



U.S. Department of Justice
Civil Rights Division

*Disability Rights Section - NYA
950 Pennsylvania Avenue, NW
Washington, DC 20530*

June 4, 2012

SENT VIA EMAIL: GovorchinP@michigan.gov

Mr. Peter Govorchin
First Attorney Corrections Division
Office of the Attorney General
525 West Ottawa Street
Lansing, Michigan 48913

Re: DJ 204-37-333; 204-37-334; 204-37-335; 204-37-336

Dear Mr. Govorchin:

As you know, the Civil Rights Division of the United States Department of Justice (Department), along with the U.S. Attorney's Office for the Eastern District of Michigan, has been investigating numerous complaints that we have received alleging that the Women's Huron Valley Correctional Facility (Huron Valley), Ypsilanti, Michigan, is in violation of Title II of the Americans with Disabilities Act of 1990 (ADA), 42 U.S.C. §§ 12131 - 12134 (Title II) and the Department's implementing regulation, 28 C.F.R. pt. 35. Our investigation was also conducted under the authority of section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794 (Section 504), and the Department's implementing regulation, 28 C.F.R. Part 42, Subpart G. Thank you for your ongoing cooperation with our investigation.

During our investigation, including on-site visits on October 21-22, 2010, January 24-26, 2011, and February 23, 2011, the Department surveyed the Huron Valley facilities to determine whether the facilities are operated so that each program, service, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities, 28 C.F.R. §§ 35.149-35.150. The review also was to ensure that facilities for which construction or alteration was begun after January 26, 1992, are readily accessible to and usable by people with disabilities, in compliance with the Department's Title II regulation 28 C.F.R. §§ 35.150 and 35.151, and the 1991 ADA Standards for Accessible Design (1991 Standards), 28 C.F.R. Part 36, App. D (2011), or the Uniform Federal Accessibility Standards (UFAS), 41 C.F.R. § 101-19.6 App. A. Our investigation also included reviewing Huron Valley's suicide prevention efforts, a component of medical and mental health care, due to a number of inmate suicides and suicide attempts that had recently occurred at the facility.

On September 15, 2010, the Department of Justice published revised final regulations for

ADA Title II effective March 15, 2011. 75 Fed. Reg. 56164 (Sep. 15, 2010). These requirements clarify and refine issues that have arisen over the past 20 years and contain new and updated requirements, including the 2010 Standards for Accessible Design (2010 Standards), defined at 28 C.F.R. § 35.104. The 2010 Standards, which become effective as of March 15, 2012, require new or altered detention and correctional facilities to provide a minimum of 3%, but no fewer than one, of the total number of cells in a facility to be accessible. Cells with mobility features must be provided for each classification level and special housing area. 28 C.F.R. § 35.151(k). In addition, pursuant to ongoing nondiscrimination obligations set out in 28 C.F.R. § 35.152(b)(3), public entities shall implement reasonable policies, including physical modifications to additional cells in accordance with the 2010 Standards, so as to ensure that each inmate with a disability is housed in a cell with the accessible elements necessary to afford the inmate access to safe, appropriate housing.

Our investigation substantiated the complainants' allegations that Huron Valley is in violation of Title II of the ADA, its implementing regulation, the applicable ADA Standards, and Section 504 in some key areas. This letter provides our findings regarding architectural and general issues for inmates with disabilities, as well as the modifications required to remedy the identified violations.¹ Also enclosed with this letter is the report prepared by Lindsay Hayes regarding Huron Valley's suicide prevention practices. In order to rectify the identified deficiencies and protect the statutory rights of the inmates confined at Huron Valley, the facility should implement the stated remedial measures **within twelve (12) months** of the date of this letter, unless a different time frame is specified therein:

1. Architectural Violations

Attachment A, incorporated by reference, details the architectural violations at Huron Valley and cites both the 1991 Standards and the 2010 Standards. Huron Valley must make the modifications specified. As of March 15, 2012, Huron Valley must use the 2010 Standards to remedy the inaccessible elements throughout the facility.

2. Housing Program

To ensure the overall accessibility of the housing program to inmates with disabilities, Huron Valley must implement comprehensive housing policies, including physical modifications to additional cells in accordance with the Standards, so as to ensure that each inmate with a disability is housed in a cell or dormitory with the accessible elements necessary to afford such inmate access to safe, appropriate housing, in the most integrated setting appropriate to the individual inmate's needs, and at the appropriate classification level. 28 C.F.R. § 35.151(k), § 35.152(b); 2010 Standards §§ 807.2 and 404.

¹ On June 6, 2011, we sent you a letter addressing medical care so those issues will not be repeated here.

3. Chapel, Programs, and Activities of Daily Living

Some inmates with mobility disabilities are denied access to chapel and other programs because they require assistance in navigating about the facility. In addition, some inmates who require assistance in activities of daily living such as dining hall service, toileting, showers, feeding, and cleaning their cells do not receive such assistance. To provide access to programs, services, and activities for inmates with disabilities, Huron Valley must provide assistance in navigating to chapel and other programs and provide assistance with daily living activities to inmates with disabilities who require it. 28 C.F.R. § 35.130. Huron Valley must also enact policies and rules relating to the qualification and responsibilities for such aide positions.

4. Infection Control

Huron Valley does not currently provide separate receptacles for the disposal of waste, diapers, catheters, and other hazardous materials. To maintain an appropriate environment for inmates with disabilities, Huron Valley must provide appropriate receptacles for appropriate disposal of waste, diapers, catheters, and other hazardous materials. 28 C.F.R. § 35.130.

5. Shower Chairs

Chairs provided to inmates with disabilities for use in showering pose safety hazards for some inmates with disabilities. Huron Valley must provide a sufficient number of appropriate shower chairs in each of the housing units where individuals with mobility impairments are housed to provide safe and equal access to showering for inmates with disabilities. 28 C.F.R. § 35.130.

6. Wheelchairs and Adaptive Equipment

Many wheelchairs provided for use by inmates are broken, dirty, ill fitting, and lack foot supports. Huron Valley must provide appropriately fitted wheelchairs and other adaptive equipment (canes, walkers, trapeze bars, etc.) to inmates with disabilities as needed. Huron Valley must also ensure that wheelchairs and other adaptive equipment are routinely cleaned, repaired, maintained, and generally kept in safe, operable condition. In addition, Huron Valley must provide prostheses, orthopedic shoes, braces, air mattresses, and other medically necessary equipment, as required to meet the needs of inmates with disabilities. 28 C.F.R. § 35.130.

