

Americans with Disabilities Act (ADA) Transition Plan

North Middlesex
Regional School
District

A Strategic Plan to Advance
Accessibility and Experiences
in the North Middlesex
Regional School District

Update June 2026





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North Middlesex Regional School District ADA Transition Plan 2026

Executive Summary

North Middlesex Regional School District (NMRSD) is committed to ensuring equal access to all its schools, programs, services, communications and activities for individuals with disabilities. This comprehensive ADA Transition Plan (Plan) establishes a systemic framework for identifying and removing barriers to accessibility in compliance with Title II of the Americans with Disabilities Act of 1990 (ADA) and Section 504 of the Rehabilitation Act of 1973. The Plan emphasizes NMRSD's commitment to inclusion and accessibility by ensuring the most equitable educational experience for all students.

NMRSD operates multiple schools and district facilities, maintains a district policy manual, publishes an accessibility statement for web content, and identifies Section 504 coordination within district leadership. The accessibility audit reports for Hawthorne Brook Middle School, Nissitissit Middle School, North Middlesex Regional High School, Spaulding Memorial School, Squannacook Early Childhood Center and Varnum Brook Elementary School show that the district has many existing accessible features, but also reveal recurring barriers in entrances, door hardware, signage, restrooms, stage and assembly access, emergency egress, classroom and workstation adaptability, communication access, and equitable participation in athletics and extracurricular settings.

This ADA Transition Plan establishes a districtwide framework for barrier removal and program access based on the completed audit findings presently available in the reports. The plan prioritizes corrections that affect life safety, independent entry, emergency preparedness, accessible toilet and shower use, access to stages and auditoriums, wayfinding, and equal participation in educational programs and school events.

The highest-priority findings include, among others, inaccessible or unsafe thresholds and exterior routes at Hawthorne Brook, lack of stage access and hearing assistance at assembly spaces, missing evacuation chairs at the high school, inaccessible main public



entry and auditorium entry conditions at Nissitissit, repeated signage mounting deficiencies, door opening force problems, and facility conditions that interfere with restroom access, emergency response, or full program participation. The district should use this plan to pair immediate low-cost operational fixes with phased capital improvements, policy revisions, staff training, and annual public reporting.

This expanded version is intended to function as a working district document rather than a short summary. It translates the audits into a full governance, implementation, and accountability framework that can be used for internal management, School Committee reporting, future consultant updates, and capital planning integration.



Table of Contents

Executive Summary.....	4
1. Purpose and Scope.....	8
2. District Framework.....	8
3. Legal and Administrative Basis.....	9
4. Methodology.....	10
5. Accessibility Vision.....	11
6. Policy Review	11
6.1 Existing Policy Review	11
6.2 Proposed Policies	12
7. Gaps Indicated by the Audits.....	12
8. Required Actions.....	13
10. Detailed Recommendations	15
11. School Committee Actions.....	17
12. Program Access Analysis	17
13. Core Program Areas.....	18
14. Interim Program Access Measures.....	18
15. Facility Findings.....	19
16. Districtwide Themes.....	19
17. Barrier Categories.....	20
18. Priority 1 Findings.....	21
18.1 Hawthorne Brook Middle School.....	21
18.2 Nissitissit Middle School.....	22
18.3 North Middlesex Regional High School.....	23
18.4 Spaulding Memorial School.....	24
18.5 Squannacook Early Childhood Center	25
18.6 Varnum Brook Elementary School	26
19. Priority 2 Findings	27
19.1 Hawthorne Brook Middle School	27
19.2 Nissitissit Middle School	28
19.3 North Middlesex Regional High School	29
19.4 Spaulding Memorial School	29
19.5 Squannacook Early Childhood Center	30
19.6 Varnum Brook Elementary School	30
20. Priority 3 Findings.....	31
20.1 School-by-School Prioritization.....	32
21. Campus Narratives.....	35
22. Cross-Campus Prioritization.....	37
23. Implementation Plan Schedule.....	39

23.1 Phase 1: Immediate Actions, 1 to 2 year	40
23.2 Phase 2: Short-Term Actions, 4 to 6 years.....	41
23.3 Phase 3: Mid-Term Actions, 6 to 8 years.....	41
23.4 Phase 4: Long-Term Actions, 8 to 10 Years	42
23.5 Implementation Plan Overview	42
24. Funding and Budget Strategy	43
25. Procurement Standards	43
26. Effective Communication.....	44
27. Digital and Information Access	45
28. Training Program	46
29. Administrative Responsibilities	46
30. Recommended Governance Structure.....	47
31. Monitoring and Annual Updates.....	47
31.1 Monitoring Metrics	48
32. Risk Considerations.....	48
33. Community Engagement	49
34. Recommendations	50
Conclusion	53
Glossary of Terms	55

1. Purpose and Scope

This plan is intended to guide NMRSD in removing barriers to equal access in facilities, services, programs, activities, communications, and administrative practices under Title II of the ADA and Section 504 of the Rehabilitation Act. It incorporates available findings from the facility audits and aligns those findings with districtwide policy, operational, and capital actions.

The current plan covers:

- Hawthorne Brook Middle School
- Nissitissit Middle School
- North Middlesex Regional High School
- Spaulding Memorial School
- Squannacook Early Childhood Center
- Varnum Brook Elementary School

The scope of this plan includes physical accessibility, program accessibility, effective communication, selected digital and information-access issues evident in the audits, emergency access, public-facing services, school event participation, and internal management systems required to sustain compliance over time. The plan is therefore broader than a facilities punch list and should be used as the district's primary roadmap for accessibility decision-making until it is formally updated.

2. District Framework

NMRSD publicly maintains a district policy manual, a website accessibility statement, and Section 504 information naming the Assistant Superintendent as Section 504 Coordinator. District Policy AC states that NMRSD does not discriminate on the basis of disability and references both Section 504 and Title II of the ADA.

These existing governance tools provide a strong base for this plan, but the audits show that the district needs a more unified implementation structure tying physical access, communication access, digital accessibility, emergency planning, policy revision, and annual accountability into a single district process.

Buildings and Grounds already serve districtwide facilities, including multiple schools and related support sites, which positions that department as a core implementation arm for the plan. At the same time, the audit findings show that many barriers are not purely construction issues, because they also involve signage management, furniture selection, hearing access, event operations, storage practices, posted information, staff workstations, and emergency response readiness.

For that reason, the district framework for this plan should be cross-functional. District administration, Buildings and Grounds, the Section 504 Coordinator, principals, student services, technology, communications, food service, athletics, and human resources should all be treated as implementation partners rather than peripheral stakeholders.

3. Legal and Administrative Basis

This plan should be understood as a Title II and Section 504 implementation document grounded in the district's own published nondiscrimination and Section 504 structures. Policy AC establishes the district's nondiscrimination commitment, while the district's Section 504 materials identify a responsible leadership role and articulate that qualified students with disabilities must have access to publicly funded programming.

The audit process reinforces that compliance obligations extend beyond admission to a building. Equal access also requires usable routes, independent entry where feasible, accessible restroom and locker room use, effective communication, wayfinding, access to assemblies and performances, access to classroom activities and instructional technology, and safe emergency egress planning.

This plan should therefore be administered as an operational civil-rights document rather than as a maintenance memo. Projects should be prioritized not only by construction



complexity, but also by how directly a barrier affects equal participation in education, employment, household engagement, public meetings, extracurriculars, and school-sponsored events.

4. Methodology

This plan relies on the school audit reports as the primary evidence base for school-level findings and recommendations. Those reports identify findings, budget ranges, priority levels, and recommended corrective actions for numerous locations within each campus.

The report reveals a practical districtwide pattern that supports transition-plan planning even before every school report has been fully synthesized. Repeated findings appear in signage, door force, automatic operators, restroom accessory placement, assembly-space access, accessible seating, adaptive technology, and emergency access conditions across more than one campus.

For purposes of this transition plan, findings are grouped into three planning lenses:

- Campus-specific barriers requiring building-level corrective
- Districtwide recurring conditions that warrant standard procedures or procurement responses
- Governance and policy issues that require leadership action, training, and recurring monitoring.

The auditing criteria use varying priority language such as High, Important, Moderate, and Low, and that planning language has been translated here into implementation phases and districtwide prioritization categories. Where a finding directly affects life safety, public entry, assembly participation, or emergency response, it is treated in this plan as an accelerated action item even if final construction may require additional design or funding steps.

