Americans with Disabilities Act (ADA) Compliance Obligations of Local Governments

February 7, 2020

by

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DLZ Ohio, Inc.
Today’s Objectives

• Review ADA requirements for local governments, including townships
  – Administrative Tasks
  – ADA Self-Evaluation
    • Facilities
    • Policies, programs, and procedures
  – ADA Transition Plan

• Public Outreach Requirements

• Federal resources for more information

Please note that the ADA is a complex law and today’s presentation covers only the most relevant parts and at a fairly low level of detail. The content presented should not be construed as legal advice in any way.
The ADA

• Enacted in 1990 - First legislation that specifically protected individuals with disabilities

• Mandates that disabled individuals shall not be excluded from participation in, denied the benefit of, or be subject to discrimination under any program or activity.

• Five (5) Parts (or “Titles”) of ADA: Title II- Public Services will be discussed today (28 CFR Part 35)
Applicability of ADA to Local Units of Government

Title II or public entity means (as defined in 28 CFR Part 35.104)

- Any State or local government (Title II Entities);

- 35.105 Self-Evaluation

- 35.149 Discrimination Prohibited
  - no qualified individual with a disability shall, . . be excluded from . . the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

- 35.150(d) Transition Plan

- Many other important provisions we can’t cover in detail today

Local Governments
- County
- City
- **Township**
- Towns/Villages
- Public Schools
- Public Colleges
- Water/Sewer Board
- Park Board/Districts
- Library Board
- Utility Board
- Transit Agency
- Many others

Anything smaller than a state agency!!
Administrative Tasks

All Title II entities should IMMEDIATELY perform the following administrative tasks if not already in place

• Get organized! Research the ADA and meet with political leaders to get buy-in on the need for compliance.

• U.S. Department of Justice investigates complaints and is charged with enforcement of ADA.

• Reach out to disability advocacy groups and persons with disabilities to assist you.

• Determine where you provide programs, including at facilities that are not owned by you (example, polling places for counties).
Administrative Tasks

- Appoint an ADA Coordinator – this can really be anyone but the ADA Coordinator has an important role and should be trained to know ADA requirements. Each department should have someone with at least basic ADA knowledge.

Publish and publicize the name and contact information for the ADA Coordinator. It should be easy to find!
Administrative Tasks

- Adopt and publish an ADA Notice. Examples available at ADA.gov. (see below sample for Denver, CO).

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), Denver, Colorado, will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: Denver does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the Americans with Disabilities Act (ADA).

Effective Communication: Denver will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Denver programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: Denver will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all Denver programs, services, and activities. For example, individuals with service animals are welcomed in Denver offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a Denver program, service, or activity, should contact the office of [name and contact info for ADA Coordinator] as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require Denver to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a Denver program, service, or activity is not accessible to persons with disabilities should be directed to [name and contact info for ADA Coordinator].

Denver will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving item from locations that are open to the public but are not accessible to persons who use wheelchairs.
Administrative Tasks

• Adopt and publish a Grievance Policy. Examples available at ADA.gov. (see below sample).

The Americans with Disabilities Act
Title II Grievance Procedure

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Maryville. The City of Maryville’s Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to:

Leland Blackwood, ADA Coordinator
400 West Broadway Ave.
Maryville, TN 37801
e-mail: lblackwood@maryville-tn.gov

Within 30 calendar days after receipt of the complaint, the ADA Coordinator will meet with the complainant to discuss the complaint and the possible resolutions. Within 30 calendar days of the meeting, the ADA Coordinator will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Maryville and offer options for substantive resolution of the complaint.

If the response by the ADA coordinator does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 30 calendar days after receipt of the response to the City Manager or his/her designee.

