ACCESSIBILITY IN EXISTING BUILDINGS SCOPING GUIDELINES

1.0 GENERAL GUIDELINES

2.0 ADA PATH OF TRAVEL COMPLIANCE

2.1 Introduction

The following “Scoping Guideline” is provided to give guidance on how to meet the Authority’s obligation under the Americans with Disabilities Act (“ADA”) and specifically “Path of Travel” (“PoT”) implementation [2010 ADA §35.151(b)].

When a “Primary Function Area” (“PFA”) in an existing building is altered, accessibility modifications beyond the project scope may be required to provide an accessible PoT to that altered area.

2.2 Project Definition

2.2.1 Capital Improvement Projects and Lease Conversion Projects not involving a Change in Use

2.2.1.1 Plan Nodes

All CIP projects that affect a PFA as defined below must investigate PoT requirements.

2.2.1.2 Budget

There is no initial budget assigned to the PoT work, as the PoT report will determine the budgetary obligation and the required scope, and will provide an estimate for the PoT work.

2.3 Background and Approach

2.3.1 Background

The City of New York, including the New York City School Construction Authority, is obligated to comply with Federal and Local Laws as they relate to accessibility. The ADA states that an alteration that affects or could affect the “Usability” of, or access to, a PFA shall be made so that, to the maximum extent feasible, the PoT to the altered area and the restrooms, telephones, and drinking fountains serving the altered area shall be readily accessible to and usable by individuals with disabilities.

2.3.2 Approach

The applicability of PoT compliance shall be identified by the AEOR in the scope report for the referred item (parent project), and listed as an additional recommended item, with an initial construction budget based on 20% of the general construction cost of the LLW# for the work affecting a PFA. (Note: this is purely a budget number, not a detailed estimate.)

For the detailed approach to scoping and preparation of the PoT Report, refer to Exhibit A – Path of Travel Process, Exhibit B – Path of Travel Process Flowchart and Exhibit C – Path of Travel – Capital Categories.
2.4 Path of Travel Scoping - Key Elements

2.4.1 PoT Requirement for Projects that Alter a PFA

PoT applicable projects have the potential to affect the “usability” of, or access to, a PFA. Based on the scope of work, below are lists that may or may not trigger PoT requirements.

2.4.1.1 Examples of projects that may trigger PoT requirements include, but are not limited to, the following:

- Projects that affect PFAs
- In an Addition Project, when a PFA is altered in the existing building for reasons other than to provide Program Accessibility
- Room conversions that affect PFAs
- Rehabilitation or renovation of PFAs

By project type:
- Reso A
- CIP
- CTF
- LSP
- Lease Conversions

By Capital Category:
See Exhibit C – Path of Travel – Capital Categories for a list of applicable PoT capital categories.

2.4.1.2 Examples of projects that typically do not trigger PoT requirements include, but are not limited to, the following:

- Projects that do not affect PFAs
- New Buildings
- Program Accessibility projects as per 2010 ADA §35.150
- Projects consisting of repairs/maintenance work, unless the work affects the usability of the element or space.
- Building Envelope projects
- MEP system replacement/upgrades*
- PA system replacement/upgrades*
- Fire Alarm system replacement/upgrades*

*Some work may affect the usability of the altered PFA. The portion of the work may involve usable elements that might be deducted per 2010 ADA §35.151 (4)(iii)(B), resulting in a $0 PoT obligation amount. Designer shall verify with the SCA ADA Director.

By project type:
- Standalone NB’s
- New Additions
- Developer Projects
- Program Accessibility Projects
2.4.2 Primary Function Area (PFA)

A PFA is an area of major activity for which a facility is intended. The primary function of a school is to educate students, and therefore the rooms and spaces directly involved are considered PFAs.

