically 72 hours before the event

## 21) Protecting A Virtual Event

It is important to take secure precautions when hosting a virtual event. Many social platforms offer such options in the settings section. Applications continuously release new and improved features, so be sure to update the latest version. Avoid hosting public meetings even if the link is shared on social media. There are specific measure that the host can take to avoid potential security issues such as:

- Avoid "join before host" so that a meeting will not start until the host starts the meeting or presentation
- Allow only signed-in users
- Explore the settings of the platform you are using for Security features such as a
  "Waiting Room" that requires attendees to be verified and then admitted to the
  event only by the host
- Do not use a Personal Meeting ID (PMI) to host public events
- Assign a password for access to the virtual event (This is very effective for smaller groups)
- Option to lock the meeting once all attendees have joined to prevent any other individuals from trying to gain access
- Remove unwanted or disruptive participants
- Hosts can mute or unmute individual participants or all of them at once

- Hosts can turn off participants video to block unwanted or inappropriate gestures on video
- Turn off file transfer to prevent participants from sharing unwanted or inappropriate content files via the in-meeting chat

## 22) After the Virtual Event

- Share materials in an accessible format
- If applicable, create a blog post or other easy-to-read collection of information to those unable to attend the event
- Make accessibility an ongoing, inclusive conversation in the community for all types of events
- Offer attendees a clear way to provide feedback or comments after the event (Remember to offer multiple ways including written, dial-in, recording, etc.)

## 23) Vendor Requirements

Agency's Requests for Proposals (RFP) must include an appendix outlining the City's accessibility guidelines as available in the Office of Innovation and Technology's RFP template. This includes a submission by the vendor of a Volunteer Product Accessibility Template (VPAT). Vendors will be held to the same standards as internally-built websites and applications.

## 24) RESOURCES:

## ADA/Disability Resources

Rooted in Rights <u>www.rootedinrights.org</u>

National Endowment for the Arts www.arts.gov

RespectAbility www.respectability.org

American Foundation for the Blind (AFB). www.afb.org

Harvard University Disability Resources www.accessibility.harvard.edu

National Deaf Center www.nationsldeafcenter.org

UC Berkeley Law <u>www.law.berkeley.edu</u>

ASGCLA (Association of Specialized, Government and Cooperative Library Agencies) <a href="https://www.asgcladirect.org">www.asgcladirect.org</a>

Voluntary Product Accessibility Template www.section508.gov/sell/vpat

#### Accessible Document Resources

Creating Accessible PDF's from Microsoft Word <a href="https://www.washington.edu/accessibility/documents/pdf-word/">https://www.washington.edu/accessibility/documents/pdf-word/</a>

Creating Headers in Microsoft Word <a href="https://support.office.com/en-us/article/video-improve-accessibility-with-heading-styles-68f1eeff-6113-410f-8313-b5d382cc3be1?ui=en-US&rs=en-US&ad=US">https://support.office.com/en-us/article/video-improve-accessibility-with-heading-styles-68f1eeff-6113-410f-8313-b5d382cc3be1?ui=en-US&rs=en-US&ad=US</a>

Making Accessible Word Documents <a href="https://support.microsoft.com/en-us/office/make-your-word-documents-accessible-to-people-with-disabilities-d9bf3683-87ac-47ea-b91a-78dcacb3c66d">https://support.microsoft.com/en-us/office/make-your-word-documents-accessible-to-people-with-disabilities-d9bf3683-87ac-47ea-b91a-78dcacb3c66d</a>

Making Accessible PowerPoint Presentations <a href="https://support.microsoft.com/en-us/office/make-your-powerpoint-presentations-accessible-to-people-with-disabilities-6f7772b2-2f33-4bd2-8ca7-dae3b2b3ef25">https://support.microsoft.com/en-us/office/make-your-powerpoint-presentations-accessible-to-people-with-disabilities-6f7772b2-2f33-4bd2-8ca7-dae3b2b3ef25</a>

Making Accessible Excel Spreadsheets <a href="https://support.microsoft.com/en-us/office/make-your-excel-documents-accessible-to-people-with-disabilities-6cc05fc5-1314-48b5-8eb3-683e49b3e593">https://support.microsoft.com/en-us/office/make-your-excel-documents-accessible-to-people-with-disabilities-6cc05fc5-1314-48b5-8eb3-683e49b3e593</a>



#### **GRIEVANCE AND APPEAL POLICY**

This policy and procedure shall apply to all City of Philadelphia entities\*

Under the Americans with Disabilities Act (ADA), qualified people with disabilities can submit a grievance if they feel that have been discriminated against based on disability. City employees who believe the City has violated their rights under the ADA should contact their Department HR Manager or the EEO officer in the Office of Labor Relations. This document outlines the grievance and appeal policy and procedures.

#### Resident submits Grievance:

Resident has 14 days from perceived discrimination to make a complaint.

While the city has an online form for grievances, residents may submit requests with directly with departments. If the resident makes the request via email, mail, phone, or in person, the employee should enter the information from the request into the form at phila.gov/ADA-grievance.

The following information must be collected from the requestor:

- Name and contact information
- Description and date of the complaint
- Description of suggested relief

If further information is required, the Office of ADA Compliance (OAC) will request the information. Once all the information is received, the OAC will oversee the process and work with the department to resolve the request.

#### Department Level Grievance Process:

Step 1: Department will meet with the resident within 15 business days from receiving the request to determine possible resolutions to the grievance.

After receiving the request, the department liaison will schedule a meeting with the resident within 15 business days to determine if the department can reach a mutually agreeable resolution. Meetings can be in person, electronic (skype, email, etc.) or phone. The Department will work closely with the OAC when processing the grievance.

Step 2: Department will create a written response to the grievance within 45 business days from the date of the request for the resident.

Responses from the City will be in documented in writing. Departments are encouraged to use the Grievance Response template. Responses must be communicated in an alternative format, if requested. The response must indicate a right to appeal.