5. Accessibility Vision

The district should adopt an accessibility vision that goes beyond technical code correction. The audits show that many barriers could be removed by combining operational discipline, inclusive procurement, targeted construction, accessible communication, and clear accountability.

A practical vision statement for implementation is as follows: every student, employee, household member, visitor, and community participant should be able to locate, enter, use, and participate in district facilities, services, communications, and events with dignity, safety, and as much independence as reasonably possible.

This vision is especially important in K-12 settings because the user groups are broad and constantly changing. A district that serves students, parents, guardians, staff, elected officials, volunteers, community users, athletes, performers, and meeting attendees must treat accessibility as a continuing operational standard rather than a one-time retrofit project.

6. Policy Review

The policy review component of this transition plan builds from NMRSD's existing public policy manual, accessibility statement, Section 504 materials, and nondiscrimination policy. The policy audit was comprehensive: we reviewed 270 policies with topics ranging from School Committee governance to instruction and student affairs. Overall, we gave recommendations on 97 of the existing policies within an accessibility and inclusion framework and crafted three additional policies based on key deficiencies in current policies. The goal was to create consistent accessibility practices across all schools.

6.1 Existing Policy Review

Upon completion of the review and drafting of recommendations for existing policies, we assigned a rating to each policy on a scale from zero to three, with zero being noncompliant, one being limited compliance, two being partially compliant, and three being fully compliant (see Policy Review Report for full evaluation criteria). Out of 270 policies, we found that:



- 66 percent (177) were rated as fully compliant;
- 25 percent (69) were rated as partially compliant;
- 7 percent (19) were rated as limited compliance; and
- 2 percent (5) were rated as noncompliant.

These results indicate that the district has a solid foundation to build on. However, significant gaps remain in several crucial areas, including grievance and complaint procedures, reasonable accommodation request processes, personnel policies, student safety and emergency preparedness, and academic and behavioral supports for students with disabilities. Additionally, some of the policies lack language that centers equity and accessibility.

6.2 Proposed Policies

In addition to providing recommendations to revise existing policies, we drafted three new policies to address some of the gaps indicated in the policy report. The proposed policies include:

- Educational Opportunities for Students with Disabilities
- Referrals for Academic and Behavioral Supports and Multi-Tiered System of Support
- Emergency Preparedness for Students with Disabilities

These policies were developed to fit with the district's values and current policy structure. To view the full text, see the attached Policy Report.

7. Gaps Indicated by the Audits

The audits suggest several operational and policy gaps that should be formally addressed districtwide.

1. **Accessible signage and wayfinding standards:** Multiple schools show repeated findings involving signs mounted above 48 inches, signs not placed on the strike side, missing braille, blocked signs, inaccurate signs, or missing directional signage.

2. **Door operation and independent entry:** The audits repeatedly identify doors that require more than 5 pounds of force, drag at the bottom, or lack automatic operators at major public entrances and assembly spaces.
3. **Effective communication:** Main offices, auditoriums, libraries, and public entry spaces were cited for missing induction loops or other hearing access supports, showing a need for a districtwide effective communication procedure for public-facing spaces and events.
4. **Emergency access and evacuation:** Findings involving inaccessible pull stations, missing evacuation chairs, obstructed eyewash stations, dim exit signs, and emergency information mounted too high show a need for standardized accessible emergency planning and inspection protocols.
5. **Program accessibility in classrooms and specialty spaces:** Science labs, music rooms, libraries, gyms, locker rooms, cafeterias, and staff work areas show repeated needs for adjustable workstations, seating variety, adaptive equipment, accessible storage, and consistent access routes.
6. **Multi-modal information access:** Nissitissit and the high school audits specifically identify paper-only or single-format information practices and recommend QR codes, tablets, captions, and digital formats, which indicates the need for districtwide communication and document accessibility standards.

8. Required Actions

The district should adopt or revise procedures in the following areas:

- ADA/504 grievance and complaint procedure for students, staff, households, and members of the public.
- Reasonable modification and accommodation procedures for school events, public meetings, and facility use.

- Effective communication procedure covering assistive listening systems, captioning, alternative formats, and accessible public-facing information.
- Signage and wayfinding standards for all schools, including mounting height, braille, strike-side placement, directional signs, and update controls when room use changes.
- Door force and entry access maintenance standards, including periodic testing and corrective work orders for public and classroom doors.
- Emergency access standard covering alarm devices, pull stations, evacuation chairs, posted plans, eyewash access, AED access, exit signage, and stair lighting.
- Digital accessibility and multi-modal communication standards for websites, forms, school schedules, meal information, resource notices, and posted instructions.
- Accessible procurement standard for classroom furniture, technology, fitness equipment, musical instruments, public counters, and communication systems.

9. Priority Areas

Policy area	Evidence from findings	Priority	Required action
Signage and wayfinding	Repeated sign height, braille, placement, visibility, and room-identification deficiencies across all four reviewed schools.	High	Adopt district signage standards and a building signage inventory program.
Door access and operators	Repeated excessive opening force and missing automatic operators at public, restroom, classroom, stair, and auditorium doors.	High	Adopt inspection and corrective maintenance procedures with quarterly testing.

Policy area	Evidence from findings	Priority	Required action
Emergency preparedness	Missing evacuation chairs, inaccessible pull stations, dim exit signs, emergency plans too high, obstructed eyewash stations.	High	Revise emergency response and equipment standards; train staff.
Effective communication	Missing induction loops and hearing access supports at entries, offices, libraries, and auditoriums.	High	Adopt district effective communication procedures for school events and public service points.
Program access in instructional and activity spaces	Science labs, libraries, music rooms, gyms, cafeterias, and locker rooms show recurring barriers to full participation.	High	Establish accessible furniture, equipment, and room setup standards.
Digital and multi-modal information	QR codes, digital schedules, captions, electronic intake, and accessible information were repeatedly recommended.	Medium-High	Adopt digital content and alternative format procedures tied to the web accessibility program.

10. Detailed Recommendations

The facility audits conducted across NMRSD show that accessibility needs are not confined to a single building or a small number of isolated

conditions but instead appear repeatedly across multiple schools and program areas in ways that affect everyday access, navigation, communication, and participation. Common themes include doorway access barriers, inconsistent or improperly placed signage, restroom accessibility details, limited hearing access in key public and instructional spaces, and insufficient availability of accessible furnishings, equipment, and work surfaces.

Taken together, these findings suggest that the District's next phase of ADA implementation should be approached as more than a collection of individual corrective actions. While each school has site-specific barriers that require targeted resolution, the recurring nature of these issues indicates the need for a districtwide framework that establishes uniform accessibility standards, consistent design expectations, and shared implementation priorities across all campuses.

This broader approach will help NMRSD move from reactive correction to proactive accessibility planning. By aligning barrier removal, standardized specifications, staff training, equipment selection, and routine monitoring, the District can strengthen program access in a way that is more coordinated, sustainable, and equitable for students, staff, households, and visitors with disabilities.

These recommendations are therefore intended to support both immediate improvements and long-term institutional change. Implemented together, they can improve safety, communication, independence, and equal participation throughout the school system while creating a stronger foundation for ongoing ADA compliance and inclusive educational access over time.

Recommended written implementation tools include:

- A district event accessibility checklist for concerts, assemblies, community gatherings, athletic events, and School Committee meetings.
 - A signage request and approval form to ensure new room names, relocations, and program changes result in accessible sign updates.
 - A door-force testing log and quarterly work-order checklist for high-use doors.
- 

- A restroom access inspection checklist covering signs, hooks, dispensers, grab bars, turning space, and stored items.
- A public information access checklist requiring alternative formats, captions where needed, QR-based digital access, and readable large-print postings for key announcements.
- A procurement review checklist for furniture, technology, fixtures, and adaptive equipment purchases.

11. School Committee Actions

Because the district already has a public policy framework and School Committee policy page, accessibility implementation should include formal board-level adoption steps where appropriate. School Committee action is especially relevant for updated nondiscrimination notice language, grievance procedures, facility use accommodation language, digital accessibility expectations, and annual transition-plan reporting requirements.

A practical governance approach would be to require annual presentation of the district's ADA Transition Plan status to the School Committee, including completed actions, delayed actions, expenditures, and policy changes adopted during the prior year. This approach would place accessibility oversight in the district's regular governance cycle rather than treating it as a consultant-only activity.