Within 30 calendar days after receipt of the appeal, City Manager or his/her designee will meet with the complainant to discuss the complaint and possible resolutions. Within 30 calendar days after the meeting, the City Manager or his/her designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by Leland Blackwood or his designee, appeals to the City Manager, or his designee, and responses from these two offices will be retained by the City of Maryville for at least three years.
The Self-Evaluation

28 CFR 35.105

Self-Evaluation Report
- Data Collection
- Database Analysis
- Barrier Ranking

Disability Community Participation

28 CFR 35.150(d)(3)

ADA Transition Plan
- Corrective Measures
- Implementation Schedule
- Financing Plan
The Self-Evaluation

It is vital that your self-evaluation be properly scoped to ensure you meet the requirements. Scoping includes a number of components:

1. What facilities need to be included?
   - Right-of-Way (ROW) facilities
   - Non-ROW facilities (buildings, parks, etc.)
   - Leased facilities

2. What areas of facilities need to be included?

3. Programs

4. Policies and procedures
The Self-Evaluation – ROW Facilities

• ROW facilities
  – Sidewalks ("Pedestrian Access Routes")
The Self-Evaluation – ROW Facilities

• ROW facilities
  – Sidewalks ("Pedestrian Access Routes")
  – Curb Ramps
The Self-Evaluation – ROW Facilities

• ROW facilities
  – Sidewalks ("Pedestrian Access Routes")
  – Curb Ramps
  – Pedestrian Signals

Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way
July 26, 2011

UNIVERSITY OF WASHINGTON
A Federal Agency Committee to Accessible Design

DLZ
The Self-Evaluation – ROW Facilities

• ROW facilities
  – Sidewalks (“Pedestrian Access Routes”)
  – Curb Ramps
  – Pedestrian Signals
  – Transit Stops and Shelters
The Self-Evaluation – ROW Facilities

- ROW facilities
  - Sidewalks ("Pedestrian Access Routes")
  - Curb Ramps
  - Pedestrian Signals
  - Transit Stops and Shelters
  - On-Street Parking
    - Only spaces that are:
      - Marked
      - Metered
Scoping the Self-Evaluation – ROW Facilities

- ROW facilities
  - Sidewalks (“Pedestrian Access Routes”)
  - Curb Ramps
  - Pedestrian Signals
  - Transit Stops and Shelters
  - On-Street Parking
  - Street Furnishings and Others

- Many towns, townships, and counties have relatively few ROW facilities but it varies, cities and other Title II agencies (e.g., transit agencies) tend to have more ROW facilities
The Self-Evaluation–Non-ROW Facilities

- Non-ROW facilities are highly variable and vary based on the type of Title II entity (city vs. county) and many other factors
  - Municipal building(s)
  - Fire station(s)
  - Police station
  - Courthouse
  - Jail
  - Polling places
  - Libraries
  - Health Department
  - Animal shelter
  - Utility service center(s)
  - Water/wastewater plant
  - Community center
  - Parks
  - Public parking lots
  - County Extension
  - Cemeteries
  - Schools
  - Hospitals/clinics
  - Sports arena/stadium
  - Parking garages
  - Community pool
  - Airport
  - Landfill/recycling center
  - Parks & recreation office
  - Golf courses
  - Senior centers
  - Public works
  - Museum
  - Zoo
  - Transit Department
  - Many others possible!!
The Self-Evaluation – Non-ROW Facilities

- Examples of facility lists

**Blount Co., Tennessee**
- County Courthouse
- Animal Shelter
- Justice Center
- Operations Center
- Health Department
- Probation
- Library
- Recovery Court
- Soil Conservation
- Museum
- Senior Center
- Recreation Center
- 5 parks
- 34 polling places
- NO ROW FACILITIES!

**City of Dayton, OH**
- 106 total facilities & parks
- Public ROW sidewalks at 104 of these facilities
- 11 segments of bike path
- 312 traffic signals
- 1312 parking meters/ on-street parking

**City of Marietta, OH**
- 23 Buildings
- 15 Parks
- City doing ROW
It is vital that your self-evaluation be properly scoped to ensure you meet the requirements. Scoping includes a number of components:

1. What facilities need to be included? This can be the most time consuming part of scoping. You need to include all of your facilities that you own or have programs in but may be limited by 2. Complicated by leases.
   - ROW facilities
   - Non-ROW facilities (buildings, etc.)