If the written response refers to activities to take place in the future, the Department ADA Liaison will track and inform the resident when the activities have been fully implemented.

If the department is unable to propose a mutually acceptable resolution to a grievance, the department must seek review from the OAC. The Director of ADA Compliance will consult with the Law Department on potential denials or unresolved requests, when necessary.

## Step 3: Resident has 10 business days from the date on the letter from the Department to request an appeal.

Requests for appeals should be directed to ADA.Request@Phila.gov. If the resident does not request an appeal the Department decision is final on the 15th business day after the date on the letter. The Office of ADA Compliance will communicate any appeal requests or outcomes to departmental ADA Liaisons.

### Level I Appeal Process:

Step 1: Office of ADA Compliance will meet with the resident within 15 business days from receiving the appeal to determine possible resolutions to the grievance.

The Director of ADA Compliance will schedule a meeting with the resident within 15 business days to determine if the City can reach a mutually agreeable resolution. Meetings can be in person, electronic (skype, email, etc.) or phone. The Director of ADA Compliance will work closely with the Law Department and the City Department when processing grievance requests.

## Step 2: Office of ADA Compliance will create a written response to the grievance within 45 business days from the date of the Level I appeal from the resident.

Responses will be in documented in writing. Use of the Grievance Response template is encouraged. Responses must be communicated in an alternative format, if requested. The response must indicate a right to appeal. If the written response refers to activities to take place in the future, the Department ADA Liaison will track and inform the resident when the activities have been fully implemented.

If the department is unable to propose a mutually acceptable resolution to a grievance, the department must seek review from the Law Department.

## Step 3: Resident has 10 business days from the date on the letter from the Department to request an appeal.

Requests for appeals should be directed to the ADA.Request@Phila.gov. If the resident does not request an appeal the Level I decision is final on the 15th business day after the date on the letter. The Office of ADA Compliance will communicate any appeal requests or outcomes to departmental ADA Liaisons.

### Level II Appeal Process:

Step 1: The Level II Committee will meet with the resident within 15 business days from receiving the appeal to determine possible resolutions to the grievance.

The Director of ADA Compliance will schedule a meeting with the resident within 15 business days to determine if the City can reach a mutually agreeable resolution. Meetings can be in person, electronic (skype, email, etc.) or phone. The Level II Committee will work closely with the Law Department and the City Department when processing grievance requests.

Step 2: Level II Committee will create a written response to the grievance within 45 business days from the date of the Level I appeal from the resident.

Responses will be in documented in writing. Use of the Grievance Response template is encouraged. Responses must be communicated in an alternative format, if requested. The response must indicate a right to appeal.

If the written response refers to activities to take place in the future, the Department ADA Liaison will track and inform the resident when the activities have been fully implemented.

If the Level II Committee is unable to propose a mutually acceptable resolution to a grievance, the Committee may seek review from the Law Department.

#### Step 3: The decision from the Level II Committee is final

The decision from the Level II Committee is final. The request will be closed. Residents may enter new requests in the future and submit substantially different information that was not considered.

#### **Timelines**

The time frames in the above procedure shall be maintained unless there are unusual or unforeseen circumstances. The City will respond as quickly as possible and will act without undue delay.

### Written Responses

Responses from the City will be in writing and communicated in an alternative format, if requested. The response from the City Department and Level I Appeal must indicate a right to appeal.

If the written response refers to activities to take place in the future, the Department or Director of ADA Compliance will inform the resident when the activities have been fully implemented. All complaints will be retained by the City of Philadelphia for at least three (3) years.

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### RESIDENT REQUESTS FOR REASONABLE MODIFICATIONS

This policy and procedure shall apply to all City of Philadelphia entities\*

## Policy:

Under Title II of the Americans with Disabilities Act (ADA), the City is responsible for physical accessibility and program accessibility. Physical accessibility ensures that individuals can access the built environment and program accessibility ensures equal access to programs, services, activities, and information provided by the City.

This policy upholds the commitment of the City of Philadelphia (City) to operate the policies, practices, procedures, services, buildings, and activities so that, when viewed in their entirety, they are accessible to and useable by qualified people with disabilities.

### Implementing Procedure:

Under the Americans with Disabilities Act (ADA), qualified people with disabilities can request "reasonable modifications\*" which are changes in the way the City operates, to give people with disabilities equal opportunity to participate in city activities.

Reasonable modification requests must allow a qualified person with a disability to participate in, and enjoy the benefits of programs, services, and activities in the same manner as residents who are not disabled.

### Step 1: Resident makes reasonable modification request

Residents may submit reasonable modification requests online or with departments. If the resident makes the request via email, mail, phone, or in person, the employee should enter the information from the request into the form at phila.gov/reasonable-modification. City employees shall enter the request online as soon as possible but no later than two (2) business days upon receipt of an oral or written request.

The following information must be collected:

- Name and contact information of person who needs the modification
- Name of the program, service, activity, or location of request
- Description of modification being requested

If additional information is needed, the City may request only that information necessary to confirm the need for the modification.

### Step 2: Department works with the Office of ADA Compliance to process the request

After receiving all information for the request, the department will respond to resident to acknowledge receipt of the request. The department ADA liaison should work with the Office of ADA Compliance (OAC) to evaluate requests.

In general, the city will approve requests so long as they meet the following criteria:

- There is a disability-related need
- The request is reasonable and would not pose an undue burden

If Department does not intend to approve request, ADA Liaison shall consult with the OAC. The Director of ADA Compliance and the Law Department will review the request and advise the department on next steps.

### Step 3: Department responds to resident

The Department will respond to the resident as soon as possible, but no later than fifteen (15) business days. The response will acknowledge the request, inform the person of the outcome of the request, and provide notice that the resident has a right to appeal a decision, if so desired. The response shall include the name and contact information of the Director of ADA Compliance.

