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**ADA Self Evaluation and
Preliminary Transition Plan
February 2, 2010**



Table of Contents

Table of Contents.....	i-ii
1.0	Current Update Self-Evaluation and Transition Plan..... 1
1.1	Summary of Current Project and Scope
1.2	Staff and Public Review
1.2.1	ADA Subcommittee
1.2.2	Staff ADA Compliance Team
2.0	City ADA Background..... 3
2.1	History and Scope of Work
2.2	Outcomes
3.0	Definitions of Scope and Methodology of Current Self Evaluation and Transition Plan Update Project 3
3.1	Self Evaluation
3.2	Programmatic Barriers
3.3	Architectural Barriers
3.4	Transition Plan
3.5	Transition Plan Methodology
4.0	Administrative Requirements of the ADA for Title II..... 4
4.1	Program Access
4.2	Integrated Programs
4.3	Communications
4.4	New Construction and Alterations
4.5	Enforcement
4.6	Complaints
5.0	2008 Self Evaluation Survey of Programs, Services and Activities Report..... 8
5.1	Summary of Survey
5.2	Summary Findings
5.3	Summary Recommendations for Transition Plan
5.4	Survey Findings and Recommendations under Administrative Requirements
5.4.1	Public Notice
5.4.2	Non Discrimination Requirements
5.4.3	Grievance Procedure
5.4.4	Equally Effective Communication
5.4.5	Media and Website
5.4.6	Training
5.4.7	Transportation and Safety
5.4.8	Written Policies and Procedures
6.0	Other City Responsibilities Under the ADA..... 18
6.1	Employment

6.2	Special Events	
6.3	Records Maintenance	
6.4	Curb Ramps and Sidewalks	
6.5	Audible Signals	
7.0	Transition Plan Completion and Barrier Removal for Programs Services and Activities	20
7.1	Transition Plan Documentation Process	
7.2	Preliminary Barrier Removal Tracking Document	
8.0	Transition Plan Completion and Barrier Removal for Facilities	24
8.1	Summary of Survey for Facilities	
8.2	Summary of Survey Findings and Transition Plan Recommendations	
8.3	Proposed Preliminary Timeline for Transition Plan Completion	
9.0	Appendices	27
	Appendix A	Definitions
	Appendix B	Summary of City of Davis Architectural Barriers Projects 1991-2010
	Appendix C	ADA Nondiscrimination Requirements
	Appendix D	Public Notice
	Appendix E	Request for Accommodation, Grievance and Complaint Procedure
	Appendix F	ADA Records Maintenance Log
	Appendix G	Facility Transition Plan Methodology Worksheet
	Appendix H	Survey Findings and Recommendations for Facilities
	Appendix I	Self Evaluation Survey Tool for Programs, Services and Activities

Self Evaluation Report and Preliminary Transition Plan City of Davis

1.0 Current Update Self-Evaluation and Transition Plan

1.1 Summary of Current Project and Scope

In 2007, the City began the process of updating the initial ADA Self Evaluation and Transition Plan originally developed in 1992 in response to the Americans with Disabilities Act (ADA), enacted in 1990 which mandates equal opportunity for individuals with disabilities.

The scope of the current self evaluation and transition plan includes the assessment of City programs, activities and services as well as selected City facilities. Staff developed a self evaluation survey tool to measure the levels of accessibility in City's programs, services and activities in compliance with ADA regulations. Sixty-nine City staff members who are responsible for program and service implementation throughout City departments completed the survey, which assessed and inventoried the level of access currently afforded to individuals with disabilities utilizing City programs. In all, 112 City programs, services and activities were surveyed. Results from the self-evaluation were tabulated, categorized and analyzed over the next year.

The other component to the Self Evaluation Survey encompasses the City's facilities. In the spring of 2008, the City contracted with the firm of Gilda Puente-Peters Architects to begin surveying city-owned facilities including each facility's surrounding public right of way. These survey reports will provide data to update the City's original transition plan. In order to proceed with ADA projects as part of 2010-2011 Community Development Block Grant funding cycle, a preliminary transition plan report is being submitted to the City Council in February 2010 that includes evaluation results of some but not all City facilities. A final comprehensive Transition Plan Report will be presented to City Council when all of the designated facility reports have been completed. The scope of work for the current city facilities self evaluation and transition plan includes survey results of the most heavily used City facilities and surrounding public right of way. The transition plan identifies both the structural and programmatic barriers to access and recommendations for actions to remove the barriers.

The City's current self evaluation will result in an updated transition plan replacing the 1992 transition plan. Current programmatic and facility assessments will be evaluated, prioritized and recorded to begin developing a plan to remove the identified barriers. A proposed timeline will be developed to accomplish the goals set forth in the updated transition plan. A realistic projection will address projects through 2012; however, efforts will be made to extend those projections to both five-year and ten-year tiers.

1.2 Staff and Public Review

According to Title II guidelines, interested parties including people with disabilities and organizations representing people with disabilities must at a minimum have an opportunity to participate in the development of the plan by submitting comments once the draft is available. The City has a well established public participation process for ensuring community stakeholders are involved in review and development of documents such as the ADA self evaluation and

transition plan. Most sections of the current report have been discussed at multiple public meetings hosted by the City's ADA Subcommittee of the Social Services Commission and the Social Services Commission which advises the Davis City Council on matters related to ADA compliance and other housing and social services issues. Both groups review and comment on the self evaluation and transition plan, and also provide input for potential solutions to structural and programmatic barriers in the City's programs. In addition to these two groups, the City established an inter-departmental ADA Compliance Team as a staff working group to assist with implementation of the self evaluation project and development of the transition plan and ongoing compliance efforts.

1.2.1 ADA Subcommittee

The ADA Subcommittee advises the Social Services Commission and consists of City staff and community members with disabilities or who represent persons with disabilities. Among the duties, the Subcommittee has the responsibility for prioritizing and recommending physical and programmatic barrier removal projects within the annual CDBG budget. Staff coordinates the work of the ADA Subcommittee and monitors the barrier removal projects to ensure that limited public resources are maximized. The Social Services Commission and the ADA Subcommittee also meet jointly to review and comment on the self-evaluation and transition plan, and also provide input for potential solutions to structural and programmatic barriers in the City's programs. In the creation of this transition plan, staff is recommending that this group, which has served as a Commission Subcommittee, would more appropriately be structured as the City's ADA Community Advisors to staff. This could both reduce some of the group's meeting and records requirements and would expand potential participation in the group by opening it up to the greater community. As a subcommittee, the group requires majority representation by the Social Services Commission, but with transition into community advisors the group could access interested parties within the community with interest and expertise in ADA projects and activities.