2. What areas of facilities need to be included?

3. Programs

4. Policies and procedures
Scoping the Self-Evaluation – Area of Facilities

- Areas that are required to be assessed
  - All areas open to the public, even if the public is not regularly allowed
  - Employee “common use” areas
    - Break rooms/lunch rooms/kitchens/kitchenettes
    - Restricted entrances, restrooms, locker rooms, etc.
    - Common circulation paths

Employee “work areas” are excluded from Title II evaluation but have Title I requirements

**Common Use.** Interior or exterior circulation paths, rooms, spaces, or elements that are not for public use and are made available for the shared use of two or more people.

**Circulation Path.** An exterior or interior way of passage provided for pedestrian travel, including but not limited to, walks, hallways, courtyards, elevators, platform lifts, ramps, stairways, and landings.

**Restricted Entrance.** An entrance that is made available for common use on a controlled basis but not public use and that is not a service entrance.

**Employee Work Area.** All or any portion of a space used only by employees and used only for work. Corridors, toilet rooms, kitchenettes and break rooms are not employee work areas.
Scoping the Self-Evaluation

It is vital that your self-evaluation be properly scoped to ensure you meet the requirements. Scoping includes a number of components:

1. What facilities need to be included? This can be the most time consuming part of scoping. You need to include all of your facilities that you own or have programs in but may be limited by 2. Complicated by leases.
   - ROW facilities
   - Non-ROW facilities (buildings, etc.)

2. What areas of facilities need to be included?

3. Programs

4. Policies and procedures
Scoping the Self-Evaluation – Programs

- Programs include the various typical services provided by Title II entities to the public, including (but not limited to):
  - Property taxes, utility, and other payments
  - Voting!!
  - Parks & recreation
  - Utility service
  - Record-keeping
  - Courts
  - Planning & zoning
  - Permitting
  - Community education programs
  - Website(s)*
  - Government representation
  - Public meetings (televised??)
  - Public safety
  - Housing
  - Transportation (motorized & non-motorized)

When thinking about “programs” and “policies and procedures”, consider the programs to be the ‘what’ and the policies and procedures to be the ‘how and why’.
Scoping the Self-Evaluation

It is vital that your self-evaluation be properly scoped to ensure you meet the requirements. Scoping includes a number of components:

1. What facilities need to be included? This can be the most time consuming part of scoping. You need to include all of your facilities that you own or have programs in but may be limited by 2. Complicated by leases.
   - ROW facilities
   - Non-ROW facilities (buildings, etc.)

2. What areas of facilities need to be included?

3. Programs

4. Policies and procedures
Scoping the Self-Evaluation – Policies and Procedures

• Policies and procedures include:
  – Employment (primarily Title I)
    • Policy Manuals
    • Job Descriptions
    • Applications for Employment
    • Job Announcements
Scoping the Self-Evaluation – Policies and Procedures

- Policies and procedures include:
  - Employment (primarily Title I)
  - Equally Effective Communication:
    - Auxiliary aids/services available
    - Assistive Listening Systems
    - Interpreter services
    - TDD for 911
    - Others
Scoping the Self-Evaluation – Policies and Procedures

• Policies and procedures include:
  – Employment (primarily Title I)
  – Equally Effective Communication:
    – Alternate Communication Formats
      • Large print documents
      • Braille documents
      • Captioning
      • Others
Scoping the Self-Evaluation – Policies and Procedures

- Policies and procedures include:
  - Designation of ADA Coordinator: contact information should be EASY TO FIND
  - Employment (primarily Title I)
  - Equally Effective Communication:
  - Alternate Communication Formats
  - Fees and Surcharges: no fees or surcharges allowed that would exceed or not be placed on persons without disability (example – copies of documents)
Scoping the Self-Evaluation – Policies and Procedures