7. Effective Communication

- a. While interpreters are provided at some events, such as disciplinary proceedings, inmates who are deaf or hard of hearing are excluded from a number of other programs because a sign language interpreter or other auxiliary aid or service is not provided, including medical appointments, mental health care, intake, classification, classes, chapel, Housing Unit meetings, Alcoholics Anonymous, Narcotics Anonymous, and parole hearings. Huron Valley must provide appropriate auxiliary aids and services where necessary to afford inmates who are deaf or hard of hearing an equal opportunity to participate in, and enjoy the benefits of, each Huron Valley program, service, and activity. In addition, consistent with legitimate security concerns, Huron Valley must ensure that inmates who are deaf or hard of hearing and inmates who are blind or who have low vision are cuffed or restrained in a manner that permits effective communication for inmates who are deaf or hard of hearing (*i.e.*, cuffing inmates in the front so they can sign) and permits safe mobility for inmates who are blind or have low vision, including the use of a cane or sighted guide. 28 C.F.R. §§ 35.130, 35.160.
- b. Batteries for hearing aids are not replenished in a timely manner, which denies effective communication and access to programs to inmates who are deaf or hard of hearing. Huron Valley must ensure that batteries required for hearing aids are replenished and installed in a timely manner to ensure effective communication and program accessibility for inmates with disabilities. 28 C.F.R. §§ 35.130, 35.160.
- c. Some inmates who are deaf or hard of hearing miss programs and activities such as meals, recreation, education, and work assignments because their housing cells either do not have visual appliances, the appliances provided do not provide effective communication, or correctional officers do not consistently use the appliances to provide effective communication. **Within three months of the date of this letter**, Huron Valley should take the following steps to ensure effective communication with inmates who are deaf or hard of hearing: In all areas housing inmates who are deaf or hard of hearing, Huron Valley must provide, maintain in good operating condition, and consistently utilize, at least one visual appliance with light intensity and duration sufficient to provide effective communication of times for meals, recreation, education, work assignments, and other events. Huron Valley must establish and implement policies and procedures, and provide training, to correctional officers regarding effective communications with inmates who are deaf or hard of hearing, and the appropriate use of the notification appliance to alert inmates who are deaf or hard of hearing to activities that are ordinarily announced orally, such as times for meals, recreation, education,

work assignments, pill call, and other events. Such procedures and training shall address the steps to be taken to ensure effective communication of both routine and atypical activities, including effective communication with inmates who are deaf or hard of hearing when such inmates are asleep. Huron Valley must incorporate training on the policies and procedures relating to the effective communication with inmates who are deaf or hard of hearing and use of the alert devices into the training provided to new correctional officers. 28 C.F.R. §§ 35.130, 35.160.

- d. Inmates who are blind or have low vision are not provided access to facility rules and other written material in accessible format, nor are they provided aides and services to meet their needs, or alternative reading material such as audio books. **Within three months of the date of this letter**, Huron Valley should take the following steps to ensure effective communication with inmates who are blind or have low vision: Provide auxiliary aides and services, including cassette or CD players, audio books, radios with headphones, Braille reading materials, large print materials, screen reader software, or other effective methods of making material available to inmates who are blind or have low vision. Huron Valley must establish and implement policies and procedures and provide training to correctional officers to ensure effective communication with inmates who are blind or have low vision. Such procedures and training shall address the steps to be taken to ensure effective communication of both routine and atypical activities. Huron Valley must ensure that training on the policies and procedures is included in the training provided to new correctional officers. 28 C.F.R. §§ 35.130, 35.160.
- e. There are no call buttons in cells and rooms that are locked and house inmates who are deaf or hard of hearing. Huron Valley must provide a call button that is operational, maintained in good operating condition, and located so that it is readily accessible to and usable by persons who are deaf or hard of hearing. Huron Valley must establish and implement policies, procedures, and training to ensure that correctional officers respond in a timely and appropriate manner when call buttons are activated. It must also ensure that training on the policies and procedures relating to the timely and appropriate response to call button activation is included in the training provided to new correctional officers. 28 C.F.R. §§ 35.130; 2010 Standards § 807.3.

We hope to work with Huron Valley in an amicable and cooperative fashion to resolve our concerns regarding Huron Valley. In the unexpected event that we are unable to reach a resolution regarding our concerns, the Attorney General is authorized to institute a lawsuit pursuant to the ADA and Section 504. We would prefer, however, to resolve this matter by working cooperatively with

you. We have every confidence that we will be able to do so in this case. We will contact you shortly to confirm that you agree to undertake and implement these measures and maintain compliance.

This letter does not address other potential incidents of discrimination on the basis of disability that may exist or arise. Rather, it is limited to the findings developed in the investigation that are reflected in this letter.

Thank you, again, for your continued cooperation. If you have questions or would like to discuss this proposed resolution, please contact me via email or at (313) 226-9149 or Mellie Nelson via email or at (202) 616-3198.

Sincerely,

BARBARA L. McQUADE
United States Attorney



Susan K. DeClercq
Assistant United States Attorney

Mellie H. Nelson
Supervisory Attorney
Disability Rights Section

Encl.

Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
			East Parking	
1	*208.2.4	4.1.6(1)(b), 4.1.2(5)(b), 4.6.4	No van accessible parking space is provided.	Provide at least one van accessible parking space for every 8 accessible parking spaces. Van accessible spaces must be a minimum of 96 inches wide and served by access aisles at least 96 inches wide.
2	208.2, 502.2, 502.3.1	4.1.6(1)(b), 4.1.2(5)(a), 4.6.3	The parking space access aisles are not defined.	Provide an access aisle for each accessible parking space. For standard accessible parking spaces, the access aisle must at least 60" wide. For van accessible parking spaces, the access aisle must be 96" wide.
			West Parking	
3	*208.2.4	4.1.6(1)(b), 4.1.2(5)(b), 4.6.4	No van accessible parking space is provided.	Provide at least one van accessible parking space for every 8 accessible parking spaces. Van accessible spaces must be a minimum of 96 inches wide and served by access aisles at least 96 inches wide.
			General	
4	206.1, 302.1, 303.3	4.1.6(1)(b), 4.1.2(1) & (2), 4.5.2	Along the accessible route throughout the facility, there are cracks in the asphalt and concrete walkways.	Provide an accessible route throughout the facility that is firm, stable, and slip resistant.
5	206.5, 404.2.9	4.1.6(1)(b), 4.1.3(7)&(8), 4.13.10	Throughout the facility, in areas where the public or inmates may operate interior doors independently, the doors with closers require more than 5 pounds force to open.	In all instances throughout the facility where common use interior doors may be operated by members of the public or inmates, provide doors that require no more than 5 pounds of force to open.
6	206.5, 404.2.7	4.1.6(1)(b), 4.1.3(7)&(8), 4.13.9	Most common use doors that are operated by inmates have knobs that require tight grasping and twisting to operate.	In all instances throughout the facility where common use doors are operable by members of the public or inmates, provide door hardware that is operable without tight grasping, tight pinching, or twisting of the wrist.
7	204.1, 307.2	4.1.6(1)(b), 4.1.3(2), 4.4.1	Throughout the facility, the underside of wall-hung objects, such as suggestion boxes, kite boxes, tty boxes, and outgoing mailboxes, are about 30" to 50" above the floor and project about 8" into the circulation path.	Provide circulation paths throughout the facility such that no objects have their leading edges protruding more than 4 inches into walks, halls, corridors, passageways, or aisles at a height between 27 inches and 80 inches above the finished floor or ground. Free-standing objects mounted on posts or pylons may overhang no more than 12 inches at a height between 27 and 80 inches above the finished floor or ground. Providing a cane-detectable barrier is an acceptable solution. A protruding object (and cane-detectable barrier) shall not reduce the clear width of an accessible route or maneuvering space.
8	*215	4.1.6(1)(b), 4.1.3(14)	In some buildings throughout the facility, where audible alarms are provided, there are no visual alarms.	Provide visual alarms for all areas of the building served by audible alarms. When provided, the light from the visual alarms must be visible in all spaces used by inmates, includes holding and housing cells.
			West Lobby	
9	211, 602.4	4.1.6(1)(b), 4.1.3(10), 4.15.2	The drinking fountain spout is 38" above the floor.	Provide a drinking fountain with a spout outlet that is no more than 36" above the floor.

