



# ADA TITLE II ASSESSMENT



Prepared for:

**Montgomery County Public Schools**  
45 West Gude Drive, Suite 4100  
Rockville, Maryland 20850

## ADA TITLE II ASSESSMENT

Lake Seneca Elementary School  
13600 Wanegarden Drive  
Germantown, Maryland 20874

### PREPARED BY:

EMG  
10461 Mill Run Circle, Suite 1100  
Owings Mills, Maryland 21117  
800.733.0660  
[www.EMGcorp.com](http://www.EMGcorp.com)

### EMG CONTACT:

Michael Nelson  
Program Manager  
800.733.0660 x6244  
[mnelson@emgcorp.com](mailto:mnelson@emgcorp.com)

**EMG Project Number:**

123821.17R000-132.303

**Date of Report:**

October 28, 2019

**On Site Date:**

May 25, 2018



# 1 Accessibility

Generally, Title II of the Americans with Disabilities Act (ADA) prohibits discrimination by entities to access and use of the government entity's programs, services, and facilities on the basis of disability. Regardless of their age, these areas and facilities must be maintained and operated to comply with the Americans with Disabilities Act Accessibility Guidelines (ADAAG), and applicable state and local accessibility regulations.

Buildings completed and occupied after January 26, 1992 are required to comply fully with ADAAG. Existing facilities constructed prior to this date are held to the lesser standard of complying to the extent allowed by structural feasibility and the financial resources available, or a reasonable accommodation must be made. The ADA guidelines were clarified and amended in 2010 based on a clarification by the Department of Justice known as the "2011 Site Construction Tolerances Addendum to the 2010 ADA Standards for Accessible Design." The aforementioned document defines the acceptable and allowed construction tolerances above or below the requirements established in the 2010 ADA Standards for barriers related to:

- Accessible Parking
- Pedestrian Path of Travel
- Building Entrances
- Interior Spaces

The scope of the ADA Assessment, as defined in the scope of work, is limited to exterior and interior areas covered by the ADA.

Based on the onsite review, EMG found that barriers to accessibility exist at the Lake Seneca Elementary School. The observed elements were analyzed using the 2010 ADA Standards for Accessible Design and state accessibility codes.

## 1.1 Accessibility Summary Table

Based on the onsite review, EMG found that barriers to accessibility exist at the Lake Seneca Elementary School. The observed elements were analyzed using the 2010 ADA Standards for Accessible Design and state accessibility codes.

EMG's assessment of the subject property identified the following areas of concern:

Facility / Building	Priority 1 Items	Priority 2 Items	Priority 3 Items	Priority 4 Items	Priority 5 Items	Total Items
Lake Seneca Elementary School	34	14	32	6	1	87
Grand Total	34	14	32	6	1	87

## 1.2 Barrier Summary Table

The following table summarizes the barriers that were identified. The costs provided are order of magnitude estimates. Costs will vary depending upon the location and volume of work performed. Individual observation details may be found in Appendix A.