Responses will be in documented in writing. Departments are encouraged to use the Reasonable Modification Response template. Responses must be communicated in an alternative format, if requested. The response must indicate a right to appeal.

If the request cannot be completed within fifteen (15) business days, the department Liaison shall contact the resident and the Director of ADA Compliance to show the need for the delay and establish a reasonable date for completion.

## Step 4: Department notifies Office of ADA Compliance of request completion

After completing the request, the department ADA Liaison must inform the OAC that the request has been completed.

If the modification request is approved, but the request is to be completed at a later date, the department ADA Liaison shall contact the resident and the Office of ADA Compliance (OAC) to indicate the projected date of completion. Additionally, at completion, the department ADA Liaison shall inform the resident and the OAC.

The ADA Liaison shall track the 1) requests received, 2) outcome, and 3) responses to requests.

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#### **EFFECTIVE COMMUNICATION POLICY**

This policy and procedure shall apply to all City of Philadelphia entities\*

## Policy:

The Americans with Disabilities Act (ADA) ensures civil rights protections to qualified people with disabilities\*. Under Title II, the City is required to ensure that their communications with people with disabilities are as effective as communications with others.

This policy upholds the commitment of the City of Philadelphia (City) to operate the policies, practices, procedures, services, buildings, and activities so that, when viewed in their entirety, they are accessible to and useable by qualified people with disabilities. The City will provide aids and services\* to facilitate effective communication, upon request, to ensure that qualified individuals with disabilities are able to participate in, benefit from, and are not subject to discrimination under City programs.

#### Implementing Policy:

- 1. Residents may request aids and services to facilitate effective communication. The request must allow a person with a disability to participate in, and enjoy the benefits of programs, services, and activities in the same manner as residents who are not disabled. Residents may enter effective communication requests online at phila.gov/reasonable-modification using the reasonable modification policy and procedure.
- 2. Departments shall ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others. The purpose of effective communication is to ensure that people with communication disabilities can receive information from, and convey information to, the City.
- 3. The type of aid or service necessary to ensure effective communication will vary on a case-by-case basis.
  - I. Consider the nature, length, and complexity of the communication.
  - II. When more than one type of communication can meet the need, give primary consideration to the communication requested by the individual with a disability.
- 4. Departments shall provide appropriate aids and services free of charge.

- 5. The City is responsible for providing interpreters. Residents are not required a person to bring someone to interpret for him or her.
- 6. The City can rely on a companion to interpret only when the following are true:
  - I. There is an emergency involving imminent threat to safety or welfare.
  - II. The resident prefers that a companion interpret, and the companion agrees, and reliance on the companion is appropriate under the circumstances.
- 7. Information about the location of accessible services, activities, and facilities must be available in a format that is accessible to people with disabilities. Accessible formats may include posting location information in large print or posting information on a webpage.
- 8. Signage\* must be provided in accordance with the 2010 ADA Standards.
- 9. Departments must be able to make and receive telephone calls with individuals who are deaf, hard of hearing, deaf-blind, or have difficulty speaking. Pennsylvania Relay provides service and training.
  - I. To use Pennsylvania Relay Dial 7-1-1 or 800-654-5988.
  - II. To obtain training for Pennsylvania Relay contact amy.strawser@hamiltonrelay.com
- 10. City employees designated as emergency personnel who provide direct telephonic services to the public must have and proficiently operate a dedicated TTY. Operators must use the TTY when they receive a silent call in addition to when they receive TTY tones.



#### **EVENTS AND MEETINGS POLICY**

Under Title II of the Americans with Disabilities Act (ADA), the City is responsible to ensure that its City sponsored events and meetings are accessible to everyone, including people with disabilities.

This policy upholds the commitment of the City of Philadelphia (City) to operate the policies, practices, procedures, services, buildings, and activities so that, when viewed in their entirety, they are accessible to and useable by people with disabilities.

Cultural festivals, craft fairs, music events, marathons, public meetings and rallies are but a few of the many events and meetings that take place every year in Philadelphia. People with disabilities must be able to obtain or enjoy the same programs, services, and activities that are available to non-disabled people.

At events and meetings sponsored by the City of Philadelphia, member of the public with disabilities must be able to:

- Obtain information about the meeting or event;
- Use meeting location via accessible route;
- Find and use accessible parking/loading zones;
- Be able to fully participate in the program; and
- Use public toilets, water fountains, first aid stations, and other amenities.

This policy will review the categories listed above and provide information to assist City employees, vendors, and subcontractors in making events or meetings that are sponsored by the City accessible to people with disabilities. 2010 ADA Standards (2010 Standards) are online at

https://www.ada.gov/regs2010/2010ADAStandards/2010ADAstandards.htm#c4

Under Title II of the Americans with Disabilities Act (ADA), the City is responsible for physical accessibility and program accessibility. Physical accessibility ensures that individuals can access the physical environment and program accessibility ensures equal access to programs, services, activities, and information provided by the City.

Access should be provided to all disabilities including, but not limited to, auditory, cognitive, physical, speech, and visual.

#### Obtain Information about the event

Organizers should plan for accessibility from the beginning to create an accessible event or meeting. Designate one or more Access Coordinators (AC) to oversee the event or meeting. The AC creates an access plan for the event, provides information on the location of accessible features, such as accessible parking or toilet facilities, where to obtain aids or services, such as materials in accessible formats or assistive listening devices and is prepared to respond to questions regarding accessibility. The AC must respond to all disability related inquiries quickly and effectively.

Notices of events/meetings must include information about wheelchair accessibility, sign language interpretation, and any other accommodations for people with disabilities that are available. Information shall contain the contact number for the coordinator of the event to obtain additional accessibility changes.