Architectural survey on October 21, 2011 applied the 1991 Standards.

* Notes a change in the 2010 Standards.

Attachment A - Huron Valley Correctional Facility - DJ# 204-37-333

Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
10	204.1, 307.2	4.1.6(1)(b), 4.1.3(2), 4.4.1	The underside of the gun discharge is 40" high and protrudes 10 1/2" into the circulation path.	Provide a circulation path at this location such that no objects have their leading edges protruding more than 4 inches into walks, halls, corridors, passageways, or aisles at a height between 27 inches and 80 inches above the finished floor or ground.
			West Visiting Room	
11	211, 602	4.1.6(1)(b), 4.1.3(10)	There is only one drinking fountain.	Provide at least one drinking fountain with a spout that is no higher than 36 inches. Ensure that fountain controls require no more than 5 pounds of force to operate; are operable with one hand without tight grasping, pinching, or twisting of the wrist; and are front mounted or side mounted near the front edge. Additionally, provide a drinking fountain that is accessible to people who have difficulty bending or stooping. This can be accommodated by the use of a "hi-lo" fountain; by providing one fountain accessible to those who use wheelchairs and one fountain at a standard height convenient for those who have difficulty bending; by providing a fountain accessible to people who use wheelchairs and a cup dispenser; or by such other means as would achieve the required accessibility for each group of people.
			West Visiting Room Lobby - Women's Toilet Room	
12	216.2, 703	4.1.6(1)(b), 4.1.3(16)(a), 4.30.4	The toilet room sign does not have raised letters or braille.	Provide a toilet room sign with information provided in raised characters and braille.
13	213.2, 606.5	4.1.6(1)(b), 4.1.3(11), 4.19.4	The pipes under the lavatory are not insulated.	Provide pipes under the lavatory that are insulated to protect a person from burns and from sharp or abrasive edges.
14	213, 603, 604, 606, 609	4.1.3(11), 4.1.6(1)(b), 4.22.4, 4.22.7, 4.13, 4.16, 4.17, 4.26, 4.27	There is no accessible toilet stall.	Provide a "standard" accessible toilet stall at least 60" wide and at least 59" deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards.
			West Visiting Room Lobby - Men's Toilet Room	
15	216.2, 703	4.1.6(1)(b), 4.1.3(16)(a), 4.30.4	The toilet room sign does not have raised letters or braille.	Provide a toilet room sign with information provided in raised characters and braille.
16	213.2, 606.5	4.1.6(1)(b), 4.1.3(11), 4.19.4	The pipes under the lavatory are not insulated.	Provide pipes under the lavatory that are insulated to protect a person from burns and from sharp or abrasive edges.
17	213, 603, 604, 606, 609	4.1.3(11), 4.1.6(1)(b), 4.22.4, 4.22.7, 4.13, 4.16, 4.17, 4.26, 4.27	There is no accessible toilet stall.	Provide a "standard" accessible toilet stall at least 60" wide and at least 59" deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards.

Architectural survey on October 21, 2011 applied the 1991 Standards.

* Notes a change in the 2010 Standards.

Attachment A - Huron Valley Correctional Facility - DJ# 204-37-333

Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
			East Visiting Area	
18	211, 602	4.1.6(1)(b), 4.1.3(10)	There is only one drinking fountain.	Provide at least one drinking fountain with a spout height no higher than 36 inches. Ensure that fountain controls require 5 pounds of force or less to operate; are operable with one hand without tight grasping, pinching, or twisting of the wrist; and are front mounted or side mounted near the front edge. Additionally, provide a drinking fountain that is accessible to people who have difficulty bending or stooping. This can be accommodated by the use of a "hi-lo" fountain; by providing one fountain accessible to those who use wheelchairs and one fountain at a standard height convenient for those who have difficulty bending; by providing a fountain accessible to people who use wheelchairs and a cup dispenser; or by such other means as would achieve the required accessibility for each group of people.
19	205, 309.4	4.1.6(1)(b), 4.1.3(13), 4.27.4	The large locker requires tight pinching to operate.	Provide controls that are operable without tight grasping, tight pinching, or twisting of the wrist.
20	206.5, 404.2.4	4.1.6(1)(b), 4.1.3(7)&(8), 4.13.6	At the door between the lobby and visiting room, the maneuvering space is 3 1/2" beside the latch side of the door.	The pull side of the door requires a forward approach. Therefore, the maneuvering space must be 60" deep and must extend 18" to the side of the latch.
			East Visiting Room Lobby - Men's Toilet Room	
21	213.2, 606.5	4.1.6(1)(b), 4.1.3(11), 4.19.4	The pipes under the lavatory are not insulated.	Provide pipes under the lavatory that are insulated to protect a person from burns and from sharp or abrasive edges.
22	213.2, 603, 604, 606, 609	4.1.3(11), 4.1.6(1)(b), 4.22.4, 4.22.7, 4.13, 4.16, 4.17, 4.26, 4.27	There is no accessible toilet stall.	Provide a "standard" accessible toilet stall at least 60" wide and at least 59" deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards.
			East Visiting Room Lobby - Women's Toilet Room	
23	213.2, 606.5	4.1.6(1)(b), 4.1.3(11), 4.19.4	The pipes under the lavatory are not insulated.	Provide pipes under the lavatory that are insulated to protect a person from burns and from sharp or abrasive edges.
24	204.1, 307.2	4.1.6(1)(b), 4.1.3(2), 4.4.1	The underside of a paper towel dispenser is 63" above the floor and projects more than 8" into the circulation path.	Provide a circulation path at this location such that no objects have their leading edges protruding more than 4 inches into walks, halls, corridors, passageways, or aisles at a height between 27 inches and 80 inches above the finished floor or ground.
25	204.1, 307.2	4.1.6(1)(b), 4.1.3(2), 4.4.1	The underside of a hand dryer is more than 27" above the floor and projects more than 4" into the circulation path.	Provide a circulation path at this location such that no objects have their leading edges protruding more than 4 inches into walks, halls, corridors, passageways, or aisles at a height between 27 inches and 80 inches above the finished floor or ground.
26	213.2, 603, 604, 606, 609	4.1.3(11), 4.1.6(1)(b), 4.22.4, 4.22.7, 4.13, 4.16, 4.17, 4.26, 4.27	There is no accessible toilet stall.	Provide a "standard" accessible toilet stall at least 60" wide and at least 59" deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards.

Architectural survey on October 21, 2011 applied the 1991 Standards.

* Notes a change in the 2010 Standards.

