



Town of Trenton

Physical Accessibility to Programs and Services

S9-24-28 | February 2025

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Report Highlights

Town of Trenton

Audit Objective

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

Key Findings

Of the 144 applicable physical accessibility components (components) we reviewed, we identified 14 components (10 percent) where Town officials could consider taking additional steps to increase physical accessibility at the Town Municipal Center. Specifically:

- Nine components located in restrooms, such as accessible stall doors with automatic closers and pipes under lavatories covered to prevent contact.
- Two located in the parking lot, including the required number of accessible parking spaces and signs identifying van accessible spaces.
- Two located at interior doorways including interior signs with raised lettering and Braille, and closing speed of at least five seconds for doors with automatic closers, and
- One at the main entrance; floor mats with securely attached edges.

Recommendations

Town officials should assess the feasibility of taking additional steps to increase physical accessibility for the 14 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 Oneida County and is governed by an elected five-member Town Council (Council) composed of a Town Supervisor and four Council members. The Supervisor is responsible for the overall administration of the Town government.

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

- The Town Clerk's Office (various licenses and permits, freedom of information act requests, etc.),
- Code Enforcement (building permits, certificates of occupancy, etc.),
- Planning Department (applications for new businesses, buildings or uses),
- The Town Court, and
- Public meetings of the Council and Planning Board, among others.

Quick Facts

Population	4,297
2023 General Fund Expenditures	\$1.5 million
Number of Employees	36

Physical Accessibility to Programs and Services

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

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

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

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

Steps Identified to Potentially Increase Physical Accessibility to Programs and Services at The Municipal Center

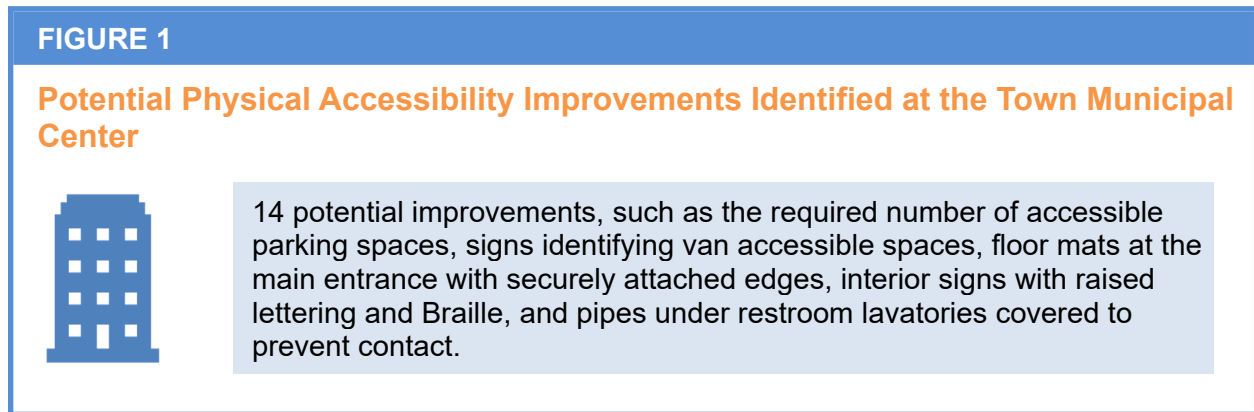
We reviewed physical accessibility to programs and services provided at the Town's Municipal Center, including access to Town department offices, public meeting spaces and restrooms located within the building as well as the respective parking lot (together "facility").

We used the ADA Checklist for Existing Facilities² (ADA Checklist), which incorporates the Standards, as a tool to assess the accessibility at the facility.

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

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

We reviewed 144 applicable physical accessibility components and identified 14 components (10 percent) where Town officials could consider taking additional steps to increase physical accessibility (Figure 1).



Examples of the potential improvements we identified and photographed at the facility, 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 14 components identified in this report.