Include the location of accessible features (seating, parking, sign language interpreters, etc.) in advertisements of the event or meeting. For example:

The Merriam Theater is wheelchair-accessible from the main entrance. A curb cut at the corner of Broad Street and Spruce Street allows for access to the main entrance. Wheelchair-accessible restrooms are on the Mezzanine level. (Edited text from Kimmelcenter.org)

Create an accessibility statement indicating "We are committed to making our event/meeting accessible to everyone, including people with disabilities. Our goal is to comply with the Americans with Disabilities Act. If you need assistance accessing the event/meeting please contact the event Access Coordinator at: (Add in name, phone and email of Access Coordinator)."

#### Arrive at the site

Hold events and meetings in accessible locations with an accessible route that is at least 36 inched wide and is unobstructed. An accessible route connects site arrival points and parking with all exterior and interior event exhibits and activities, including public amenities, such as toilet rooms, water fountains, and telephones.

At least one accessible route shall be provided from public transportation stops, accessible parking spaces, passenger loading zones, and public sidewalks. The accessible route shall connect all accessible buildings, accessible facilities, accessible elements and accessible spaces that are on the same site and part of the event. Objects that protrude into circulation paths

must have detectable warnings. Ground surfaces on accessible routes and in accessible spaces shall comply with 2010 Standard 302.

Elements and spaces of accessible facilities shall be identified by the International Symbol of Accessibility complying with 2010 Standard 703.7.2.1:

- Parking spaces designated as reserved for individuals with disabilities.
- Accessible passenger loading zones.
- Permanent rooms and spaces.
- Accessible entrances when not all are accessible.
- Accessible toilet and bathing facilities.
- Inaccessible entrances and toilets shall have directional signage to indicate the route to the nearest accessible entrance or toilet.

Barricades and vehicles are frequently used to temporarily block access in areas around events. Ensure that barricades do not block curb ramps and that there is at least a 36-inch space between each barricade so that a person with a wheelchair may pass through.

## Find and use accessible parking and loading zones

When parking is provided, accessible parking shall comply with 2010 Standards 208. Provide passenger loading zones for vehicles to drop off participants safely outside the flow of traffic.

### Attend performances, participate in activities, and enter exhibits.

Elements such the entrance gate, ticketing area, main desk, and information booth must be physically accessible and provide programmatic accessibility. Provide structural access to these elements by placing elements on an accessible route and ensuring that a section of the counter or service window is useable for people in wheelchairs. Provide directional signage to help people navigate around the event.

Provide programmatic access by ensuring that people with disabilities have equal access to programs, services, and activities.

Assembly and seating areas must be accessible, both in the design of facilities and in how the program is offered. Seating must provide a range of locations so people with disabilities can choose where to view activities or performances. Companions must be allowed in areas that are designated as reserved for people with disabilities. The number of wheelchair locations required is related to seating capacity. One percent of all seats shall be aisle seats with no or removable armrests on the aisle side. Each accessible seat shall be identified by a sign or marker. Signage notifying patrons of the availability of seats shall be posted at the ticket office.

### Experience and enjoy activities

The ADA Standards do not cover the design of elements that are not attached to a structure. Thus, portable display tables or panels that are part of a space are not required to meet ADA Standards. However, under the ADA, it is expected that participants will be able to experience full enjoyment of the event or meeting.

- To provide programmatic access ensure that people with disabilities have equal access to participate in all events and meeting.
- Ensure that assembly and seating areas can be accessed, used and meet the requirements for design of facilities and in how the program is offered. Locate seating on an accessible route.
- Locate display tables, cases, and shelves on an accessible route.
- Provide video and audio tours of exhibits that are inaccessible for people with disabilities.
- Allow people the opportunity to touch and handle objects to perceive weight, texture, shape, etc.
- Provide spoken narrative or an audio component to describe the content of images and visual presentations.
- People with hearing disabilities must have access to the content of
- audio/visual presentations, such as slide shows and videos. Provide captions, subtitles, or a written script of the audio component.
- Vendors and presenters may need to take items down or carry an object to a person to view.
- Be inclusive to people with sensory disabilities and autism spectrum disorder by designating low-sensory or quiet spaces, allow people to move unrestricted if safe, relax rules, and allow stress relief items.

#### **Effective Communication**

Providing equal access to communication is fundamental to program accessibility. Ensure that communications with people with disabilities are as effective as communications with others.

- Provide a sign language interpreter for events, if needed.
- Spoken narrative can be displayed in a variety of ways, including projection, captions or subtitles.
- A script of a performance can be provided before the performance.
- Audio descriptions should be provided for performances that are mostly visual or where key information is visually presented.

# Access public toilets, water fountains, first aid stations, and other amenities

- Support services and amenities that are provided to the public, such as restrooms and portable toilets, telephones, and drinking fountains must be provided in an accessible manner to people with disabilities. If providing first aid, resting booths, or other amenities, these spaces must be accessible to people with disabilities.
- Toilets shall comply with applicable 2010 Standards.
- For single user portable toilet clustered at a single location, at least 5% but no less than one toilet unit shall be installed at each cluster.
- Accessible units shall be identified by the International Symbol of Accessibility.
- Drinking water must be readily available to all people. If water fountains are not present, consider providing water in an alternative accessible manner.
- Ensure that amenities available to the public are available at an accessible height and on an accessible route.

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## **LIAISON POLICY**

ADA Liaisons are employees from each department who ensure that qualified individuals with disabilities can participate in, benefit from, and are not subject to discrimination in City programs, services, and activities.

- 1. Liaisons shall be assigned by the director of the department, or designee, to carry out the roles and responsibilities in ADA policies and procedures. If a Liaison is not able to fulfil their duties, due to workload or other concerns, the department is required to assign a new Liaison.
- 2. Departments will assign one or more ADA Liaisons, as necessary. Multiple Liaisons are necessary when the following is true:
  - a. The department receives more than 25 reasonable modification requests per year.
  - b. The assigned ADA Liaison does not have full knowledge of, or access to, the entire department.
- 3. All new Liaisons will attend training on ADA related policies and procedures. Training may take place in a group or individually.
- 4. Liaisons will obtain information and updates on policies and procedures and distribute the information to new and existing employees within their department as needed. Liaisons will disseminate training materials, regulatory updates, and best practices to departments.
- 5. Liaisons will gather information and data from departments and share with Director of ADA Compliance, as requested.
- Liaisons will assist departments with ADA concerns, compliance and requests.
   Liaisons will collaborate with the Director of ADA Compliance, as needed, for guidance.
- 7. Liaisons will ensure that reasonable modification and effective communication requests are routed correctly, addressed, and completed according to policy.