1.2.2 Staff ADA Compliance Team

The City's ADA compliance team was initially formed to monitor the self evaluation survey project for programs, services and activities and to review those findings. As a team, staff representatives from each City department gather and exchange information on public feedback and current differences in procedures between departments. Team members have provided advice and input in the development of the ADA Public Notice, and the Grievance and Complaint Procedure helping to standardize documents across departments to inform the public of their rights under ADA federal law. These staff representatives continue to serve as the ADA contact persons within their departments for public and staff inquiries. Upon completion of the report and preliminary transition plan, the Committee's goals and objectives will be re-evaluated to ensure that the plan recommendations are properly documented and consistently applied across departments and are completed in a timely manner. The ADA compliance team will continue to work with the ADA Coordinator to ensure that the recommended measures of the self evaluation survey are efficiently documented, monitored and implemented including financial and/or administrative burdens that may impede those measures.

2.0 City ADA Background

2.1 History and Scope of Previous Work

Title II of the ADA was passed into law in 1990 requiring all local governments to conduct a self evaluation of all facilities, programs and services. The City of Davis completed its first ADA self-evaluation resulting in a transition plan that was adopted by the City Council in July 1992. The transition plan listed both programmatic and physical changes necessary to achieve program accessibility and developed a written plan that identified the modifications to be made. The scope of work examined ten areas, including physical barriers, policies and practices, communications, auxiliary aids, emergency evacuations, historic preservation program, determination of undue burdens, training, employment, and new construction. During this period, the City identified a part-time consultant who convened an ad-hoc ADA advisory committee for the coordination of the project. It was also during this time that the ADA Subcommittee was formed under the Social Services Commission and provided annual recommendations for the prioritization of ADA projects consistent with the original self evaluation findings.

2.2 Outcomes

The transition plan recommendations resulting from the 1992 self evaluation included one-time projects (such as, identified structural changes, initial and ongoing employee training, the purchase of auxiliary aids) and ongoing projects (including, but not limited to, priority curb ramps, priority play equipment modifications, Braille conversion including other signage and media modifications and public information on accessibility). Checklists were created and projected costs were factored into the CDBG and CIP funding process. A tracking list was maintained to monitor the elimination of physical barriers within the City. During the self-evaluation, residents with disabilities and interested community members represented the community by providing input for City's programs, services, and activities to promote accessibility for persons with disabilities. The City's progress towards ADA compliance under the original transition plan can be viewed in Appendix B.

3.0 Scope and Methodology of Current Self Evaluation and Transition Plan Update Project

3.1 Self-Evaluation (28 CFR 35.105)

By federal mandate, the City is required to evaluate current policies and practices to identify and correct any barriers that are inconsistent with the intent of the law. One tool employed by the City for examining accessibility was a questionnaire administered to department staff, the results of which provide information on the nature of a program, service or activity and provisions made for individuals with disabilities to access these services. The cornerstone of measurement rests in what types of written policies, procedures and staff training are or are not in place to achieve ADA compliance. The self evaluation also encompasses a survey report of city buildings, facilities and the public right-of-way maintained by the city assessing physical barriers that may impede access to the programs, services and activities that the city provides.

3.2 Programmatic Barriers

The self evaluation report identifies gaps, assesses and evaluates programs, services and activities operated by the City. Programmatic barriers are measured against the ADA Non

Discrimination and Administrative Requirements as published by the U.S. Department of Justice and listed in this document in Appendix C. Staff identified as having the best knowledge of program operations were identified and answered survey questions. The results were tabulated for the purposes of removing these barriers through a systematic program as described later in this report and incorporated into the City's ADA transition plan.

3.3 Architectural Barriers

The self evaluation report identifies gaps and assesses physical barriers, which include City-owned or leased buildings, facilities, and the public right of way. Though the ADA does not prescribe any standards for the evaluation of existing facilities, on-site assessments were made using the following new construction and alteration standards: the ADA Standards as they are appended in Title 28 of the Code of Federal Regulations, part 36 (from hereon referred to as the Americans with Disabilities Act Accessibility Guidelines, or ADAAG), and the California State Accessibility Standards (from hereon referred to as the CSAS). These requirements are contained in the current California Building Standards Code. The Facilities survey identifies, locates, and cites specific codes for architectural barriers in both the federal and state accessibility guidelines and standards outlined in the ADAAG and the CSAS. The City contracted with Gilda Puente-Peters Architects in spring 2008 to survey city-owned facilities including the surrounding public right of way. These survey reports will provide data to update the city's original transition plan for facilities completed in 1992, guiding future ADA project decisions by the City.

3.4 Transition Plan

The City's transition plan will be a written document produced from results of the comprehensive surveys of existing programmatic and architectural barriers for individuals with disabilities. This transition plan describes programmatic and architectural barriers in City programs and facilities and estimates the costs for their mitigation, sets priorities for their elimination, and provides a schedule for their removal. The plan will include estimated timelines for completing the modifications.

3.5 Transition Plan Methodology

The City is utilizing a systematic technique for ranking and prioritizing architectural barrier removal based on health and safety considerations, access impediments and evaluating both the focus of facility use with the intensity of use of each facility. Other factors used in analyzing barrier removal are project costs, funding availability and priority ranking with similar capital improvement projects underway.

4.0 Administrative Requirements of the ADA for Title II: State and Local Governments.

A public entity was required to comply with the requirements of title II on January 26, 1992, whether or not it had completed its self evaluation. A self evaluation is a public entity's assessment of its current policies and practices. The self evaluation identifies and corrects those policies and practices that are inconsistent with Title II requirements. As part of the self evaluation, a public entity should:

- Identify all of the public entity's programs, activities, and services; and
- Review all the policies and practices that govern the administration of the public entity's programs, activities, and services.

In this regard, a public entity should be mindful that although its policies and practices may appear harmless, they may result in denying individuals with disabilities the full participation of its programs, activities, or services. Areas that need careful examination include the following:

1. A public entity must examine each program to determine whether any physical barriers to access exist. It should identify steps that need to be taken to enable these programs to be made accessible when viewed in their entirety. If structural changes are necessary, they should be included in the transition plan.
2. A public entity must review its policies and practices to determine whether any exclude or limit the participation of individuals with disabilities in its programs, activities, or services. Such policies or practices must be modified, unless they are necessary for the operation or provision of the program, service, or activity. The self evaluation should identify policy modifications to be implemented and include complete justifications for any exclusionary or limiting policies or practices that will not be modified.
3. A public entity should review its policies to ensure that it communicates with applicants, participants, and members of the public with disabilities in a manner that is as effective as its communications with others. If a public entity communicates with applicants and beneficiaries by telephone, it should ensure that TDD's or equally effective telecommunication systems are used to communicate with individuals with impaired hearing or speech. Finally, if a public entity provides telephone emergency services, it should review its policies to ensure direct access to individuals who use TDD's and computer modems.
4. A public entity should review its policies to ensure that they include provisions for readers for individuals with visual impairments; interpreters or other alternative communication measures, as appropriate, for individuals with hearing impairments; and amanuenses for individuals with manual impairments. A method for securing these services should be developed, including guidance on when and where these services will be provided. Where equipment is used as part of a public entity's program, activity, or service, an assessment should be made to ensure that the equipment is usable by individuals with disabilities, particularly individuals with hearing, visual, and manual impairments. In addition, a public entity should have policies that ensure that its equipment is maintained in operable working order.
5. A review should be made of the procedures to evacuate individuals with disabilities during an emergency. This may require the installation of visual and audible warning signals and special procedures for assisting individuals with disabilities from a facility during an emergency.
6. A review should be conducted of a public entity's written and audio-visual materials to ensure that individuals with disabilities are not portrayed in an offensive or demeaning manner.
7. If a public entity operates historic preservation programs, it should review its policies to ensure that it gives priority to methods that provide physical access to individuals with disabilities.