2.4.2.1 PFAs in school buildings include, but are not limited to, the following:
- Typical and Specialized Classrooms
- Auditoriums/Gymatoriums
- Gymnasiums, including Locker Rooms
- Athletic Fields and Field houses, including Bleachers and Student Locker Rooms
- Playgrounds, Greenhouses and other outdoor Educational Spaces
- Libraries
- Cafeterias
- Offices that a child may need to get to (e.g. general office, principal’s/assistant principal’s office, guidance office, social worker’s office, medical suite, SBST office, etc.)
- Nurses Office and Health Clinics
- Rooftop Educational Spaces
- Swimming Pools

2.4.2.2 Spaces that are NOT PFAs include, but are not limited to, the following:
- Mechanical/Electrical Rooms, Boiler Rooms, and other MEP areas
- Supply Storage Rooms
- OSFNS Kitchens
- Employee Lounges or Employee Locker Rooms
- Janitorial Closets
- Circulation Paths, including Entrances, Lobbies and Corridors
- Restrooms (unless included as part of a Student Locker Room)

2.4.3 Alterations

The definition of “Alteration” in the ADA differs from that of the NYC Building Code.

2.4.3.1 As per ADAAG 106.5, an “Alteration” is a change to a building or facility that affects or could affect the usability of the building or facility or portion thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance, reroofing, painting or wallpapering, or changes to mechanical and
electrical systems are not alterations unless they affect the usability of the building or facility.

For example, if a Gymnasium floor (or portion of the floor) is being reconstructed due to water damage, the work would be considered an alteration because it affects the usability of the space. Affecting usability means when an element is covered by a standard in ADAAG. Therefore, this work is considered an "alteration" per ADA definition.

2.4.4 Usability

2.4.4.1 As per the US Access Board, “the term ‘usability’ often means the work (even if it’s maintenance) involving elements or spaces covered by the standards”

For example, a new HVAC system being installed wouldn’t necessarily require compliance with the standards. However, if the new HVAC system involves installing new thermostats that are an operable element, and thus covered in the standards, altering it is considered affecting the “usability” and the new thermostats will need to comply with ADA.

2.4.5 Disproportionality

2.4.5.1 Per ADA, an accessible PoT must be provided as part of an alteration project that affects the usability of, or access to a PFA, but only to the extent that the cost to do so is not disproportionate to the overall cost of the alteration to the PFA. This is the comparative analysis referred to as “disproportionality”, when the cost exceeds 20% of the cost of the alteration to the PFA.

2.4.6 Prior PoT Applicable Projects

2.4.6.1 When the subject PFA of the current parent project, or another PFA on the same PoT, has been renovated at the subject building within the past three years and did not include the required PoT work, the applicable PoT Obligation amount of that prior project shall be included in the current PoT project.

Applicable previous projects shall have an NTP date within three years of the current parent projects’ forecasted NTP.

2.4.6.2 If a school has a previously unobligated PoT amount from prior projects (for example, projects that did not have enough PoT allocation to satisfy the PoT priority), the unobligated amounts from those projects shall be applied to the current PoT project.

2.4.7 Deductions

2.4.7.1 Deductible Alteration Costs

2.4.7.1.1 Deduct the cost of windows, hardware, controls, electrical outlets and signage as per §35.151(b)(4)(i)(B).
2.4.7.1.2 Deduct what is not considered an Alteration per ADAAG definition 106.5, such as normal maintenance, reroofing, painting or wallpapering, or changes to the mechanical and electrical systems (unless they affect the usability).

2.4.7.1.3 Deduct the cost of items that do not affect usability, such as ceilings, demolition, firestopping, etc.

- As per the US Department of Justice, elements that are not covered in the standards are not considered elements affecting usability, and can be deducted from the construction cost.

- For example, for a new carpet installation, the carpet is covered in ADAAG 302.2, and is considered an element affecting usability; therefore, the cost of the carpet cannot be deducted. However, the adhesive that binds the carpet with the subfloor is not covered in the standards and is not considered as an element affecting usability, so the cost of the adhesive can be deducted.

2.4.7.2 Deductible Alteration Expenditures

2.4.7.2.1 Deduct the cost of elements that improve the existing Path of Travel that are scoped as part of the parent project.

2.4.8 Priority

2.4.8.1 In choosing which accessible elements to provide, priority should be given to those elements that will provide the greatest access, in the following order:

- An accessible entrance to the facility
- An accessible route to the PFA
- At least one accessible restroom for each sex, or a single unisex restroom serving the PFA
- Accessible drinking fountains serving the PFA; and
- When possible, additional accessible elements, such as parking, storage and alarms.