12. Program Access Analysis

The audits make clear that accessibility barriers in NMRSD affect program access as much as physical entry. In several buildings, a student or visitor may be able to enter the school generally but still face barriers to equitable participation in lunch service, stage presentations, science labs, music instruction, library use, athletic facilities, restroom access, or emergency evacuation.

This distinction matters because an ADA transition plan should not stop identifying technical elements such as sign heights or hardware details. It should also identify which

programs are functionally limited by those conditions and whether interim measures can preserve equal access while permanent work is pending.

13. Core Program Areas

Based on the audits, the following district program areas require active accessibility management:

- Main public entry and school reception.
- Classroom instruction, including science, music, chorus, keyboard labs, and resource rooms.
- Library, computer, and media access.
- Cafeteria service, payment, seating, and meal information access.
- Gymnasiums, locker rooms, athletic participation, and spectator access.
- Auditoriums, stages, performances, and assembly communication access.
- Restroom and staff support space use.
- Emergency evacuation and emergency-response communication.

14. Interim Program Access Measures

The district should document interim measures for any high-priority space that cannot be fully corrected immediately. Examples supported by the nature of the findings include:

- Relocating events or presentations to accessible rooms while stage lifts or entry upgrades are pending.
 - Reserving and clearly marking accessible cafeteria seating and auditorium seating pending permanent furniture and seating reconfiguration.
 - Assigning staff to remove obstructions and verify accessible routes before school events or public meetings.
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- Using portable hearing assistance systems until permanent induction loops are installed.
- Moving classes, labs, or meetings to rooms with better access if a scheduled space remains inaccessible.
- Providing accessible digital versions of paper-based schedules or forms while broader information-access procedures are implemented.

Interim measures should not be treated as permanent substitutes for barrier removal. They should instead be logged by site and linked to capital or operational actions so that temporary workarounds do not become the district's default long-term approach.

15. Facility Findings

The facility audits show several recurring districtwide barrier categories. While each school has building-specific conditions, the pattern across the reports is consistent enough to support both campus-level and districtwide corrective action planning.

16. Districtwide Themes

The most common facility findings across the schools are:

- Inconsistent or inaccessible signage, including missing braille, improper height, blocked visibility, and inaccurate room identification.
 - Doors that are too heavy, drag, or lack automatic operation at high-use public entrances and assembly spaces.
 - Restroom deficiencies involving sign height, missing vertical or side grab bars, inaccessible accessories, improper stall or fixture support, and storage or furnishings that obstruct access.
 - Program access barriers in classrooms, labs, libraries, cafeterias, gyms, stages, locker rooms, and music spaces due to fixed-height furnishings, limited adaptive equipment, inaccessible storage, and insufficient accessible seating choices.
- 

- Emergency and egress issues involving inaccessible routes, inadequate exit sign visibility, inaccessible pull stations, missing evacuation equipment, and poor stair visibility or lighting.

17. Barrier Categories

For implementation purposes, the district should classify all school findings into the following facility categories:

- Arrival and accessible parking.
- Exterior routes, thresholds, and site circulation.
- Public entries, vestibules, and reception counters.
- Classroom doors, interior room doors, and automatic operators.
- Signage, room identification, and directional wayfinding.
- Restrooms, locker rooms, and showers.
- Cafeterias and food service.
- Libraries, computer labs, and media spaces.
- Auditoriums, stages, and assembly support systems.
- Gyms, spectator spaces, and athletic participation areas.
- Emergency egress, alarms, evacuation aids, and stair safety.

This structure allows the district to compare recurring findings across campuses and bundle similar corrective actions together. For example, signage correction, door-force adjustment, vertical grab-bar installation, hearing assistance procurement, and accessible workstation purchases may all be more efficient if addressed districtwide rather than school by school.

18. Priority 1 Findings

The following findings should be treated as the highest immediate priorities because they involve life safety, independent access to primary functions, public/assembly access, or high-risk barriers.

18.1 Hawthorne Brook Middle School

High-priority Hawthorne Brook findings include exterior thresholds at gym doors, lack of stage access, elevator communication barriers, accessible parking deficiencies, and an inaccessible exterior connection at the greenhouse doorway. Specific top items include:

- Doorway 6 and Doorway 7 at the gymnasium have 3-inch exterior thresholds that create wheelchair barriers and tripping hazards.
- The auditorium stage lacks an accessible route and requires a vertical platform lift.
- The elevator near the main office lacks directional signage, an overhead visual indicator, adequate audible announcements, and braille on control buttons.
- Accessible parking at the front of the school lacks compliant signage, transfer space, and a smooth defined accessible route to the pathway.
- Doorway 3 to the greenhouse lacks adequate lighting and a continuous accessible pathway to the paved roadway.

These conditions should be treated as first-phase district actions because they affect fundamental entry, vertical access, and participation in assembly functions. Hawthorne Brook also appears to have a concentration of route and public-space issues that make it the most urgent school for physical barrier-removal planning among the fully reviewed campuses.



Figure 1 Hawthorne Brook Middle School

18.2 Nissitissit Middle School

Nissitissit's highest-priority items center on public entry, assembly access, and independent access to major public spaces. Specific top items include:

- The main public entry does not include automatic door operators on interior and exterior doorways, and assistive listening support is not provided in the high-use entry area.
- Auditorium entry doors do not include automatic door operation, and room signage is obstructed or insufficient for wayfinding.
- Some accessible auditorium seating areas are obstructed by media equipment and do not consistently provide clear transfer space or seating choice.
- Science room eyewash access is obstructed in at least one lab, which raises emergency access concerns.

Nissitissit should be treated as a major public-access and student-participation priority because several of its findings affect spaces used for reception, instruction, events, and general circulation. The concentration of issues in public entry and auditorium functions also suggests that the school's accessibility work will have strong benefits for students, households, staff, and community event participants.



Figure 2 Nissitissit Middle School

18.3 North Middlesex Regional High School

The high school's most urgent findings focus on emergency evacuation and broad districtwide access conditions. Specific top items include:

- Evacuation chairs are not provided near elevators or interior stairways, leaving students or guests with mobility disabilities without a safe means of egress during emergencies when elevators cannot be used.
- Building-wide signage is not consistently mounted or placed correctly, limiting tactile wayfinding across both floors.
- Multiple classroom and stairway doorways require more than 5 pounds of force, affecting independent access to learning areas and exits.
- Overhead exit signage includes signs with low illumination, reducing visibility in normal and emergency conditions.

Because the high school likely serves large student volumes, after-hours events, and public functions, emergency egress deficiencies should be accelerated regardless of broader campus sequencing. The missing evacuation chairs alone justify immediate implementation action, since emergency preparedness cannot depend solely on ad hoc staff improvisation.



Figure 3 North Middlesex Regional High School

18.4 Spaulding Memorial School

The excerpts for Spaulding Memorial School show immediate and important concerns in circulation safety, accessible technology, cafeteria access, and restroom signage. Specific top items include:

- Area rugs in the school, including the nurse's office and library, create recurring slip and trip hazards and should be secured or removed.
- Computer lab and library stations lack clearly available modified technology and accessible arrangements for students and staff.
- The cafeteria cash register cart narrows exit openings from the lunch line to 30 inches, limiting accessible egress.
- Restroom signage is mounted too high even where braille is present.

Spaulding's immediate work can likely begin quickly because several high-priority items are operational or low-cost rather than major structural reconstruction. That makes the campus a strong candidate for a fast corrective-action package focused on clutter removal, signage correction, and accessible technology provision.



Figure 4 Spaulding Memorial School

18.5 Squannacook Early Childhood Center

Squannacook's most important findings focus on accessible entrance and exterior routes, dedicated child-serving restrooms, and dedicated sensory spaces. Specific top items include:

- Ensure at least one primary entrance and associated exterior route provides a smooth, slip-resistant, and obstruction-free path of travel from accessible parking and drop-off to the main office and primary program spaces. Any abrupt level changes, steep cross-slopes, or poorly lit transitions should be addressed first, given the age of the students.
- Confirm that at least one child-serving restroom and any dedicated changing area per program cluster has compliant clearances, grab bars, accessible fixtures, and unobstructed floor space so that students and caregivers can use them safely and with dignity.
- Verify that classrooms serving students with mobility, sensory, or developmental disabilities have clearly identified, usable egress routes and any necessary areas of refuge or staff-assisted evacuation procedures, especially given limited self-direction among preschool-age children.