8. A public entity should review its policies to ensure that its decisions concerning a fundamental alteration in the nature of a program, activity, or service, or a decision that an undue financial and administrative burden will be imposed by title II, are made properly and expeditiously.
9. A public entity should review its policies and procedures to ensure that individuals with mobility impairments are provided access to public meetings.
10. A public entity should review its employment practices to ensure that they comply with other applicable nondiscrimination requirements, including section 504 of the Rehabilitation Act and the ADA regulation issued by the Equal Employment Opportunity Commission.
11. A public entity should review its building and construction policies to ensure that the construction of each new facility or part of a facility, or the alteration of existing facilities after January 26, 1992, conforms to the standards designated under the title II regulation.
12. A review should be made to ascertain whether measures have been taken to ensure that employees of a public entity are familiar with the policies and practices for the full participation of individuals with disabilities. If appropriate, training should be provided to employees.
13. If a public entity limits or denies participation in its programs, activities, or services based on drug usage, it should make sure that such policies do not discriminate against former drug users, as opposed to individuals who are currently engaged in illegal use of drugs.

4.1 Program Access

State and local governments:

- Must ensure that individuals with disabilities are not excluded from services, programs, and activities because buildings are inaccessible.
- Need not remove physical barriers, such as stairs, in all existing buildings, as long as they make their programs accessible to individuals who are unable to use an inaccessible existing facility.
- Can provide the services, programs, and activities offered in the facility to individuals with disabilities through alternative methods, if physical barriers are not removed, such as
 - a) Relocating a service to an accessible facility, e.g., moving a public information office from the third floor to the first floor of a building.
 - b) Providing an aide or personal assistant to enable an individual with a disability to obtain the service.
 - c) Providing benefits or services at an individual's home, or at an alternative accessible site.
- Are not required to take any action that would result in a fundamental alteration in the nature of the service, program, or activity or in undue financial and administrative burdens. However, public entities must take any other action, if available, that would not result in a fundamental alteration or undue burdens but would ensure that individuals with disabilities receive the benefits or services.

4.2 Integrated Programs

Integration of individuals with disabilities into the mainstream of society is fundamental to the purposes of the Americans with Disabilities Act. Public entities may not provide services or

benefits to individuals with disabilities through programs that are separate or different, unless the separate programs are necessary to ensure that the benefits and services are equally effective.

Even when separate programs are permitted, an individual with a disability still has the right to choose to participate in the regular program. For example, it would not be a violation for a city to offer recreational programs specially designed for children with mobility impairments, but it would be a violation if the city refused to allow children with disabilities to participate in its other recreational programs.

State and local governments may not require an individual with a disability to accept a special accommodation or benefit if the individual chooses not to accept it.

4.3 Communications

State and local governments must ensure effective communication with individuals with disabilities.

Where necessary to ensure that communications with individuals with hearing, vision, or speech impairments are as effective as communications with others, the public entity must provide appropriate auxiliary aids. "Auxiliary aids" include such services or devices as qualified interpreters, assistive listening headsets, television captioning and decoders, telecommunications devices for deaf persons (TDD's), videotext displays, readers, taped texts, Braille materials, and large print materials.

A public entity may not charge an individual with a disability for the use of an auxiliary aid. Telephone emergency services, including 911 services, must provide direct access to individuals with speech or hearing impairments.

Public entities are not required to provide auxiliary aids that would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens. However, public entities must still furnish another auxiliary aid, if available, that does not result in a fundamental alteration or undue burdens.

4.4 New Construction and Alterations

Public entities must ensure that newly constructed buildings and facilities are free of architectural and communication barriers that restrict access or use by individuals with disabilities.

When a public entity undertakes alterations to an existing building, it must also ensure that the altered portions are accessible.

The ADA does not require retrofitting of existing buildings to eliminate barriers, but does establish a high standard of accessibility for new buildings. Public entities may choose between two technical standards for accessible design: The Uniform Federal Accessibility Standard (UFAS), established under the Architectural Barriers Act, or the Americans with Disability Act Accessibility Guidelines, adopted by the Department of Justice for places of public accommodation and commercial facilities covered by title III of the ADA.

The elevator exemption for small buildings under ADA Accessibility Guidelines would not apply to public entities covered by title II.

4.5 Enforcement

Private parties may bring lawsuits to enforce their rights under title II of the ADA. The remedies available are the same as those provided under section 504 of the Rehabilitation Act of 1973. A reasonable attorney's fee may be awarded to the prevailing party.

Individuals may also file complaints with appropriate administrative agencies. The regulation designates eight Federal agencies to handle complaints filed under title II.

Complaints may also be filed with any Federal agency that provides financial assistance to the program in question, or with the Department of Justice, which will refer the complaint to the appropriate agency.

4.6 Complaints

Any individual who believes that he or she is a victim of discrimination prohibited by the regulation may file a complaint. Complaints on behalf of classes of individuals are also permitted.

Complaints should be in writing, signed by the complainant or an authorized representative, and should contain the complainant's name and address and describe the public entity's alleged discriminatory action.

(Source: <http://www.ada.gov/reg2.html>)

5.0 2008 Self Evaluation Survey Report for Programs, Services and Activities

5.1 Summary of Survey

The online survey administered to key City staff assessed and inventoried the level of access currently afforded to individuals with disabilities utilizing City programs. Areas that were assessed during the current programmatic self evaluation project are:

- Notices informing the public of their rights under the ADA
- Forms and methods used to advertise the program's services and activities
- Forms and methods for program modifications, grievances and complaints
- Types of equipment and materials available and maintenance of such equipment
- Program testing and entrance requirements
- Telephone emergency services
- Emergency evacuation plans for individuals
- Contractual language for outside services.

Within the above categories the ADA General Requirements were integrated into the design of the survey to insure an accurate assessment of current City policies and procedures. Thus the self evaluation survey results reflect a comprehensive measurement of ADA requirements that will provide an accurate assessment of the existing barriers in City programs, services and activities.