Attachment A - Huron Valley Correctional Facility - DJ# 204-37-333

Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
27	*213.3, 603, 604, 606, 609	4.1.6(1)(b), 4.1.3(11), 4.22.4	There are 6 toilet stalls and none complies with the ambulatory stall requirements.	Provide at least one "ambulatory" stall that is exactly 36 inches wide with a toilet centerline 18 inches from each wall or partition, an outward swinging, self-closing door, and parallel grab bars complying with the cited Standards.
Clinic Toilet Room - K1037				
28	213.2, *603.3	4.1.6(1)(b), 4.1.3(11), 4.19.6	The reflective surface of the mirror is mounted 41" above the floor.	Provide a mirror with the bottom of its reflective surface no higher than 40" above the floor.
29	213.2, 608.3	4.1.6(1)(b), 4.1.3(11), 4.21.4	In the shower, only 1 grab bar is provided. The grab bar on the control wall is missing.	Provide a shower with grab bars on at least 2 walls near a corner. One grab bar must be on the control wall and the other grab bar must be on an adjacent wall.
Clinic Dialysis Toilet Room				
30	206.5, *404.2.3	4.1.6(1)(b)&(d), 4.1.3(7)&(8), 4.13.5	The clear opening of the door is 29 1/2".	Provide a doorway that has a minimum clear opening of 32" when the door is open 90 degrees.
31	213.2, 603, 604, 606, 609	4.1.6(1)(b), 4.1.3(11), 4.13, 4.16, 4.18, 4.19, 4.26, 4.27, 4.30	The toilet room does not have any accessible features.	Provide an accessible toilet room such that all of the room's elements, including signage, door, door hardware, clear floor space, water closet, grab bars, lavatory, mirror, controls, and dispensers, comply with the Standards.
Waiting Area Toilet Room				
32	206.5, 404.2.7	4.1.6(1)(b), 4.1.3(7) & (8), 4.13.9	The door requires tight grasping and twisting to operate.	Provide accessible door hardware that is operable without tight grasping, tight pinching, or twisting of the wrist.
33	213.2, 606.5	4.1.6(1)(b), 4.1.3(11), 4.19.4	The pipes under the lavatory are not insulated.	Provide pipes under the lavatory that are insulated to protect a person from burns and from sharp or abrasive edges.
34	213.2, 604.4	4.1.6(1)(b), 4.1.3(11), 4.16.3	The toilet seat is less than 17" high.	Provide a toilet seat with its top surface between 17" and 19" above the floor.
35	213.2, 604.6	4.1.6(1)(b), 4.1.3(11), 4.16.5	The toilet flush control is on the closed side of the toilet.	Provide a flush control mounted on the "open" side of the toilet's clear floor space; 44 inches or less above the finished floor; and requiring a maximum of 5 pounds of force to operate; or provide an automatic flush device.
36	213.2, 604.5.2	4.1.6(1)(b), 4.1.3(11), 4.16.4	The rear grab bar at the toilet is less than 36" long.	Provide a rear grab bar at the toilet that is at least 36" long.
Intake Reception Entrance				
37	206.5, 404.2.5	4.1.6(3)(d)(ii)	The threshold at the entrance door is 1".	Provide an accessible door with a threshold that is no more than ¼ inch high, or is between ¼ inch and ½ inch high and is beveled with a slope no greater than 50%.
Intake Health Toilet Room				
38	213.2, *603.3	4.1.6(1)(b), 4.1.3(11), 4.19.6	The reflective surface of the mirror is mounted 43" above the floor.	Provide a mirror with the bottom edge of its reflective surface no higher than 40" above the floor.
39	213.2, 606.5	4.1.6(1)(b), 4.1.3(11), 4.19.4	The pipes under the lavatory are not insulated.	Provide pipes under the lavatory that are insulated to protect a person from burns and from sharp or abrasive edges.

Architectural survey on October 21, 2011 applied the 1991 Standards.

* Notes a change in the 2010 Standards.

Attachment A - Huron Valley Correctional Facility - DJ# 204-37-333

Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
40	225, 308, 305, *811.3	4.1.6(1)(b), 4.1.3(12), 4.25.3	The coat hook is mounted higher than 54" above the floor.	Provide a coat hook at a maximum height above the finished floor of 48 inches for a forward approach or 54 inches for a side approach and that is accompanied by clear floor space of 30 by 48 inches that allows a forward or parallel approach by a person using a wheelchair.
41	213.2, 604.4	4.1.6(1)(b), 4.1.3(11), 4.16.3	The toilet seat is less than 17" high.	Provide a toilet seat with its top surface between 17" and 19" above the floor.
Intake Area Bathroom				
42	206.1, 303.3	4.1.6(1)(b), 4.1.2(1) & (2), 4.5.2	The threshold entrance has a vertical rise of 1/2".	Provide an accessible route such that changes in level that exceed 1/4" are beveled.
43	213.2, *603.3	4.1.6(1)(b), 4.1.3(11), 4.19.6	The reflective surface of the mirror is mounted 42" above the floor.	Provide a mirror with the bottom edge of its reflecting surface no higher than 40" above the floor.
44	225, 308, 305, *811.3	4.1.6(1)(b), 4.1.3(12), 4.25.3	The clothes hook is mounted 63" above the floor.	Provide a clothes hook at a maximum height above the finished floor of 48 inches for a forward approach or 54 inches for a side approach and that is accompanied by clear floor space of 30 by 48 inches that allows a forward or parallel approach by a person using a wheelchair.
45	213.2, 608, 609, 610	4.1.6(1)(b), 4.1.3(11), 4.21.2	The shower is 36" wide by 40" deep. The clear floor space is flush with the seat wall.	Provide a transfer shower that is exactly 36 inches wide and 36 inches deep with a 48 inch long and 36 inch wide clear floor space alongside the shower opening, and an L-shaped shower seat mounted on the wall opposite the controls and extending the full depth of the stall; OR a shower that is at least 30 inches deep and 60 inches wide with no curb or threshold and with a 36 inch deep and 60 inch wide clear floor space at the shower opening. Ensure that the shower has grab bars, controls, a shower spray unit, and a seat, curb, and enclosure, if provided, that comply fully with the Standards.
East Dining Room				
46	226.1, 305, 306, 902	4.1.6(1)(b), 4.1.3(18), 4.32	The knee space under the table is less than 19" deep.	Wheelchair spaces are provided at tables. The clear floor space under the table must be at least 30" wide. The knee space under the table must be at least 27" high, and 19" deep.
Food Service Building				
47	205, 308, 309	4.1.6(1)(b), 4.1.3(13), 4.27.3	The Healthcare Kite box is out of reach because the countertop is 41" high and the controls [mail slot] are 13 1/2" from the front edge.	Provide accessible controls that are the within reach ranges of individuals who use wheelchairs. In this instance, a side reach over a countertop is required. For the controls to be within reach the countertop cannot be higher than 34" and the controls cannot be more than 10" from the front edge of the counter.
48	206.1, 403.5	4.1.6(1)(b), 5.1, 5.5	The corral narrows the food service lines to 32".	Provide food service lines that are at least 36" wide.
School Building				
49	206.1, 303	4.1.6(1)(b), 4.1.2(1) & (2), 4.5	Near the entrance to the building, there is a change in level of about 1" that is not beveled.	Provide an accessible route such that changes in level that exceed 1/4" are beveled.

Architectural survey on October 21, 2011 applied the 1991 Standards.

* Notes a change in the 2010 Standards.