• Policies and procedures include:
  – Employment (primarily Title I)
  – Equally Effective Communication:
  – Alternate Communication Formats
  – Fees and Surcharges: no fees or surcharges allowed that would exceed or not be placed on persons without disability (example – copies of documents)
  – Design standards, ordinances, and details
Scoping the Self-Evaluation – Policies and Procedures

• Policies and procedures include:
  – Public Meetings
    • Identify all public boards and commissions and when and where they meet, ensure accessibility of all locations
    • Determine need for assistive listening devices
    • Copies of agendas and minutes
    • Meeting notices
    • TV broadcasts – are meetings broadcast live and/or recorded??
Scoping the Self-Evaluation – Policies and Procedures

• Policies and procedures include:
  – Public Meetings
  – Emergency Procedures: have specific plans for the disabled
    • Evacuation plans for individual facilities
    • Community-wide Emergency Management Plan
• Policies and procedures include:
  – Public Meetings
  – Emergency Procedures
  – Public information:
    • Equal Opportunity postings
    • Non-discrimination notices for meetings
    • Signage
    • Others

The City of Maryville is committed to providing equal access to City facilities, programs, meetings and services and we do comply with the Americans with Disabilities Act of 1990. In order to assist individuals with disabilities who require accommodations for participation in or access to City programs, services, and/or meetings, the City requests that individuals make requests for these accommodations at least forty-eight (48) hours ahead of the scheduled program, service, and/or meeting. To make arrangements, contact the ADA Coordinator, at (865) 273-3430 or email at lblackwood@maryville-tn.gov
Policies and Procedures – Staff Training

• All communities should educate staff about basic ADA issues
• Staff training is an often overlooked component of ensuring success
  – Specialized training recommended for:
    • ADA Coordinator
    • Law enforcement officers
    • Parks & recreation staff
    • Frontline staff that regularly interact with the public
• Suggested training topics could include:
  – Disability etiquette
  – Plan reviewers/inspectors
  – Modifications to provide reasonable accommodation
  – Communicating with customers with disabilities
  – Accepting calls placed through a relay system.
  – Others
Many disability organizations provide ADA training free of charge or for a nominal fee. The U.S. Access Board or the ADA National Network can provide local contact information for these organizations.

https://adata.org/ada-training
Performing the Self-Evaluation – Checklist

Many options available to complete self-evaluation:

• Staff (if available)
• Consultant
• Volunteers (beware)
• Combination

Whatever option you select, ensure compliance, don’t skimp on details.

• Have a good checklist and know what you need to evaluate at each facility.
  – Several checklists are readily available, most have some issues you need to be aware of.
  – Primary issue is knowing what you need to look at (scoping and technical) and how to do it.
The Transition Plan

28 CFR 35.105
Self-Evaluation Report
- Data Collection
- Database Analysis
- Barrier Ranking

28 CFR 35.150(d)(3)
ADA Transition Plan
- Corrective Measures
- Implementation Schedule
- Financing Plan

Disability Community Participation
28 CFR Part 35.150(d) Transition plan.

(3) The plan shall, at a minimum—

(i) Identify physical obstacles in the public entity’s facilities that limit the accessibility of its programs or activities to individuals with disabilities;

(ii) Describe in detail the methods that will be used to make the facilities accessible;

(iii) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and

(iv) Indicate the official responsible for implementation of the plan.