5.2 Summary of Findings

Training of city staff was identified as a major gap with a high priority for correction in order to ensure that accurate information is provided to the public about equal access, responding to reasonable accommodations requests, and understanding and applying City ADA policy and procedures.

Some examples of these barriers include:

- A need to improve staff training in order to promote public awareness of the City’s responsibility to provide equal access for persons with disabilities.
- A need to standardize language for citywide ADA policies and procedures applicable to programs and services conducted or negotiated by the City and/or within City facilities.
- A need to improve training for supervisors who process grievances related to ADA access.
- A need to review and if necessary revise contract language to ensure that the City’s outside contractors are trained and equipped to comply with ADA standards.
- A need for continued staff training on website accessibility for individuals with visual impairments.

Based on results of the internal survey of programs, services, and activities, the following section, Section 5.3, provides language for this portion of the transition plan.

5.3 Summary of Recommendations for Transition Plan

Transition Plan Focus Areas and Actions for City Programs, Services, and Activities:

Focus Area	Proposed Actions for Focus Area
Training	<ul style="list-style-type: none"> • Staff training in ADA issues and requirements • Staff training on handling requests for reasonable accommodations and grievances • Increase staff knowledge and use of communication tools such as California Relay Service, TTY lines and knowledge and use of auxiliary aids such as hearing devices. • Increase staff knowledge and use of Community Resource list for contract services such as Braille Transcription and certified interpreting services. • Increase staff knowledge and skills in the production of documents in alternative formats, as needed. • Continued staff training on website accessibility for individuals with visual impairments.

Focus Area	Proposed Actions for Focus Area
Policies and Procedures	<ul style="list-style-type: none"> • City-wide standardization of policies and procedures related to ADA issues, including: posting and circulation of the Public Notice of the City’s Policy on ADA compliance, Requests for Reasonable Accommodations, and filing grievances and complaints. • Improve city emergency operations planning and response related to the safe evacuation of individuals with disabilities. • There is a need to standardize policies and procedures related to ADA issues including procedures for requesting reasonable accommodations and filing grievances and complaints.
Communications	<ul style="list-style-type: none"> • There is a need for informing the general public of the City’s obligations to comply with ADA requirements. A standard public notice to be published on all City documents and City website is needed so that individuals with disabilities are able to access city services information.
Grievance Procedures	<ul style="list-style-type: none"> • There is a need for a consistent, standardized procedure for handling grievances related to ADA issues. There are currently a variety of different ways each City department handles grievances in this area a city-wide procedure is needed.
Media and Website	<ul style="list-style-type: none"> • There is a need to increase use of alternative media (i.e. radio) and to improve access to information on the City’s website.
Transportation and Safety	<ul style="list-style-type: none"> • There is a need to improve emergency operations planning and responses related to individuals with disabilities.

Ongoing actions in these focus areas will continue to be the development of regular ADA awareness training for staff, and evaluation by the ADA Coordinator and Community Services Director of areas of operation that require additional written policies and procedures to ensure compliance with ADA requirements. Further efforts will be made to communicate City goals for full compliance of ADA requirements to all Department Heads. Long-term goals will focus on effectively monitoring milestones in completing projects listed in the transition plan, and periodically updating the document to reflect needed changes as a result of new revisions in ADA Title II requirements.

5.4 Survey Findings and Recommendations under Administrative Requirements for Programs, Services and Activities

The following section documents specific findings of the Survey as measured by the ADA Administrative Requirements.

5.4.1 Public Notice (28 C.F.R.35.106 Notice)

The Americans with Disabilities Act requires a public notice of nondiscrimination to inform applicants, participants, beneficiaries, and other interested persons of their rights and protections under the ADA law (28 CFR 35.106).

- **Survey Findings:**
 - 1) Language for the Notice of Nondiscrimination and the City’s ADA Public Notice was not standardized across departments or non-existent.

2) Staff responses reflected a lack of knowledge about the purpose of the Notice, its content or how the information can be accessed. There were 89 programs that skipped the question all together.

- **Recommendations:**

- 1) Adopt standardized language for the Public Notice.
- 2) Adopt written procedures and staff training on proper application of the Public Notice.
- 3) Update and circulate to staff existing program policies for inclusion of individuals with disabilities.

5.4.2 Nondiscrimination Requirements: (28 C.F.R. § 35; 130.a; 35.150)

Any policies, practices, or procedures that may limit or exclude individuals with disabilities must be reasonably modified, unless doing so would result in a fundamental alteration in the nature of the service, program, or activity.

- **Findings:**

- 1) Almost 40% of respondents said they are not aware of the procedure for an individual to request a modification of program policies, procedures or practices to accommodate his/her disability.
- 2) Only 20% of respondents reported that they have written policies and procedures for notifying members of the public of their right to request modifications of policies and procedures.
- 3) Only 35% of respondents notify the public of their right to request alternative formats and auxiliary aids.
- 4) 69% of City staff surveyed state that they are informed how to handle a request for an accommodation by word of mouth indicating there is not adequate or consistent training or written policies and procedures for responding to the requests and needs of individuals with disabilities.

- **Recommendations**

- 1) Implement staff training on the ADA requirements for modifying a program, policy and procedure to accommodate any person with a disability.
- 2) Develop a written policy and procedure for notifying members of the public of their right to request modifications of policies and procedures.
- 3) Develop a written policy and procedure for notifying members of the public of their right to request information in alternative formats and for requesting auxiliary aids such as assistive hearing devices.
- 4) Write procedures for the consistent application of responding to requests for accommodations and develop and implement a program for adequate staff training.

5.4.3 Grievance Procedure [28 C.F.R.35.107 (b) Complaint procedure]

The Americans with Disabilities Act requires the adoption of a grievance procedure for grievances arising under Title II (28 CFR 35.107b) for entities with fifty or more employees. The procedure must provide for investigation and resolution of complaints at the local level without requiring the complainant to resort to complaint procedures at the federal government level. Individuals may also file complaints with appropriate administrative agencies. The regulation designates eight Federal agencies to handle complaints filed under title II. Complaints may also

be filed with any Federal agency that provides financial assistance to the program in question, or with the Department of Justice, which will refer the complaint to the appropriate agency.

- **Survey Findings**

- 1) More than half of staff members surveyed stated their department did not have a grievance procedure.
- 2) More than half of staff members surveyed who makes decisions on grievances reported they had not received training on a grievance procedure.

- **Recommendations**

- 1) Develop written policy and procedure for processing grievances and complaints and provide adequate training on its application to City staff.
- 2) Require federal and state disability rights training for staff members who make decisions on grievances.

