



City of Rome

Physical Accessibility to Programs and Services

S9-24-40 | February 2025

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Report Highlights

City of Rome

Audit Objective

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

Key Findings

Of the 463 applicable physical accessibility components (components) we reviewed, we identified 79 components (17 percent) where City officials could consider taking additional steps to increase physical accessibility at selected facilities. Specifically:

- 54 components at the City Hall, such as accessible parking spaces located on the closest accessible route and signs identifying van accessible spaces.
- 21 components at the City Court, such as interior signs with raised lettering and Braille and service counters with a portion at an accessible height.
- Four components at the Police Department, such as access ramps with level landings and extended railings.

Recommendation

City officials should assess the feasibility of taking additional steps to increase physical accessibility for the 79 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 Oneida County and is governed by an elected Mayor and eight-member Common Council (Council). The Mayor is the chief executive officer responsible for the overall administration of the City government.

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

- The Clerk's Office (various licenses and permits, freedom of information act requests, etc.),
- The Treasurer's Office (budgeting, tax billing and collection, disbursements, etc.),
- The Code Enforcement Office (building permits, code enforcement, inspections, etc.) among others, and
- Public meetings of the Council and other Boards and Commissions.

The Justice Building, consisting of the City Court and Police Department, is also accessible to the public.

Quick Facts

Population	32,127
2023 General Fund Expenditures	\$67.7 million
Number of Employees	467

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 the City Hall and the Justice Building, including access to City department offices, public meeting spaces and public restrooms located within these buildings.

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

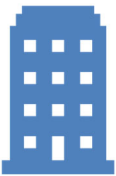
1 https://www.cdc.gov/disability-and-health/articles-documents/disability-impacts-all-of-us-infographic.html?CDC_AAref_Val=https://www.cdc.gov/ncbddd/disabilityandhealth/infographic-disability-impacts-all.html

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

We reviewed 463 applicable physical accessibility components at the selected facilities and identified 79 components (17 percent) where City officials could consider taking additional steps to increase physical accessibility, including 54 components at the City Hall and 25 at the Justice Building consisting of 21 components at the City Court and four components at the Police Department (Figure 1).

FIGURE 1

Potential Physical Accessibility Improvements Identified at Selected City Facilities



City Hall: 54 potential improvements, such as accessible parking spaces located on the closest accessible route, signs identifying van accessible spaces, entrance door with a closing speed of at least five seconds, securely attached mats at the entrance, interior signs with raised lettering and Braille, and at least one accessible restroom.



City Court: 21 potential improvements, such as interior signs with raised lettering and Braille, service counters with a portion at an accessible height, covered pipes under restroom lavatories to prevent injury from contact and soap dispensers installed at an accessible height.



Police Department: Four potential improvements, such as ramps with accessible level landings where the ramp changes direction and railings that extend at least 12 inches horizontally beyond the top and bottom of the ramp.

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 79 components identified in this report.

Appendix A: Response From City Officials

JEFFREY M. LANIGAN
Mayor



JOSEPH G. GUILIANO
Commissioner of Public Works

Kelsey Beach
Administrative Aide to the Commissioner

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Feb 19, 2025

City of Rome draft report S9-24-40- Response Draft Audit

[REDACTED]

[REDACTED]

The City of Rome is currently under construction at Rome City Hall , 198 Washington Street, with the Rome City Hall Health and Safety Improvement Project. This draft audit field research was conducted during active construction in the late fall of 2024 by yourself and [REDACTED]. The City of Rome does not confirm nor deny the draft report as it is presented due to the ongoing project at Rome City Hall. While the City of Rome does recognize that we are not fully ADA complainant throughout all public buildings we are actively moving towards the goal of becoming more compliant. The Rome City Hall Health and Safety Project does include new ADA practices and construction. The practices included are new push activated door releases, Braille signage at office entrances, new curb ramps for exterior access, ADA compliant reception areas with service counters and ADA compliant seating.

To support these actions listed above, the Common Council of Rome approved the official naming of an ADA Coordinator. The sitting Commissioner of Public Works for the City of Rome is legislated as the ADA Coordinator for the City of Rome. This was legislated on February 13, 2025. This person is currently myself. Under my direction the City of Rome will continue to make strives to obtain a fully compliant City and its public services buildings. The planning of an action plan is underway with Rome City Hall being the center of the most prevalent improvements as City Hall is our most visited public site on a daily basis. I believe that the City of Rome promotes accessibility and mobility for all levels but we realize through this audit that our effort needs to continue to achieve better access and mobility.

Our proposed action plan includes continued upgrades at Rome City Hall and a third-party engineering consultant to assist with inspecting all public facilities and workspaces for compatibility with ADA requirements. The City's current ADA Transition Plan will be revised to include all City owned public facilities and not just the current pedestrian Right of Way plan. The consultant will be tasked with a structural review for access and mobility in all the publicly owned buildings

Respectfully,

Joseph Guiliano
Commissioner of Public Works/ ADA Coordinator

Cc Jeffrey Lanigan, Mayor City of Rome
Kimberly Rogers, Chief of Staff
John Nash , President Rome Common Council
Gerard Feeney, Corporation Counsel

Appendix B: Potential Physical Accessibility Improvements

FIGURE 2

Potential Physical Accessibility Improvement Examples^a



No signs identifying van accessible parking spaces at City Hall.



Service counter at the Court Clerk's office without an accessible portion no higher than 36 inches.



Police Department entrance ramp did not have a level landing where it changes direction that is at least 60 inches by 60 inches and there was a temporary obstruction.



Signs at the entrance to the Treasurer's Office in City Hall without raised lettering and Braille.

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	39	1	3%
Curb Ramps	15	2	13%
Drinking Fountains	13	0	0%
Elevators	14	2	14%
Entrance	68	7	10%
Interior Doors	48	0	0%
Lavatories	42	6	14%
Parking	11	2	18%
Ramps	29	2	7%
Sales and Service Counters	17	5	29%
Seating	3	0	0%
Signs	18	16	89%
Soap Dispensers and Hand Dryers	12	5	42%
Toilet Compartments (Stalls)	43	13	30%
Toilet Rooms (Bathrooms)	27	5	19%
Water Closets (Toilets)	64	13	20%
Totals	463	79	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 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

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

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