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#### **DEFINITIONS AND ADDITIONAL INFORMATION**

#### Aids and Services:

Aids and Services may include materials in alternative format such as large print, braille, additional time or assistance to complete an application, written notes rather than spoken conversation, or a sign language interpreter. These examples are not meant to be an exhaustive list.

# Aids & Services and modifications are provided free of charge:

Best practice: proactively budget for aids and services such as sign language interpreters, braille, transcription, readers, and assistive listening systems. Purchase systems rather than services when possible.

For Example:

Purchase a braille machine rather than paying per document.

Purchase a transcription machine to create multiple transcriptions.

These examples are not meant to be an exhaustive list.

## City of Philadelphia entities:

The policies and procedures do not include quasi-public agencies and authorities. As separate authorities which receive federal funding, they are directly responsible for maintaining compliance with federal laws and regulations governing accessibility:

- Transportation Services for Individuals with Disabilities (SEPTA)
- Fair Housing, Residential, and Long-term Care Facilities (PHA)
- Education (School District)
- Philadelphia Redevelopment Authority
- Philadelphia Industrial Development Corporation

# Director of ADA Compliance Contact and statement:

The City of Philadelphia has designated the Director of ADA Compliance, as the entity to coordinate the responsibilities related to the ADA. You may contact the Director of ADA Compliance using the following information:

Director of ADA Compliance, City of Philadelphia 1400 John F Kennedy Blvd. City Hall, RM 112 Philadelphia, PA 19107 ADA.Request@phila.gov

Reasonable modifications can be entered at: phila.gov/reasonable-modification Grievances can be entered at: phila.gov/ADA-grievance

# Employees with disabilities:

Information about Title I reasonable accommodations for employees can be found at <a href="https://www.phila.gov/personnel/ADAFAQ.html">https://www.phila.gov/personnel/ADAFAQ.html</a>

# Individual with a disability for the purposes of a modification:

The ADA defines a person with a disability as a person who has a physical or mental impairment that substantially limits one or more major life activities.

When determining disability consider the following:

- Does the person have an impairment?
   Physical impairments affect bodily systems such as nerves, muscles, and immune system.
   Mental impairments include emotional or mental illness, behavioral disorders, and autism. Physical and mental impairments often overlap. For example, an injury can affect the brain, spinal cord and nervous system, which can influence emotional regulation and learning.
- II. Does the impairment substantially limit major life activities?

  An impairment is only a disability if it causes a limitation to a major life activity. Major life activities are activities essential to daily life such as walking, breathing, learning, and many others. An impairment is "substantially limiting" if the person cannot perform the major life activity the way an average person can. The "substantially limits" standard is not to be overly restrictive.

The ADA Amendments Act of 2008 requires that the definition of disability be interpreted broadly and should not require extensive analysis.

#### Reasonable modification – Review:

"Reasonable" in the phrase "reasonable modification":

Reasonable means that there is a connection between the request and the disability.

## Examples:

A person who is blind may request someone to read a document while at an appointment with a City employee.

A person who is deaf or hard of hearing may ask for a sign language interpreter or assistive listening device.

A person with a mobility disability may ask for a meeting to be held in an accessible location.

These examples are not meant to be an exhaustive list of examples.

A request may not be reasonable if the request can be met in a different, but equally effective, manner. The City will consider the resident's preference when determining which modification is reasonable.

The City does not provide individually prescribed devices or services that are not available to other, non-disabled, people.

## For example:

Joel is not able to remove the snow from his sidewalk due to his disability; therefore, he asked the City to shovel the snow. Because the City does not provide this service for any resident, the City will not provide the service as modification.

This example is not meant to be an exhaustive list.

# "Modification" in the phrase "reasonable modification":

A modification is a change in the way the City currently operates that is necessary for a qualified person with a disability to have an equal opportunity to participate in civic activities.

## **Record Retention:**

All information related to disability requests is confidential.

The City department will provide a copy of any written correspondence related to reasonable modification requests to the Director of ADA Compliance and department ADA Liaison.

Requests to access disability related documents or information from entities not related to the City shall be made to the Director of ADA Compliance.

Documents will be maintained in accordance with the record retention schedule.

# Signage:

- I. Accessible entrances and restrooms must be marked with the international symbol for accessibility.
- II. A sign that depicts the international access symbol and an arrow pointing in the direction of the closest accessible entrance or element must be placed at all inaccessible public entrances and bathrooms.

III. Signs must be designed and placed according to standards in the 2010 ADA and other relevant laws.

# "Qualified" in the phrase "Qualified" Individual with a disability:

For participation in programs, services and activities of the City, a person is qualified if they meet the eligibility requirements of the program, service or activity.

## Undue Burden:

The ADA does not require any action that would result in a fundamental alteration to the nature of the program or activity, would create a direct threat, or would cause an undue financial or administrative burden.

- I. Undue burden: If removing a barrier would be burdensome, then the department will consider if access or services can be provided in another form.
- II. Direct threat: Must be based on real, rather than perceived, threat and consider if the threat can be eliminated.