5.4.4 Equally Effective Communication [28 CFR 35.160(a)]

The Americans with Disabilities Act requires public entities to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others. Further, the Act requires the provision of appropriate auxiliary aids and services, when necessary, to give an individual with a disability and equal opportunity to participate in and enjoy the benefits of programs, services, and activities. Generally, the requirement to provide an auxiliary aid or service is triggered when a person with a disability requests it. State and local governments must ensure effective communication with individuals with disabilities.

Where necessary to ensure that communications with individuals with hearing, vision, or speech impairments are as effective as communications with others, the public entity must provide appropriate auxiliary aids. "Auxiliary aids" include such services or devices as qualified interpreters, assistive listening headsets, television captioning and decoders, telecommunications devices for deaf persons (TDD's), videotext displays, readers, taped texts, Braille materials, and large print materials.

A public entity may not charge an individual with a disability for the use of an auxiliary aid. Telephone emergency services, including 911 services, must provide direct access to individuals with speech or hearing impairments.

Public entities are not required to provide auxiliary aids that would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens. However, public entities must still furnish another auxiliary aid, if available, that does not result in a fundamental alteration or undue burdens.

- **Survey Findings**

- 1) There is no documented system, policy or procedure for the usage of, training or maintenance of the City's Text Telephone Terminal Type (TTY). Results indicated that 38 programs were not aware of an available TTY for their use. Only 20% stated their staff had been trained to use the TTY and 76% said the phone was not available for the public to use to make outgoing calls necessary for internal inquiries or to request transportation.

- 2) 90% of employees surveyed responded they were not trained to use the California Relay Service to communicate with hearing impaired clients.
 - 3) 67% of survey respondents said their program does not notify the public about whether their primary program is architecturally accessible (e.g., whether or not it is accessible to people in wheelchairs, whether or not there are obstructions that would hinder people who are blind).
 - 4) 79% of staff stated they did not know of a written policy and procedure they must follow to assist someone in requesting materials in an alternative format or requesting an auxiliary aid. 50% said their program does not use auxiliary aids to make program materials and services accessible.
 - 5) In their regular contract monitoring process Program Officers/ Contract Monitors responded that they do not have a citywide policy and procedure to measure the contractor's record of providing written materials in alternative format (e.g. Braille, audio tape, large print, floppy disk, email, website, etc.).
- **Recommendations**
 - 1) Document the purpose, usage, location, and maintenance of the City's TTY line in a citywide procedure.
 - 2) Include information and instructions about the California Relay Service in the ADA Training Manual.
 - 3) Include a written announcement of the availability of alternative formats in City publications.
 - 4) Develop a written citywide policy and procedure for processing Requests for Reasonable Accommodations including alternative formats and auxiliary aids.
 - 5) Develop a citywide policy and procedure to identify whether potential contractors/consultant's provide for written materials in alternative formats? (e.g. Braille, audio tape, large print, floppy disk, email, website, etc.).

5.4.5 Media and Website [28 C.F.R.35.130 (b) (7)]

A public entity must adopt and distribute a public notice about the relevant provisions of the ADA to all persons who may be interested in its programs, activities, and services and should review its policies to ensure that it communicates with applicants, participants, and members of the public with disabilities in manner that is as effective as its communications with others.

One way to help meet the access requirements is to ensure that government websites have accessible features for people with disabilities. An agency with an inaccessible website may also meet its legal obligations by providing an alternative accessible way for citizens to use the programs or services, such as a staffed telephone information line. These alternatives, however, are unlikely to provide an equal degree of access in terms of hours of operation and the range of options and programs available. For example, job announcements and application forms, if posted on an accessible website, would be available to people with disabilities 24 hours a day, 7 days a week.

The effective communication requirement also covers television programs, or videos produced by a public entity. This would mean *providing* closed captioning or a sign language interpretation on the video screen. [28 C.F.R.35.160 Preamble]

The City's website provides an alternative means of communication for individuals with disabilities, particularly those individuals with mobility disabilities, however the content of the following areas continues to be updated:

- The policy on nondiscrimination on the basis of disability
- Listing local resources and their contact information
- Listing information about the role of the ADA Subcommittee.
- Providing access to Request/Grievance/Complaint Procedures and Forms
- Posting Future Transition Plan and Self Evaluation Reports
- Listing transportation options for persons with disabilities

An ADA home page will also be created as part of the updated transition plan.

Editing for clarity of wording in city brochures for programs is continuing to be made. Registration forms and public documents for the visually impaired continue to be refined for electronic documents. The City has also increased access to televised public meetings and production videos, and has made assistive listening devices available in off-site meeting rooms when there are City sponsored public meetings.

- **Survey Findings**

- 1) Standardized language for the Notice of Nondiscrimination is not being used by all departments for the City's Public Notice and city-produced printed materials, which includes information about how to obtain documents in alternative formats.
- 2) Information about a Website Accessibility Policy including describing specific actions taken to make City website accessible to people with disabilities is undetermined based on survey results.
- 3) Information about website accessibility training taken by staff and/or contractors responsible for developing and posting web pages and content is undetermined based on the survey results.
- 4) It was reported by 90% of respondents that city produced videos, movies, or broadcasts do not have visual captioning for individuals with hearing impairments. (i.e., the verbal portion of the broadcast transcribed and displayed at the bottom of the screen).

- **Recommendations**

- 1) Develop standardized language for the Public Notice of Non-Discrimination that can be posted in an accessible format in both hard and soft copy.
- 2) Develop a written policy and procedure describing website accessibility including specific actions to be taken by staff.
- 3) Establish training guidelines for designated staff and/or contractors responsible for developing and posting web pages and content.
- 4) Review the feasibility of using captions for public broadcasts and other city-produced media.

5.4.6 Training

While the ADA does not mandate a specific program of training for Title II ADA practices and principles, Title II entities are expected to comply with ADA requirements. Practically, this cannot be accomplished without a methodical system of training. Employees who are

knowledgeable in all aspects of ADA customer service and quality control, understanding architectural barriers, policies and procedures, grievance procedures, safety and transportation including emergency procedures for the evacuation of disabled persons are prepared to meet the requirements. The key to continued success in meeting the requirements of the Americans with Disabilities Act is to educate and inform through staff development and increased community awareness.

• **Survey Findings**

- 1) Survey results show that the overwhelming majority of City staff is not trained on how to use the TTY.
- 2) There is no citywide ADA Title II training program in place and instruction is primarily by word of mouth and by request only.
- 3) 82% of respondents indicated that Program Officers/Contract Monitors are not trained in recognizing programmatic and communication access problems.
- 4) Almost all responses indicated there is no program in place for monitoring whether a contractor’s staff is trained or has knowledge of serving people with disabilities including resolving grievances.
- 5) The majority of respondents answered the following question by indicating they receive little or no training on the following ADA categories:

Do members of your staff receive training on any of the following information? (Check all that apply).

