

City of Cohoes

Physical Accessibility to Programs and Services

S9-24-26 | February 2025

Contents

- Report Highlights 1**

- Physical Accessibility to Programs and Services 2**
 - Steps Identified to Potentially Increase Physical Accessibility to Programs and Services at Selected City Facilities 2
 - What Do We Recommend? 3

- Appendix A – Response From City Officials 4**

- Appendix B – Potential Physical Accessibility Improvements 5**

- Appendix C – Audit Methodology and Standards 7**

- Appendix D – Resources and Services 8**

Report Highlights

City of Cohoes

Audit Objective

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

Key Findings

Of the 293 applicable physical accessibility components (components) we reviewed, we identified 49 components (17 percent) where City officials could consider taking additional steps to increase physical accessibility at selected City facilities. Specifically:

- 25 components at the City Hall, such as accessible entrances to restrooms and wheelchair accessible lavatories.
- 21 components at the Cohoes Public Library (Library), such as access aisles in accessible parking spaces.
- Three components at the Police Station, such as signs with raised lettering and Braille.

Recommendation

City officials should assess the feasibility of taking additional steps to increase physical accessibility for the 49 components identified in this report. City officials agreed with our findings and indicated they plan to initiate corrective action.

Audit Period

January 1, 2023 – June 30, 2024

Background

The City is located in Albany County and is governed by an elected Mayor and six-member Common Council (Council). The Mayor is responsible for the overall administration of the City government.

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

- The City Clerk's Office (various licenses and permits, freedom of information act requests, etc.),
- The City Treasurer's Office (collection of taxes, water and sewer bills, parking tickets and related inquiries),
- The Building and Planning Department (building permits, code complaints, etc.),
- The City Court, and
- Public meetings of the Council and Board of Managers, among others.

The Library, temporarily located in the Cohoes Senior Center, and the Police Station, located directly behind City Hall, are also accessible to the public.

Quick Facts

City	
Population	18,147
2023 General Fund Expenditures	\$21.9 million
Number of Employees	169

Physical Accessibility to Programs and Services

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

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

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

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

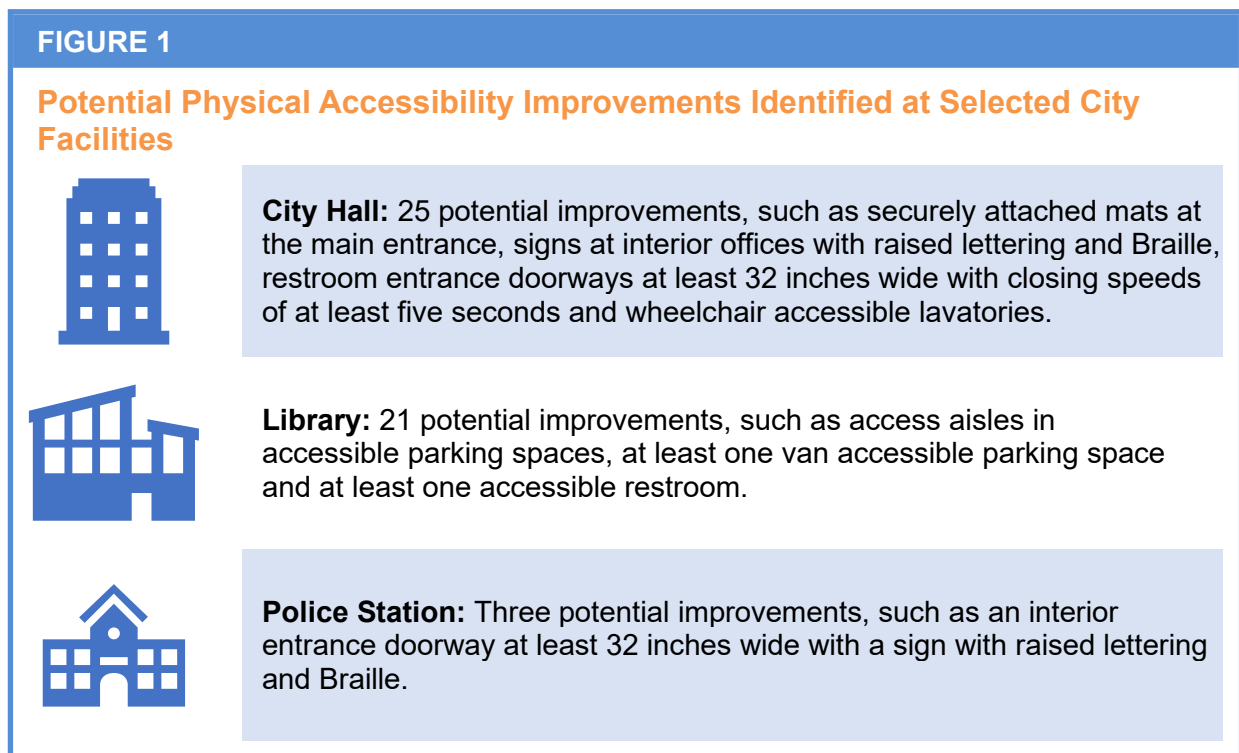
Steps Identified to Potentially Increase Physical Accessibility to Programs and Services at Selected City Facilities

