



# ADA TITLE II ASSESSMENT



Prepared for:

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

## ADA TITLE II ASSESSMENT

Rosemary Hills Elementary School  
2111 Porter Road  
Silver Spring, Maryland 20910

### 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:**

123821.17R000-082.303

**Date of Report:**

October 30, 2019

**On Site Date:**

September 6, 2017



# 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 Rosemary Hills 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 Rosemary Hills 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
Rosemary Hills Elementary School	32	10	15	1		58
Grand Total	32	10	15	1		58

## 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
70691	Rosemary Hills Elementary School	FIRST FLOOR	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 doors except new wing	ADA
70692	Rosemary Hills Elementary School	FIRST FLOOR	Interior Access Route	Door	1	The pull side of the accessible door does not have the required maneuvering clearances.	Rooms 307 and 309	ADA
70696	Rosemary Hills Elementary School	FIRST FLOOR	Exterior Access Route	Stairs	1	Handrails are not compliant.	Courtyard 1	ADA
70703	Rosemary Hills Elementary School	FIRST FLOOR	Interior Access Route	Protruding Object	1	Protruding objects obstruct the required clear width of the accessible route.	Room 105	ADA
70705	Rosemary Hills Elementary School	FIRST FLOOR	Interior Access Route	Stairs	1	Handrails are not provided.	Stage	ADA
70706	Rosemary Hills Elementary School	SECOND FLOOR	Interior Access Route	Door	1	The opening force of the accessible, hinged, non-fire door is more than 5 pounds.	Rooms 257,255,251	ADA
70610	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	The accessible route has gaps in the surface greater than 1/2" wide.	Sidewalk at Basketball Courts	ADA
70615	Rosemary Hills Elementary School	SITE	Exterior Access Route	Stairs	1	Handrails are not compliant.	Stair 1	ADA
70616	Rosemary Hills Elementary School	SITE	Exterior Access Route	Stairs	1	Handrails are not provided.	Stair 3	ADA
70617	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	Sidewalk has areas of vertical level changes in excess of 1/4" that are not ramped.	Northeast Courtyard	ADA
70618	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	The accessible route has gaps in the surface greater than 1/2" wide.	North Entrance	ADA
70624	Rosemary Hills Elementary School	SITE	Exterior Access Route	Curb Ramp	1	The curb ramp does not meet the slope requirements.	Curb Ramp 1	ADA
70625	Rosemary Hills Elementary School	SITE	Entrance to Building	Building Entrance-Door	1	The maneuvering clearance at the accessible door is not level and clear.	Main Entrance	ADA
70626	Rosemary Hills Elementary School	SITE	Entrance to Building	Building Entrance-Door	1	The maneuvering clearance at the accessible door is not level and clear.	Door #2	ADA
70627	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	The accessible route has cross slopes greater than 1:50 (2%).	Southwest Access	ADA
70628	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	The accessible route has cross slopes greater than 1:50 (2%).	Northwest Access	ADA
70629	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	Sidewalk has areas of vertical level changes in excess of 1/4" that are not ramped.	South Crosswalk	ADA
70630	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	The accessible route has gaps in the surface greater than 1/2" wide.	South Crosswalk	ADA
70631	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	The accessible route has gaps in the surface greater than 1/2" wide.	South Crosswalk	ADA
70632	Rosemary Hills Elementary School	SITE	Exterior Access Route	Curb Ramp	1	The curb ramp does not meet the slope requirements.	Curb Ramp 2	ADA
70633	Rosemary Hills Elementary School	SITE	Exterior Access Route	Stairs	1	Handrails are not compliant.	Stair 4	ADA
70634	Rosemary Hills Elementary School	SITE	Exterior Access Route	Stairs	1	The stair treads and edge of top landing do not have visual contrast on the leading edge.	Stair 4	ADA
70635	Rosemary Hills Elementary School	SITE	Exterior Access Route	Stairs	1	ADVISORY: A child's height handrail is not provided.	Stair4	ADA
70636	Rosemary Hills Elementary School	SITE	Exterior Access Route	Ramp	1	The accessible route to the facility has a stairway, which does not comply with vertical rise requirements.	South Entrance	ADA
70638	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	The accessible route has gaps in the surface greater than 1/2" wide.	South Entrance	ADA
70673	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	The accessible route has cross slopes greater than 1:50 (2%).	East Sidewalks	ADA
70675	Rosemary Hills Elementary School	SITE	Exterior Access Route	Ramp	1	The accessible route to the facility has a stairway, which does not comply with vertical rise requirements.	Door 18	ADA

