



# Town of Columbia

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## Physical Accessibility to Programs and Services

**S9-24-29 | January 2025**

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# Report Highlights

## Audit Objective

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

## Key Findings

Of the 77 applicable physical accessibility components (components) we reviewed, we identified 13 components (17 percent) where Town officials could consider taking additional steps to increase physical accessibility at the Town Hall. Specifically:

- Six components in the restrooms, such as mirrors, hand dryers and grab bars mounted at the proper height.
- Three components in the parking lot, such as accessible parking with painted lines and access aisles.
- Two components at the Town Clerk’s office, including an accessible portion of the service counter and signs with raised lettering and Braille.
- One component each at the main entrance and the Town Court, including securely attached floor mats and signs with raised lettering and Braille.

## Recommendation

Town officials should assess the feasibility of taking additional steps to increase physical accessibility for the 13 components identified in this report. Town officials agreed with our findings and indicated they plan to initiate corrective action.

## Audit Period

January 1, 2023 - June 30, 2024

## Background

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

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

- The Town Clerk’s Office (various licenses and permits, birth and death records, etc.),
- Code Enforcement (building permits, certificates of occupancy, etc.),
- The Town Court, and
- Public meetings of the Board, Planning Board, Zoning Board of Appeals, and the Board of Assessment Review.

### Quick Facts

Town	
Population	1,569
2023 General Fund Expenditures	\$254,000
Number of Employees	30

# Physical Accessibility to Programs and Services

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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.<sup>1</sup> It is important that someone with a disability can participate in their local government's decision-making process and be provided the same services and program opportunities as everyone else.

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

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

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

## Steps Identified to Potentially Increase Physical Accessibility to Programs and Services at the Town Hall

We reviewed physical accessibility to programs and services provided at the Town Hall, including access to Town department offices, public meeting spaces, and restrooms located within the building as well as the respective parking lot (together "facility").

We used the ADA Checklist for Existing Facilities<sup>2</sup> (ADA Checklist), which incorporates the Standards, as a tool to assess the accessibility at the facility.

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<sup>1</sup> [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](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)

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

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We reviewed 77 applicable physical accessibility components and identified 13 components (17 percent) where Town officials could consider taking additional steps to increase physical accessibility (Figure 1).

**FIGURE 1**

**Potential Physical Accessibility Improvements Identified at the Town Hall**



13 potential improvements, such as mirrors, hand dryers and grab bars mounted at the proper height in the restrooms, accessible parking with painted lines and access aisles in the parking lot; including an accessible portion of the service counter, and signs with raised lettering and Braille at the Town Clerk’s office and at the Town Court.

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

**What Do We Recommend?**

1. Town officials should assess the feasibility of taking additional steps to increase physical accessibility for the 13 components identified in this report.

# Appendix A: Response From Town Officials

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Town Supervisor  
Nathan Seamon

## TOWN OF COLUMBIA

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Town Clerk  
Therese Winchester

Jim Cotton, Town Council  
Ryan Fagan, Town Council  
Bruce Learned, Town Council  
H. Ed Reed, Town Council, Deputy Supervisor

R. Mark Buddle, Superintendent of Highways  
Mary Doremus, Tax Collector  
John M. Skinner, Justice

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January 5, 2025

To whom it may concern,

This letter is to confirm receipt of the preliminary draft findings report from the Office of the New York State Comptroller Audit that was conducted in 2024 on the Town of Columbia office building, related to the 1990 Americans with Disabilities Act (ADA).

The Town of Columbia has been and will continue to review and analyze the findings to assess which potential physical accessibility improvements it will make based on the Town's available resources in 2025 and beyond.

The Town of Columbia understands that it is under no legal obligation to act on any of the potential physical accessibility improvements referenced in the preliminary draft findings report, given the age of the building, however it is prepared to make some physical accessibility improvements.

To the best of the Town's current employees' knowledge, no informal or formal comments, positive or negative, have been communicated to the Town, past or present, pertaining to the physical accessibility improvements being referenced in the preliminary draft findings report.

Please keep us apprised of the audit process, and feel free to reach out to discuss further.

Sincerely,

Nathan Seamon  
Town Supervisor  
Town of Columbia  
147 Columbia Center Road, Ilion, NY 13357  
Cell: (315) 868-7981  
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# Appendix B: Potential Physical Accessibility Improvements

FIGURE 2

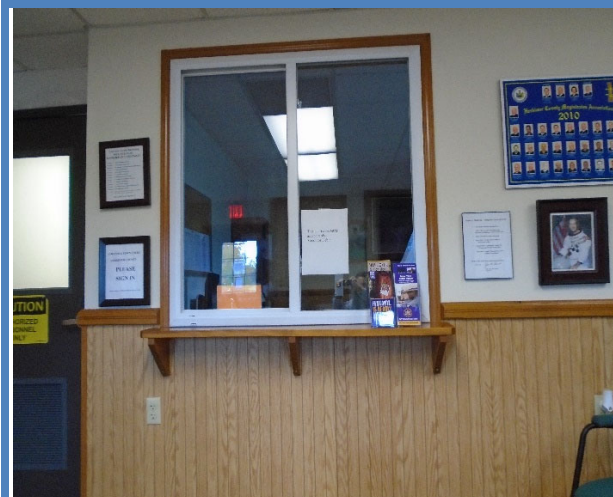
## Potential Physical Accessibility Improvement Examples at the Town Hall<sup>a</sup>



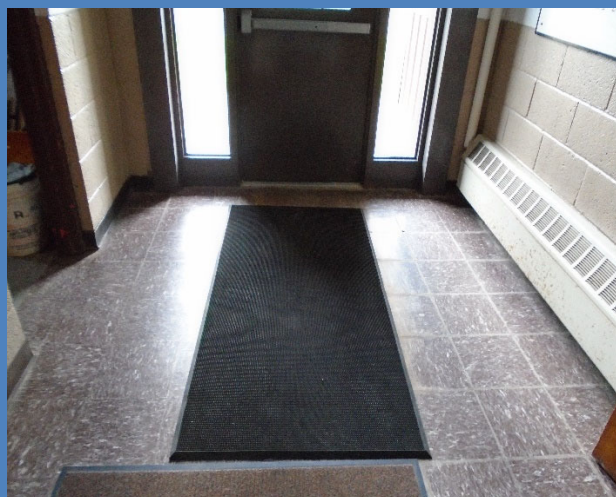
Accessible parking did not have painted lines showing the reserved spots or access aisles.



Restroom hand towel dispenser, mirror and door lock are mounted too high.



Service counter at Town Clerk's office is too high.



Rugs inside accessible main entrance were not secured.

a) Photos taken by OSC auditors in October 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	11	0	0%
Entrance	15	2	13%
Interior Doors	4	0	0%
Lavatories	7	0	0%
Parking	6	3	50%
Ramps	9	0	0%
Sales and Service Counters	3	1	33%
Seating	1	0	0%
Signs	3	2	67%
Soap Dispensers and Hand Dryers	2	1	50%
Toilet Rooms (Bathrooms)	5	1	20%
Water Closets (Toilets)	11	3	27%
<b>Totals</b>	<b>77</b>	<b>13</b>	<b>17%</b>



## Appendix C: Audit Methodology and Standards

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

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

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

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

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

## Appendix D: Resources and Services

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### **Regional Office Directory**

[www.osc.ny.gov/files/local-government/pdf/regional-directory.pdf](http://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](http://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](http://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](http://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](http://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](http://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](http://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](http://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](http://www.osc.ny.gov/local-government/academy)

## Contact

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