Appendix A: Response From Town Officials



Town of
TRENTON
New York

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January 22, 2025

ATTN: Statewide Audit Unit

STEPHEN A. GODFREY
Supervisor

In response to the Physical Accessibility to Programs and Services, Report of Examination conducted in September 2024, findings are being addressed as noted.

RACHEL I. BUNKER
Town Clerk

ANNE ZIELENSKI
Town Justice

- We are currently working on finding the automatic closures for the restroom stall doors, with the help of our supplier.

JASON STIEHL
Highway Superintendent

- Two toilets have been replaced. A third toilet with a right-hand lever is scheduled to arrive by the end of the week.

MICHAEL BENNISON
Councilman

- Pipes located under the lavatory sinks have been covered in both restrooms.

JAMES FARR
Councilman

- There are plans to resurface the parking lot in the summer. At that time, we will address adding accessible parking spaces and van accessible parking signs.

CHRISTOPHER CRUMB
Councilman

- Interior signs with raised lettering and Braille have been ordered and are expected to arrive next week for installation.

ERIC D. TAYLOR
Councilman

- The automatic closure on the exterior doors have been adjusted.

- Attaching the carpets at the main entrance will be addressed soon.

Please feel free to contact me with any questions at (315) 896-2664.

Sincerely,

Stephen A. Godfrey
Supervisor

cc:



Dina Thompson

The Town of Trenton is an equal opportunity provider and employer.

Appendix B: Potential Physical Accessibility Improvements

FIGURE 2

Potential Physical Accessibility Improvement Examples^a



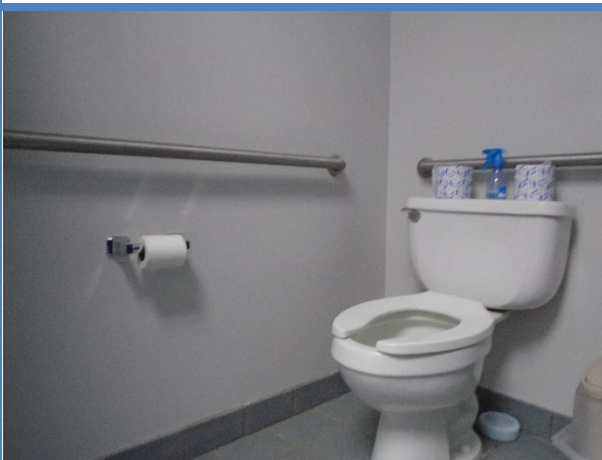
Sign without raised lettering and Braille and not mounted on the latch side of the door at the Town Court and public meeting rooms.



Sign without raised lettering and Braille and not mounted on the latch side of the door at the Town Clerk's office.



Pipes under restroom lavatories in the men's restroom were not insulated to protect against potential injuries from contact with hot or cold pipes, as well as sharp or abrasive surfaces.



Flush control on closed side of the water closet in the woman's restroom.

a) Photos taken by OSC auditors in September 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	13	0	0%
Drinking Fountains	7	0	0%
Entrance	19	3	16%
Interior Doors	27	1	4%
Lavatories	14	2	14%
Parking	11	2	18%
Signs	3	3	100%
Soap Dispensers and Hand Dryers	4	0	0%
Toilet Compartments (Stalls)	16	2	13%
Toilet Rooms (Bathrooms)	8	0	0%
Water Closets (Toilets)	22	1	5%
Totals	144	14	10%

Appendix C: Audit Methodology and Standards

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

- We selected the Town from a list of all cities, towns and villages (excluding NYC) not currently in OSC's audit process at the time of selection. We divided the list into seven regions and used expenditure data reported in the 2023 fiscal year to judgmentally select cities, towns and villages from these regions for an even representation across the State for this multi-unit audit.
- We reviewed applicable laws and regulations, as well as any policies and procedures the Town had regarding accessibility. The potential improvements to physical accessibility identified in the report, however, are intended for informational purposes only and should not be construed as OSC opining as to the legality of the Town's compliance with ADA requirements.
- We interviewed Town staff and reviewed Council 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 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 Town Clerk's office.

Appendix D: Resources and Services

Regional Office Directory

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Contact

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