We reviewed physical accessibility to programs and services provided at City Hall, the Library and Police Station, including access to City department offices, public meeting spaces and restrooms located within these buildings. For City Hall, which is an historic building, certain services are located on the second floor, which are not accessible to individuals with mobility disabilities. To address this issue, City officials meet with and provide required services in an accessible conference room located on the first floor. The conference room is equipped with a television, video camera and microphone allowing an individual with a disability to participate in public meetings.

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

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

We reviewed 293 applicable physical accessibility components at the selected facilities and identified 49 components (17 percent) where City officials could consider taking additional steps to increase physical accessibility, including 25 components at City Hall, 21 components at the Library and three components at the Police Station (Figure 1).



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

What Do We Recommend?

1. City officials should assess the feasibility of taking additional steps to increase physical accessibility for the 49 components identified in this report.

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

Appendix A: Response From City Officials

CITY OF COHOES OFFICE OF THE MAYOR

WILLIAM T. KEELER
Mayor

97 Mohawk Street
Cohoes, New York 12047



Telephone: (518) 233-2119
Facsimile: (518) 233-2159

mayor@ci.cohoes.ny.us
www.cohoes.com

February 5, 2025

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

To Whom It May Concern:

I would like to thank the staff from the New York State Comptroller's Office Statewide Audit Unit for their time spent assessing the accessibility of our public facilities here in the City of Cohoes.

The city will be looking at each recommended area of potential physical accessibility improvements as identified in your draft report and assess the feasibility for improvements on our behalf.

Once again, thank you for your time and due diligence in this matter. Should you have any questions, please do not hesitate to contact me at any time.

Sincerely,

William T. Keeler
Mayor

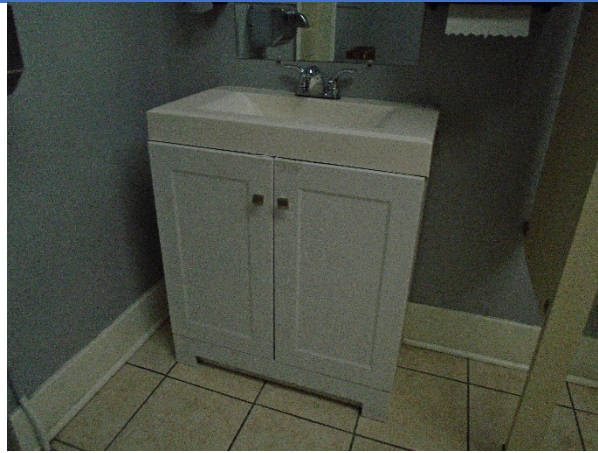
Appendix B: Potential Physical Accessibility Improvements

FIGURE 2

Potential Physical Accessibility Improvement Examples^a



Parking spaces without marked access aisles at the Library.



Lavatory without clearance underneath for wheelchair access in the City Hall men's restroom.



Stall door/stall not wide enough and no rear grab bar in the City Library men's restroom.



Police Station entrance sign lacking raised lettering and Braille.

a) Photos taken by OSC auditors in July and August, 2024 with permission from local officials.

Figure 3: Potential Physical Accessibility Improvements by Component

Accessibility Checklist Component Category	Applicable Checklist Components Reviewed	Potential Improvements Identified	Percentage With Potential Improvements Identified
Accessible Route	34	0	0%
Controls	2	0	0%
Curb Ramps	10	0	0%
Entrance	51	9	18%
Food Service Lines	2	0	0%
Interior Doors	14	1	7%
Lavatories	28	8	29%
Parking	18	3	17%
Platform Lifts	5	0	0%
Rooms and Spaces	9	1	11%
Sales and Service Counters	4	0	0%
Seating	9	0	0%
Signs	6	2	33%
Soap Dispensers and Hand Dryers	8	3	38%
Toilet Compartments (Stalls)	31	9	29%
Toilet Rooms (Bathrooms)	20	5	25%
Water Closets (Toilets)	42	8	19%
Totals	293	49	17%

Appendix C: Audit Methodology and Standards

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

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

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

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

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

Appendix D: Resources and Services

Regional Office Directory

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Contact

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

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

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

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

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

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

Tel (607) 721-8306 • Fax (607) 721-8313 • Email: Muni-Statewide@osc.ny.gov

[osc.ny.gov](https://www.osc.ny.gov)