Americans with Disabilities Act (ADA)	36.2%
Fair Housing Amendments Act	9.6%
Section 504 of the Rehabilitation Act	8.5%
State Disability Laws	17.0%
NONE	63.8%

- 6) The majority of respondents answered the following question by indicating they receive little or no training on the following ADA categories:

Do members of your staff receive training in working with people who have? (Check all that apply).

Psychiatric disabilities	28.6%
Learning cognitive disabilities	34.3%
Speech impairments	22.9%
Hearing impairments	31.4%
Visual impairments	31.4%
Mobility impairments	45.7%
Immune system disorders (such as HIV, Multiple Chemical Sensitivities, Lupus, etc.)	11.4%
NONE	51.4%

• **Recommendations**

- 1) Implement citywide ADA Title II training program where the scope of training for city staff should include American with Disabilities Act, Fair Housing Amendments Act, Section 504 of the Rehabilitation Act, and state disability laws. The scope of training for city staff covers the following categories of disabilities: Psychiatric disabilities, learning or cognitive disabilities, speech impairments, hearing

impairments, visual impairments, mobility impairments and immune system disorders.

- 2) Implement citywide training to explain the purpose, usage, location, and maintenance of the City's TTY line.
- 3) Implement training for Program Officers/Contract Monitors to recognize and respond to programmatic and communication access problems.
- 4) Revise language in city contracts to require training of contractor staff to comply with ADA requirements including resolving grievances.

5.4.7 Transportation and Safety [28 C.F.R. §§ 35.130, 35.149]

One of the primary responsibilities of state and local governments is to protect residents and visitors from harm, including assistance in preparing for, responding to, and recovering from emergencies and disasters. State and local governments must comply with Title II of the ADA in the emergency-and-disaster-related programs, services, and activities they provide. This requirement applies to programs, services, and activities provided directly by state and local governments as well as those provided through third parties, such as the American Red Cross, private nonprofit organizations, and religious entities. Under Title II of the ADA, emergency programs, services, activities, and facilities must be accessible to people with disabilities and generally may not use eligibility criteria that screen out or tend to screen out people with disabilities. A community evacuation and recovery plan enables people with disabilities, including those who have mobility, vision, hearing, cognitive, and psychiatric disabilities to safely self-evacuate, to be evacuated by others, and to return home. Some people with disabilities will need accessible transportation, which during an emergency may include wheelchair lift-equipped school buses, transit buses, paratransit vehicles, and taxis.

Transportation plans should address people with disabilities' needs to transport mobility aids, such as wheelchairs or scooters, oxygen tanks or other medical equipment, and service animals. The National Council on Disability issued a report on June 13, 2005 titled "The Current State of Transportation for People with Disabilities in the United States". This report includes fixed route public transportation paratransit, and private transportation and makes recommendations to improve transportation for people with disabilities. While the recommendations are not requirements, the City is trying to enhance its transportation services for people with disabilities. In addition to the local Unitrans bus system, the City provides transportation specifically for persons with disabilities through Davis Community Transit (DCT). DCT provides service in the city limits of Davis within ¾ mile of fixed route bus lines. Customers who qualify under the American with Disabilities Act may use this service and may be accompanied by a personal attendant at no extra charge when required. DCT cards are issued upon completion of an application and qualification process for paratransit services. Generally, people with disabilities who are unable to use the fixed route services provided by Unitrans and Yolo bus are qualified for use of paratransit services.

- **Survey Findings**

- 1) The majority of respondents said that wheelchair accessible transportation for people who may need it is not provided by the programs they operate
- 2) 75% of programs and services do not have a rubric of safety standards (guidelines or requirements for self-care, danger to others.)
- 3) Only half of respondents said they were aware of the emergency evacuation procedures at of the building or site where they work.

- 4) 86% of respondents stated their evacuation procedure does not have specific provisions for evacuating people with disabilities.
- 5) Only 2% responded that members of the public are notified of emergency evacuation procedures by brochure or written material and 18% stated the public is not notified.
- 6) Only half of programs' primary sites are equipped with both visual and audio alarms.

- **Recommendations**

- 1) Develop and disseminate information for ensuring that the public is aware of public transportation available to individuals with disabilities who may need transportation to or within City programs.
- 2) Review and update of program safety standards, policies and procedures including ADA requirements.
- 3) Review and update all emergency evacuation procedures.
- 4) Review and update citywide policy and procedure for the evacuation of people with disabilities in all City program and activity sites and buildings.
- 5) Publish and circulate emergency evacuation procedures to both staff and the public.
- 6) Conduct survey of the visual and audible warning systems throughout City facilities and include actions in the updated Transition Plan for correcting any deficiencies or identified gaps.

5.4.8 Written Policies and Procedures [28 C.F.R.35.130 (b) (3); 28 C.F.R.35.130 (b) (7)]

City policies, procedures, and practices must be nondiscriminatory to people with disabilities and must be modified if necessary to avoid discrimination. Actions taken by the City must be nondiscriminatory to people with disabilities, as well as actions undertaken by contractors on behalf of the City. The exception to this requirement is if the nature of the program, service, or activity would be fundamentally altered as a result of changing the policy, procedure, or practice.

While the City has some administrative policies in place that respond to ADA requirements, there are others that still require completion. Other policies and procedures directly related to the ADA Administrative Requirements must continue to be drafted and completed to ensure compliance in the areas of transportation and safety, equal access in communications including electronic media, administrative methods including contract language and specifications for contracting with vendors to ensure ADA compliance.

- **Survey Findings**

- 1) There is no written citywide policy and procedure in place for the use and posting of the ADA Public Notice, which explains Title II's requirements to applicants, participants, beneficiaries, and other interested persons.
- 2) There is no written citywide policy and procedure to process an individual's request for a modification of program policies, procedures or practices to accommodate his/her disability.
- 3) There is no written citywide policy and procedure to process an individual's grievance and/or complaint in response to a denial to a request for accommodation.
- 4) There is no citywide identified list of firms or organizations to access auxiliary aids and other access services such as interpreters and Braille Transcribers.
- 5) A city wide policy and procedure with specific provisions for evacuating people with disabilities is not in place.

- 6) There is no citywide policy and procedure in place for ADA provisions at special events.
- 7) 76% of City programs do not have a written policy and procedure for contract employees or vendors to follow in assisting people with disabilities.

- **Recommendations**

- 1) Develop a citywide policy and procedure to prescribe the application of the ADA Public Notice.
- 2) Develop a written citywide policy and procedure to process requests for modification of program policies, procedures or practices to accommodate a disability.
- 3) Develop a citywide policy and procedure to process an ADA related grievances and/or complaints.
- 4) Develop and distribute a written resource list to be used by city staff for locating auxiliary aids services interpreters and Braille Transcribers.
- 5) Review and update as needed written citywide policy and procedure for evacuating people with disabilities during emergency situations.
- 6) Develop a written citywide policy and procedure for ensuring compliance with ADA provisions and access at City special events.
- 7) Develop citywide policy and procedure for contract employees or vendors to follow in assisting people with disabilities.