Examples:
- In an Auditorium renovation, the PoT shall start at the main building entrance at the sidewalk, through the building to the auditorium. The PoT shall include the nearest restrooms and drinking fountain serving the Auditorium.
- In a playground renovation, the PoT should start at the main building entrance at the sidewalk, through the building to the playground. The PoT shall include returning back inside the building to the nearest restrooms and drinking fountains, if no drinking fountain is provided in the playground. The PoT should increase accessibility to the building, as well as accessibility between the building and the playground.
2.4.8.2 When the PoT funding obligation, calculated using the Path of Travel Worksheet in the Path of Travel Report, is not enough to cover the top priority item, the designer is to move to the next priority item, in sequence, until the PoT obligation has been met. There may be only partial work of one priority, or could be work of two priorities that may fit in the PoT Obligation.

2.4.9 Cost Estimate

2.4.9.1 The PoT Cost Estimate is used to verify that the PoT obligation is met. It shall be equal to, or greater than the PoT Obligation amount.

3.0 Exhibits

A. Path of Travel Process
B. Path of Travel Process Flowchart
C. Path of Travel Applicability by Capital Category

End of ADA Path of Travel Compliance Scoping Guidelines
The following “Path of Travel Process” is intended to supplement the ADA Path of Travel Compliance Scoping Guideline by providing detailed explanations of the PoT process and creation of the PoT Report during the scope and design phase for different types of projects.

A. Applicable Projects by Type

All standalone new buildings, new additions, and developer projects shall be designed to comply fully with ADA requirements and are therefore exempt from the Path of Travel process. Program Accessibility projects, both full and partial, are also exempt.

Lease conversion projects are exempt from the PoT process if the project involves a change of use and upgrading the entire facility. Further clarifications regarding the various types of lease conversion projects are indicated below.

All CIP, Reso A, CTF and LSP projects are subject to the PoT process.

B. PoT Process through Scope and Design Phases

1. Lease Conversions Projects not involving a Change of Use (i.e.: Non-Public School)

All non-public school lease conversion projects are PoT applicable since they will affect primary function areas.

A non-public school lease conversion project is typically initiated when Real Estate requests a study to determine the feasibility of converting the parochial school into a public school. A&E prepares a site assessment report with a cost estimate. For the report, 20% of the general construction cost shall be used as a placeholder estimate for the Path of Travel requirement until the project is authorized to proceed to scope and design. At such time, Capital Plan Management (CPM) will issue an llw# for the non-public school lease conversion and another llw# for the PoT. A PoT Report shall be required once the scope report has been finalized, a cost estimate has been derived and the project enters the design phase. The PoT Report shall be generated under the PoT llw# and the obligation amount shall be based on the eligible work in the parent project. An electronic copy of the draft PoT Report shall be reviewed by the DM and DPM for clarity and completeness and then forwarded to the Authority’s ADA Director. Once the ADA Director accepts the final PoT Report, the DM and DPM shall follow the standard lease conversion scope report distribution and proceed to design. The default delivery of the PoT work will be to package the PoT llw# with the parent project llw#(s) to be bid as one project. If the PoT cost estimate exceeds $200,000, then the DM will consult with CM and CPM as to whether the PoT work should be a standalone project to be bid separately from the parent project.

2. Lease Conversions Projects involving a Change of Use

If the school is the sole tenant of a leased facility, the project shall be designed to comply fully with ADA requirements and the project is therefore exempt from the PoT process.

If the school has a dedicated entrance within a multi-tenant facility, the project shall be designed to comply fully with ADA requirements and the project is therefore exempt from the PoT process.

If the school shares an entrance within a multi-tenant facility, the project is subject to the PoT process and the DM shall request a PoT llw# from CPM. A PoT Report shall be required once the scope report is finalized, a cost estimate has been derived and the project enters the design phase. The PoT Report shall be generated under the PoT llw# and the obligation amount shall be based on the eligible work in the parent project. An electronic copy of the draft PoT Report shall be reviewed by the DPM and DM for clarity and completeness and forwarded to the ADA Director. Once the ADA Director accepts the final PoT Report, the DM and DPM shall follow the standard lease conversion
scope report distribution and the project shall proceed to design. The default delivery of the PoT work will be to package the PoT llw# with the parent project llw#(s) to be bid as one project. If the PoT cost estimate exceeds $200,000, then the DM will consult with CM and CPM as to whether the PoT work should be a standalone project to be bid separately from the parent project.