Attachment A - Huron Valley Correctional Facility - DJ# 204-37-333

Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
50	206.5, 404.2.5	4.1.3(7), 4.1.6(3)(d)(ii), 4.13.8, 4.5.2	The threshold at the entrance door exceeds 3/4".	Provide an accessible door with a threshold that is no more than 1/4 inch high, or is between 1/4 inch and 3/4 inch high and is beveled with a slope no greater than 50%.
51	206.5, 404.2.7	4.1.6(1)(b), 4.1.3(7)&(8), 4.13.9	The doors that are operated by the inmates have knobs that require tight grasping and twisting to operate.	Provide accessible door hardware that is operable without tight grasping, tight pinching, or twisting of the wrist.
52	211, 602	4.1.6(1)(b), 4.1.3(10), 4.15.2	The designated accessible drinking fountain spout height is more than 36" above the floor.	Provide at least one drinking fountain with a spout height no higher than 36 inches. Ensure that fountain controls are operable with 5 pounds of force or less; are operable with one hand without tight grasping, pinching, or twisting of the wrist; and are front mounted or side mounted near the front edge. Additionally, provide a drinking fountain that is accessible to people who have difficulty bending or stooping. This can be accommodated by the use of a "hi-lo" fountain; by providing one fountain accessible to those who use wheelchairs and one fountain at a standard height convenient for those who have difficulty bending; by providing a fountain accessible to people who use wheelchairs and a cup dispenser; or by such other means as would achieve the required accessibility for each group of people.
53	204.1, 307.2	4.1.6(1)(b), 4.1.3(2), 4.4.1	The underside of the drinking fountain is 32 1/2" high and protrudes more than 4" into the circulation path.	The underside of the drinking fountain may not protrude into the accessible route by more than 4" if the underside is more than 27" above the floor.
School Building Auditorium				
54	219	4.1.6(1)(b), 4.1.3(19)(b)	No assistive listening system is provided.	There are approximately 186 fixed seats which requires an assistive listening system of at least 8 receivers. In addition, provide signage notifying patrons that an assistive listening system is available.
55	221	4.1.6(1)(b), 4.1.3(19)(a)	No wheelchair spaces with companion seats are provided. In addition, no aisle seats with removeable or folding armrests on the aisle side are provided.	In this assembly area with approximately 186 fixed assembly seats, provide at least 4 wheelchair spaces with companion seats. In addition, ensure that 1% of the fixed seats are aisle seats with no armrests on the aisle side, or removeable or folding armrests on the aisle side. Provide signage notifying patrons of the availability of such seats.
56	206.5, 404.2.4	4.1.6(1)(b), 4.1.3(7)&(8), 4.13.6	At the Auditorium door, the maneuvering space is 2" beside the latch side of the door.	The pull side of the door requires a forward approach. Therefore, provide a door with clear maneuvering space that is at least 60" deep and that extends at least 18" to the side of the latch.
57	206.5, 309, 404.2.7	4.1.6(1)(b), 4.1.3(7)&(8), 4.13.9	The Auditorium door has a thumb latch that requires tight grasping to operate.	Provide accessible door hardware that is operable without tight grasping, tight pinching, or twisting of the wrist.
School Building Toilet Room with Stalls				
58	213.2, 606.5	4.1.6(1)(b), 4.1.3(11), 4.19.4	The pipes under the lavatory are not insulated.	Provide pipes under the lavatory that are insulated to protect a person from burns and from sharp or abrasive edges.

Architectural survey on October 21, 2011 applied the 1991 Standards.

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Attachment A - Huron Valley Correctional Facility - DJ# 204-37-333

Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
59	213.2, 603, 604, 606	4.1.3(11), 4.1.6(1)(b), 4.22.4, 4.22.7, 4.13, 4.16, 4.17, 4.26, 4.27	There is no accessible toilet stall.	Provide a "standard" accessible toilet stall at least 60" wide and at least 59" deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards.
School Building - Legal Writing Room				
60	226.1, 305, 306, 902.2	4.1.6(1)(b), 4.1.3(18), 4.32	The knee space under the table is less than 27" high and 19" deep.	Ensure that the wheelchair seating provided at tables have clear floor space under the table that is at least 30" wide and knee space under the table that is at least 27" high, and 19" deep.
61	226.1	4.1.6(1)(b), 4.1.3(18)	Wheelchair spaces are not provided at the desks with the laptops and typewriters.	Provide accessible wheelchair seating locations at a minimum of 5% of the tables.
Fieldhouse				
62	206.5, 404.2.4	4.1.6(1)(b), 4.1.3(7)&(8), 4.13.6	The maneuvering space at the entrance has a slope of 5.8%	Provide clear maneuvering space at the door that is flat -- i.e., does not slope more than 2% in any direction.
63	206.5, 404.2.5	4.1.3(7), 4.1.6(3)(d)(ii), 4.13.8, 4.5.2	The threshold at the entrance door is 1".	Provide an accessible entrance with a threshold that is no more than ¼ inch high, or is between ¼ inch and ½ inch high and is beveled with a slope no greater than 50%.
64	205, 308, 309	4.1.6(1)(b), 4.1.3(13), 4.27.3	In the toilet room, the paper towel dispenser controls are higher than 48" above the floor.	Provide controls that are within accessible reach ranges. This control requires a forward reach over an obstruction that is no more than 20" deep. Therefore, the controls must be within 48" of the floor.
65	213.2, 606.5	4.1.6(1)(b), 4.1.3(11), 4.19.4	In the toilet room, the pipes under the lavatory are not insulated.	Provide pipes under the lavatory that are insulated to protect a person from burns and from sharp or abrasive edges.
66	213.2, 603, 604, 606	4.1.3(11), 4.1.6(1)(b), 4.22.4, 4.22.7, 4.13, 4.16, 4.17, 4.26, 4.27	There is no accessible toilet stall.	Provide a "standard" accessible toilet stall at least 60" wide and at least 59" deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards.
Outdoor Recreation Area near Housing Unit 4				
67	206.1, 403	4.1.6(1)(b), 4.1.2(1) & (2), 4.3.7	The portion of the accessible route to the recreation area enclosed by a fence has a slope of 5.9% and does not have handrails and landings.	Provide an accessible route such that the route does not slope more than 8.33% and does not slope more than 5% without having ramp features.
68	206.1, 302.1	4.1.6(1)(b), 4.1.2(1) & (2), 4.5.1	In the recreation area, the accessible route from the entrance to the tennis courts, telephones, volleyball, basketball, tables, and ball fields is not paved.	Provide an accessible route such that the route is firm, stable, and slip resistant.
Outdoor Recreation Area near Calhoun Hall				
69	206.1, 302.1, 303	4.1.6(1)(b), 4.1.2(1) & (2), 4.5.1	A portion of the accessible route to the volleyball area is not paved.	Provide an accessible route such that the route is firm, stable, and slip resistant.
Automotive Shop				
70	206.1, 403	4.1.6(1)(b), 4.1.2(1) & (2), 4.3.7	A portion of the accessible route to the shop has a slope of 9.8%.	Provide an accessible route such that the route does not slope more than 8.33%. Handrails must be provided where the accessible route slopes more than 5% and has a vertical rise of more than 6".