Id	Facility	Building	Assembly	Type	Barrier Priority	Detail	Location Description	ADA
107046	Lake Seneca Elementary School	ATHLETIC FIELDS	Exterior Access Route	Exterior Accessible Route	1	A compliant accessible route is not provided from the public access to the amenity.	Baseball, Softball and Soccer Fields	ADA
107233	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Stairs	1	Handrails are not compliant.	Exterior Stair - STR2	ADA
107237	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Stairs	1	Handrails are not compliant.	Exterior Stair - STR3	ADA
107240	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp has a running slope in excess of 1:12 (8.33%) and/or cross slope in excess of 1:48 (2.08%).	Exterior Ramp - R2	ADA
106986	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	The accessible route has cross slopes greater than 1:20 (5%).	Accessible route AR1	ADA
107298	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Stairs	1	The stair treads and edge of top landing do not have visual contrast on the leading edge.	Stair - STR3	ADA
107299	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Stairs	1	Handrail extensions are not compliant.	Stair - STR4	ADA
107300	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Stairs	1	Handrails are not compliant.	Stair - STR3	ADA
108824	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp is required but not provided.	Ramp R-A; along accessible route from parking lot to the play fields at the lower level adjacent to STR4	ADA
108825	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp has a rise greater than 6"; however, handrails are not provided.	Ramp R-A; along accessible route from parking lot to the play fields at the lower level adjacent to STR4	ADA
106987	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	The accessible route has cross slopes greater than 1:50 (2%).	Accessible route AR2	ADA
107002	Lake Seneca Elementary School	EXTERIOR	Entrance to Building	Building Entrance-Door	1	The maneuvering clearance at the accessible door is not level and clear.	Entrance Door - DR20	ADA
107003	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Loading/Unloading Zone	1	A compliant accessible route is not provided from the passenger loading/unloading zone to the public facility entrance.	Bus loading/unloading zone	ADA
107012	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	The accessible route has areas of vertical level changes in excess of 1/4" that are not beveled or ramped.	Entrance - DR14	ADA
107015	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Stairs	1	Handrail extensions are not compliant.	Stair - STR4	ADA
107016	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Stairs	1	The stair treads and edge of top landing do not have visual contrast on the leading edge.	Stair - STR4	ADA
107103	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Curb Ramp	1	The curb ramp does not meet the slope requirements.	Curb Ramp - CR4	ADA
107105	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Curb Ramp	1	The curb ramp landing is not level. The slope of the curb ramp landing exceeds the maximum allowable 1:48 (2.08%).	Curb Ramp - CR1 Landing	ADA
107106	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Curb Ramp	1	The adjacent surfaces at transitions to adjoining walks, gutters and streets at the curb ramp are not at the same level.	Curb Ramp - CR4	ADA
107229	Lake Seneca Elementary School	EXTERIOR	Exterior Access Route	Ramp	1	The handrails are not compliant.	Exterior Ramps - R1 and R4	ADA
107028	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Door	1	The opening force required to open the accessible, hinged, non-fire door is more than 5 pounds.	All Interior Classroom Doors	ADA
107029	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Door	1	The hardware at the accessible door (including sliding doors - both sides) requires tight grasping, pinching or twisting of the wrist to operate OR is mounted below 34" or above 48".	All Interior Classroom Doors	ADA
107030	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Door	1	The opening force required to open the accessible, hinged, non-fire door is more than 5 pounds.	All Office Doors	ADA

Id	Facility	Building	Assembly	Type	Barrier Priority	Detail	Location Description	ADA
107032	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Stairs	1	Handrails are not provided.	All Purpose Room - Stage	ADA
107035	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Protruding Object	1	Protruding objects in the 27" to 80" range above finished floor protrude more than 4" into the circulation path along the interior accessible route.	Drinking Fountains - DF1 and DF21	ADA
107120	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Ramp	1	The ramp running slope exceeds 1:12 (8.33%).	Interior Ramp - R1	ADA
107121	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Ramp	1	Handrail heights are not compliant.	Interior Ramp_ R1	ADA
107245	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Door	1	The hardware at the accessible door (including sliding doors - both sides) requires tight grasping, pinching or twisting of the wrist to operate OR is mounted below 34" or above 48".	All Office Doors	ADA
108827	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Door	1	The pull side of the accessible door does not have the required maneuvering clearances.	Drinking Fountain DF1 adjacent to	ADA
108833	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Door	1	The pull side of the accessible door does not have the required maneuvering clearances.	Restroom Door - SR06	ADA
108829	Lake Seneca Elementary School	PARKING LOT	Exterior Access Route	Loading/Unloading Zone	1	The loading/unloading zone is not 96" wide by 20' long with vertical clearance of 114".	Bus Loading and Unloading Area	ADA
107057	Lake Seneca Elementary School	PLAYGROUNDS	Exterior Access Route	Basketball Court	1	An accessible route does not directly connect each side of the court outside the play lines.	Basketball Court	ADA
107062	Lake Seneca Elementary School	PLAYGROUNDS	Exterior Access Route	Exterior Accessible Route	1	A compliant accessible route is not provided from the public access to the amenity.	Picnic table adjacent to the play court area	ADA
107067	Lake Seneca Elementary School	PLAYGROUNDS	Exterior Access Route	Exterior Accessible Route	1	A compliant accessible route is not provided from the public access to the amenity.	Playground PG1 - Bucket Ball	ADA
107045	Lake Seneca Elementary School	ATHLETIC FIELDS	Baseball/Softball Field	Player Seating	2	A wheelchair space is not provided at each team bench area at the sports fields.	Baseball, Softball and Soccer Fields	ADA
107033	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Signage	2	The interior signage does not have compliant visual and tactile characters, with raised or indented characters or symbols.	All Classrooms and Restrooms	ADA
107034	Lake Seneca Elementary School	INTERIOR	Locker and Dressing Rooms	Locker and Dressing Rooms	2	The required number of accessible locker and dressing/fitting rooms are not provided.	Building Services Office	State of Massachusetts
107043	Lake Seneca Elementary School	INTERIOR	Common Areas	Vending Machine	2	The vending machines have operable parts which are not within reach range.	Staff Lounge	ADA
107123	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Signage	2	The interior signage does not have compliant visual and tactile characters, with raised or indented characters or symbols.	All Office and Staff Restrooms	ADA
107226	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Sink	2	The sink rim is higher than 34", and does not have knee and toe clearance (does not apply to mop basins, utility sinks, or bar sinks).	Staff Workroom, Staff Lounges	ADA
107063	Lake Seneca Elementary School	PLAYGROUNDS	Exterior Access Route	Gate	2	The swinging gate does not have a smooth surface within 10" of the ground measured vertically on the push side extending the full width of the gate.	Playground - PG3	ADA
107070	Lake Seneca Elementary School	PLAYGROUNDS	Playground	Ground Surface-Fibar	2	The ground surface has not been inspected and maintained regularly.	Playgrounds - PG1	ADA