These items come first because they directly affect safe arrival, daily movement, and

emergency response for young children, staff, and households, especially those with mobility disabilities. They address issues such as inaccessible parking connections, unsecured mats, raised thresholds, noncompliant exterior exits, and other hazards that increase tripping and evacuation risk



Figure 5 Squannacook Early Childhood Center

18.6 Varnum Brook Elementary School

Highest priority items for Varnum include signage and wayfinding gaps, obstructed circulation and parking, and playground accessibility. Specific top items include:

- Correct any gaps in accessible parking layout, curb ramps, and primary routes to the main entrance, and address door-force, threshold, or operator issues at the main public entry so that students, staff, and households with disabilities can enter independently during busy arrival and dismissal windows.
- Address barriers that affect exit routes, stair visibility, exit signage, or access to emergency devices (pull stations, AEDs, eyewash where applicable), giving priority to conditions that would impede safe evacuation or shelter-in-place for students with disabilities.
- Prioritize corrections in the most heavily used student restrooms, signage, grab bars, turning space, door swing, and accessories placement—so that at least one accessible stall per bank is fully usable on each floor or wing.

These findings are prioritized first because they affect the most frequently used public routes and the safest means of entering, moving through, and exiting the school. The audit identified significant issues at the main entrance, accessible route surfaces, automatic door access, stair visibility, and other hazards that may impede safe and independent access.



Figure 6 Varnum Brook Elementary School

19. Priority 2 Findings

Priority 2 items are those that should be completed as soon as possible because they affect the greatest number of users or major program areas.

19.1 Hawthorne Brook Middle School

Important Hawthorne Brook findings include inaccessible locker room features, hearing assistance gaps, uneven auditorium entries, inaccessible restroom representations, inaccessible side parking access, fire alarm pull station height, baseball field access, and missing directional signage for public functions. Representative items include:

- The girls locker room lacks an ADA-compliant shower, accessible lockers, compliant door force, and a visual fire alarm,
- The auditorium does not have an assistive listening system.
- Several auditorium doorways exceed 5 pounds of force, lack automatic operators, and include uneven transitions.

- The girls restroom near the library is signed as wheelchair accessible even though the interior layout does not support wheelchair access.
- Accessible employee parking at the side lot lacks van space and includes an inaccessible route near the trees.

These items should be emphasized in second-phase design and procurement because they influence athletic participation, assembly participation, employee access, and wayfinding integrity. The restroom mislabeling issue also deserves special attention because inaccurate accessibility signage can cause confusion, wasted travel, and reduced trust in district accessibility information.

19.2 Nissitissit Middle School

Important Nissitissit findings include restroom modifications, cafeteria accessible seating, office communication access, stage step contrast, gym and event restroom improvements, corridor door force, AED access, weight room accessibility, exit visibility, and posted emergency information height. Representative items include:

- Library entry lacks automatic door operation and assistive listening support.
- Student and event restrooms need signage corrections, vertical grab bars, door operators, motion-sensor fixtures, and changing table improvements.
- Cafeteria seating lacks designated accessible tables with knee clearance, and entry doors lack automatic operators.
- Main office reception needs an accessible electronic sign-in process and hearing access support.
- Weight room layouts and equipment limit participation by students who use wheelchairs or need adaptive fitness equipment.

These findings suggest that Nissitissit's implementation strategy should combine public-facing fixes with student-program improvements. A school where public entry, office communication, cafeteria access, and athletic participation all require improvement will benefit from a coordinated rather than siloed project sequence.

19.3 North Middlesex Regional High School

Important high school findings include restroom signage and grab-bar corrections, accessible teacher break room features, science room access details, stair doorway force, classroom door force, and brightened exit signage. Representative items include:

- Staff accessible restrooms need signage corrections, vertical grab bars, and reduced door opening force.
- Teacher break rooms need adjustable workstations, better microwave placement, improved faucets, and corrected door operation.
- Science Room 243 needs accessible station identification, storage within reach, and reduced door force.
- Exit stairway doorways and some classroom doors require hardware adjustment to support independent access.

While many of these items are individually moderate in cost, their combined effect on daily student and staff access is substantial. The district should therefore treat repeated classroom door and signage findings as a systematic conditions program rather than an isolated maintenance list.

19.4 Spaulding Memorial School

Important Spaulding items include nurse's office clearance, signage consistency, cafeteria seating choice, restroom hardware and sign heights, and accessible route issues caused by furnishing placement. Representative items include:

- The nurse's office bathroom contains stored clothing that reduces wheelchair access space.
- Hall and room signage is inconsistent or missing and should include braille and proper mounting height.
- Cafeteria tables with attached benches limit wheelchair pull-up seating.
- Restroom signs and hooks are often mounted too high, reducing independent usability.

Spaulding's Priority 2 issues show a strong pattern of accessibility being limited by everyday room setup and furnishing choices rather than only by fixed architecture. That means school-level management, not just capital funding, will be important to successful implementation.

19.5 Squannacook Early Childhood Center

Important Squannacook items include signage placement, circulation, parking & exterior access, stairs and level changes, assistive technology, and playgrounds. Representative items include:

- Classroom access and circulation. Resolve barriers created by fixed furnishings, crowded layouts, or poorly placed storage that restrict wheelchair circulation, adult assistance, or quiet/regulation space within classrooms.
- Visitor-facing entry and reception. Address any access issues at main reception, including door force, counter height, and clear space, so individuals with disabilities can independently check in, meet with staff, and participate in early childhood meetings, screenings, and conferences.
- Play areas and early childhood equipment. Prioritize accessible surfacing, routes, and at least some inclusive equipment options in outdoor play and gross-motor areas so that children with mobility or sensory disabilities can participate alongside peers.

This group is prioritized because it determines whether students and households can actually use core programs and services, not just enter the building, including classrooms, student restrooms, cafeteria circulation and seating, play areas, and household-facing spaces.

19.6 Varnum Brook Elementary School

Important Varnum items include signage and wayfinding gaps, obstructed circulation, parking, playground accessibility, entrance mats and thresholds, and storage and reach ranges. Representative items include:

- Library, media, and computer spaces. Ensure that the library/media center and any computer labs have at least some adjustable-height workstations, accessible routes between stacks/tables, and accessible seating that can accommodate wheelchair users and students who need additional support.

- Cafeteria and food service. Address cafeteria line configuration, serving counter heights, payment stations, and seating layouts to ensure that students who use mobility devices or need adult assistance can navigate lines, pay, and sit with peers without being segregated.
- Specialty classrooms (art, music, science, resource rooms). Resolve fixed-height table issues, tight circulation, and inaccessible storage in key specialty rooms, prioritizing spaces where hands-on participation, instruments, or lab work are core to the curriculum.

These items are prioritized next because they directly affect equal participation in educational and student-life activities throughout the school day. The audit identified barriers in the cafeteria, library, auditorium, playgrounds, restrooms, and specialty spaces that can limit access to meals, assemblies, recreation, learning activities, and school events.

20. Priority 3 Findings

Priority 3 items should be addressed in the short-to-mid term, especially when bundled with furniture replacement, renovations, or annual maintenance work.

Examples across the attached schools include:

- Replacement of manual soap, towel, and faucet fixtures with motion-sensor models in many restrooms and shared spaces.
- Provision of adjustable desks and diverse seating options in classrooms, offices, libraries, and teacher work areas.
- Additional adaptive technology in computer labs and libraries.
- Improved acoustics, sensory supports, and adaptive instruments in music and band spaces.
- Reconfigured seating and routes at exterior recreation and spectator areas.

Although these items are not always first-order life-safety barriers, they remain important to equitable daily use and should not be deferred indefinitely. Many of them can be resolved efficiently through furniture replacement cycles, technology refresh schedules, and room-

by-room operational standards.

20.1 School-by-School Prioritization

The following section prioritizes the schools based on the severity and breadth of findings visible in the materials reviewed here.

1. Hawthorne Brook Middle School

Hawthorne Brook should be prioritized first because the findings identify multiple high-severity barriers involving exterior access, stage access, elevator usability, parking access, and key public/event spaces. The combination of inaccessible thresholds, inaccessible stage access, deficient accessible parking, inaccessible routes, and emergency-related issues creates a strong case for first-phase implementation at this campus.