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Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
71	206.1, 403.5	4.1.6(1)(b), 4.1.3(2), 4.4.1	The passage to the lockers, toilet room and eyewash narrows to only 30" wide between the doorframe and the lockers.	Provide an accessible route such that the route does not narrow to 32" for a distance of no more than 24".
72	226.1, 305, 306, 902.2	4.1.6(1)(b), 4.1.3(18), 4.32	The knee space under the eyewash is less than 19" deep.	Provide knee space under the eyewash that is at least 30" wide, 27" tall, and 19" deep.
73	211, 602	4.1.6(1)(b), 4.1.3(10), 4.15.2	Only one drinking fountain is provided and is not accessible to those who have difficulty bending.	Provide a drinking fountain that is accessible to people who have difficulty bending or stooping. This can be accommodated by the use of a "hi-lo" fountain; by providing one fountain accessible to those who use wheelchairs and one fountain at a standard height convenient for those who have difficulty bending; by providing a fountain accessible to people who use wheelchairs and a cup dispenser; or by such other means as would achieve the required accessibility for each group of people.
74	213.2, 603, 604, 605, 606	4.1.6(1)(b), 4.1.3(11), 4.13, 4.16, 4.18, 4.19, 4.26, 4.27, 4.30	The toilet room does not have any accessible features.	Provide an accessible toilet room such that all of the room's elements, including signage, door, door hardware, clear floor space, water closet, urinal, grab bars, lavatory, mirror, controls, and dispensers, comply with the Standards.
Classification Cell Block				
75	217	4.1.6(1)(b), 4.1.3(17)(a)	The telephones are mounted too high and are not accessible to wheelchair user.	Provide at least one telephone with a clear floor space at least 30" by 48" that allows for a forward reach with the highest operable part of the telephone mounted no more than 48" above the floor.
Classification Cell Block Bathroom:				
76	206.1, 303.3	4.1.6(1)(b), 4.1.2(1) & (2), 4.5.2	The threshold at the bathroom entrance exceeds 1/4" and has a vertical rise of 1/2".	Provide an accessible route such that changes in level that are no greater than 3/4", and level changes greater 1/4" are beveled.
77	213.2, *603.3	4.1.6(1)(b), 4.1.3(11), 4.19.6	The reflective surface of the mirror is mounted 49" above the floor.	Provide a mirror with the bottom edge of its reflective surface is within 40" of the floor.
78	213.2, 606.5	4.1.6(1)(b), 4.1.3(11), 4.19.4	The pipes under the lavatory are not insulated.	Provide pipes under the lavatory that are insulated to protect a person from burns and from sharp or abrasive edges.
79	213.2, 604.8.1.1	4.1.3(11), 4.1.6(1)(b), 4.22.4, 4.22.7, 4.13, 4.16, 4.17, 4.26, 4.27	There is no accessible toilet stall.	Provide a "standard" accessible toilet stall at least 60" wide and at least 59" deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards.
80	213.3.7, 225, 308, 305, *603, *811.3	4.1.6(1)(b), 4.1.3(12), 4.25.3	The clothes hook is mounted higher than 54" above the floor.	Provide a clothes hook at a maximum height above the finished floor of 48 inches for a forward approach or 54 inches for a side approach and that is accompanied by clear floor space of 30 by 48 inches that allows a forward or parallel approach by a person using a wheelchair.

Architectural survey on October 21, 2011 applied the 1991 Standards.

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Attachment A - Huron Valley Correctional Facility - DJ# 204-37-333

Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
81	213.2, 608, 609, 610	4.1.6(1)(b), 4.1.3(11), 4.21.2	The shower is 38 1/2" wide by 40" deep.	Provide a transfer shower that is exactly 36 inches wide and 36 inches deep with a 48 inch long and 36 inch wide clear floor space alongside the shower opening, and an L-shaped shower seat mounted on the wall opposite the controls and extending the full depth of the stall; OR a shower that is at least 30 inches deep and 60 inches wide with no curb or threshold and with a 36 inch deep and 60 inch wide clear floor space at the shower opening. Ensure that the shower has grab bars, controls, a shower spray unit, and a seat, curb, and enclosure, if provided, that comply fully with the Standards.
82	213.2, 608.6	4.1.6(1)(b), 4.1.3(11), 4.21.6	A handheld showerhead is not provided and the fixed showerhead is more than 48" above the floor.	Provide either a fixed showerhead mounted 48" above the floor or a handheld shower unit.
Classification Cell - #29				
83	206.5, 404.2.7	4.1.6(1)(b), 4.1.3(7)&(8), 4.13.9	The door has a knob that requires tight grasping and twisting to operate.	Provide accessible door hardware that is operable without tight grasping, tight pinching, or twisting of the wrist.
84	206.5, *404.2.3	4.1.6(1)(b)&(d), 4.1.3(7)&(8), 4.13.5	The clear opening of the door is 31".	Provide a doorway with a minimum clear opening of 32" when the door is open 90 degrees.
85	205, 309.2	4.1.6(1)(b), 4.1.3(13), 4.27.2	The clear floor space for the window is blocked by the bed.	Provide a 30" by 48" clear floor space at the window.
86	205, 309.3	4.1.6(1)(b), 4.1.3(13), 4.27.4	The window control requires tight grasping, tight pinching, or twisting of the wrist to operate.	Provide controls that are operable without tight grasping, tight pinching, or twisting of the wrist.
87	213.2, *603.3	4.1.6(1)(b), 4.1.3(11), 4.19.6	The reflective surface of the mirror is mounted 53" above the floor.	Provide a mirror with the bottom edge of its reflective surface no higher than 40" above the floor.
Housing Unit 1 - Level IV - Segregation [Existing]				
88	28 CFR § 35.151(k)	4.1.3(7), 4.1.3(11), 4.13, 4.16, 4.19, 4.26, 4.27, 9.2.2, Figs. 28, 29, 35, 36, 37. See also UFAS § 4.1.4(9)	There are no accessible cells.	Provide accessible cells so that at least 3% minimum of the total cells are accessible and ensure that all inmates with disabilities are housed in accessible cells. To be accessible, all of the cells' elements, including door, clear floor space, water closet, grab bars, lavatory, mirror, bed, controls, and dispensers, comply with the ADA Standards.
Housing Unit 3				
89	206.1, 303.3	4.1.6(1)(b), 4.1.2(1) & (2), 4.5.2	Near the entrance to the housing unit, the walkway has settled creating a change in level of about 1".	Provide an accessible route, such that changes in level that exceed 1/4" are beveled.
Housing Unit 3 Bathroom				
90	206.1, 303.3	4.1.6(1)(b), 4.1.3(1), 4.5.2	The entrance to the shower area changes in level by more than 1/2" and is not beveled.	Provide an accessible route such that changes in level exceeding 1/4" are beveled.