3. Reso A/CIP
   The Scope Report and Reso A Scope/Field Report templates both contain questions that must be answered to determine whether the scope of work for the project is PoT applicable. The majority of the PoT applicable projects are Reso A projects since many of them affect primary function areas. There are two separate PoT processes for Reso A and CIP projects. (If a project is transferred to the Division of School Facilities (DSF), then the parent project and the PoT project are both transferred.)
   
a. Reso A Projects
   For many Reso A projects, CPM will create a PoT llw# from the onset. Refer to the table below for the list of Reso A types for which a PoT will automatically be created. If the project is deemed not PoT applicable by the ADA Director, the DPM shall notify CPM as such and request that the PoT llw# be cancelled.

<table>
<thead>
<tr>
<th>Cap Cat</th>
<th>Project Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>1D1</td>
<td>Athletic Fields</td>
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<tr>
<td>1D3</td>
<td>Swimming Pool</td>
</tr>
<tr>
<td>1E17</td>
<td>Auditorium Upgrade</td>
</tr>
<tr>
<td>1E18</td>
<td>Gymnasium Upgrade</td>
</tr>
<tr>
<td>1E21</td>
<td>Cafeteria Upgrade</td>
</tr>
<tr>
<td>2C2</td>
<td>Playground Upgrade</td>
</tr>
<tr>
<td>3A2</td>
<td>Room Conversion</td>
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<tr>
<td>3A5</td>
<td>Science Lab Upgrade</td>
</tr>
<tr>
<td>3A6</td>
<td>Library Upgrade</td>
</tr>
</tbody>
</table>

When a draft Reso A Scope/Field Report is received, an electronic copy of the draft Reso A Scope/Field Report shall be reviewed by the DPM and DM to ensure all PoT questions based on the current scope template are correctly answered and forwarded to the ADA Director. The DPM shall include the ADA Director as a scope reviewer when filling out the staff request form for scope reviewers. The ADA Director shall review the report to verify whether the PoT questions were answered correctly.

Once the final Reso A Scope/Field Report is received, the DPM shall follow the standard Scope Turnover transmittal process.

If the Reso A Project referred item is within the Reso A budget, the scope transmittal will note that the referred item will proceed to design. The associated PoT llw# will be used to track the generation of the PoT Scope Report. The obligation amount will be based on the eligible work in the parent Reso A project.

If the Reso A Project referred item exceeds the Reso A budget, the scope transmittal will note that the referred item shall not proceed to design unless approval is obtained from CPM.
The associated PoT llw# shall not proceed to the scope phase until the parent project is approved.

Once the referred Reso A project is approved to proceed to design, the PoT Report shall be generated under the PoT llw# and the obligation amount shall be based on the eligible work in the parent Reso A project. The PoT Report duration shall range from 6 to 8 weeks. The draft PoT Report shall be submitted 3 to 5 weeks from the start of the PoT effort. An electronic copy of the draft PoT Report shall be reviewed by the DM and DPM for clarity and completeness and then forwarded to the ADA Director. Once the ADA Director accepts the final PoT Report, the DM and DPM shall follow the standard Scope Turnover transmittal process and the project shall proceed to design. The default delivery of the PoT work will be to package the PoT llw# with the parent project llw#(s) to be bid as one project. If the PoT cost estimate exceeds $200,000, then the DM will consult with CM and CPM as to whether the PoT work should be a standalone project to be bid separately from the parent project.

b. CIP Projects

When a draft Scope Report is received, an electronic copy of the draft Scope Report shall be reviewed by the DPM and DM to ensure all PoT questions based on the current scope template are correctly answered and forwarded to the ADA Director. The DPM shall include the ADA Director as a scope reviewer when filling out the staff request form for scope reviewers. The ADA Director shall review the report to verify whether the PoT questions were answered correctly.

If the ADA Director confirms that the CIP project is PoT applicable, then the project will have PoT as an additional recommended item. The PoT additional recommended item construction cost shall be based on 20% of the total construction cost(s) of the LLW#(s) for the work affecting a Primary Function Area. Note, however, that PoT compliance shall not be scoped during the scope phase.