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# **APPENDIX II: PUBLIC COMMENTS RECEIVED**

No.	Comments Received on DRAFT Report During 30-day Comment Period	Note
1	This plan mentions ADA curb cuts, but not enforcement efforts to prevent people from parking on them. It also doesn't address sidewalks blocked by construction and outdoor dining.	See footnote on page 7
2	The ADA covers and protects people living with all mental health conditions as disabilities. Offices should include plans to incorporate safe places for people living with mental disabilities, which includes, a workplace "buddy" like they have in the UK and other countries. It should also include more public education about mental health conditions based on facts. The unemployment rate for people living with mental health conditions nationwide is 80%, but in Pennsylvania it is 90.8%, proving discrimination in hiring is rampant.	Discussed during public meetings
3	Please ensure your audit considers the needs of ALL Disabled people, not just a limited quantity of physical disabilities. This includes Developmental Disabilities, etc.  A majority of sites named are non-compliant with respect to communication accessibility.  The majority of sites fail/refuse to correct accessible communication /contact for people who need text/chat based communication.  Ex. Non deaf disabled who need text /chat do not have access to tty. It is unacceptable to slap a tty number on a website as a universal solution. Email is not commensurate with audio phone/ tty. Email response can be days or months from the time a question is submitted. Imagine if you had to wait weeks-months for any single question/inquiry.  It's is equivalent to a policy told that people with auditory processing disabilities must go to the end of the line & won't be served until months after everyone else gets their way—even if the person wars first to arrive. It's discriminatory and illegal.	Addressed where possible in Final Plan and during public meetings
4	New construction in McMichael Park for a playground which is going on now should be ADA compliant. Currently there is no L&I permit or inspection. Who is in charge? Have you seen the design plan? Work has been going on for two months. Surprised that work is underway without following protocols.	Comment sent to Parks & Recreation
5	City Hall needs signage about which offices on the third floor are accessible to persons who use mobility devices from the elevators at the visitor's entrance. I have had several experiences where I had to do stairs on the third floor	Signage package for City Hall is

Milligan and Company

No.	Comments Received on DRAFT Report During 30-day Comment Period	Note
	because there was no other way to get from the visitor's entrance to a specific office.	being developed
6	Events held throughout the city like on the parkway or waterfront cause problems. The events are problematic for wheelchair users, deaf, blind, cognitive disabilities, etc. How is the city making sure that city events will be accessible when the events come back - after covid.	The City has a new events policy, included in Appendix I
7	I am a disabled Philadelphia resident. Over a year I have lived here, I have encountered countless barriers to access. The website soliciting these comments only allows someone to enter 1,000 characters. The city should fix this, publicize this fact, and extend the comment period, or else many people will be prevented from commenting.  Inaccessibility of sidewalks and curb cuts is a serious problem in Philadelphia, preventing many from accessing the city. The disability rate in Philadelphia is the highest of large U.S. cities, so it is paramount to address structural barriers.	Addressed where possible in Final Plan and during public meetings
8	I am a disabled Philadelphia resident. Over the 18 years I've lived here, I have encountered countless barriers to access. The website soliciting these comments only allows someone to enter 1,000 characters. The city should fix this, publicize this fact, and extend the comment period, or else many people will be prevented from commenting.  The map on page 18 (Figure 1. Map of City Facilities Assessed by ADA Priority) should be made publicly accessible in a usable form so people can use the map to locate a facility and see what barriers have been reported. It should be updated with projected dates for accessibility changes.	Option being explored
9	1000 characters is insufficient for a public comment form on the ADA Transition Plan. Please see associated email.	Email included in next comment below
10	I am a disabled Philadelphia resident. Over the 5 years I've lived here, I have encountered countless barriers to access. 1000 character limit on a public comment form is insufficient and inaccessible. The city should fix this, publicize this fact, and extend the comment period, or else many people will be prevented from commenting.  Sidewalks and curb cuts are a serious problem in Philadelphia. The disability rate in Philadelphia is the highest of large U.S. cities, so it is paramount to address structural barriers, especially to public facilities. Indeed these facilities should not be called "public" if they are inaccessible to disabled	Addressed where possible in Final Plan and during public meetings

No.	Comments Received on DRAFT Report During 30-day Comment Period	Note
	residents. I urge the city to share the measures it will take as a result of the ongoing sidewalk lawsuit as soon as these can be shared. It's imperative that the city not only fix but routinely maintain sidewalks and curb cuts in good condition and free from snow and other obstacles. Outdoor dining has made parking even harder on main street in Manayunk. Restaurants are routinely blocking sidewalks and the curb cuts are atrocious.	
	The fatal shooting of Walter Wallace, Jr. by Philadelphia Police calls into question the effectiveness of the 911 program for PWDs/ PPD ADA registration form. This program & form is not well-publicized. Moreover, the form gives the highly inappropriate impression that disabled Philadelphians & their families are responsible for identifying themselves to the police in advance, at the cost of their lives. Much work must be done to ensure ADA compliance of the PPD. Hire disability led organizations across the city to train the police in disability compliance.	
	The city must proactively, continuously review curb cuts for the need to upgrade them and cannot rely on individual citizens to report them to the ADA Curb Ramp Partnership Program. It is exhausting when I'm rolling on my way to work to stop and make a report. Once an individual makes a request using this form, this information should be made public, as well as the status of the upgrades. It should be easier for people to make comments. Refer to the comment form as mentioned above. Lack of transparency into this process has eroded public confidence in the efficacy of this reporting mechanism.	
	The map on page 18 (Figure 1. Map of City Facilities Assessed by ADA Priority) should be made publicly accessible in a usable form so people can use the map to locate a facility and see what barriers have been reported. It should be updated with projected dates for accessibility changes.  It is disappointing that inaccessible public bathrooms warrant a rating of only	
	"priority 3." Being able to use the bathroom in a public building is a high priority for me.  I support the idea of a city-wide ADA maintenance unit, mentioned on page	
	22, and want the city to act on it.	
11	<ol> <li>Who participated in the site visits that resulted in these identified locations and priorities?</li> <li>How many people with disabilities were directly involved and present at the site visits?</li> <li>Which disabilities were included?</li> </ol>	Addressed where possible in Final Plan and during public
	<ul><li>4. What tool was used to evaluate sites?</li><li>5. What does "no major issues mean"?</li></ul>	meetings