Transition Plans are planning documents. Detail should be fairly low but enough to know how to move forward. Find a GOOD example and use as a template. Beware the MANY bad examples.
The Transition Plan

• Need a way of “listing” non-compliant items for all facilities (we use Excel spreadsheets).
  – Include an estimated cost for corrective action or short-term alternate to provide access
  – Prioritize based on barrier presented

<table>
<thead>
<tr>
<th>Item</th>
<th>Priority</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adjust Door</td>
<td>Low</td>
<td>$100</td>
</tr>
<tr>
<td>Notes: Operating force is 7 lbs. (5 lb. max.). Door rubs on the floor. Federal Guideline: 404.2.8.1, 404.2.9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Insulate Water Lines</td>
<td>Medium</td>
<td>$100</td>
</tr>
<tr>
<td>Notes: Supply lines, valves, and exposed drain pipes are not insulated to protect against contact. Federal Guideline: 606.5</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reposition Mirror</td>
<td>Low</td>
<td>$50</td>
</tr>
<tr>
<td>Notes: Bottom edge of reflecting surface over sink is at 49-1/2&quot; ht. (40&quot; max.). Federal Guideline: 603.3</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Remove/Reposition Protruding Objects</td>
<td>Low</td>
<td>$50</td>
</tr>
<tr>
<td>Notes: Paper towel dispenser protrudes 8-1/2&quot; at 48&quot;. Federal Guideline: 307.2</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Replace One Urinal</td>
<td>Medium</td>
<td>$920</td>
</tr>
<tr>
<td>Notes: Top of lip is 23-3/4&quot; high (17&quot; max. ht.). Rim projects only 11-1/2&quot; from wall (13 1/2&quot; min.). Flush control at 51&quot; high (48&quot; max). Federal Guideline: 605.2</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Public Outreach

ADA requires outreach during both the Self-Evaluation and Transition Plan phases. Law is not specific how this is done:

• 35.105 Self-Evaluation

(b) A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the self-evaluation process by submitting comments.
Public Outreach

ADA requires, and is suggested, during both the Self-Evaluation and Transition Plan phases. Law is not specific how this is done:

- 35.105 Self-Evaluation
- 35.150(d) Transition Plan

A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments.
Public Outreach

• Options can include publishing a public notice in the local paper, posting a notice in the municipal building, etc.

Dear Advocate for the Disabled,

The Town of South Whitley has conducted a Self-Evaluation of all Town-owned facilities and all Town programs for compliance with the Americans with Disabilities Act (ADA) and prepared a draft Transition Plan describing the results of the self-evaluation. Title II of the ADA requires that each of the Town's services, programs, and activities be readily accessible and usable by individuals with disabilities. Copies of the Self-Evaluation and Transition Plan are available for public review at the following locations beginning on July 25, 2018:

• Clerk’s Office, 118 E. Front Street, South Whitley (during normal business hours)
• South Whitley Community Public Library, 201 E. Front Street, South Whitley (during normal hours)
• Town web site in PDF Format – https://southwhitley.org/

Comments can be provided, in writing, by the deadline of August 8, 2018 at 12 p.m. to Kent Slater, ADA Coordinator, at Town Hall or via e-mail at kslater@southwhitley.org. All comments will be reviewed and considered and included in the appendix of the document. The Town Board will hear comments on the Transition Plan at their regularly scheduled meeting on August 14, 2018, in the Council Chambers, 118 E. Front Street. This meeting begins at 6:30 p.m. and will be an opportunity for the community to provide suggestions, ask questions, and provide comments on the draft Self-Evaluation and Transition Plan. It is the intention of the Town to adopt the Self-Evaluation and Transition Plan at the August 14, 2018, meeting.
Public Outreach

• Publish a notice in the local newspaper

AFFIDAVIT OF PUBLICATION IN
THE DAILY TIMES

NOTICE OF PUBLIC COMMENT PERIOD

Notice is hereby given that the city of Maryville is conducting a Self-Evaluation of all City-owned facilities, public right-of-way, and programs for compliance with the Americans with Disabilities Act (ADA). Title II of the ADA requires that each of the City’s services, programs, and activities be readily accessible and usable by individuals with disabilities.

The City is soliciting public input, especially from persons with disabilities, their caregivers, and disability advocates, on what barriers to access or use of City facilities or programs exist or are perceived to exist. This will also be an opportunity for the community to provide suggestions and comments on how to remove barriers. All comments will be reviewed and considered for inclusion in the self-evaluation and transition plan.