Once the final Scope Report is received, the DPM shall follow the standard Scope Turnover Transmittal process.

If a project is a Scope Only, the scope transmittal will note that the design team will not proceed to design for the referred item(s) and the PoT additional recommended item unless approval is obtained from CPM.

If a project is a Scope and Design Only, the scope transmittal will note that the design team will proceed to design with the referred items but will not proceed with the additional recommended item(s) including the PoT additional recommended item until CPM issues an llw# for the additional recommended item(s).

Once CPM approves the PoT additional recommended item, CPM will create a PoT llw# that will be forwarded to the A&E station (Note that the budget amount associated with the PoT llw# is only a placeholder). This will trigger A&E to proceed with the PoT Report. (If the project has the potential to increase in costs during the design phase due to assumptions made during the scope phase, the DM may decide to start the PoT Report after receipt of the 50% submittal and base the PoT obligation on the 50% cost estimate.) The PoT Report shall be generated under the PoT llw# and the obligation amount shall be based on the eligible work in the parent project. The PoT Report duration shall range from 6 to 8 weeks. The draft PoT Report shall be submitted 3 to 5 weeks from the start of the PoT effort. An electronic copy of the draft PoT Report shall be reviewed by the DM and DPM for clarity and completeness and then forwarded to the ADA Director. Once the ADA Director accepts the final PoT Report, the DM and DPM shall follow the standard Scope Turnover transmittal process and the project shall proceed to design. The
default delivery of the PoT work will be to package the PoT llw# with the parent project llw#(s) to be bid as one project. If the PoT cost estimate exceeds $200,000, then the DM will consult with CM and CPM as to whether the PoT work should be a standalone project to be bid separately from the parent project.

C. PoT Cost Estimates
   1. For PoT projects being packaged with the parent project – The mark-ups on the base construction cost (labor and materials) for the PoT work shall include most of the standard SCA mark-ups such as ACM allowance (10%), PLA, general conditions, overhead, and profit. Custodial fees and site security are not to be added since they are already part of the package via the parent project.

   2. For stand-alone PoT projects – All standard SCA mark-ups shall be applied to the PoT base construction cost, since it is not part of a package with a parent project.

   3. For PoT work to be done as bulletins/change orders – All standard SCA mark-ups shall be applied to the PoT base construction cost.

Note: Site security needs to be looked at on a project-by-project basis. For the most part, the general rule should be that site security is NOT to be included on interior projects.
### Scoping Phase

<table>
<thead>
<tr>
<th>Designer</th>
<th>DM/DPM</th>
<th>ADA Director</th>
<th>Capital Planning</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Draft Scope Report</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Final Scope Report</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Scope Report Turnover Transmittal</strong></td>
<td></td>
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</tr>
</tbody>
</table>

- **PoT Applicable Projects:**
  - Reso A (CP creates additional PoT llw at onset for certain project types)
  - CIP, CTF, LSP, Lease Conversion

- **Non-PoT Applicable Projects:**
  - Standalone NB’s
  - New Additions
  - Program Accessibility Projects
  - Developer Projects

- **Abbreviations:**
  - CM – Construction Management
  - CP – Capital Planning
  - DM – Design Manager
  - DPM – Design Project Manager
  - PoT – Path of Travel
  - SOW – Scope of Work
  - ARI – Additional Recommended Item

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**Exhibit B - Path of Travel Flowchart**

- **Draft Scope Report:**
  - PoT Review Complete for Draft Scope Report
  - PoT Not Applicable: PoT llw# will be canceled (if already created at onset)
  - PoT Applicable: Additional PoT llw# will be created for PoT (if not already created at onset)

- **Final Scope Report:**
  - PoT Review Complete for Final Scope Report
  - PoT Not Applicable: PoT llw# will be canceled (if already created at onset)
  - PoT Applicable: Additional PoT llw# will be created for PoT (if not already created at onset)

- **DM/DPM:**
  - Check for Completeness
  - Distribute Comments, PoT Review Complete for Draft Scope Report
  - Distribute Comments, PoT Review Complete for Final Scope Report

- **Draft Scope Report PoT Review:**
  - 1. Are PoT questions answered correctly?
  - 2. Is 20% PoT cost listed as ARI (if PoT is applicable)?