Outstanding Written Policies and Procedures

In completing the self evaluation, it was noted that the City does not have written policies for ADA requirements related to:

- Emergency Management
- Transportation and Safety
- Web-Based Services and Programs
- Special Events
- Promotional Materials and Auxiliary Aids
- Records Maintenance

6.0 Other City Responsibilities Under the ADA

6.1 Employment

The Americans with Disabilities Act, specifically Title I, requires public entities to practice nondiscrimination in all parts of the employment process (28 CFR 35.140 and 29 CFR 1630.4). This term includes recruiting, application process, interviewing, testing of any kind, and hiring practices. It also covers employees with disabilities who need accommodations to complete their work. Section 504 of the Rehabilitation Act of 1973, which the City follows, also covers individuals with disabilities and the ADA regulation found in the Equal Employment Opportunity Commission (EEOC).

The City Human Resources division will make an individualized assessment of whether a qualified individual with a disability meets selection criteria for employment decisions. To the extent the City's selection criteria have the effect of disqualifying an individual because of disability; those criteria will be job-related and consistent with business necessity. This report does not include evaluation of ADA Title I programs and activities.

6.2 Special Events

The City is working on an administrative policy to address access for individuals with disabilities during special events. The drafting of a policy and procedure for special events is underway which will outline alternative methods for publicity, auxiliary aids, additional wheelchair seating, accessible paths of travel at the site and in the public right-of way for parking and access to public transportation. Examples of single and perennial events in the City of Davis are the Amgen Bicycle Tour, Celebrate Davis, the holiday lighting event, and 4th of July activities.

6.3 Records Maintenance

Requests and complaints submitted by the public that are deemed to be ADA matters will be recorded on the ADA Issues Tracking Log and maintained by the City's ADA Coordinator. Department staff has the responsibility of communicating these requests and complaints, including inquiries, to the office of the ADA Coordinator according to the finalized City wide policies and procedures as found in Appendix E. A template of the most recent version of the log may be found in Appendix F.

6.4 Curb Ramps and Sidewalks

Prior to the inception of the first transition plan in 1992, the City has endeavored to install ADA compliant curb ramps. As early as 1974, architectural barrier removal has been included in annual ADA projects upon request from a person with a disability and during road widening and annual street overlay projects. The updated curb ramp standards and project status, including standard curb ramps, built-up curb ramps, diagonal curb ramps, returned curb ramps, depressed curb ramps, combination curb ramps, and raised islands are reviewed by the City's Public Works Department annually. Curb ramp details include concrete-contrast, grooving and gutter requirements, and detectable warnings.

The Public Works Department also has a sidewalk program. The sidewalk program includes proactively reviewing sidewalks and marking them for correction in areas where sidewalk has lifted, cracked, or been damaged. Sidewalk issues are also addressed on a case-by-case basis as notified by citizens or those using the sidewalks. A study is currently underway by Public Works staff to evaluate curb ramps and sidewalks citywide. More details will be included in the final transition plan itself.

6.5 Audible Signals

Since 2002 the City has been working towards the installation of audible signal crossings at designated intersections throughout the City. Audible signals provide important safety measures for pedestrians with visual impairments. The ADA Subcommittee, Social Services Commission and Public Works Department have combined efforts to ensure that the funding, review and selection of intersections and purchase of equipment continue. By 2005 five intersections had been retrofitted with audible signals. Since that date, at least five other intersections have been installed and equipment has been purchased with CDBG funding to move forward with additional installations.

7.0 Transition Plan Completion and Barrier Removal for Programs Services and Activities

7.1 Transition Plan Documentation Process

In order to track the progress of the City's efforts to complete the transition plan and remove identified barriers in City programs, services and activities, a proposed timeline document found in item 7.2 below will be incorporated into the final transition plan. The document, when completed, will list the survey evaluation results that do not meet the ADA Administrative requirements. As indicated earlier in this report, work has already begun on completing the ADA Public Notice, the Grievance and Complaint Policy and Procedure and also for providing a consistent policy and procedure for granting requests for reasonable accommodations citywide. During the calendar year of 2010, it is expected that the staff ADA Compliance Team, the ADA Subcommittee and the ADA Coordinator will complete the list of gaps as found in the survey, and begin to assign tasks and set deadlines using the proposed timeline document. Barrier removal progress will continue to be monitored by the above groups during this time and a revised and updated timeline document will be completed annually to identify additional gaps, monitor progress and deadlines and review obstacles to accomplishing barrier removal goals. The following table is a preliminary template that will provide the City with a measured and methodical approach for addressing issues of access citywide and also for each department. Subject to review by each City department and the City Council, the document will become a part of the City's final transition plan.

7.2 Preliminary Barrier Removal Tracking Document for Programs, Services and Activities

Barrier Removal	Responsible Dept.	Program Name	Staff Contact	Scheduled Completion Date	Notes	Status
Public Notice						
Complete ADA Public Notice draft explaining to the Public their rights and the City's responsibilities under the ADA circulate and post in Department offices and on city website.						
Continue to modify city published material including contracts to include ADA language for both programmatic and architectural access.						
Nondiscrimination Requirements						
Circulate information to City staff to emphasize the importance of providing the public notice of their right to access under ADA.						
Review ADA language in city contracts, lease agreements and other business forms for ADA compliant language.						
Update and continually review all application forms and other printed materials Citywide to ensure language used is non-discriminatory.						
Equally Effective Communication						
Develop and circulate a citywide policy for including the Notice of Nondiscrimination on printed materials.						
Develop and maintain a list of auxiliary aid provides (Braille transcribers, qualified sign language, technical assistance, ADA trained city maintenance)						
Request an annual report from IS on accessibility projects completed and pending.						
Provide training for the California Relay Service and TTY equipment on an annual basis.						

Barrier Removal	Responsible Dept.	Program Name	Staff Contact	Scheduled Completion Date	Notes	Status
Transportation and Safety						
Coordinate Dept. safety standards for citywide review						
Establish emergency evacuation procedures including ADA evacuation efforts by improving the visual and audible warning systems through City facilities as identified in the updated Transition Plan						
Solicit, document and incorporate from the ADA subcommittee all phases of emergency response plans.						
Review program evacuation plans to include provisions for the safe evacuation of those who have mobility, vision and/or hearing impairments, cognitive disabilities, mental illness or other disabilities.						
Training						
Develop and implement employee ADA training program that will vary upon the roles and responsibilities of job description						
Design and develop ADA new employee orientation training						
Collaborate with first responders (police officers and fire) who interact with the public to begin developing training for programmatic access in public safety.						
Policies and Procedures						
Draft and approve citywide policy and procedure for the intake and processing of Grievances and Complaints and for granting of Reasonable Accommodation to individuals in the public requesting a modification to a program, service or activity for the purposes of access.						