Id	Facility	Building	Assembly	Type	Barrier Priority	Detail	Location Description	ADA
107122	Lake Seneca Elementary School	PLAYGROUNDS	Picnic Area	Picnic Table	2	The picnic table does not allow a clear space for forward wheelchair approach with knee and toe clearance.	Playground - PG1	ADA
107125	Lake Seneca Elementary School	PLAYGROUNDS	Playground	Ramp	2	The ramp within the play area connecting ground level components has a running slope steeper than 1:16.	Playground - PG2 Ramp	ADA
107126	Lake Seneca Elementary School	PLAYGROUNDS	Playground	Transfer System	2	The transfer steps are higher than 8" each.	Playground - PG2	ADA
107099	Lake Seneca Elementary School	RESTROOMS	Interior Access Route	Reach Range	2	Items requiring an unobstructed forward reach motion are higher than 48" maximum or lower than 15" minimum height above finish floor.	Student Restrooms - CR03, CR07, CR09 and CR10	ADA
107266	Lake Seneca Elementary School	RESTROOMS	Interior Access Route	Reach Range	2	Items requiring an unobstructed forward reach motion are higher than 48" maximum or lower than 15" minimum height above finish floor.	Public Restroom - SR06	ADA
107086	Lake Seneca Elementary School	RESTROOMS	Interior Access Route	Reach Range	2	Items requiring an unobstructed forward reach motion are higher than 48" maximum or lower than 15" minimum height above finish floor.	Staff Restroom - SR01	ADA
107027	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Signage	3	Means of egress signage is not provided.	All exterior egress doors DR1 to DR20	ADA
107031	Lake Seneca Elementary School	INTERIOR	Common Areas	Assembly Area	3	The assistive listening device is not compliant or is not provided.	All Purpose Room	ADA
107264	Lake Seneca Elementary School	INTERIOR	Employee Work Areas	Locker Rooms-Bench	3	The locker room does not have a compliant bench.	Building Services Office	ADA
107091	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Mirror	3	The bottom of the reflective surface of the mirror is mounted higher than 40".	Student Restrooms - CR03, CR10 and G14	ADA
107093	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The grab bars at the water closet are not compliant.	Student Restrooms - CR03 and CR07	ADA
107094	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Signage	3	The restroom does not have compliant signage at the door with the International Symbol of Accessibility, raised characters, and Braille.	Student Restrooms - CR3, G04, B05, CR07, CR08, CR09, CR10, B13, G14, B15 and G16	ADA
107096	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Lavatory	3	Pipes are not insulated	Student Restrooms - CR07, CR08, CR09, B13 and G14	ADA
107097	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The water closet in a single/user or unisex restroom does not have the required clearance.	Student Restrooms - CR07, CR08 and CR10	ADA
107098	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The flush control is located on the closed side and/or is not within reach range.	Student Restrooms - CR3, CR9 and CR10	ADA
107100	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Toilet Stall	3	A wheelchair stall is not provided in a multi-user restroom.	Student Restrooms - G04, B05, B13, G14, B15 and G16	ADA
107073	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Transfer Shower Stall	3	Grab bars are not provided in the transfer shower stall.	Staff Restrooms - SR01 and SR17	ADA
107074	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Transfer Shower Stall	3	A seat is not provided in the transfer shower stall.	Staff Restrooms - SR01 and SR17	ADA
107075	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Transfer Shower Stall	3	The curb is more than 1/2" high.	Staff Restrooms - SR01 and SR17	ADA
107076	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The flush control is located on the closed side and/or is not within reach range.	Public Restroom - SR06	ADA
107078	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Lavatory	3	Pipes are not insulated	Public Restroom - SR06	ADA
107079	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The height of the water closet is not 17" minimum to 19" maximum above finished floor.	Student Restrooms - CR07	ADA
107082	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Signage	3	The restroom does not have compliant signage at the door with the International Symbol of Accessibility, raised characters, and Braille.	Public Restroom - SR06	ADA