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Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
91	213.3.7, 305, 308, *603.4, *811.3	4.1.6(1)(b), 4.1.3(12), 4.25.3	The clothes hook near the shower is 63" above the floor.	Provide a clothes hook at a maximum height above the finished floor of 48 inches for a forward approach or 54 inches for a side approach and that is accompanied by clear floor space of 30 by 48 inches that allows a forward or parallel approach by a person using a wheelchair.
92	213.2, 608	4.1.6(1)(b), 4.1.3(11), 4.21.2	The clear floor space for the transfer shower is flush with the seat wall.	Provide clear floor space for the transfer shower that is at least 36" by 48". It must extend 12" beyond the seat wall.
93	213.2, 608	4.1.6(1)(b), 4.1.3(11), 4.21.3	The shower seat is 20" above the floor.	Ensure that the top surface of the fixed seat in the transfer shower is between 17" and 19" above the floor.
Calhoun, Harrison, Gladwin, Fillmore, and Emmet Halls				
94	213.2	4.1.6(1)(b), 4.1.3(11)	All single-user and group bathrooms that serve the accessible housing cells must comply with the Standards.	Each single-user and group common use bathroom must be accessible in accordance with the Standards.
95	206.5, 404.2.5	4.1.3(7), 4.1.6(3)(d)(ii), 4.13.8, 4.5.2	In these housing units, the threshold at the dayroom door to the outside exceeds 1 1/2".	Provide an accessible door with a threshold that is no more than 1/4 inch high, or is between 1/4 inch and 3/4 inch high and is beveled with a slope no greater than 50%.
96	206.1, 302.1	4.1.6(1)(b), 4.1.2(1) & (2), 4.5.1	In these housing units, the accessible route from the dayroom to the outdoor tables is not paved.	Provide an accessible route such that the route is firm, stable, and slip resistant.
Calhoun Hall - Two-Bed Cell - Cell C1045-B.				
97	206.5, 404.2.4	4.1.6(1)(b), 4.1.3(7)&(8), 4.13.6	Inside, the maneuvering space at the door is only 39" deep.	At this door which requires a latch-side approach and does not have a closer, provide clear maneuvering space on the pull side of the door that is at least 48" deep and that extends at least 24" from the latch.
98	232, 226, 305, 306, 902	4.1.6(1)(b), 4.1.3(18), 4.32.3	The knee space under the desk is only 18" wide and extends less than 19".	Provide an accessible desk with knee space that is 30" wide, extend 19" underneath, and is at least 27" high.
Calhoun Hall - Four-Bed Cell - Cell C1063.				
99	232, 226, 902.2	4.1.6(1)(b), 4.1.3(18), 4.32.3	The knee space under the desk is only 18" wide and extends less than 19".	Provide an accessible desk with knee space that is 30" wide, extend 19" underneath, and is at least 27" high.
100	232, 206.2.4	4.1.6(1)(b), 4.1.3(1)	The accessible route does not connect to the bed. The ladder to the top bunk blocks the path.	Provide an accessible route that connects all accessible spaces and elements throughout the facility.
Calhoun Hall - Single Use Bathroom - C1061				
101	213.2, *603.3	4.1.6(1)(b), 4.1.3(11), 4.19.6	The reflective surface of the mirror is mounted 41" above the floor.	Provide a mirror with the bottom edge of its reflective surface no more than 40" above the floor.
Calhoun Hall - Group Bathroom				
102	206.1, 403.5	4.1.6(1)(b), 4.1.3(2), 4.4.1	The passage at the privacy partition is only 29 1/2" wide.	Provide an accessible route that is at least 36 inches wide. However, the accessible route may narrow to 32" for a distance of no more than 24".
103	213.2, *603.3	4.1.6(1)(b), 4.1.3(11), 4.19.6	The reflective surface of the mirror is mounted 41" above the floor.	Provide a mirror with the bottom edge of its reflective surface no higher than 40" above the floor.
104	213.2, 604.2	4.1.6(1)(b), 4.1.3(11), 4.17.2	The toilet centerline is 19" from the sidewall.	Provide a toilet with a center line that is 18" from the side wall.
105	222, 803.4, *903	4.1.3(21), 4.35.4, 4.1.6(1)(b)	The bench is only 12" deep.	There is a dressing area with a fixed bench. The bench must be at least 48" long against a wall and at least 24" deep.

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Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
106	213.2, 608, 609, 610	4.1.6(1)(b), 4.1.3(11), 4.21.2, 4.21.3, 4.21.4	The shower is 36" wide by 42 1/4" deep. No fixed shower seat is provided and the grab bar is 30 1/2" long.	Provide a transfer shower that is exactly 36 inches wide and 36 inches deep with a 48 inch long and 36 inch wide clear floor space alongside the shower opening, and an L-shaped shower seat mounted on the wall opposite the controls and extending the full depth of the stall; OR a shower that is at least 30 inches deep and 60 inches wide with no curb or threshold and with a 36 inch deep and 60 inch wide clear floor space at the shower opening. Ensure that the shower has grab bars, controls, a shower spray unit, and a seat, curb, and enclosure, if provided, that comply fully with the Standards. The grab bar on the control wall must extend the length of the wall.
Emmet Hall - Single User Bathroom				
107	213.2, *603.3	4.1.6(1)(b), 4.1.3(11), 4.19.6	The reflective surface of the mirror is mounted 41 1/2" above the floor.	Bottom of the reflective edge of the mirror must be within 40" of the floor.
108	213.2, *604.2	4.1.6(1)(b), 4.1.3(11), 4.16.2	The toilet centerline is 22 1/2" from the sidewall.	Provide a toilet with a center line that is 18" from the side wall.
109	213.2, 604.5.1	4.1.6(1)(b), 4.1.3(11), 4.16.4	The front end of the side grab bar is only 45 1/2" from the rear wall.	At the toilet, provide a side grab bar with its far end no closer than 54" from the rear wall.
110	213.2, 608, 609, 610	4.1.6(1)(b), 4.1.3(11), 4.21.2, 4.21.3, 4.21.4	The shower is 36" wide by 42" deep. The clear floor space for the transfer shower is flush with the seat wall. No fixed shower seat is provided and the grab bar on the control side does not extend the length of the wall.	Provide a transfer shower that is exactly 36 inches wide and 36 inches deep with a 48 inch long and 36 inch wide clear floor space alongside the shower opening, and an L-shaped shower seat mounted on the wall opposite the controls and extending the full depth of the stall; OR a shower that is at least 30 inches deep and 60 inches wide with no curb or threshold and with a 36 inch deep and 60 inch wide clear floor space at the shower opening. Ensure that the shower has grab bars, controls, a shower spray unit, and a seat, curb, and enclosure, if provided, that comply fully with the Standards. The grab bar on the control wall must extend the length of the wall.
Emmet Hall - Group Bathroom				
111	213.2, *603.3	4.1.6(1)(b), 4.1.3(11), 4.19.6	The reflective surface of the mirror is mounted 41" above the floor.	Provide a mirror with the bottom edge of its reflective surface no higher than 40" above the floor.
112	213.2, *604.2	4.1.6(1)(b), 4.1.3(11), 4.16.2	The toilet centerline is 20" from the sidewall.	Provide a toilet with a center line that is 18" from the side wall.
113	222, 803.4, *903	4.1.3(21), 4.35.4, 4.1.6(1)(b)	The bench is only 12" deep.	In the dressing area, provide a fixed bench that is at least 48" long against a wall and at least 24" deep.