In addition to those high-severity items, Hawthorne Brook also has extensive program-access issues in locker rooms, the auditorium, restrooms, cafeteria wayfinding, and reception communication. The volume and variety of findings suggest that this campus would benefit from a concentrated accessibility project with both capital and operational work streams rather than piecemeal corrections.

2. Nissitissit Middle School

Nissitissit should be prioritized second because the findings affect the main public entry, auditorium access, event and cafeteria access, restrooms, science lab emergency use, and inclusive participation in major public and instructional spaces. The campus also shows a significant concentration of improvements needed for hearing access, automatic doors, restroom usability, and adaptive instructional features.

Nissitissit's profile is especially important because many of its barriers intersect with public-facing uses and student inclusion in shared spaces. Main entry, auditorium, cafeteria, library, and office corrections would likely produce broad practical benefit across school operations and community use.



3. North Middlesex Regional High School

The high school should be prioritized third, with immediate emergency egress work accelerated regardless of campus order, because the missing evacuation chairs and widespread door, signage, and exit-sign issues affect districtwide safety and independent movement. The campus may be especially important for after-hours public use, large gatherings, and staff administrative functions, which strengthens the urgency of the emergency and wayfinding corrections.

The high school also appears to have extensive recurring condition issues that are ideal for districtwide systems work, such as signage standardization and door-force adjustment. For that reason, the school can serve as a pilot site for recurring maintenance protocols even while larger emergency items are being addressed immediately.

4. Spaulding Memorial School

Spaulding should be prioritized fourth among the fully excerpted facilities because many issues appear lower-cost and operationally solvable, though several should still be addressed immediately, especially trip hazards, lunch-line egress, modified technology access, and restroom/signage corrections. Spaulding's findings make it a good candidate for a fast operational compliance package that can be completed while larger capital work proceeds elsewhere.

Spaulding should not be understood as low importance. Rather, the reviewed findings suggest that the school may achieve meaningful early compliance gains through prompt correction of clutter, signage, and furniture-access issues.

5. Squannacook Early Childhood Center

Squannacook should be prioritized fifth, with key drivers of safety, route continuity, equitable access to daily student spaces, and communication access. The highest-priority actions focus on barriers that create immediate tripping hazards, restrict accessible emergency egress, or disrupt essential circulation through the building. These include



securing or removing rugs and mats, adding transition strips at floor changes, addressing inaccessible exits at classrooms, the cafeteria, and gym, maintaining clear 36-inch routes, repairing stair conditions, and ensuring modified technology and captioning access.

Squannocook is not low priority; rather, it presents opportunities for meaningful compliance gains by addressing barriers that affect routine use by many occupants. Early actions should also include improving accessible parking and entry routes, correcting signage and restroom conditions, enhancing cafeteria seating choice, and upgrading playground accessibility. Additional improvements such as lighting, acoustics, and flexible furnishings can follow as part of a broader usability enhancement effort.

6. Varnum Brook Elementary School

Varnum Brook should be prioritized sixth, guided by four core access goals: an independent, accessible main entry; equitable participation in shared programs; safe circulation; and effective communication. The highest-priority actions address barriers that limit independent entry, create tripping or egress risks, or restrict access to key areas such as the front office, cafeteria, playground, auditorium, and primary routes. These include adding automatic door openers, stabilizing the entrance route, providing assistive listening in key spaces, securing rugs and mats, correcting obstructed signage and narrowing exits, improving stair and elevator conditions, addressing safety hazards, and ensuring consistent captioning and communication supports.

Varnum Brook is not low priority; it presents clear opportunities for meaningful compliance gains once critical issues are addressed. Next steps should focus on improving parking and entry access, wayfinding, restroom usability, and equitable seating and storage access. Additional enhancements—such as lighting, fixtures, quiet room configuration, and flexible support spaces—can follow as part of longer-term upgrades that strengthen overall usability across the school.

21. Campus Narratives

Hawthorne Brook Middle School Narrative

The findings portray Hawthorne Brook as a campus where exterior circulation, event access, and specialized spaces present the strongest barriers. High-priority thresholds at gym doors, inaccessible stage access, deficient parking and route connections, and elevator communication issues together indicate that independent use of key school functions is limited for some users.

The school also shows program-access issues in locker rooms, auditorium seating, hearing assistance, music rooms, band areas, and classroom support spaces. Many of these findings affect participation quality, not just technical code dimensions, which means corrective work should be planned with both facilities staff and educational program leaders.

Nissitissit Middle School Narrative

Nissitissit's audits show a school with many positive elements but recurring barriers at public entries, auditorium access points, restrooms, classrooms, library spaces, and fitness areas. The campus appears especially in need of automatic door operators, hearing access supports, signage correction, and program adaptations that support students using mobility devices or adaptive equipment.

The school also reflects a broader accessibility pattern relevant to district policy: many barriers are created by layout, stored materials, signage placement, or information format choices rather than major construction alone. This makes Nissitissit a strong case study for how operational practices and facility corrections must work together.

North Middlesex Regional High School Narrative

The high school findings emphasize emergency preparedness, independent circulation, and accessibility consistency across a large building. Missing evacuation chairs, widespread door-force issues, low-illumination exit signs, and signage inconsistency create a system-



level concern rather than a single isolated defect.

The school also contains important staff and instructional access issues, including break room usability, adjustable workstations, restroom sign and grab-bar issues, and science room access details. The building likely supports both student and administrative functions, accessibility upgrades there will have broad district significance.

Spaulding Memorial School Narrative

Spaulding Memorial exhibits recurring access issues tied to route safety, furniture choices, clutter, signage consistency, cafeteria usability, and accessible technology availability. The findings suggest that school-level space management and procurement decisions strongly influence the user experience at this campus.

The campus also illustrates how seemingly modest barriers can have outsized effects. A narrowed lunch-line exit, unsecured rugs, inaccessible hooks or signs, and lack of modified technology each limit independence in ways that are practical and immediate for students and staff.

Squannocook Early Childhood Center Narrative

Squannocook Early Childhood Center reflects a campus with several positive access features, including a step-free main entrance, accessible parking, and an elevator that supports circulation between levels, but it also shows recurring access challenges tied to arrival safety, route continuity, classroom and restroom usability, signage, and communication access.

The findings demonstrate how everyday barriers, such as poorly located or marked accessible parking, missing crosswalks and uneven surfaces, unsecured rugs and flooring transitions, incomplete emergency egress routes, inconsistent signage, and limited assistive technology, can significantly affect independence and safety, particularly for young students who rely on clear, predictable environments. Together, these conditions highlight how site management, equipment choices, and incremental facility decisions shape the



day-to-day accessibility experience at the school.

Varnum Brook Elementary School Narrative

Varnum Brook Elementary School reflects a campus with widespread accessibility needs affecting arrival, entry, shared student spaces, restrooms, recreation areas, and communication access, even as it provides some usable features like an elevator, varied lobby seating, and limited accessible routes to key areas.

The findings show how highly visible barriers, such as inaccessible entry doors, uneven exterior routes, lack of assistive listening, non-inclusive playgrounds, constrained cafeteria layouts, and unsafe or inaccessible auditorium seating and stage access, directly limit daily participation for students, staff, and households. These conditions, along with recurring issues like obstructed fixtures, inconsistent signage, inaccessible equipment, and clutter-related hazards, underscore how operational practices, furnishing decisions, and communication systems strongly shape the overall accessibility experience at the school.

22. Cross-Campus Prioritization

School	Most critical themes	Why priority is elevated	Primary implementation mode
Hawthorne Brook Middle School	Exterior access, stage access, elevator usability, parking, auditorium conditions.	Multiple high-severity route and assembly barriers affecting public use and core school functions.	Capital + operational + communications.