City of Davis
 ADA Self-Evaluation and Preliminary Transition Plan

Barrier Removal	Responsible Dept.	Program Name	Staff Contact	Scheduled Completion Date	Notes	Status
P&P for Common Practices for Program Accessibility, i.e. official list for auxiliary aids, ADA staff representatives, designation of official staff for initial programmatic and architectural access questions.						
P&P for ADA access at city special events						
P&P for ADA training of employees						
P&P for Department accountability for ADA related matters						
P&P for Annual Report for Compliance in Employment Practices						
P&P for Use and Maintenance of Auxiliary Aids						
Media and Website						
Provide ADA page on City website with access information.						
Test website and electronic documents for accessibility and procedure for providing alternative formats.						
Inspect and produce list of non-city facilities to be used for meetings or programs to ensure access including auxiliary aids such as assistive listening devices.						
Develop maintenance and review schedule for all assistive listening devices, the platform lift at the theater, paths of travel, equipment re-location issues, posted access policies during renovation.						

8.0 Transition Plan Completion and Barrier Removal for Facilities

8.1 Summary of Survey for Facilities

The facilities survey identifies, locates, and cites specific codes for architectural barriers in both the federal and state accessibility guidelines and standards outlined in the ADAA and the CSAS. Specific physical barriers are identified in Appendix H of this report. Examples of these barriers include: non-accessible restrooms, improper signage, protruding objects, path of travel obstructions within facilities, public right of way safety issues (hazardous sidewalk conditions), accessible door entrance mechanisms, and cross-slope violations. The report also contains a comprehensive list and analysis of physical barriers, recommendations for removal, costs and also a priority based on the degree of the hazard. The facilities included in this preliminary report are:

- Central Park including the Hattie Weber Museum
- Civic Center Complex
- Veterans Memorial Center
- Senior Center
- Community Pool Complex

8.2 Summary of Facility Survey Findings and Transition Plan Recommendations

The table below summarizes a cross sample of findings and recommendations for barrier removal. There are numerous other existing conditions and suggested recommendations listed in the detailed report provided in Appendix H.

Facility	Findings and Proposed Action Plan
Veterans Memorial Center	<ul style="list-style-type: none"> • Reconfigure restroom stalls to achieve ADA compliance for access • Grind or repair numerous pavement dislocations to eliminate safety hazards. • Provide tactile and Braille fire exit signage • Provide new detectable warnings to warn blind pedestrians of hazardous or vehicular area. • Modify driveways surface to provide required cross slope surface • Provide portable assistive listening system with signage indicating availability to the public.
Civic Center Complex	<ul style="list-style-type: none"> • Remove, relocate protruding objects or provide a detectable rail or edge between 27” and 80” above finished floor. • Provide directional signage as required to direct people to accessible entrances, including directional arrows. • Remove existing curb ramp and provide new curb ramp with the required slopes, top and bottom landings, 12” grooves and detectable warnings. • Enlarge opening and replace door and door frame for accessible entry • Provide lever type or other accessible hardware, mounted between 30” to 44” high. • Dismantle signed accessible parking stall which does not meet ADA standards.

Facility	Findings and Proposed Action Plan
Central Park & Hattie Weber Museum	<ul style="list-style-type: none"> • Provide new grating, with compliant grid openings ½” max in the direction of traffic flow. • Provide new threshold and/or modify landing as required to insure code compliance. • Modify walk/sidewalk/pedestrian way to provide compliant cross slope. • Remove built-up curb ramp and “NO PARKING” and aisle painting to remove encroachment into parking access aisle and vehicular traffic lanes.
Senior Center	<ul style="list-style-type: none"> • Lower defibrillator, change operable hardware and provide a cane detectable element underneath, mounted at 27” high maximum. • Provide tactile and Braille fire exit language. • Relocate obstacles (i.e. floor mounted door stops), to provide the required continuous surface without abrupt changes in levels. • Provide new code compliant curb ramp, including detectable warnings. • Relocate plumbing, patch and match walls as required and provide new accessible water closet.
Community Pool Complex	<ul style="list-style-type: none"> • Provide new handrail extension to meet ADA standard. • Provide contrasting color striping at bleachers to be code compliant • Remodel counter to have accessible section • Remount toilet paper dispenser to required distance from water closet.

8.3 Proposed Preliminary Timeline for Facilities Transition Plan

Appendix H is a partial list of the City facilities that were surveyed. Staff will continue to consider the CIP/CDBG project proposals for the 2010-11 fiscal year by evaluating the information provided in this report. By early 2011, surveys for all designated buildings and facilities will be included in this report format and will become part of the completed transition plan. These reports will be an essential part of fiscal planning for future barrier removal. The reports will also be modified to include columns that will track the progress of barrier removal, including staff contacts, pending work and completion dates.

9.0 Appendices Introduction and Summary

The following Appendices provide information that will be incorporated into the City’s final transition plan. These documents have been developed by the ADA Coordinator in consultation with other city staff, the ADA Subcommittee, the Social Services Commission, the Staff ADA Compliance Team, the architectural firm of Gilda Puente-Peters, the City of Vacaville’s ADA Office, and the ADA website for the Department of Justice.

The Appendices include:

- A. Definitions about programmatic and physical access to clarify the scope of the City’s self evaluation survey
- B. A summary of ADA architectural barriers removal projects completed from 1992-2010.
- C. ADA Non Discrimination Requirements and Administrative Requirements Frequently Asked Questions
- D. The City’s public notice of nondiscrimination to inform applicants, participants, beneficiaries, and other interested persons of their rights and protections under the ADA law
- E. The City’s policy and procedure for processing requests for reasonable accommodations, grievances and complaints

- F. A Preliminary version of the ADA Records Maintenance Log which documents incoming requests, complaints and events related to ADA compliance issues
- G. A facility transition plan methodology worksheet which provides a template for the evaluation and prioritization of buildings, facilities and public right of way that are identified as having projects for barrier removal
- H. Facility survey findings and recommendations report which identifies barriers in and around City facilities, describing the existing condition and type of barrier, the ADAAG requirement code(s), the suggested recommendation, cost estimate and a priority number which ranks the severity of hazard based on the professional expertise, training and experience of the facilities consultant and surveyor, Gilda Puente-Peters
- I. The City's survey tool with summary results for programs, services and activities used in the 2008 staff self evaluation. The survey questions were gathered from a collection of data from other local government ADA surveys, from the Department of Justice ADA Title II Survey Tool Kit, and the types of programs, services and activities the City provides. The survey categories were aligned to address all aspects of the Administrative Requirements. A thorough analysis of all programs, services and activities was inventoried to assure that the appropriate staff members and all facets of division programs were surveyed.