No.	Comments Received on DRAFT Report During 30-day Comment Period	Note
	<ul> <li>6. WHY will some of these changes take until 2028?? This is illegal as the ADA is 30 years old and a transition plan was required within 2 years of law passage.</li> <li>7. Were people with disabilities consulted in determining which locations would get priority?</li> <li>8. Is there a stakeholder or advisory group to ensure this plan is implemented with fidelity? If so, how do I join?</li> <li>9. If these represent "self assessment" where is the check and balance to ensure accurate reporting?</li> </ul>	
12	It is imperative, as noted in recent events, that the 911 number for people with disabilities and how to address this is more prevalent. Philadelphia is a historical and prominent city with a large population of disabled people.  I read in this report that out of the 537 sites and facilities visited that only 55 had no accessibility issues. This is absolutely appalling. Philadelphia can and must do better for the abundant population of disabled people living here. Philadelphia could be a leader on the east coast of response to emergencies with disabled people and accessible design of public facilities. I also urge this committee to garner input from actual disabled people in the development and designing of these programs, structures and accessibility features. This is absolutely vital to the health, safety, well-being and the very lives of the disabled citizens of Philadelphia.	Addressed where possible in Final Plan and during public meetings
13	I am a disabled Philadelphia resident. Over the four years I've lived here, I have encountered countless barriers to access.  Inaccessibility of sidewalks and curb cuts is a serious problem in Philadelphia, preventing many from accessing the city. The disability rate in Philadelphia is the highest of large U.S. cities, so it is paramount to address structural barriers, especially to public facilities. Indeed these facilities should not be called "public" if they are inaccessible to a large part of our city's people. I urge the city to share the measures it will take as a result of the ongoing sidewalk lawsuit as soon as these can be shared. It's imperative that the city not only fix but routinely maintain sidewalks and curb cuts in good condition and free from snow and other obstacles.  It is also disappointing that inaccessible public bathrooms warrant a rating of only "priority 3." Being able to use the bathroom in a public building is a high priority for me.	Addressed where possible in Final Plan and during public meetings
14	Liberty Resources, Inc. (LRI) is a nonprofit, Medicaid Consumer-controlled advocacy organization, pushing for equal rights for Philadelphia's disability community for over 40 years. Over its existence, LRI has been made painfully aware of the many areas in which the city has not provided adequate	

No.	Comments Received on DRAFT Report During 30-day Comment Period	Note
	modifications to overcome access barriers faced by those with disabilities in our city. These barriers prevent people with disabilities from enjoying the public services our city has to offer.	
	As you probably know, Philadelphia has the highest rate of disability among all large US cities, comprising 16% of city residents. We believe providing access to public facilities for these people is essential to ensuring life in an integrated setting in their own homes, not segregated in nursing homes and other institutions. We are grateful the city has undertaken this ADA Transition Plan, but have found several areas that we feel must be amended to provide true equity in access.  -LRI	
15	We believe limiting the Transition Plan's scope should not be limited to facilities that are entirely funded through the city (pg 6). While we recognize that the city may not be able to exercise direct action against these entities, as advocates for the disability community we affirm that our city should work to ensure equal access to all public facilities within its limits. Transportation, housing, education (etc. etc.) are all essential to our people and since these are beyond the purview of this investigation we believe the city should work with us to include them in the planLRI	Scope of project was limited to Title II of the ADA and funding.
16	The city's proposed "911 Program for People with Disabilities" can be seen as intrusive and dangerous. The responsibility of self-reporting ought not to be placed on the shoulders of those in the disability community. Not only may some people feel uncomfortable with answering this question, but also because of this expectation, those who do not report their disability will be endangered by a police officer who may assume that that they do not have a disability. There is no substitute for an emergency response service trained in de-escalation and non-lethal responses. (pg 11) -LRI	Addressed at public meeting
17	LRI has been part of a number of city public events which do have ASL interpreter services but they do not cover the duration of the event. This occurs when city events, such as City Council meetings, go on much longer than expected. Interpreters leave even though the meeting is not over because they were only booked for a pre-ordained time, leaving many in the Deaf community without a means to understand what is being said in the meeting. (pg 12)  Channel 64, or PHLgovTV, must be closed captioned. There are many people	Options being explored
	in Philadelphia who are Deaf or hard-of-hearing who do not understand ASL.	

No.	Comments Received on DRAFT Report During 30-day Comment Period	Note
	These people are not able to watch or participate in their governmentLRI	
18	The city must be more transparent and active in its management of curb ramps. Many intersections in the city lack sufficient ramps or have ramps that are quickly deteriorating. Not only should the city be more transparent about their system for recording and repairing curb ramps, but also this process should not depend on the reporting of ordinary citizens to alert the city of its barriers. This is all even more important when ramps are entirely blocked with snow and ice. (pg 12)	Addressed where possible in Final Plan and during public meetings
	We would also like greater discussion into how something is deemed "structurally feasible". Since a large number of proposed actions have a cost attached to them, we believe it is important to understand how this designation is arrived at. If this is maintained, it is our belief that these facilities should not be considered "public" because a large segment of the public is denied access. It should be made clear exactly why a facility is considered not to be "structurally feasible". (pg 15) -LRI	
19	LRI does not believe in the priority system. In particular how/ why is priority 1 separate from 2why would anyone go to a place if they don't have "Access to goods, services, programs, and activities"? (pg 17) We are glad the city is prioritizing low-income areas, but cost too? How do they fit together? (pg 17) We do believe in the merits of "virtual programming". However, such technology should not be offered as an alternative to making a facility accessible. (pg 19) It is a real danger to our community that technological programming will be used as a substitute for facilities providing real access, in the case that it is substantially cheaperLRI	Addressed where possible in Final Plan and during public meetings
20	We have many questions about how the proposed changes will be enforced, in particular the "City-Wide Short-Term Maintenance Recommendations"(pg 19)? Larger-scale actions will be easier to oversee, and while LRI is concerned with oversight generally, it is these set of smaller recommendations that may go more easily unchecked. Therefore we support the proposed ADA maintenance unit (pg 20) to enforce these changes and take action to ensure access.  Lastly we believe it is essential to include the address of the facilities listed, so the public can accurately identify them. Since many parks and other facilities have names that are not widely known or they are known under different names in the neighborhood, the report must include a nearby intersection or some other way to geographically identify.	Addressed where possible in Final Plan and during public meetings