Nissitissit Middle School	Main entry, auditorium access, hearing access, restroom usability, cafeteria and library access.	High concentration of public-facing and student-participation barriers.	Capital + program access + equipment.
North Middlesex Regional High School	Emergency egress, signage, door force, exit visibility, staff/instructional access.	Immediate emergency concerns with districtwide systems implications.	Emergency action + maintenance system + phased upgrades.
Spaulding Memorial School	Route safety, signage, cafeteria egress, accessible technology, restroom usability	Many low-cost issues with immediate usability benefit if corrected promptly	Operation correction + targeted upgrades
Squannocook Early Childhood Learning Center	Safe arrival and circulation; classroom and restroom usability; access to shared program space; communication and wayfinding	Level changes, unstable surfaces, and inaccessible exits create heightened safety and egress risks in Pre-K settings	Combined approach; immediate operational fixes, targeted equipment purchase, and phased capital projects
Varnum Brook Elementary School	Inaccessible / unsafe entry conditions; barriers in shared student spaces (cafeteria, playground);	Barriers occur at both public-facing entry and central program area used daily for meals,	Mixed strategy: facilities work (entrance, routes), procurement standards, and

	restroom and signage issues; communication access	assemblies, and restroom use	strengthened daily operation controls
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23. Implementation Plan Schedule

The implementation schedule is needed because the audits reveal a mix of life-safety issues, high-impact access barriers, and lower-cost operational fixes that cannot realistically be addressed all at once yet also cannot be left to ad hoc decision-making. Without a phased schedule, urgent corrections such as inaccessible thresholds, missing evacuation chairs, heavy or dragging doors, blocked eyewash stations, and misleading accessibility signage would compete directly with larger capital projects like platform lifts, restroom reconfigurations, and locker room upgrades, increasing the risk that high-risk barriers remain in place longer than necessary. A structured implementation sequence allows the district to remove immediate hazards and restore basic independent access quickly, while still planning and funding larger projects that require design, permitting, and coordination with the broader capital program.

The schedule is also critical for governance, budgeting, and accountability, because it translates hundreds of discrete findings into a coherent work program that can be monitored, reported, and adjusted over time. By grouping actions into immediate, short-term, mid-term, and long-term phases, NMRSD can align maintenance and capital dollars with the severity and reach of each barrier, bundle similar fixes across campuses (for example, signage, door hardware, or assistive listening systems), and set clear expectations for principals, facilities staff, and the School Committee about what will be done and when. This approach reduces the likelihood that individual schools are left to resolve complex ADA issues on their own and helps ensure that improvements in access to entries, restrooms,

classrooms, cafeterias, auditoriums, and emergency routes are implemented systematically rather than opportunistically

23.1 Phase 1: Immediate Actions, 1 to 2 year

This phase should focus on low-cost or high-risk corrections that can be completed quickly.

- Remove or secure rugs, stored items, carts, and other obstructions affecting routes, exits, eyewash stations, and restroom access.
- Lower or relocate signs that are too high, blocked, inaccurate, or missing at critical rooms and restrooms.
- Adjust door hardware where feasible to reduce opening force and eliminate dragging doors.
- Install temporary operational supports for inaccessible stages, events, and public entries while permanent construction is underway.
- Install or procure evacuation chairs and train staff in their use.
- Remove false or misleading accessibility designations and direct users to the nearest compliant route or restroom pending upgrades.
- Public Entry, life safety, and high-use shared spaces. This includes automatic door operators at the main entrances, removing tripping hazards from rugs and wires, relocating restroom rules and signs that cover braille, and standardizing use of captions and other communication supports in common areas
- Accessible parking restriping and relocation adjustments as needed, crosswalks and curb-ramp improvements, installation of assistive listening at the main office and other communication-intensive spaces

23.2 Phase 2: Short-Term Actions, 4 to 6 years

This phase should address moderate capital items and districtwide operational standards.



- Install automatic door operators at the highest-priority public, auditorium, cafeteria, and library entries.
- Correct accessible parking layouts, signage, and route connections where identified.
- Standardize signage districtwide using a unified inventory and replacement program.
- Install induction loops or equivalent hearing access systems at selected offices, entries, libraries, and assembly spaces.
- Provide accessible seating and workstation adjustments in cafeterias, classrooms, libraries, and staff work areas.
- Address broader modernization items and reoccurring conditions, such as , motion-sensor restroom and sink fixtures, automatic shades, quiet-room and specialty-room reconfiguration, improved accessible storage systems, additional adaptive furnishings, and any larger auditorium, stair, or restroom modifications not resolved earlier.
- Permanent exterior route corrections at classroom and cafeteria exits, elevator communication improvements such as audible chimes, and playground resurfacing

23.3 Phase 3: Mid-Term Actions, 6 to 8 years

This phase should address larger space modifications.

- Reconfigure restrooms, locker rooms, showers, and related support spaces where accessibility is structurally limited.
 - Add platform lifts or other permanent stage access solutions where needed.
 - Reconfigure auditorium seating, gym seating, locker rooms, and weight rooms for broader program access.
 - Upgrade elevators, communication systems, and emergency device placement where major work is needed.
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23.4 Phase 4: Long-Term Actions, 8 to 10 Years

This phase should integrate major projects into district capital planning.

- Include accessibility upgrades in all major renovation, flooring, lighting, and doorway modernization projects.
- Upgrade older assembly, athletic, and exterior recreation areas for full inclusive participation.

23.5 Implementation Plan Overview

To make the implementation schedule operational, every finding should be logged with a standard action format. The district's action register should include school, specific location, barrier description, user impact, interim measure, recommended correction, responsible party, budget range, funding source, target date, and status.

A practical action hierarchy is:

1. Remove life-safety or route obstruction hazards immediately.
2. Correct inaccurate accessibility information and missing wayfinding.
3. Restore independent access at primary public entries and high-use doors.
4. Correct restroom and locker room conditions that prevent basic use.
5. Address hearing access and communication barriers in public spaces.
6. Expand inclusive participation in instructional, library, cafeteria, stage, and athletic programs.

The district should also flag "repeat condition" findings that occur across multiple schools. Repeat conditions are useful because they can often be solved through one district standard rather than multiple custom solutions.

24. Funding and Budget Strategy

The audits include budgeting ranges for many findings, which means the district already has



a starting point for phased cost planning. Those ranges should be translated into a district capital and operational funding strategy that distinguishes between immediate low-cost work, moderate retrofit work, and larger multi-year projects.

A practical funding framework should separate actions into the following bands:

- Immediate operational fixes, such as sign relocation, clutter removal, hook lowering, furniture rearrangement, and route clearing.
- Moderate maintenance projects, such as door hardware adjustment, sign replacement, dispenser relocation, fixture replacement, and workstation modifications.
- Equipment purchases, such as induction loops, evacuation chairs, adjustable desks, adaptive keyboards, or accessible seating.
- Capital improvements, such as platform lifts, parking and route reconstruction, shower upgrades, major restroom changes, and entry automation.

The district should assign a probable funding source to each action item, such as maintenance budget, school operating budget, district capital plan, technology budget, emergency preparedness budget, or future bond/renovation project. This structure will make the transition plan more useful to finance staff and district leadership because it links findings to realistic implementation pathways.

25. Procurement Standards

The facility findings show that many accessibility barriers are reinforced by procurement choices, particularly in furniture, technology, signs, fixtures, audio systems, and instructional equipment. For example, fixed-height desks, uniform seating, inaccessible computer stations, non-adjustable music stands, inaccessible microwaves, and manual communication systems appear across more than one school.

The district should adopt procurement standards requiring accessibility review before purchasing:



- Classroom desks and teacher workstations.
- Library and computer-lab furniture.
- Auditorium and reception communication systems.
- Restroom accessories and fixtures.
- Seating for cafeterias, break rooms, hallways, and auditoriums.
- Music, science, fitness, and adaptive instructional equipment.

Procurement review should involve the requesting department, facilities staff where installation is relevant, and the district's accessibility or Section 504 leadership. This step can prevent the district from replacing one barrier with another during routine refresh cycles.

26. Effective Communication

The audits reveal a recurring communication-access problem at public counters, auditoriums, libraries, and entries where hearing assistance or other communication supports are missing. Effective communication should therefore be addressed as a district standard, not merely a building preference.

District procedures should cover:

- Permanent or portable assistive listening at auditoriums, libraries, public counters, and large meeting areas.
 - Captioning expectations for displayed media and school event presentations where appropriate, supported by audit recommendations for closed captioning and multi-modal information.
 - Alternative formats for public notices, schedules, cafeteria information, and student resource materials.
 - Intake and sign-in systems that are accessible to people who cannot easily complete paper forms or communicate through glass barriers.
- 

The district should also define event-access procedures that require staff to plan for interpreters, CART, assistive listening, accessible seating, route verification, and accommodation requests in advance of major public events. These procedures are especially important for concerts, public hearings, open houses, athletic events, and graduation-related activities.