- **Final Scope Report PoT Review:**
  - 1. Are PoT questions answered correctly?
  - 2. Is 20% PoT cost listed as ARI (if PoT is applicable)?

- **If there is a Change to the SOW or Scope Estimate:**
  - Notify DM/DPM

- **If there is NO Change to SOW or Scope Estimate:**
  - PoT Review Complete for Draft Scope Report

- **Prepare Turnover Transmittal and Distribute Final Scope Report**

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**Page 1 of 2**
**Design Phase**

<table>
<thead>
<tr>
<th><strong>Draft Path of Travel Report</strong></th>
<th><strong>Final Path of Travel Report</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GENERATE DRAFT PATH OF TRAVEL REPORT</strong></td>
<td><strong>REVISE FINAL PATH OF TRAVEL REPORT</strong></td>
</tr>
<tr>
<td><strong>Distribute Comments: PoT Review Complete for Draft Path of Travel Report</strong></td>
<td><strong>Distribute</strong></td>
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<tr>
<td><strong>Review Draft Path of Travel Report</strong></td>
<td><strong>NOT Accepted</strong></td>
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<tr>
<td><strong>Comments are issued, notify DM/DPM</strong></td>
<td><strong>Comments are issued, notify DM/DPM</strong></td>
</tr>
<tr>
<td><strong>Revise Final Path of Travel Report</strong></td>
<td><strong>Accepted</strong></td>
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<tr>
<td><strong>Notify CP/DM/DPM</strong></td>
<td><strong>Recommend as Stand-alone or Package with the Parent Project</strong></td>
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<tr>
<td><strong>With DM/DPM/CM’s recommendation, CP decides how to proceed with the design:</strong></td>
<td><strong>Stand-alone Project</strong></td>
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<tr>
<td>1. Packaged with Parent Project (Default), or</td>
<td><strong>(Default)</strong></td>
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<tr>
<td>2. Stand-alone Project if the cost estimate is greater than $200k</td>
<td><strong>Parent Project</strong></td>
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</table>

**Exhibit B - Path of Travel Flowchart**

**Design Phase**
The following is a list of Capital Categories for Capital Improvement Projects. Those rows that are highlighted in green are typical categories that would affect a PFA and thus are subject to the PoT Process.

<table>
<thead>
<tr>
<th>Capital Category Codes</th>
<th>Capital Category Description</th>
<th>Funding Source</th>
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</thead>
<tbody>
<tr>
<td>1A1</td>
<td>New Construction - Building Replacement</td>
<td>Capacity</td>
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<tr>
<td>1B1</td>
<td>Full Modernizations</td>
<td>Capital</td>
</tr>
<tr>
<td>1B2</td>
<td>Interior Modernizations</td>
<td>Capital</td>
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<td>1B3</td>
<td>Exterior Modernizations</td>
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<td>1C1</td>
<td>Asbestos</td>
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<td>1C10</td>
<td>Flood Elimination</td>
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<td>1C11</td>
<td>Air Conditioning Retrofit</td>
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<td>1C12</td>
<td>Lead Paint Abatement</td>
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<td>1C13</td>
<td>Reinfocing Support Elements</td>
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<td>1C14</td>
<td>Interior Spaces</td>
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<td>1C2</td>
<td>Boiler Conversion</td>
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<tr>
<td>1C3</td>
<td>Climate Control</td>
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<td>1C4</td>
<td>Indoor Air Pollution Abatement</td>
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<td>1C5</td>
<td>Kitchen Conversion</td>
<td>Citywide</td>
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<td>1C6</td>
<td>Low-Voltage Electrical System</td>
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<td>1C7</td>
<td>Electrical Lighting Fixtures</td>
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<td>Elevators and Escalators</td>
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<td>1C9</td>
<td>Reinfocing Cinder Concrete Slabs</td>
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<td>Playground Redevelopment</td>
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<td>Parking Lots to Playgrounds</td>
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<td>Swimming Pools</td>
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<td>Roofs</td>
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<td>1E10</td>
<td>Toilets - Staff</td>
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<td>1E11</td>
<td>Floors</td>
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