Id	Facility	Building	Assembly	Type	Barrier Priority	Detail	Location Description	ADA
107083	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The height of the water closet is not 17" minimum to 19" maximum above finished floor.	Staff Restrooms - SR01 and SR17	ADA
107085	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Signage	3	The restroom does not have compliant signage at the door with the International Symbol of Accessibility, raised characters, and Braille.	Staff Restrooms - SR01, SR02, M11, W12 and SR17	ADA
107087	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Lavatory	3	Pipes are not insulated	Staff Restrooms - SR01, SR02 and Kitchen Hand Sink	ADA
107089	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Transfer Shower Stall	3	The spray unit does not have a minimum 59" long hose.	Staff Restrooms - SR01 and SR17	ADA
107090	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Lavatory	3	The grab bars at the water closet are not present.	Staff Restrooms - SR01, SR02 and SR17	ADA
107274	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Mirror	3	The bottom of the reflective surface of the mirror is mounted higher than 40".	Staff Restroom - W12	ADA
107276	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The toilet paper dispenser is not at a compliant location.	Student Restrooms - CR03, CR07 and CR08	ADA
107277	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The space between the grab bar and projecting objects below and at the ends of the bar is less than 1 1/2" minimum.	Student Restrooms - CR03, CR07, CR08 and CR10	ADA
107278	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The space between the grab bar and projecting objects above the grab bar is less than 12" minimum.	Student Restroom - CR08	ADA
107279	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The rear grab bar at the water closet is not compliant.	Student Restrooms - CR08 and CR10	ADA
107280	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The space between the grab bar and projecting objects below and at the ends of the bar is less than 1 1/2" minimum.	Staff Restroom - W12	ADA
107281	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The water closet in a single/user or unisex restroom does not have the required clearance.	Student Restrooms - CR07, CR08 and CR10	ADA
107282	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The rear grab bar at the water closet is not compliant.	Student Restrooms - CR08 and CR10	ADA
107283	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The toilet paper dispenser is not at a compliant location.	Public Restroom - SR06	ADA
109207	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The water closet in a single/user or unisex restroom does not have the required clearance.	Student Restrooms - CR03, CR07, CR08, CR09 and CR10	ADA
107036	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Drinking Fountain/Water Cooler	4	The minimum number of drinking fountains is not provided. If the minimum number is provided, two levels or a hi-lo are not provided. If more than 2 are provided, less than 50% are high or less than 50% are low.	Classroom Drinking Fountains - DF2 thru DF8	ADA
107037	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Drinking Fountain/Water Cooler	4	The minimum number of drinking fountains is not provided. If the minimum number is provided, two levels or a hi-lo are not provided. If more than 2 are provided, less than 50% are high or less than 50% are low.	Classroom Drinking Fountains - DF11 thru DF20	ADA
107038	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Drinking Fountain/Water Cooler	4	The location of the spout of the wheelchair height drinking fountain is not compliant.	Classroom Drinking Fountains - DF2 thru DF8	ADA
107257	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Drinking Fountain/Water Cooler	4	The minimum number of drinking fountains is not provided. If the minimum number is provided, two levels or a hi-lo are not provided. If more than 2 are provided, less than 50% are high or less than 50% are low.	Corridor Drinking Fountain - DF1	ADA

Id	Facility	Building	Assembly	Type	Barrier Priority	Detail	Location Description	ADA
107265	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Drinking Fountain/Water Cooler	4	The location of the spout of the wheelchair height drinking fountain is not compliant.	Classroom Drinking Fountains - DF11 thru DF20	ADA
108826	Lake Seneca Elementary School	INTERIOR	Interior Access Route	Drinking Fountain/Water Cooler	4	Knee and toe clearance is not provided at the lower level fountain.	Drinking Fountains DF1 and DF21	ADA
109210	Lake Seneca Elementary School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	5	The water closet in a single/user or unisex restroom does not have the required clearance.	Staff Restrooms - SR01, SR02, SR06 and SR17	ADA