27. Digital and Information Access

The district's public accessibility statement provides a useful starting point for digital access governance. The audits show that many information barriers arise when key materials are available only in print, when room uses change without sign updates, or when users are expected to rely on inaccessible or unclear posted information.

The district should adopt standards for:

- Accessible PDFs, Word documents, and slide materials shared with households and staff.
- Digital availability of school schedules, cafeteria information, event details, and student resource notices through QR codes or accessible web pages.
- Captions on audiovisual content used in instructional or public-facing contexts were indicated by the audits.
- Accessible electronic forms and sign-in tools for front office and student support uses.

Although this transition plan is primarily driven by facility audits, the recurring recommendations for digital schedules, tablets, QR codes, captions, and accessible information show that information access is already a practical part of the district's ADA risk profile. That work should be integrated into the transition plan rather than handled separately.

28. Training Program

The findings show that many barriers could reappear if staff are not trained on daily accessibility practices. A district training program should therefore accompany physical corrections.



Recommended audiences and topics include:

- Principals and school leaders, covering event access, complaint response, room assignment, and emergency access responsibilities.
- Buildings and Grounds staff, covering signage placement, door-force checks, route maintenance, restroom inspections, and corrective action logging.
- Front office staff, covering effective communication, sign-in accessibility, alternative formats, and accommodation intake.
- Teachers and support staff, covering classroom layout, storage placement, accessible instructional materials, captions, and adaptive technology supports.
- Food service, athletics, and event staff, covering accessible seating, route setup, service counter access, and event communication supports.
- Safety and emergency teams, covering evacuation chairs, route clearance, eyewash access, posted emergency information, and alarm/exit visibility monitoring.

Training should recur annually and whenever major staff roles change. The district should also incorporate accessibility checks into principal walkthroughs and maintenance inspections, so training is reinforced by routine oversight.

29. Administrative Responsibilities

District implementation should be coordinated through a formal ADA Transition Plan management team led by district administration in coordination with the Section 504 Coordinator and Buildings and Grounds. School principals, special education leadership, communications staff, technology staff, facilities personnel, and School Committee leadership should each have defined implementation roles tied to the actions in this plan.

At minimum, the district should assign responsibility for:

- Capital projects and maintenance work orders.
 - Policy revision and formal adoption.
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- Event accessibility and effective communication.
- Digital accessibility and alternative format information.
- Annual plan updates, complaint tracking, and progress reporting.

30. Recommended Governance Structure

A formal structure should include:

- A district ADA/504 steering group that meets quarterly.
- A facilities implementation lead within Buildings and Grounds.
- A school-level accessibility liaison at each campus.
- A communications and digital-access lead.
- A data/reporting owner responsible for the action register and annual status updates.

The district should also define escalation rules for unresolved barriers, especially where immediate safety or public-access concerns exist. Issues such as blocked eyewash access, missing evacuation equipment, inaccessible public entries, or misleading accessibility signage should move rapidly from school-level observation to district-level action.

31. Monitoring and Annual Updates

This plan should operate as a living document. The district should maintain a corrective action register that logs each barrier, school location, responsible party, cost range, interim measure, target completion date, and status.

Annual updates should report on completed items, revised schedules, expenditures, policy updates, training delivered, new barriers identified, and any additional findings from schools not fully synthesized in this first version of the plan.

31.1 Monitoring Metrics

The district should track at least the following metrics:

- Number of Priority 1 items completed by school.
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- Number of door-force corrections completed.
- Number of signs corrected or replaced under the district signage program.
- Number of hearing access systems installed or deployed.
- Number of restrooms and locker rooms brought into operational compliance.
- Number of staff trained in evacuation-chair use and emergency accessibility procedures.
- Number of campuses with current event-access and public-information checklists in active use.

Quarterly internal reporting is recommended even if public reporting occurs annually. More frequent internal monitoring will help the district keep operational barriers from reappearing between annual updates.

32. Risk Considerations

The audits indicate several risk themes that should inform district prioritization. These include emergency egress limitations, inaccurate accessibility messaging, inaccessible public entries, restroom usability failures, inaccessible assembly participation, and instructional participation barriers.

Risk should be evaluated through multiple lenses:

- Safety risk, such as tripping hazards, blocked emergency fixtures, and missing evacuation equipment.
 - Civil-rights risk, such as inaccessible public meetings, inaccessible stages, or inaccessible core student spaces.
 - Reputation and trust risk, such as signs indicating accessibility where actual use is limited.
 - Operational risk, such as repeated dependence on manual staff intervention because doors, signs, or service systems are not independently usable.
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By documenting risk alongside cost and timing, the district can better justify accelerated work on certain projects that might otherwise appear deferrable. The findings provide multiple examples where low-cost corrections could produce meaningful risk reduction quickly.

33. Community Engagement

Community engagement started with the development of several surveys that reach out to administrators, staff and household members/caregivers. A summary of the survey findings can be found in the North Middlesex Regional Schools Survey Summary Report. The transition plan will be stronger if the district supplements consultant findings with ongoing feedback from students with disabilities, parents and guardians, employees, and community users of school facilities. This is especially relevant for auditoriums, cafeterias, athletic spaces, office counters, and after-hours public events where user experience may reveal barriers not captured fully in static reports.

Recommended engagement methods include:

- Focus groups with students and households connected to the reviewed schools.
- Staff feedback sessions for building-level operational issues such as storage, route clearance, signage, and fixture access.
- A public accessibility comment process linked to the district website and facility use materials.
- Annual review of transition-plan progress with a summary open to community comment.

Community engagement should not replace technical analysis, but it can help the district prioritize the barriers that most directly affect lived experience. It also supports transparency and confidence in the district's implementation process.

The audits indicate that many of the most important accessibility improvements are not isolated to one campus, but recur across NMRSD facilities in the form of doorway access



barriers, inconsistent signage, restroom detail deficiencies, limited hearing access, and gaps in accessible furnishings and equipment. For that reason, the District should treat implementation not only as a series of site-specific fixes, but also as a districtwide modernization effort that establishes consistent accessibility expectations for all schools and all major program areas. These recommendations are intended to help NMRSD move from individual findings to a coordinated access strategy that improves safety, communication, independence, and equal participation for students, staff, households, and visitors with disabilities. By combining immediate barrier removal with standardized specifications, staff training, and ongoing monitoring, the District can make measurable progress toward sustained program access and stronger ADA implementation over time.

34. Recommendations

This plan indicates that many of the most important accessibility improvements are not isolated to one campus, but recur across NMRSD facilities in the form of doorway access barriers, inconsistent signage, restroom detail deficiencies, limited hearing access, and gaps in accessible furnishings and equipment. For that reason, the District should treat implementation not only as a series of site-specific fixes, but also as a districtwide modernization effort that establishes consistent accessibility expectations for all schools and all major program areas.

These recommendations are intended to help NMRSD move from individual findings to a coordinated access strategy that improves safety, communication, independence, and equal participation for students, staff, households, and visitors with disabilities. By combining immediate barrier removal with standardized specifications, staff training, and ongoing monitoring, the District can make measurable progress toward sustained program access and stronger ADA implementation over time.

- Prioritize districtwide correction of high-use entry barriers by installing automatic door operators or reducing door opening force at main entrances, auditorium entries, gym connections, library entrances, and other heavily used public-facing doorways

so students, staff, and visitors can move independently through core program spaces.

- Standardize all tactile and directional signage across the district by relocating signs to visible latch-side locations, mounting them at accessible height, improving color contrast, updating room identification where current use has changed, and ensuring braille remains readable and unobstructed.
 - Implement a districtwide restroom improvement package that focuses first on repeated low- to moderate-cost corrections, including vertical grab bars, accessible stall identification, corrected signage placement, motion-sensor soap or faucet fixtures where needed, accessible reach ranges, and removal of obstructions that interfere with sink use, mirrors, or emergency access.
 - Improve access to performance, assembly, and event spaces by ensuring accessible routes to stages remain clear, adding or upgrading lifts where no accessible stage access exists, identifying dispersed accessible seating, improving step-edge contrast and handrails, and installing or expanding assistive listening systems in auditoriums and presentation spaces.
 - Expand hearing-access infrastructure beyond the auditorium by adding induction loops or assistive listening coverage at reception areas, conference rooms, libraries, and other communication-intensive spaces, paired with clear signage explaining availability, device location, and staff responsibility for distribution and maintenance.
 - Adopt inclusive furniture and equipment standards for classrooms, libraries, labs, music rooms, art rooms, offices, and athletic spaces so each school consistently provides seating with and without arms, height-adjustable workstations, accessible technology stations, adaptive instructional tools, and clear floor space for maneuvering.
 - Address science, art, career-technical, and physical education access through
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targeted program modifications, including reachable storage, accessible lab stations, accessible or adaptive equipment, unobstructed eyewash and safety equipment, accessible lockers, adaptive fitness equipment, and instructional materials available in multiple formats.