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Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
114	213.2, 608, 609, 610	4.1.6(1)(b), 4.1.3(11), 4.21.2, 4.21.3, 4.21.4	The shower is 36" wide by 42" deep. The clear floor space for the transfer shower is flush with the seat wall. No fixed shower seat is provided and the grab bar on the control side does not extend the length of the wall.	Provide a transfer shower that is exactly 36 inches wide and 36 inches deep with a 48 inch long and 36 inch wide clear floor space alongside the shower opening, and an L-shaped shower seat mounted on the wall opposite the controls and extending the full depth of the stall; OR a shower that is at least 30 inches deep and 60 inches wide with no curb or threshold and with a 36 inch deep and 60 inch wide clear floor space at the shower opening. Ensure that the shower has grab bars, controls, a shower spray unit, and a seat, curb, and enclosure, if provided, that comply fully with the Standards. The grab bar on the control wall must extend the length of the wall.
Gladwin Hall - Single User Bathroom				
115	213.2, *603.3	4.1.6(1)(b), 4.1.3(11), 4.19.6	The reflective surface of the mirror is mounted 41 1/2" above the floor.	Provide a mirror with the bottom edge of its reflective surface no more than 40" above the floor.
116	213.2, 604.4	4.1.6(1)(b), 4.1.3(11), 4.16.3	The toilet seat in is less than 17" high.	Provide a toilet seat with its top surface between 17" and 19" above the floor.
117	213.2, *604.2	4.1.6(1)(b), 4.1.3(11), 4.16.2	The toilet centerline is 19" from the sidewall.	Provide a toilet with a center line 18" from the side wall.
118	213.2, 608, 609, 610	4.1.6(1)(b), 4.1.3(11), 4.21.2, 4.21.3, 4.21.4	The shower is 36" wide by 41 1/2" deep. The clear floor space for the transfer shower is flush with the seat wall. No fixed shower seat is provided and the grab bar on the control side does not extend the length of the wall.	Provide a transfer shower that is exactly 36 inches wide and 36 inches deep with a 48 inch long and 36 inch wide clear floor space alongside the shower opening, and an L-shaped shower seat mounted on the wall opposite the controls and extending the full depth of the stall; OR a shower that is at least 30 inches deep and 60 inches wide with no curb or threshold and with a 36 inch deep and 60 inch wide clear floor space at the shower opening. Ensure that the shower has grab bars, controls, a shower spray unit, and a seat, curb, and enclosure, if provided, that comply fully with the Standards. The grab bar on the control wall must extend the length of the wall.
Gladwin Hall - Group Bathroom 1				
119	222, 803.4, *903	4.1.3(21), 4.35.4, 4.1.6(1)(b)	The bench is only 12" deep.	There is a dressing area with a fixed bench. The bench must be at least 48" long against a wall and at least 24" deep.
120	213.3.7, 225, 305, 308, *603, *811.3	4.1.6(1)(b), 4.1.3(12), 4.25.3	The clothes hook near the shower is mounted higher than 54" above the floor.	Provide a clothes hook at a maximum height above the finished floor of 48 inches for a forward approach or 54 inches for a side approach and that is accompanied by clear floor space of 30 by 48 inches that allows a forward or parallel approach by a person using a wheelchair.

Architectural survey on October 21, 2011 applied the 1991 Standards.

* Notes a change in the 2010 Standards.

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Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
121	213.2, 608, 609, 610	4.1.6(1)(b), 4.1.3(11), 4.21.2, 4.21.3, 4.21.4	The shower is 36" wide by 42" deep. The clear floor space for the transfer shower is flush with the seat wall. No fixed shower seat is provided and the grab bar on the control side does not extend the length of the wall.	Transfer shower must be exactly 36 inches wide and 36 inches deep with a 48 inch long and 36 inch wide clear floor space alongside the shower opening, and an L-shaped shower seat mounted on the wall opposite the controls and extending the full depth of the stall; OR a shower that is at least 30 inches deep and 60 inches wide with no curb or threshold and with a 36 inch deep and 60 inch wide clear floor space at the shower opening. Ensure that the shower has grab bars, controls, a shower spray unit, and a seat, curb, and enclosure, if provided, that comply fully with the Standards. The grab bar on the control wall must extend the length of the wall.
Gladwin Hall - Second Group Bathroom 2				
122	213.2, *603.3	4.1.6(1)(b), 4.1.3(11), 4.19.6	The reflective surface of the mirror is mounted 45" above the floor.	Provide a mirror with the bottom of its reflective surface no more than 40" above the floor.
123	213.2, 608, 609, 610	4.1.6(1)(b), 4.1.3(11), 4.21.2, 4.21.3, 4.21.4	The shower is 36" wide by 42" deep. The clear floor space for the transfer shower is flush with the seat wall. No fixed shower seat is provided and the grab bar on the control side does not extend the length of the wall.	Provide a transfer shower that is exactly 36 inches wide and 36 inches deep with a 48 inch long and 36 inch wide clear floor space alongside the shower opening, and an L-shaped shower seat mounted on the wall opposite the controls and extending the full depth of the stall; OR a shower that is at least 30 inches deep and 60 inches wide with no curb or threshold and with a 36 inch deep and 60 inch wide clear floor space at the shower opening. Ensure that the shower has grab bars, controls, a shower spray unit, and a seat, curb, and enclosure, if provided, that comply fully with the Standards. The grab bar on the control wall must extend the length of the wall.
Jennings Hall				
124	206.5, 404.2.5	4.1.3(7), 4.1.6(3)(d)(ii), 4.13.8, 4.5.2	The threshold at the entrance door exceeds 3/4".	Provide an accessible door with a threshold that is no more than 1/4 inch high, or is between 1/4 inch and 3/4 inch high and is beveled with a slope no greater than 50%.
Jennings Hall - Group Bathroom				
125	213.2, 606.5	4.1.6(1)(b), 4.1.3(11), 4.19.4	The pipes under the lavatory are not insulated.	Provide pipes under the lavatory that are insulated to protect a person from burns and from sharp or abrasive edges.
126	213.2, 606.4	4.1.6(1)(b), 4.1.3(11), 4.19.5	The faucet has knobs that require twisting of the wrist to operate.	Provide a lavatory faucet that is operable without tight grasping, tight pinching, or twisting of the wrist.
127	205, 305	4.1.6(1)(b), 4.1.3(13), 4.27.2	The clear floor space for the sanitary napkin disposal is blocked by the toilet.	Provide an accessible sanitary napkin disposal with a 30" by 48" clear floor space (required to access controls).
128	213.2, 603, 604, 606, 609	4.1.3(11), 4.1.6(1)(b), 4.22.4, 4.22.7, 4.13, 4.16, 4.17, 4.26, 4.27	There is no accessible toilet stall.	Provide a "standard" accessible toilet stall at least 60" wide and at least 59" deep (or at least 56 inches deep with a wall-mounted toilet) such that all of the stall's elements, including stall door, stall door hardware, water closet, size and arrangement, toe clearances, grab bars, controls, and dispensers, comply with the Standards.
129	213.3.7, 225, 305, 308, *603, *811.3	4.1.6(1)(b), 4.1.3(12), 4.25.3	The coat hook next to the toilet stall is mounted higher than 54" above the floor.	Provide a coat hook at a maximum height above the finished floor of 48 inches for a forward approach or 54 inches for a side approach and that is accompanied by clear floor space of 30 by 48 inches that allows a forward or parallel approach by a person using a wheelchair.

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Huron Valley Correctional Facility - ADA Report				
	2010 Standards	1991 Standards	Violation	Requirement/Corrective Action
130	213.3.7, 225, 305, 308, *603, *811.3	4.1.6(1)(b), 4.1.3(12), 4.25.3	The coat hook next to the shower is mounted higher than 54" above the floor.	Provide a coat hook at a maximum height above the finished floor of 48 inches for a forward approach or 54 inches for a side approach and that is accompanied by clear floor space of 30 by 48 inches that allows a forward or parallel approach by a person using a wheelchair.

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