Public comments may be dropped off in writing or mailed to the Human Resources office at the Maryville Municipal Building during normal business hours or provided via email to blackwood@maryville-tn.gov. Comments will be accepted until April 30, 2018.

The City complies with the Americans with Disabilities Act. Upon request, the City will provide written materials in appropriate alternative formats, or disability-related modifications or accommodation, including auxiliary aids or services, to enable individuals with disabilities to participate in public input. Please send a written request, including your name, mailing address, phone number, and brief description of the requested accommodation at least three (3) business days prior to the close of the comment period to the ADA Coordinator at (865) 273-3430 or Blackwood@maryville-tn.gov.

April 1, 2018

State of Tennessee, County of Blount, ss: Bryan Sandmeier being duly sworn, deposes and says that he is the General Manager of the Daily Times, a newspaper published in Maryville, Blount County, Tennessee and that the notice hereto attached was published __ consecutive days/weeks in said newspaper, first publication date being April 11, 2018, the last publication date being _____________, 2018.

Signed: [Signature]
Public Outreach

- Publish a notice in the local newspaper
- Develop a list of advocacy groups and send a letter about the project
  - National
  - Regional
  - Statewide
  - Local

Example List of Organizations for E. Tennessee Project
- Southeast ADA Center
- Disability Rights Tennessee
- Tennessee Disability Coalition
- The Arc of Tennessee
- The Arc of the Smoky Mountains
- Statewide Independent Living Council of Tennessee
- disABILITY Resource Center
- National Federation of the Blind-Tennessee
- Tennessee Council of the Blind
- East Tennessee Council of the Blind
- STEP-Support and Training for Exceptional Parents
- Tennessee Commission on Aging and Disability
- East Tennessee AAAD
- Tennessee Association of the Deaf
Public Outreach

- Publish a notice in the local newspaper
- Develop a list of advocacy groups and send a letter about the project

Tennessee Disability Coalition
955 Woodland Street
Nashville, TN 37206

Dear Advocate for the Disabled,

Blount County Government is conducting a Self-Evaluation Study of all city-owned facilities and programs for compliance with the Americans with Disabilities Act (ADA). Title II of the ADA requires that each of the city’s services, programs, and activities be readily accessible and usable by individuals with disabilities. Title II also requires public outreach to the community, especially persons with disabilities, their caregivers, and advocacy groups for the disabled. Blount County Government is sending this letter to solicit public input and comment on barriers that exist, or are perceived to exist, to persons with disabilities to access city programs.

We welcome your input to assist us on this project. All comments will be reviewed and considered and included in the final report. Please feel free to pass the information about this project on to others that you believe might be interested in providing input or comments. The comment period will be open until adoption of the plan by the County Commission, which is tentatively scheduled to occur following a Public Hearing at a regular meeting in summer 2018. A copy of the draft Transition Plan will be made available for public review and comment prior to the Public Hearing.
Public Outreach

Use of on-line surveys, need to advertise where they can be accessed but are anonymous and tend to get good comments

<table>
<thead>
<tr>
<th>3. Have you, a family member, or someone you know encountered any difficulties accessing city facilities or programs due to the disability?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td># Response(s)</td>
</tr>
<tr>
<td>Yes (please describe below)</td>
</tr>
<tr>
<td>No</td>
</tr>
<tr>
<td>No Responses</td>
</tr>
<tr>
<td><strong>Total</strong></td>
</tr>
<tr>
<td>13 Comment(s)</td>
</tr>
</tbody>
</table>
Resources – The USDOJ

- Maintains web site with excellent information for compliance as well as examples of what happens in cases of non-compliance (http://www.ada.gov/)
The Access Board website includes a variety of information (www.access-board.gov).
Questions??

Contact Information
Greg Galieti
ggalieti@dlz.com