- Improve main office, student services, and nurse spaces by strengthening accessible communication and privacy features, including induction loops or amplified communication tools, accessible sign-in methods, adjustable desks or exam equipment where needed, and seating options that support varied mobility needs.
- Establish an operations and maintenance protocol requiring staff to keep accessible routes, stage entries, eyewash stations, reception areas, and designated accessible seating free of stored items, loose rugs, furniture encroachments, and temporary fixes that reduce safe passage.
- Integrate accessibility into capital planning and procurement by requiring that future renovations, furniture purchases, signage packages, security upgrades, and technology replacements conform to the district's accessibility standards rather than reproducing the same barriers identified in the audits.
- Create a recurring monitoring process in which the District updates the barrier inventory annually, verifies completion of corrective actions, tests assistive listening systems and automatic doors, and reviews whether policy and facility improvements are producing consistent program access across all schools.
- Provide annual training for administrators, facilities staff, front office staff, custodial teams, and event personnel on accessible door operation, effective communication, assistive listening distribution, furniture placement, accessible route maintenance, and the importance of preserving accessibility features after installation.

Conclusion

This plan shows that NMRSD has both a workable compliance foundation and a clear need for a coordinated districtwide ADA transition plan.

The most urgent work involves public and emergency access, accessible routes, signage, door operation, assembly access, restroom usability, and equitable participation in instruction and school life.

A successful implementation strategy should not treat the audit reports as isolated building documents. The district should use them as one systemwide dataset to drive immediate corrections, focused policy revision, capital planning, staff training, and annual accountability across all schools. With that approach, NMRSD can move from a collection of findings to a practical and measurable accessibility program that improves access for students, staff, households, and community members across the district.

This expanded transition plan is intended to support that next step. It provides a fuller administrative and implementation structure so the district can connect audited findings to policy action, campus sequencing, budget planning, equipment purchasing, staff training, and annual public accountability.

Appendix I: Glossary of Terms

Glossary of Terms

Accessible Route

A continuous, unobstructed path that connects all accessible elements and spaces on a site or within a building, such as parking, entrances, classrooms, restrooms, and assembly areas.

Accommodation

A change or adjustment that enables a person with a disability to participate in a program, service, activity, or employment setting on an equal basis without fundamentally altering that program or lowering essential standards.

ADA (Americans with Disabilities Act)

A federal civil rights law prohibiting discrimination against individuals with disabilities in employment (Title I), state and local government services (Title II), public accommodations (Title III), telecommunications (Title IV), and related areas.

ADA Coordinator

The individual designated by the District to coordinate ADA compliance activities, respond to ADA-related inquiries, and oversee the resolution of complaints and requests for reasonable modifications.

ADA Self-Evaluation

A systematic review of a public entity's policies, practices, and procedures to identify and correct rules, methods, or customs that may discriminate against individuals with disabilities, as required under Title II of the ADA.

ADA Transition Plan

A planning document required under Title II of the ADA that identifies physical and communication barriers in existing facilities, describes the methods and schedule for removing those barriers, and assigns responsibility for implementation.

Administrative Policy Barrier

A barrier created by policies, procedures, or practices (for example, absence of a communication access policy) that limits access for individuals with disabilities, even when the physical environment is compliant.

Alternate Format

A format that makes information accessible to people who cannot use standard print, such as large print, braille, audio, accessible PDF, or screen-reader-friendly digital documents.

Assembly Area

A space where people gather for school programs or events, such as auditoriums, cafeteriums, gymnasiums, stadiums, or performance spaces.

Assistive Listening System (ALS)

An amplification system—such as an induction loop, FM system, or infrared system—that transmits sound directly to hearing aids, cochlear implants, or receivers to improve speech clarity in large or noisy spaces.

Barrier

Any physical, communication, policy, or programmatic condition that limits or prevents equal access for people with disabilities.

Barrier Removal

Actions taken to eliminate barriers to access, such as adding ramps, adjusting door hardware, re-stripping parking, revising policies, or adding auxiliary aids and services.

Braille Signage

Tactile signs that include raised characters and braille, typically mounted at a consistent



height and location next to doors, to support wayfinding for people who are blind or have low vision.

Capital Improvement Plan (CIP)

The District's long-range plan for major facility investments, such as renovations and new construction, which can be used to integrate and fund larger ADA barrier-removal projects.

Communication Access

Ensuring that information and interactions are accessible through methods such as captioning, sign language interpreters, assistive listening systems, plain language, and accessible digital content.

DCAP (District Curriculum Accommodation Plan)

A District-wide framework describing how general education programs will be adapted to meet diverse learner needs, including practices and supports that may complement, but do not replace, ADA and Section 504 obligations.

Digital Accessibility

Design and remediation practices that ensure websites, online platforms, documents, learning management systems, and multimedia can be used by people with disabilities, often guided by the Web Content Accessibility Guidelines (WCAG).

Effective Communication

An ADA standard requiring public entities to provide auxiliary aids and services, and to adjust communication methods as needed, to ensure that people with disabilities can communicate and receive information as effectively as others.

Facility Audit (Accessibility Survey)

A systematic on-site assessment of school buildings, grounds, and routes that identifies barriers to access and documents recommended corrective actions, cost ranges, and priorities.



Findings

Individual barriers or conditions identified during the facility or policy audits, typically documented with a location, description, code reference, recommended fix, and priority level.

Horizontal and Vertical Grab Bars

Support bars installed in restrooms and showers to assist with balance and transfers; proper location, length, and mounting height are specified by ADA Standards.

IDEA (Individuals with Disabilities Education Act)

Federal law ensuring special education and related services for eligible students with disabilities, including requirements for IEPs and transition services.

IEP (Individualized Education Program)

A written plan developed under IDEA that describes the specialized instruction, related services, and transition services a student with a disability will receive to support progress and post-secondary goals.

NMRSD (North Middlesex Regional School District)

The regional public school district serving Ashby, Pepperell, and Townsend, Massachusetts.

Program Access

The ADA requirement that, when viewed in its entirety, a public entity's services, programs, and activities must be readily accessible to and usable by individuals with disabilities, even if every individual facility is not fully compliant.

Program Relocation / Programmatic Solution

A strategy for achieving program access by relocating a service, class, or activity to an accessible location rather than immediately modifying the original space, when appropriate and non-discriminatory.

Reasonable Modification (Reasonable Accommodation)

A change to policies, practices, or procedures that is necessary to avoid discrimination on



the basis of disability, unless it would fundamentally alter the nature of a service, program, or activity.

Restroom Accessibility

The set of features—such as maneuvering clearances, fixture heights, grab bars, signage, and turning space—that must work together to provide usable restroom access for people with disabilities.

Section 504 (of the Rehabilitation Act of 1973)

A federal civil rights law that prohibits disability discrimination in any program or activity receiving federal financial assistance, including school districts.

Section 504 Plan

A written plan describing the accommodations and services a student with a disability needs to access general education programs under Section 504, distinct from an IEP under IDEA.

Secondary Transition (Special Education)

The coordinated set of activities, beginning no later than age 14 in Massachusetts, that supports a student's movement from school to post-school activities such as college, employment, and independent living.

Stakeholder Engagement

Intentional outreach to students, families, staff, and community members—including people with disabilities—to inform, review, and refine ADA Transition Plan priorities and implementation strategies.

Structured Prioritization

The use of criteria such as life-safety, program impact, feasibility, cost, and equity to sequence barrier-removal projects over time.



Title II (ADA)

The portion of the ADA that applies to state and local governments, including public school districts, covering all services, programs, and activities they operate.

Universal Design

An approach to planning and design that aims to create environments, programs, and materials usable by all people, to the greatest extent possible, without the need for individual accommodations.

Wayfinding

The system of signs, markings, and environmental cues that help people navigate facilities; in the ADA context, this includes accessible signage placement, tactile and braille signs, visual contrast, and clear routes.