No.	Comments Received on DRAFT Report During 30-day Comment Period	Note
	Thank you for taking the time to review our commentsLRI	
21	I'd like to submit the following research for integration into public comments. This research shows how libraries are important centers for communities to prevail through disasters caused by climate change, namely flooding and extreme heat. Library accessibility is important because it can determine whether disabled people can access critical resources during climate emergencies. In this research I've identified the Free Library branches that should be prioritized for ADA upgrades based on communities' climate risks and disabled populations. Most of them are marked as priority 1 on the current plan, but I'd like to see the Paschalville and Northeast Regional branches moved from a 2 to a 1. Additionally, I hope that the City integrates an approach to the plan that considers the importance of accessible community centers as sites for climate resilience.  Additionally, we both know from lived experience and lawsuits filed that the poor maintenance of sidewalks and curb cuts renders them inaccessible to many Philadelphians. Its way past time for the city to act on this, especially in	Click Link for research story board  Addressed where possible in Final Plan and during public meetings
	regards to streets and sidewalks adjacent to public facilities. Those facilities should not be called "public" if they are inaccessible to a large part of our city's people. The city needs to not only fix but maintain streets and sidewalks, and not just in Center City.	
	Relatedly, the new outdoor dining rules must be enforced and restaurants monitored for compliance. The Department of Commerce has laid out reasonable measures for ensuring sidewalk accessibility, but they have no enforcement arm. Enforcement cannot be left up to individual residents filing complaints. Additionally, many restaurants do not have any wheelchair-accessible tables or step-free access, rendering them inaccessible to many disabled consumers.	
	The city must proactively, continuously review streets, sidewalks and curb cuts, and cannot rely on individual complaints to know where and when to act. Especially during COVID, our streetscape is ever-changing, and city government has a responsibility to ensure that streets are navigable for all residents.	
22	I am a disabled Philadelphia resident. Over the 15 years I have lived here, I have encountered countless barriers to access. I will first note that the website soliciting these comments only allows someone to enter 1,000 characters. The city should fix this, publicize this fact, and extend the comment period, or else many people may be deterred or prevented from commenting.	Addressed where possible in Final Plan and during public meetings

No.	Comments Received on DRAFT Report During 30-day Comment Period	Note
	Inaccessibility of sidewalks and curb cuts is a serious problem in Philadelphia, preventing many from accessing the city. I urge the city to share the measures it will take as a result of the lawsuit as soon as these can be shared. It is imperative that the city not only fix but routinely maintain sidewalks and curb cuts in good condition and free from snow and other obstacles.	
	Relatedly, the new outdoor dining rules must be enforced and restaurants monitored for compliance. Currently, sidewalk dining frequently makes sidewalks impassable and blocks curb cuts. Some restaurants do not have any wheelchair-accessible tables. Tables on the street often obstruct bus zones, preventing buses from pulling to the sidewalk to safely deploy their ramps for wheelchair users.	
	The fatal shooting of Walter Wallace, Jr. by Philadelphia Police calls into question the effectiveness of the 911 program for people with disabilities and PPD ADA registration form. This program and form are not well-publicized. Moreover, the form gives the highly inappropriate impression that disabled Philadelphians & their families are responsible for identifying themselves to the police in advance, at the cost of their lives. Much work must be done to ensure ADA compliance of the PPD.	
	Every library branch location should have an Access Technology Workstation, mentioned on page 12.	
	The city must proactively, continuously review curb cuts for the need to upgrade them and cannot rely on individual citizens to report them. Once an individual makes a request using the online form, this information should be made public, as well as the status of the upgrades. I personally have reported many curb cuts over several years and few if any have been fixed. The ability of individuals to report curb cuts must be better publicized, as it is not widespread knowledge in the disability community.	
	The map on page 18 (Figure 1. Map of City Facilities Assessed by ADA Priority) should be made publicly accessible in a usable form so people can use the map to locate a facility and see what barriers have been reported. It should be updated with projected dates for accessibility changes.	
	It is disappointing that inaccessible public bathrooms warrant a rating of only "priority 3." Being able to use the bathroom in a public building is a high priority for me.	
	I support the idea of a city-wide ADA maintenance unit (mentioned in the plan) and want the city to act on it.	

No.	Comments Received on DRAFT Report During 30-day Comment Period	Note
	The Independence Library (facility #74) has a barrier that is not reported: very	
	heavy doors.	
	Franklin Square Park (#63) has an extremely heavy door with broken lock to the accessible restroom.	

No.	Comments Received During the Two Public Meetings	Notes
1	Who made the decision to exclude courts and why?	Addressed at public meeting
	Why was Human Resources/Title I was not included?	
	What will be the impact of the litigation on rights of way and sidewalks?	
2	What were trends in public comments received?	Addressed at public meeting
3	How long did it take to physically assess all of the buildings?	10 months
4	Please include addresses for included facilities so community can identify	Included in Final Plan
5	I am new to using mobility aids would looking at the facilities	Addressed at public meeting
	that scored a zero be good places for me to go having few accessibility issues?	
6	Could you speak to impact of covid on funding How do you assess if a facility is "structurally feasible" to modify?	Addressed at public meeting
7	What other cities has Milligan worked with?	Addressed at public meeting
8	Discuss police involvement with ADA	Addressed at public meeting
9	Discuss website accessibility	Addressed at public meeting