Id	Facility	Building	Assembly	Type	Barrier Priority	Detail	Location Description	ADA
70676	Rosemary Hills Elementary School	SITE	Entrance to Building	Building Entrance-Door	1	The maneuvering clearance at the accessible door is not level and clear.	Door 18	ADA
70677	Rosemary Hills Elementary School	SITE	Exterior Access Route	Stairs	1	Handrails are not compliant.	East Access Route	ADA
70678	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	The accessible route has running slopes greater than 1:20 (5%).	East Sidewalk	ADA
70680	Rosemary Hills Elementary School	SITE	Exterior Access Route	Loading/Unloading Zone	1	The access aisle is not at the same level as the loading/unloading area.	Northwest Drop Off	ADA
70681	Rosemary Hills Elementary School	SITE	Exterior Access Route	Exterior Accessible Route	1	The accessible route has cross slopes greater than 1:50 (2%).	Northwest Sidewalk	ADA
70619	Rosemary Hills Elementary School	FIRST FLOOR	Interior Access Route	Signage	2	The interior signage does not have compliant visual and tactile characters, with raised or indented characters or symbols.	All signage	ADA
70688	Rosemary Hills Elementary School	FIRST FLOOR	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.	Typical All Switches	ADA
70697	Rosemary Hills Elementary School	FIRST FLOOR	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).	Room 201	ADA
70699	Rosemary Hills Elementary School	FIRST FLOOR	Common Areas	Vending Machine	2	The vending machines have operable parts which are not within reach range.	Room 104	ADA
70609	Rosemary Hills Elementary School	SITE	Exterior Access Route	Door	2	The swinging door does not have a smooth surface within 10" of the ground measured vertically on the push side extending the full width of the door.	Playground	ADA
70611	Rosemary Hills Elementary School	SITE	Playground	Transfer System	2	The side of the transfer platform used for transfer is obstructed.	Playground 1	ADA
70612	Rosemary Hills Elementary School	SITE	Playground	Play Component	2	The entry points to a play component requiring transfer to entry points or seats is lower than 11" and higher than 24".	Playground 2	ADA
70613	Rosemary Hills Elementary School	SITE	Playground	Play Component	2	The entry points to a play component requiring transfer to entry points or seats is lower than 11" and higher than 24".	Playground 1	ADA
70614	Rosemary Hills Elementary School	SITE	Playground	Transfer System	2	The transfer steps are higher than 8" each.	Playground 1	ADA
70620	Rosemary Hills Elementary School	SITE	Interior Access Route	Signage	2	The provided signage is not mounted at the latch side of the door or at a compliant height.	Signage is mounted too low and is on the adjacent wall, not next to the latch side of the door.	ADA
70682	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom-Lavatory	3	The lavatory is mounted higher than 34" to the higher of the rim or counter.	Rm 313	ADA
70683	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom-Toilet Stall	3	The side grab bar is not compliant in the wheelchair stall.	Rm 313	ADA
70684	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom-Water Closet	3	ADVISORY: The grab bars are not located per children's specifications in the wheelchair stall used primarily by children.	Typical all Multi-user restrooms	ADA
70685	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom-Water Closet	3	The centerline of the toilet in the wheelchair stall is not 16" minimum to 18" maximum from the sidewall.	Rm 313	ADA
70689	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom-Lavatory	3	Pipes are not insulated.	K Bathrooms	ADA
70690	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom	3	The entire restroom is not compliant due to limited room dimensions.	Room 201	ADA
70693	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom-Water Closet	3	The flush control is located on the closed side and/or is not within reach range.	Room 303	ADA
70694	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom-Water Closet	3	The flush control is located on the closed side and/or is not within reach range.	Room 305	ADA
70695	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom-Water Closet	3	The centerline of the toilet in the wheelchair stall is not 16" minimum to 18" maximum from the sidewall.	Room 305	ADA
70698	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom	3	The entire restroom is not compliant due to limited room dimensions.	Room 104	ADA

Id	Facility	Building	Assembly	Type	Barrier Priority	Detail	Location Description	ADA
70700	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom	3	The entire restroom is not compliant due to limited room dimensions.	Classroom Restrooms	ADA
70701	Rosemary Hills Elementary School	FIRST FLOOR	Employee Work Areas	Locker Rooms	3	The locker room does not have accessible lockers.	Room 105	ADA
70702	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom	3	The entire restroom is not compliant due to limited room dimensions.	Room 105	ADA
70704	Rosemary Hills Elementary School	FIRST FLOOR	Restroom	Restroom/Bathroom	3	The entire restroom is not compliant due to limited room dimensions.	Room 109	ADA
74440	Rosemary Hills Elementary School	FIRST FLOOR	Employee Work Areas	Locker Rooms-Bench	3	The locker room does not have a compliant bench.	Room 105	ADA
70687	Rosemary Hills Elementary School	FIRST FLOOR	Interior Access Route	Drinking Fountain/Water Cooler	4	The spout of the lower level drinking fountain is located more than 5" from the front edge of the fountain.	K Classrooms	ADA